



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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Via ECFS and Overnight Delivery

September 30, 2015

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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, Semi-annual Call Center Report*

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), enclosed for submission to the Commission is ASL Services Holding, LLC's (ASL/Global VRS) October 1, 2015 semi-annual *Call Center Report*.

[REDACTED]

These call centers and corresponding information regarding their operations will appear on the Company's April 1, 2016 *Call Center Report*.

**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,

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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).

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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 Document 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.

In accordance with the Commission’s May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, 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 via U.S. Mail 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.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage-paid envelope enclosed for this purpose. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC



Angela Roth  
Chief Executive Officer

Enclosure (Confidential Version Only)

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<sup>3</sup> 47 C.F.R. §0.457.

REDACTED – FOR PUBLIC INSPECTION.

[REDACTED]