ClearCaptions

REDACTED FOR PUBLIC INSPECTION

May 31, 2017

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Federal Communications Commission
Office of the Secretary

VIA EMAIL & VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: **REQUEST FOR CONFIDENTIAL TREATMENT**
Notification of Substantive Change
CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch,

ClearCaptions, LLC ("ClearCaptions") hereby requests confidential treatment of all information contained after the heading ***BEGIN CONFIDENTIAL*** and before the close heading ***END CONFIDENTIAL*** (the "Confidential Information") in the enclosed Notification of Substantive Change ("Notification") pursuant to the *Protective Order* in the above-captioned proceeding and in accordance with Sections 0.457 and 0.459 of Federal Communications Commission ("FCC" or "Commission") rules.[1]

The Confidential Information is company-specific, proprietary commercial and business information that is not customarily disclosed to the public or within the industry, and is subject to Exemption 4 of the Freedom of Information Act ("FOIA").[2] The Confidential Information has been redacted from the version electronically filed with the Commission.

1. **Identification of the specific information for which confidential treatment is sought.**

ClearCaptions requests confidential treatment of all information contained after the heading ***BEGIN CONFIDENTIAL*** and before the close heading ***END CONFIDENTIAL*** in the enclosed Notification. That information has been redacted in the public version of the Notification. The Confidential Information is proprietary commercial and business information

[1] *Structure and Practices of the Video Relay Service, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities,* CG Docket Nos. 10-51 & 03-123, Protective Order, DA 12-402 (Mar. 14, 2012); 47 C.F.R. §§ 0.457, 0.459.

[2] 5 U.S.C. § 552(b)(4); *see also* 47 C.F.R. § 0.457(d).

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that is not customarily disclosed to the public or within the industry, and is confidential commercial information under Exemption 4 of the FOIA.[3]

2. Identification of the Commission proceeding in which the information is submitted or a description of the circumstances giving rise to the submission.

ClearCaptions is submitting the enclosed Notification to provide the Commission notification of a substantive change in ClearCaptions' service pursuant to Section 64.606(f)(2) of the Commission's rules.[4]

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The Confidential Information at issue is proprietary commercial information that is specific to ClearCaptions and is sensitive for competitive reasons. This information is safeguarded from competitors and is not made available to the public. If the Confidential Information is not protected from disclosure, other relay providers could utilize the information against ClearCaptions.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Confidential Information concerns Internet Protocol Captioned Telephone Service ("IP CTS"), a nationwide competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

The disclosure of the Confidential Information could cause substantial competitive harm to ClearCaptions. Because other relay providers would have access to significant information regarding ClearCaptions' current capabilities, they could use the Confidential Information to ClearCaptions' disadvantage in the marketplace.

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[3] 5 U.S.C. § 552(b)(4).

[4] 47 C.F.R. § 64.606(f)(2).

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6. **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.**

ClearCaptions routinely treats the Confidential Information as confidential and exercises significant care to ensure such information is not disclosed to competitors or the public.

7. **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

ClearCaptions does not make the Confidential Information available to the public.

8. **Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

ClearCaptions requests that the Confidential Information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ClearCaptions.

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 Confidential Information contains proprietary commercial information that ClearCaptions will safeguard as necessary.

Should you have any questions concerning the foregoing request, please contact the undersigned.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory
ClearCaptions, LLC
595 Menlo Drive
Rocklin, CA 95765

cc: Eliot Greenwald
Bob Aldrich
Dave Rolka
TRSreports@fcc.gov

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Federal Communications Commission
445 12th Street, S.W.
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Re: **Notification of Substantive Change**
CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

This Notification of Substantive Change is being provided pursuant to 47 C.F.R. § 64.606(f)(2) regarding a substantive change in ClearCaptions, LLC ("ClearCaptions") services and features as a provider of Internet Protocol Captioned Telephone Service ("IP CTS").

An IP CTS call center used by ClearCaptions changed locations, with the new location beginning to handle traffic on May 10, 2017, and the former location ending operation on May 13, 2017.

*****BEGIN CONFIDENTIAL*****

[redacted]

*****END CONFIDENTIAL*****

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*****BEGIN CONFIDENTIAL*****

[redacted]

*****END CONFIDENTIAL*****

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ClearCaptions certifies that this change did not affect its compliance with applicable minimum standards.

Respectfully submitted,
CLEARCAPTIONS, LLC

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory
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