



REDACTED FOR PUBLIC INSPECTION

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FCC Mail Room

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Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

December 17, 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*

Dear Secretary Dortch:

Pursuant to Mr. Aldrich's December 15, 2015 telephonic and email request for information in the above-referenced matter, ASL Services Holdings, LLC ("ASL/Global VRS") provides the following information:

1. ASL/Global expenditures for 2014, 2015, and 2016 on executive compensation (fully loaded) to the extent attributed to VRS;

Allocated Executive Salaries for 2014: [REDACTED]
Allocated Executive Salaries for 2015: [REDACTED]
Estimated Allocated Executive Salaries for 2016: [REDACTED]

2. How many executives are reflected in these costs;

2014: [REDACTED] executives for all 12 months
2015: [REDACTED] executives for 9 months, [REDACTED] executives for 3 months
2016: [REDACTED] executives for all 12 months

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3. How many of those executives are dedicated to VRS vs. allocated between VRS and other lines of business; and

All of our executives allocate their time between various lines of business. Our business entity has [REDACTED] business segments: [REDACTED]. At the close of each month's finances, the accounting department undergoes an extensive allocation process that allocates the costs of executive compensation in proportion to the time expended on each of these separate business segments. Once the costs are allocated accordingly to each leg of the business, financials are generated for each core business unit.

4. Which categories of cost data (in your cost filings with Rolka Loube) include these expenditures or portions of them (e.g., "Finance/Accounting," "Other Corporate Overheads," etc.).

Our executive compensation allocation costs are reported on the expenditure line item: "Salaries and Benefits – Man Emp". The employer payroll taxes, benefits and actual allocated expenses for all management including executive compensation is reported under that line item and reporting accordingly on our cost filings with Rolka Loube on an annual basis.

Pursuant to Section 0.459 of the Commission's rules, 47 C.F.R §0.459, ASL/Global VRS requests confidential treatment for the Company-specific, highly sensitive and proprietary commercial information contained above, and withhold that information from any public inspection. The confidential information has been redacted from the public version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exception 4 of the Freedom of Information Act ("FOIA").

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, ASL/Global VRS states as follows:

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

ASL/Global VRS requests confidential treatment to the confidential information redacted from the version filed electronically with the Commission, specifically including financial information.

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

ASL/Global VRS is providing corporate-specific proprietary information to supplement information provided to the Commission in a Joint Emergency Petition submitted on November 15, 2015.

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

The confidential information constitutes highly confidential financial information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

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

The confidential information involves video relay services, a highly competitive service.

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

Disclosure of the redacted information could cause substantial competitive harm to ASL/Global VRS, because other video relay service providers would gain access to critical financial information and be able to assess the Company's relative size; information that would be useful in competing against ASL/Global VRS and undermine the Company's ability to compete.

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

ASL/Global VRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

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

ASL/Global VRS does not make the redacted information to the public or to third parties. Financial and usage information has been provided to the Commission.

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

This information is being voluntarily submitted by ASL/Global VRS. ASL/Global VRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to ASL/Global VRS.

An original and one (1) copy of the confidential this letter and two (2) redacted, public inspection copies of this letter are enclosed. Two (2) confidential copies of this letter are directed to Greg Hlibok, Chief Disabilities Rights Office.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in black ink, appearing to read "Andrew O. Isar", written over a horizontal line.

Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC