

**VOLUNTARILY SUBMITTED CONFIDENTIAL INFORMATION**

**Subject to Request for Confidential Treatment**

**Pursuant to 47 C.F.R. §§ 0.457, 0.459**

Redacted for Public Inspection

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Structure and Practices of the Video Relay  
Service Program

Telecommunications Relay Services and  
Speech-to-Speech Services for Individuals  
with Hearing and Speech Disabilities

CG Docket No. 10-51

CG Docket No. 03-123

**ASL SERVICES HOLDINGS, LLC/ GLOBALVRS'S RESPONSE TO STAFF  
QUESTIONS RE  
VRS PROVIDERS' JOINT PROPOSAL FOR IMPROVING FUNCTIONAL  
EQUIVALENCE AND STABILIZING RATES**

ASL Services Holdings, LLC (known as "GlobalVRS") is a certified VRS provider that has been in collaborative efforts with the other 5 Certified VRS providers (collectively known as "United Providers") with the initiative of rate stabilization of the VRS per-minute compensation rate. In addition to the urgent need for rate stabilization of the VRS per-minute compensation rate, the United Providers also identified solutions for various other needs within the VRS community including SOA (Speed of Answer), Skill Based Routing and use of Deaf interpreters in VRS.

The United Providers recently met with Commission on these topics and additional information was requested. ASL Services Holdings, LLC/GlobalVRS hereby submits a response to questions posed by the Commission staff at the April 8, 2015 meeting with Video Relay Service ("VRS")

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providers. In addition to this filing, which contains provider-specific proprietary information, the providers are submitting a joint response addressing a number of the questions below.

**\*\*BEGIN CONFIDENTIAL\*\* provider-specific confidential information.**

[REDACTED]

**\*\*END CONFIDENTIAL\*\* provider-specific confidential information.**

Respectfully submitted,

  
Angela Roth  
Managing Member,  
President and Chief Executive Officer

Date: April 20<sup>th</sup>, 2015