ASL SERVICES HOLDINGS, LLC.
GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via Electronic and Overnight Delivery

September 15, 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, Notification of Substantive Change

Dear Secretary Dortch:

Pursuant to Section 64.606(f)(2)(ii) of the Commission's rules, 47 C.F.R. §64.606(f)(2)(ii)), ASL Services Holdings, LLC ("ASL/Global VRS") hereby advises the Commission and TRS Fund Administrator that effective November 16, 2015, ASL/Global VRS is opening a new call center located at **[REDACTED]**.

ASL/Global VRS affirms that this is a commercial location consisting of office space capable of accommodating **[REDACTED]**. Video Interpreters will be fully trained ASL/Global VRS employees and are subject to the Company's practices, policies, and procedures. ASL/Global VRS is equipping this location to have full access to its automatic call distribution platform and features including, but not limited to, emergency 911 access, registration database access, and to otherwise meet the applicable requirements set forth in the Commission's mandatory minimum standards, 47 C.F.R. §§64.604 *et seq.*, as amended, and the Telecommunications Relay Service Fund Administrator's reporting, monitoring, and filing requirements. This call center will operate on a perpetual (24 hours per day) basis.

Name and contact information for Center Manager is:

[REDACTED]

A copy of the call center lease will be provided upon request.

ASL/Global VRS new call center is being deployed to further expand the Company's **[REDACTED]** operations, while enhancing ASL/Global VRS' ability to serve an expanding subscriber base generally. This call center will appear on subsequent bi-annual Call Center Reports. The deployment of this call center will be transparent to the public and will not result in a disruption of service. Pursuant to Section 64.606(f)(2)(ii) of the Commission's rules this *Notification of Substantive Change* is provided more than sixty (60) days prior to the deployment of this call center.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,[1] and "Exemption 4" of the Freedom of Information Act,[2] 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,[3] 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.

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 the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC

Gabrielle Joseph
Chief Operations Officer

cc: David Rolka, Rolka Loube Saltzer Associates (via electronic and RL extranet submission)

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[1] 47. C.F.R §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.