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Via Electronic Comment Filing Submission (ECFS)

December 28, 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; ASL Services Holdings, LLC Objection to Release of Confidential Information

Dear Secretary Dortch:

ASL Services Holdings, LLC (“ASL/Global VRS”) hereby objects to the release of confidential documents Acknowledgement submitted under the *Protective Order*¹ and *Second Protective Order*² in the above referenced matter by CSDVRS, LLC dba ZVRS’s regulatory counsel for the purpose of obtaining Highly Confidential materials filed in these proceedings.

Pursuant to paragraph 7 of the *Second Protective Order*,

Each Submitting Party shall have an opportunity to object to the disclosure of its Stamped Highly Confidential Documents or Highly Confidential Information to any such person. A Submitting Party must file any such objection at the Commission and serve it on Counsel representing, retaining or employing such person within three business days after receiving a copy of that person’s Acknowledgment (or where the person seeking access is one described in clause 1 or 2 of paragraph **Error! Reference source not found.**, file and serve such objection as promptly as practicable after receipt of the Acknowledgment).

¹ See *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 03-123 and 10-51.

² *Id.*

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ASL/Global VRS is currently in litigation with CSDVRS, LLC.³ As a result, any Highly Confidential documents or information released to CSDVRS, LLC regulatory counsel could be prejudicial to ASL/Global VRS. In the absence of knowledge of the specific nature of the documents sought by CSDVRS, LLC's regulatory counsel, ASL/Global VRS must presume that any information previously filed under the Second Protective Order will be requested and made available to counsel. Release of Highly Confidential documents and/or information could provide CSDVRS, LLC and its litigation counsel with information that should appropriately be obtained through litigation discovery.

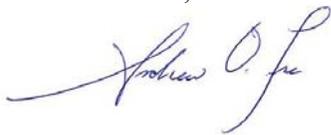
Should ASL/Global VRS' objection be rejected, ASL/Global VRS requests that the specific Highly Confidential Documents or Highly Confidential Information requested by CSDVRS, LLC be identified to ASL/Global VRS before their release.

Though counsel's letter is dated December 17, 2015, the letter was not received until December 23, 2015. This objection is timely filed within the three business day period required under the *Second Protective Order*. A copy has been served on the Company's counsel.

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

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC

cc: Steven A. Rowlings
Gregory Hlibok (via email)

³ See, *Gracias VRS, LLC v. CSDVRS, LLC*, Circuit Court for the Sixth Judicial Circuit Pinellas County, Florida, Case No.: 11-10965-CI-021.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a true and correct copy of the foregoing Objection of ASL Services Holdings, LLC was sent by first class mail to the following individual:

Steven A. Rowings
Akin Gump Strauss Hauer & Field LLP
1333 New Hampshire Avenue NW
Washington, D.C. 20036

Respectfully submitted this December 28, 2015



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Regulatory Consultant to
ASL Services Holdings, LLC