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Via Courier

April 21, 2015

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

RE: *Structure and Practices of the Video Relay Service program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Secretary Dortch:

ASL Services Holding, LLC's ("ASL" branded "Gracias VRS") voluntarily submits to the Commission the enclosed *Response to Staff Questions Re: VRS Providers' Joint Proposal for Improving Functional Equivalence and Stabilizing Rates* ("Response").

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ and "Exemption 4" of the Freedom of Information Act,² ASL respectfully requests that the enclosed *Response* be deemed confidential and protected, accordingly. This *Response* is being voluntarily submitted in response to Commission staff questions following a recent *ex parte* meeting. The *Response* contains "trade secrets" as set forth in Section 0.457 of the Commission's rules,³ in that the information reveals sensitive financial information would be useful to the other five TRS Fund eligible competitors

¹ 47. C.F.R §§ 0.457 and 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.

Ms. Marlene H. Dortch
April 21, 2015
Page 2

in determining ASL's underlying cost structure thus providing an unfair competitive advantage.

Further, the *Response* contains confidential information not intended for public consumption. ASL provides this *Response* voluntarily to assist the Commission in evaluation of appropriate cost reimbursement for emerging carriers. ASL would not otherwise make this information available to the Commission unless otherwise affirmatively requested. ASL would otherwise make this *Response* publically available under any circumstance. Release of this *Response* to the public could cause ASL irreparable and inestimable harm. ASL requests that the *Response* be withheld from public inspection, accordingly.

ASL requests that the confidentiality of the *Response* be maintained indefinitely or at a minimum for a period of no less than five (5) years, after which ASL requests affirmative notice of the destruction of the *Response* and all copies or that the *Response* and all copies be returned to ASL. In the event that the Commission denies this request for confidentiality, ASL requests that its *Response* and all copies be returned to the Company pursuant to Section 0.459(e).

A public inspection copy has been filed via the Commission's electronic comment filing system. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar". The signature is fluid and cursive, with a large initial "A" and "I".

Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC

Enclosures