

January 29, 2016

VIA ECF [Redacted Version]

VIA OVERNIGHT DELIVERY and E-Mail [Confidential Version]

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

Electronic cc: Karen Peltz Strauss, Gregory Hlibok, and Robert Aldrich

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123 and *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51 – **CONFIDENTIAL INFORMATION** – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS. 03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Dear Ms. Dortch:

Hancock, Jahn, Lee & Puckett, LLC d/b/a Communication Axxess Ability Group and branded as Star VRS and Star VRS for the DeafBlind (“Star VRSdb”) (“collectively CAAG/Star VRS”) herein provides additional cost data to assist the Federal Communications Commission (“FCC” “Commission”) in making a determination regarding a rate freeze for the three Tier 1 Providers.¹

The attached *Preliminary Cost Data and Projections*² (Appendix A) show clearly that during 2015, absent a rate freeze, CAAG/Star VRS was not able to make significant progress or growth as was originally projected. An unstable rate environment delayed, by over 9 months, the brand name change to Star VRS and the release of new software and applications for CAAG/Star

¹ *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].

² Actually Cost Data and Projections submitted to the Fund Administrator on February 22nd may vary to some degree.

VRS that would have potentially allowed CAAG/Star VRS to appropriately compete in the VRS market. However, with the launch of VRS for the DeafBlind in March, 2015 and the re-brand to Star VRS along with an upgrade to competitive software and applications in December, 2015 CAAG/Star VRS is poised for growth during 2016 and may reduce its per minute rate by roughly [BEGIN CONFIDENTIAL INFORMATION] [REDACTED] [END CONFIDENTIAL INFORMATION]. That being said, CAAG/Star VRS would still be operating at a significant loss, even on allowable costs, and underscores the need for an immediate rate freeze as proposed by the FCC and supported by all Commenters.

Request for Confidential Treatment: Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, CAAG respectfully requests confidential treatment of the non-public, non-redacted version of this letter and its attachment. The confidential version contains proprietary information not intended for public consumption. CAAG/Star VRS would not make this information public under any circumstance. Release of the confidential version of this letter to the public could cause CAAG/Star VRS irreparable and inestimable harm. CAAG/Star VRS requests that the confidential version of this letter be withheld from public inspection. Should disclosure of the confidential version of this letter be requested, CAAG/Star VRS requests that it be informed of such request so that CAAG/Star VRS may take appropriate action to safeguard its interests.

Pursuant to the Commission's Second Protective Order in the above-referenced matter, one copy of the confidential version of this letter and two copies of the redacted public version are enclosed. Two copies of the confidential version are being mailed to Gregory Hlibok, Consumer

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and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W.,
Room 3-B431, Washington, D.C. 20554 and cc via email to Gregory Hlibok, Karen Peltz
Strauss, and Robert Aldrich.

Questions may be directed to Jeremy Jack, Vice President, CAAG/Star VRS.

Sincerely,

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

Jeremy M. Jack
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Appendix A

[BEGIN CONFIDENTIAL INFORMATION]

[END CONFIDENTIAL INFORMATION]