



January 13, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Sorenson outside counsel response to ASL/Global VRS objection to Acknowledgments of Confidentiality in CG Docket Nos. 10-51 and 03-123.

Dear Ms. Dortch:

On behalf of Sorenson Communications, Inc., (“Sorenson”) I write to respond to the December 28, 2015 letter of Andrew O. Isar, which purports to object to the disclosure of ASL Services Holdings, LLC’s (“ASL/Global’s”) Confidential or Highly Confidential Information to Sorenson’s outside regulatory counsel under the First and Second Protective Orders in this proceeding.¹ In its letter, ASL/Global appears to concede that Sorenson’s outside regulatory counsel who have submitted Acknowledgments of Confidentiality meet the requirements for access under the First and the Second Protective Orders: it does not allege or present any evidence that Sorenson’s outside regulatory lawyers are involved in “competitive decisionmaking” or are otherwise ineligible for access under the Orders. Rather, ASL/Global apparently objects to the entire concept of a protective order and has filed nearly identical letters objecting to the release of information to lawyers for Purple and CSDVRS.

ASL/Global’s objections are meritless. The Commission has already issued two protective orders in this proceeding, and to the extent that ASL/Global has submitted information under these two protective orders it is bound by the terms of the orders, which provide for the release of Highly Confidential to outside counsel. ASL/Global cannot avail itself of the benefits of the protective orders and then object to the obligations imposed by these orders to release redacted information to outside counsel for other parties.

In any event, ASL/Global’s objections are based on a fundamental misunderstanding of the protective order. ASL/Global asserts that the release of its Highly Confidential Information to Sorenson could “could provide valuable competitive information to Sorenson,” but of course, the Second Protective Order prohibits Sorenson’s outside counsel from disclosing another party’s information to Sorenson. ASL/Global also expresses concern that it does not know “the

¹ Letter from Andrew Isar, Regulatory Consultant, ASL Services Holdings, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 & 10-51 (filed Dec. 28, 2015) (“ASL Objection”).

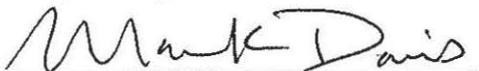
Marlene H. Dortch
January 11, 2016
Page 2

specific nature of the documents sought by Sorenson's regulatory counsel," but under the relevant protective orders, Sorenson will receive copies of ASL/Global's documents from ASL/Global itself. Thus, ASL/Global's objections are fundamentally misplaced.

Finally, it bears emphasis that to the extent ASL/Global raises any timely objection at all, it is only to the two most recent Acknowledgments of Confidentiality that were served on it on December 15, 2015. In June 2012 and subsequently, Sorenson served Acknowledgments of Confidentiality that ASL/Global has never objected to, and the attorneys who signed these acknowledgments are therefore entitled to view ASL/Global's Highly Confidential Information.

Because ASL/Global has raised no valid objection to the Acknowledgments of Confidentiality, the Commission should expeditiously overrule its objection.

Respectfully submitted,

A handwritten signature in black ink that reads "Mark D. Davis". The signature is written in a cursive style and is underlined.

Mark D. Davis
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cc: Greg Hlibok (by e-mail)
Andrew O. Isar
Angela Roth

CERTIFICATE OF SERVICE

I certify that on January 13, 2016, I caused a copy of the foregoing Letter to be served on the following individuals by overnight mail and e-mail.

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