



May 6, 2019

VIA ELECTRONIC FILINGS

Marlene H. Dortch, Esq.
Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT OF *EX PARTE* PRESENTATION
MezmoCorp (dba InnoCaption)
CG Docket Nos. 03-123 and 13-24

Dear Ms. Dortch:

MezmoCorp (dba InnoCaption), requests highly confidential treatment of certain information contained in the enclosed *Ex Parte* Presentation (“Presentation”). The redacted version has been filed today in CG Docket Nos. 03-123 and 13-24. Pursuant to Exemption 4 of the Freedom of Information Act and the Rules of the Federal Communications Commission, InnoCaption requests confidential treatment for the information which has been labeled confidential in the attached Presentation and redacted in the public version of the Presentation.¹

1. *Identification of the specific information for which confidential treatment is sought.* InnoCaption requests highly confidential treatment of InnoCaption internal usage data, financial impact information, internal staffing requirements, and investment needs. This information is both financial in nature and confidential. Accordingly, this information would not routinely be made available to the public.
2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* InnoCaption is submitting this *Ex Parte* Presentation for inclusion in the Commission’s docketed proceeding regarding Telecommunications Relay Services, CG Docket Nos. 03-123 and 13-24.

¹ 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d) and 0.459; *see also* 18 U.S.C. § 1905

3. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*
The information for which InnoCaption is requesting confidential treatment includes internal and financial information which is company-specific, competitively-sensitive, and confidential. The information provided can be used by competitors and potential competitors to the detriment of InnoCaption. This information is not customarily made available to the public and is protected by the Company.
4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The confidential internal and financial information disclosed in this filing relates to InnoCaption customer usage, and the reimbursement rates for the provision of Internet Protocol Caption Telephone Service (IP-CTS). Disclosure of the confidential information will likely cause irreparable harm to InnoCaption by providing competitors information which may be used to their competitive advantage.
5. *Explanation of how disclosure of the information could result in substantial competitive harm.* This information is financial and confidential in nature and would not be subject to public inspection. The Commission's rules recognize that release of this kind of internal and financial information is likely to produce competitive harm.
6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.* InnoCaption takes precautions to ensure confidential information such as the internal data and financial information included in this document is not released to the public or obtained by competitors and potential competitors through other means.
7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The confidential internal and financial information is not available to the public. Additionally, the information has not otherwise been disclosed previously to the public.
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* InnoCaption requests confidential treatment of the redacted information indefinitely, as it is not currently possible to determine a specific date by which the information could be disclosed without risk of harm.
9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* The information provided by InnoCaption is internal data and financial in nature, obtained from a person outside of the government, and confidential. Therefore, the financial and confidential information in question is protected by Exemption 4 of FOIA.²

² 5 U.S.C. § 552(b)(4)

Please do not hesitate to contact the undersigned at (703) 865-5553 or cristinaduarte@innocaption.com with any questions you may have.

Respectfully Submitted,

/s/ Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)



May 6, 2019

Via Electronic Filing

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: Notice of Ex-Parte Presentation - CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On May 3, 2019 Joseph Duarte, Co-CEO of InnoCaption, and Cristina Duarte, Director of Regulatory Affairs for InnoCaption ("InnoCaption Team"), met with Travis Litman, Chief of Staff and Legal Advisor for Commissioner Rosenworcel.

The purpose of the meetings was to discuss the financial impact the upcoming IP-CTS rate cuts will have on the Company.¹ InnoCaption encouraged the Commission to issue an industry wide rate freeze until a more permanent rate methodology is implemented. In the event the Commission does not find it appropriate to issue an industry wide rate freeze, InnoCaption requested an emergency rate freeze for itself, as the smallest provider, to ensure the Company's short-term financial viability.

This notice is filed in accordance with Section 1.1206(b) of the Commission's rules.²

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Cristina O. Duarte", with a horizontal line extending to the right.

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

¹ *Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing Loss and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79 (June 8, 2018) ("Order")

² 47 C.F.R. § 1.1206(b).



