

REDACTED - FOR PUBLIC INSPECTION



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Via ECFS and Overnight Delivery

June 23, 2015

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

RE: ASL Services Holdings, LLC 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 ("ASL/Global VRS"), hereby submits to the Federal Communications Commission ("Commission") the attached confidential consumer Complaint Log submission for the period June 1, 2014 through May 31, 2015. 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 enclosure. This represents a customer complaint/inquiry to call ratio of less than 1% of the calls **[Redacted]** calls processed by the Company during this period. The majority of the complaints pertained to pixilation, interoperability, and technical issues.

ASL 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/Global VRS' 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,<sup>1</sup> and "Exemption 4" of the Freedom of Information Act,<sup>2</sup> ASL 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,<sup>3</sup> in that the information reveals the location of Company call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL would not otherwise make these Documents publically available under any circumstance. Release of these Documents to the public could cause ASL irreparable and inestimable harm. ASL requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

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<sup>1</sup> 47 C.F.R §0.459.

<sup>2</sup> 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).

<sup>3</sup> 47 C.F.R. §0.457.

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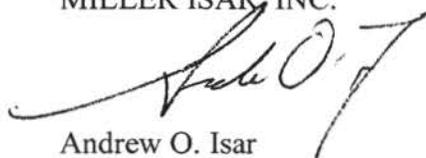
In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, enclosed are an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent to Mr. Gregory Hlibok, 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,

MILLER ISAR, INC.

A handwritten signature in black ink, appearing to read "Andrew O. Isar", written over the typed name below.

Andrew O. Isar

Regulatory Consultants to  
ASL Services Holdings, LLC

Enclosure (Confidential Version Only)

cc: Greg Hlibok, Disability Rights Office, FCC (confidential version via electronic delivery)  
Karen Pelz Strauss (confidential version via electronic delivery)