

April 28, 2015

VIA ECF [Redacted Version]

VIA OVERNIGHT DELIVERY and E-Mail [Non-redacted Version]

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Electronic cc: Karen Peltz Strauss and Gregory Hlibok

Re: *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51 –
CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS. 03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Dear Ms. Dortch:

Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Access Ability Group (“CAAG”) herein provides supplemental information regarding an ex parte filing made by all six Video Relay Service (“VRS”) providers (April 23, 2015). In the meeting with the Consumer and Government Affairs Bureau (“CGB” “Bureau”) each provider was given the opportunity to meet privately with the Bureau to discuss confidential, provider specific answers to questions posed in a meeting between Federal Communications Commission (“FCC” “Commission”) staff and all six VRS providers on April 8, 2015. CAAG representatives Everett Puckett (CEO, CAAG), and Jeremy Jack (Vice President, CAAG) briefly attended such a meeting with Karen Peltz Strauss (Deputy Chief, CGB), Robert Aldrich (Attorney Advisor, CGB), and Eliot Greenwald (Attorney-Advisor, Disability Rights Office, CGB). At the meeting CAAG provided confidential, provider specific information (Appendix A, Confidential) and provider specific cost data (Appendix B, Confidential) for the Commission’s review. In this meeting the Bureau inquired as to how many minutes CAAG would need to become solvent. CAAG shared that it would require

approximately [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION] to become solvent.

CAAG herein reiterates that rate stabilization for the entire industry is critical¹ while the Commission completes structural reforms set out in the 2013 VRS Reform Order². Additionally, CAAG emphasizes the unique cost challenges of emerging providers and encourages the Commission to consider methods for additional compensation to be distributed to emerging providers in order to preserve consumer choice and appropriate competition in VRS.

Request for Confidential Treatment: Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, CAAG respectfully requests confidential treatment of the non-public, non-redacted version of this letter and its attachment. The confidential version contains proprietary information not intended for public consumption. CAAG would not make this information public under any circumstance. Release of the confidential version of this letter to the public could cause CAAG irreparable and inestimable harm. CAAG requests that the confidential version of this letter be withheld from public inspection. Should disclosure of the confidential version of this letter be requested, CAAG requests that it be informed of such request so that CAAG may take appropriate action to safeguard its interests.

Pursuant to the Commission's Second Protective Order in the above-referenced matter, one copy of the confidential version of this letter and two copies of the redacted public version are enclosed. Two copies of the confidential version are being mailed to Gregory Hlibok, Consumer

¹ Joint Proposal of All Six VRS Providers for Improving Functional Equivalence and Stabilizing Rates, CG Docket Nos. 10-51 & 03-123 (filed Mar. 30, 2015).

² REPORT AND ORDER AND FURTHER NOTICE OF PROPOSED RULEMAKING, Adopted: June 7, 2013 Released: June 10, 2013, FCC 13-82

and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W.,
Room 3-B431, Washington, D.C. 20554 and cc via email to Gregory Hlibok and Karen Peltz
Strauss.

Questions may be directed to Jeremy Jack, Vice President, CAAG VRS.

Sincerely,

Jeremy M. Jack

Appendix A

[BEGIN CONFIDENTIAL INFORMATION]

[END CONFIDENTIAL INFORMATION]

Appendix B

[BEGIN CONFIDENTIAL INFORMATION]

[END CONFIDENTIAL INFORMATION]