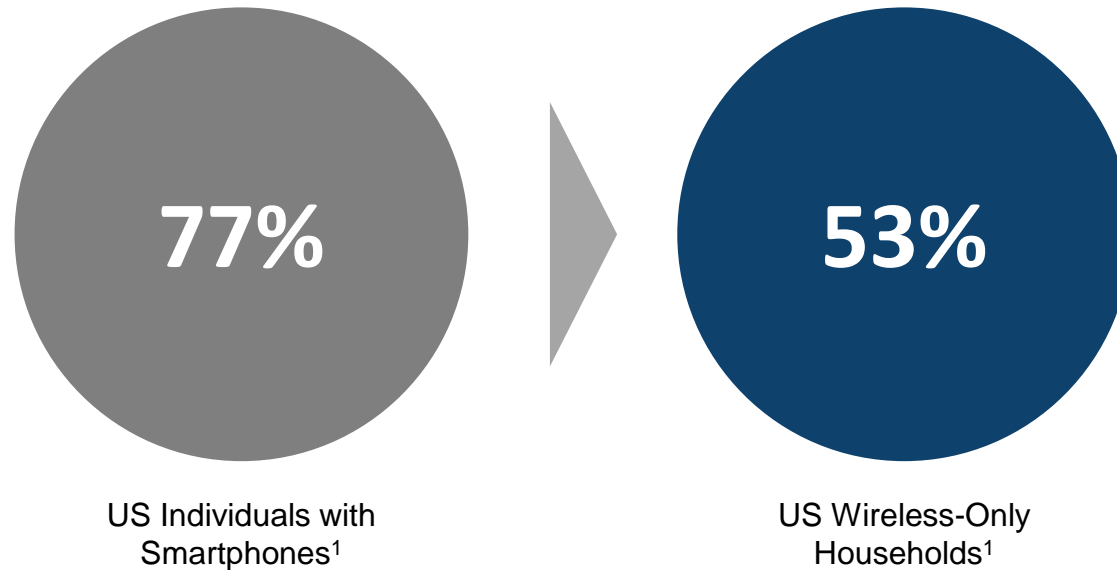
Business Progress Update

April 25, 2019

InnoCaption's Purpose

In an increasingly mobile-centric world, InnoCaption provides the deaf and hard of hearing community with the only complete mobile app-based IP-CTS communication solution

With increasing smartphone penetration, most US households no longer have a landline phone



Examples of situations where our users need mobile voice communications

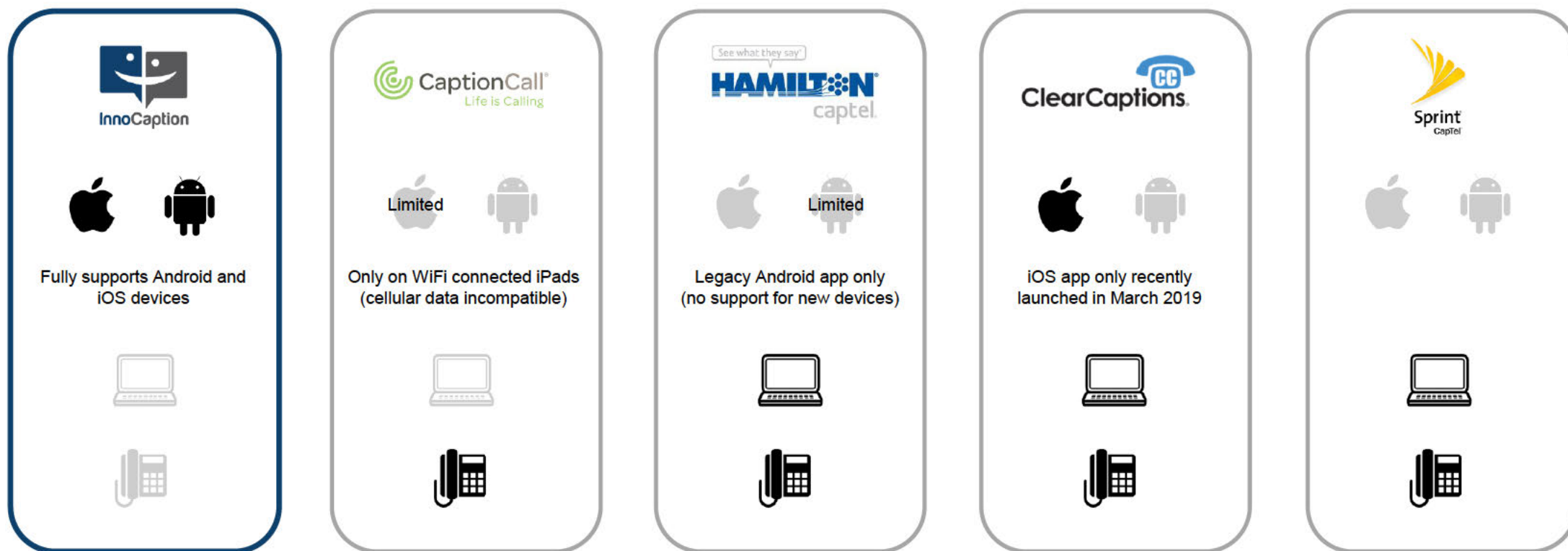
- Receive a client call for work
- Make an outbound call to a colleague
- Participate in phone interviews
- Call doctor's office
- Dial 911 emergency
- Receive call from child's school
- Book or confirm restaurant reservation
- Call family and friends on the go

