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REDACTED FOR PUBLIC INSPECTION

June 25, 2019

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Annual Complaint Log: CG Docket No. 03-123

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.604(c)(1), please find attached CSDVRS LLC.'s (d/b/a ZVRS) complaint log summary for the period of June 1, 2018 to May 31, 2019 in its provision of video relay services ("VRS").

A redacted version has been electronically filed in the Commission's docket. An unredacted confidential version has been electronically sent to Eliot Greenwald, Deputy Chief of FCC's Disability Rights Office.

Pursuant to 47 C.F.R. §0.459, ZVRS requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in complaint log summary and that the information be withheld from any public inspection. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS states as follows:

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

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

2. Identification of the circumstance giving rise to the submission.

ZVRS is filing its annual complaint log per the requirements of 47 C.F.R. §64.604(c)(1).

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

The confidential information in the ZVRS application is highly sensitive commercial information specific to its operations. This information is therefore safeguarded from competitors and is not made available to the public.



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

The confidential information involves VRS, a form of telecommunications relay service, which is a highly competitive service.

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

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because other competing VRS providers would have access to the company's service information, and providers could use such information to compete against ZVRS and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken to prevent unauthorized disclosure.

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its 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.

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

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

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

Sincerely,

/s/

Gregory Hlibok
Chief Legal Officer

cc: Eliot Greenwald, Deputy Chief
Disability Rights Office

Attachment: [Redacted]