REDACTED – FOR PUBLIC INSPECTION

ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via ECFS and Overnight Delivery

June 21, 2016

DOCKET FILE COPY ORIGINAL

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

RE: ASL Services Holdings, LLC dba GlobalVRS Annual Consumer Complaint Log Submission, Docket Nos. 03-123; 10-51

Dear Secretary Dortch:

Pursuant to Section 64.604(c)(1), 47 C.F.R. §64.604(c)(1)(i) and (ii), ASL Services Holdings, LLC dba GlobalVRS ("ASL/GlobalVRS"), hereby submits to the Federal Communications Commission ("Commission") the attached confidential consumer Complaint Log submission for the period June 1, 2015 through May 31, 2016. The Complaint Log's contents comply with Section 64.604(c)(1)(i).

Pursuant to 47 C.F.R. §64.604(c)(2), the Company received **[Redacted]** complaints and inquiries, detailed in the Company's report included in the enclosed Confidential CD-ROM. This represents a customer complaint/inquiry to call ratio of **[Redacted]** of the **[Redacted]** calls processed by the Company during this period. The majority of the complaints pertained to **[Redacted]** matters.

ASL/GlobalVRS has been able to resolve operational issues immediately in virtually all cases. Each complaint was resolved to the caller's satisfaction, where possible. Otherwise the caller was informed of the Company's practices or efforts to resolve the issue, where a resolution was required.

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Pursuant to pursuant to 47 C.F.R. § 64.604(c)(2), ASL/GlobalVRS' contact person for VRS consumer information and complaints remains:

Gabrielle Joseph
VP Operations
ASL Services Holdings, LLC
3700 Commerce Blvd
Kissimmee, FL 34741
Email: gabrielle@aslservices.com
Office: 407-518-7900 ext 321
Fax: 407-518-7903

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,[1] and "Exemption 4" of the Freedom of Information Act,[2] ASL/GlobalVRS respectfully requests that the above information be deemed confidential and protected, accordingly. This information constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules,[3] in that the information reveals information regarding complaints that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL/GlobalVRS would not otherwise make these Document publically available under any circumstance. Release of these Documents to the public could cause ASL/GlobalVRS irreparable and inestimable harm. ASL/GlobalVRS requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL/GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, ASL/Global VRS states as follows:

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

ASL/Global VRS requests confidential treatment to the confidential data associated with its consumer complaints.

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[1] 47. C.F.R §0.459.

[2] 47 C.F.R.§0.457(d). *See National Parks and Conservation Assn.* v. *Morton,* 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851,1860 (1998).

[3] 47 C.F.R. §0.457.

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

ASL/GlobalVRS is providing call consumer complaint data as required pursuant to 47 C.F.R. §64.604(c)(1)(i) and (ii).

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

The confidential information constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

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

The confidential information involves video relay services, a highly competitive service.

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

Disclosure of call center data information could cause substantial competitive harm to ASL/Global VRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against ASL/Global VRS and undermine the Company's ability to compete.

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

ASL/Global VRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

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

ASL/Global VRS does not make the redacted information to the public or to third parties. Financial and usage information has been provided to the Commission.

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

This information is being submitted by ASL/GlobalVRS. ASL/GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to ASL/Global VRS.

In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Elliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to Ms. Joseph.

Sincerely,

ASL SERVICES HOLDINGS, LLC

Angela Roth
Chief Executive Officer

Enclosure (Confidential Version Only – CD ROM)

cc: Elliot Greenwald, Counsel Consumer and Government Affairs Bureau (confidential version via electronic delivery)