1. Pew Research Center as of 2018; National Center for Health Statistics as of 2017 REDACTED FOR PUBLIC INSPECTION

Driving Innovation

InnoCaption has been at the forefront of innovation within the IP-CTS industry with its mobile communication offering, a service that other providers have been slow to bring to market

Captioned call service offering for each IP-CTS provider



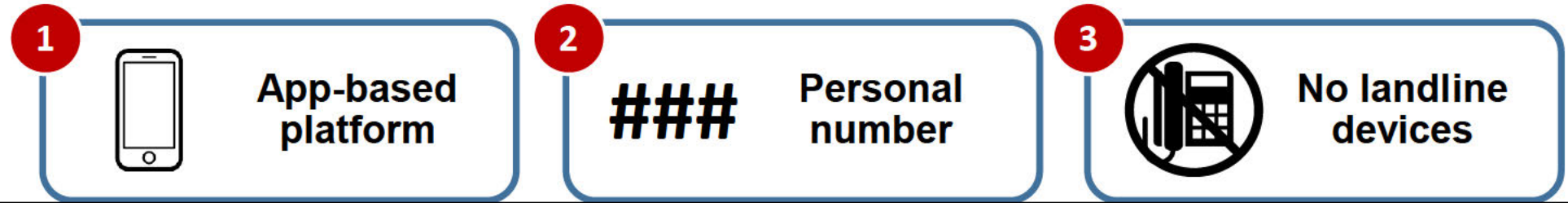
Note: Service offerings as of April 22, 2019

Confidential

REDACTED FOR PUBLIC INSPECTION

Unique Advantages

InnoCaption's unique focus on its mobile-only communication service provides benefits for users, reduces compliance risks, and contributes to the long-term sustainability of the TRS Fund



Users



Compliance



Funding

Confidential

REDACTED FOR PUBLIC INSPECTION

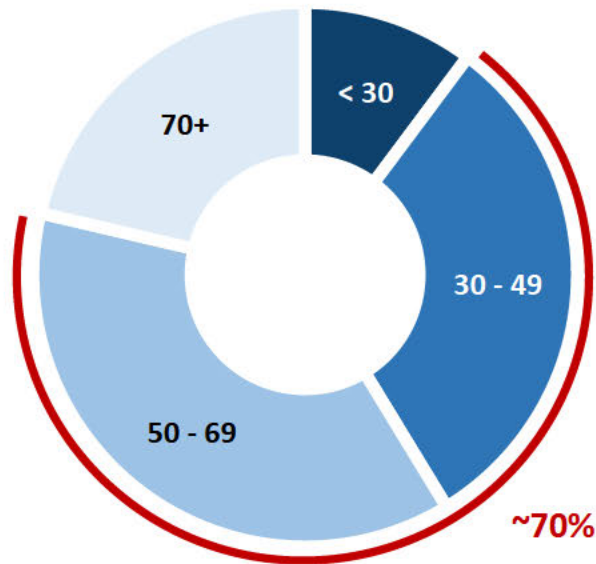
Our User Profile

InnoCaption is a powerful enabler for a largely working age, technologically savvy user base. [REDACTED]

[REDACTED]

[REDACTED]

Users by Age Group



Source: Company user data as of December 2018; InnoCaption User Survey completed in December 2018

Confidential

REDACTED FOR PUBLIC INSPECTION

Who are InnoCaption users?

