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Via Electronic Comment Filing System

March 29, 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

Dear Secretary Dortch:

Pursuant to Section 64.5109(e) of the Commission's rules, 47 C.F.R. §64.5109(e), ASL Services Holdings, LLC dba GlobalVRS ("ASL/GlobalVRS") hereby submits its Customer Proprietary Network Information certification for calendar year 2015.

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

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC dba GlobalVRS

Attachment

cc: Greg Hlibok, Chief, Disability Rights Office (via Email)

Annual 47 C.F.R. §64.5105 et seq. CPNI Certification

Annual Customer Proprietary Network Information ("CPNI") Certification covering the period January 1, 2015 through December 31, 2015, pursuant to 47 C.F.R. §64.5109(e).

Date Filed: March 29, 2016

Name of Company covered by this Certification: ASL Services Holdings, LLC dba Global VRS

Name of Signatory: Angela Roth

Title of Signatory: Chief Executive Officer

Certification:

I, Angela Roth, certify that I am an officer of ASL Services Holdings, LLC dba GlobalVRS (ASL/GlobalVRS), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules for Internet-based Telecommunications Relay Service Providers, 47 C.F.R. §64.5105 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.5105 et seq. of the Commission's rules as applicable.

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed by a company at either state commissions, the court system or the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 19 of the U.S. Code and may be subject to enforcement action.



Angela Roth
Managing Member, President and Chief
Executive Officer
ASL Services Holdings, LLC
3700 Commerce Boulevard, Suite 216
Kissimmee, Florida
Telephone: 407.518.7900

Attachment 1: Statement Concerning Company Procedures

ASL Services Holdings, LLC dba GlobalVRS (ASL/GlobalVRS) ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees who may have access to CPNI receive an initial CPNI protection briefing and periodic reminders thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic notes and retained for a minimum of three years, as set forth in 47 C.F.R. §64.5109. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2015, the Company took no action against data brokers. In calendar year 2015, the Company received no consumer complaints regarding CPNI issues.