



ANDREW O. ISAR

4304 92ND AVENUE NW
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 866.474.3630
WWW.MILLERISAR.COM

Via Electronic Comment Filing Submission (ECFS)

January 28, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
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:

The following is in response to Purple Communications, Inc.'s ("Purple") January 26, 2015 response to ASL Services Holdings, LLC ("ASL/GlobalVRS") objection to the release of confidential documents following submission of Acknowledgements of Confidentiality ("Acknowledgement") under the *Protective Order* and *Second Protective Order*¹ in the above referenced matters. ASL/Global VRS reiterates its objection to release of Highly Confidential materials to Purple or other parties. Purple mirrors Sorenson Communications, LLC's ("Sorenson") response to ASL/Global VRS' objection as being "meritless." ASL/Global VRS maintains the issue of whether confidential information may be released under *Second Protective Order* warrants Commission deliberation and that its opposition is neither "purported" or meritless.

As to Purple's conclusion that ASL/GlobalVRS is not contending that Outside Counsel fails to meet the requirements for access under the Protective Orders, ASL/GlobalVRS states - as it did in its response to Sorenson - that it is not for ASL/GlobalVRS but rather for the Commission to determine whether Purple meets such requirements.

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, *Second Protective Order* DA 12-858 (May 31, 2012).

Ms. Marlene H. Dortch

January 28, 2016

Page 2

Regarding Purple's characterization that ASL/GlobalVRS' objection is to the release of any confidential information under the protective Orders is simply incorrect. ASL/GlobalVRS clearly recognizes the protections established under the Protective Orders. ASL/GlobalVRS also recognizes the limitations imposed on counsel to provide information to counsel's client. Yet that counsel is prohibited from sharing actual documents or direct information gleaned from its information request does not preclude counsel from formulating gathered information in a way that will benefit counsel's client to ASL/GlobalVRS or other providers' detriment. Ultimately whether the information requested will indeed be used to enhance the record in this proceeding is a matter for the Commission to decide.

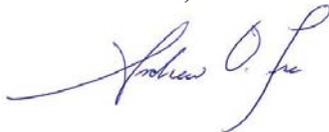
Despite Purple's characterization of *Second Protective Order* provisions governing limitation of access cited in ASL/GlobalVRS' response to Sorenson as "describing the function" – distinguishing between Highly Confidential information from other confidential information - release of confidential information of any kind as enhancing the record again remains a matter for Commission determination.

To the extent that release of confidential information is in the hands of the Commission, ASL/GlobalVRS objections are justified, and should be considered by the Commission.

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

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar", written in a cursive style.

Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC

cc: Monica Desai (via priority delivery and email)
Gregory Hlibok (via email)

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 priority delivery to the following individual:

Monica S. Desai
Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, D.C. 20037

Respectfully submitted this January 28, 2016



Andrew O. Isar
Miller Isar, Inc.
4304 92nd Avenue NW
Gig Harbor, WA 98335
Telephone: 253.851.6700

Regulatory Consultant to
ASL Services Holdings, LLC