REDACTED FOR PUBLIC INSPECTION

Traction to Date

We have come a long way since 2016 and our steady growth in call volumes and positive feedback from users demonstrates the value and quality of our service

REDACTED FOR PUBLIC INSPECTION

Immediate Investment Need

REDACTED FOR PUBLIC INSPECTION

Impact of IP-CTS Rate Cuts

REDACTED FOR PUBLIC INSPECTION

Request for Emergency Rate Freeze

REDACTED FOR PUBLIC INSPECTION

[REDACTED]

REDACTED FOR PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

Conclusion

- InnoCaption is a leader in the IP-CTS industry with regards to mobile technology and offers users a unique and modern accessibility solution

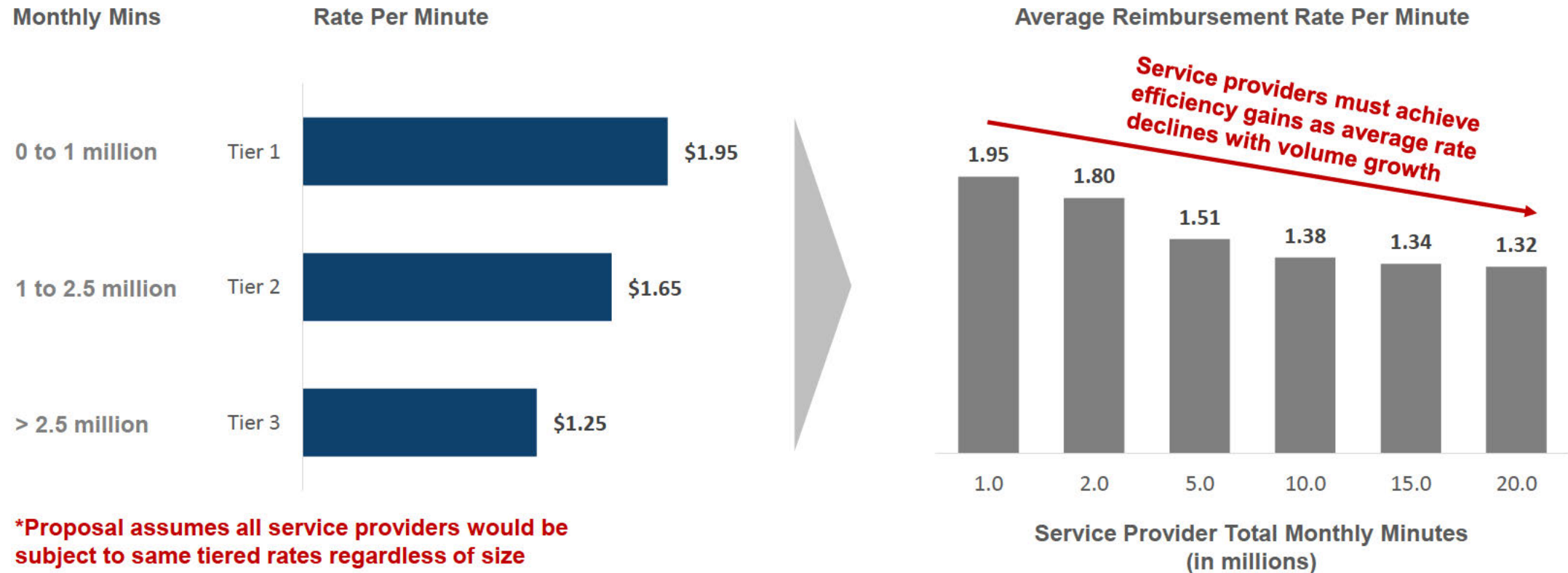
- [REDACTED]

- [REDACTED]

- [REDACTED]

Appendix – Proposed Tiered Rates

A tiered rate structure (similar to VRS rates) would allow smaller, innovative players to quickly scale and build out basic infrastructure, while investing for long-term efficiency gains. We have developed our own cost curve projection to form the basis of the following proposed tiered rate structure



REDACTED FOR PUBLIC INSPECTION



Thank you!

For any questions regarding this presentation, please contact:

Cristina Duarte
Director of Regulatory Affairs
cristinaduarte@innocaption.com