

VOLUNTARILY SUBMITTED CONFIDENTIAL INFORMATION

Subject to Request for Confidential Treatment

Pursuant to 47 C.F.R. §§ 0.457, 0.459

Redacted for Public Inspection

ASL SERVICES HOLDINGS, LLC.

GLOBALVRS

3700 COMMERCE BOULEVARD

KISSIMMEE, FLORIDA 34741

Via Overnight Delivery

April 28, 2015

Ms. Marlene H. Dortch
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, ASL Services Holdings, LLC (Global VRS)
Submission of Additional Confidential Data In Response to Commission Request

Dear Secretary Dortch:

The following is a direct response to the inquiry made by CGB/DRO meeting on Tuesday, April 21, 2015 of ASL Services Holdings, LLC (“ASL/GlobalVRS”), a certified woman/minority-owned Federal Telecommunications Relay Service Fund eligible provider of video relay services to Spanish and English speaking Deaf/Hard of Hearing communities. As requested, ASL/GlobalVRS hereby submits additional financial data of our organization for review by the Commission. The financial data will further substantiate the need for additional compensation and [redacted] as an emerging provider, in particular one serving marginalized populations (i.e. Spanish and Deaf/Blind).

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

[REDACTED]

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

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/GlobalVRS respectfully requests that this *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 in determining ASL/GlobalVRS's underlying cost structure thus providing an unfair competitive advantage.

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

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.

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ASL/GlobalVRS 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

Respectfully submitted,



Angela Roth
Managing Member,
President and Chief Executive Officer