

December 16, 2015

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

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Hancock, Jahn, Lee & Puckett, LLC Confidential Supplemental Information to *2015 Further Notice of Proposed Rulemaking* Comments (Public Inspection Copy)

Dear Ms. Dortch:

Herein Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Access Ability Group and branded Star VRS and Star VRS for the DeafBlind ("CAAG/Star VRS") provides the Federal Communications Commission ("FCC/Commission") with confidential supplementary provider-specific executive cost information to its *2015 Further Notice of Proposed Rulemaking* ("*2015 Rate FNPRM*") Comments.

**Request for Confidential Treatment:** Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, CAAG/Star VRS respectfully requests confidential treatment of the provider-specific, highly sensitive and proprietary commercial information contained in this supplement, and withhold that information from any public inspection. The confidential information has been redacted from the public version electronically filed with the Commission.

Pursuant to Section 0.459(b) of the Commission's rules CAAG/Star VRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought**

CAAG/Star VRS requests confidential treatment to the confidential information redacted from the version filed electronically with the Commission.

**2. Identification of the circumstances giving rise to the submission**

CAAG/Star VRS is providing provider-specific sensitive and proprietary information to support its *2015 Rate NPRM* Comments.

**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged**

The information herein includes provider specific business statistics and financials.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

**REDACTED**

Video relay service is a highly competitive industry with only six eligible providers.

**5. Explanation of how disclosure of the information could result in competitive harm**

Public inspection of the disclosed information would allow for all six eligible providers to gain access to highly sensitive and proprietary information that would undermine CAAG/Star VRS' ability to compete.

**6. Identification of any measures taken to prevent unauthorized disclosure**

The disclosed information is proprietary in nature and CAAG/Star VRS has extensive security measures in place to protect this information from outside inspection.

**7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties**

The disclosed information has not been made available to the public or third parties except in the case of the Fund Administrator under the governance of the FCC.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure**

Because there is no way to determine when the disclosure of this information would no longer have the ability to cause company harm, CAAG/Star VRS requests the information remain confidential indefinitely.

All questions may be directed to the undersigned.

Sincerely,



Jeremy M. Jack  
Vice President, CAAG/Star VRS  
916-225-4944  
jeremy.jack@caag4.com

Attachments

cc: Karen Peltz Strauss (karen.strauss@fcc.gov)  
Gregory Hlibok (gregory.hlibok@fcc.gov)  
Robert Aldrich (robert.aldrich@fcc.gov)

**REDACTED**

Hancock, Jahn, Lee & Puckett, LLC Supplement to its  
2015 Rate FNPRM Comments  
CG Docket Nos. 10-51 and 03-123

CAAG/Star VRS herein submits supplementary executive cost data to its 2015 Rate FNPRM<sup>1</sup> Comments<sup>2</sup>.

- 1) Executive costs for years 2014, 2015, and projected costs for year 2016

2014: \$[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

2015: \$[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

2016: \$[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

- 2) The amount of executives reflected in these costs

[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

- 3) The amount of these executives dedicated to VRS vs. allocated between VRS and other lines of business

All executive costs are dedicated to VRS

- 4) Categories of cost data submitted to the Fund Administrator that include these expenditures or portions of them

Salaries and Benefits (Relay Center: Management)

Legal/Regulatory

Marketing/Advertising Expenses

Note that CAAG/Star VRS does not include [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION] in its cost data submission to the Fund Administrator. These executive costs are cared for under the parent company CAAG and none of these costs are allocated to VRS. Therefore CAAG/Star VRS executive costs submitted to the Fund Administrator are solely [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].

CAAG/Star VRS hopes this additional information will assist the FCC in expediting the critical proposed and emergency petitioned Tier I rate freeze.

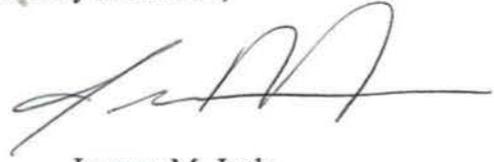
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<sup>1</sup> *In the Matter of Structure and Practices of the Video Relay Service Program and Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, *Further Notice of Proposed Rulemaking*, FCC 15-143 (October 21, 2015) [2015 Rate FNPRM].

<sup>2</sup> *Comments Hancock Jahn Lee & Puckett, LLC*

**REDACTED**

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. M. Jack', with a long horizontal flourish extending to the right.

Jeremy M. Jack  
Vice President, CAAG/Star VRS  
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