



## ASL SERVICES HOLDINGS, LLC.

Global VRS  
3700 Commerce Boulevard  
Kissimmee, Florida 34741

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Via ECFS and Overnight Delivery

March 31, 2016

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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, Semi-annual Call Center Report*

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), enclosed for submission to the Commission is ASL Services Holding, LLC's ("ASL/Global VRS") April 1, 2016 semi-annual *Call Center Report*.

On September 15, 2015, ASL/Global VRS submitted a substantive change notice pursuant to Section 64.606(f)(2)(ii) of the Commission's rules, 47 C.F.R. §64.606(f)(2)(ii), of the opening of a [REDACTED] on or after [REDACTED]. On [REDACTED], a separate substantive change notice was submitted regarding the opening of a [REDACTED] located at [REDACTED] on or after [REDACTED]. This report now includes these call centers.

**Request for Confidential Treatment. Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules,<sup>1</sup> and "Exemption 4" of the Freedom of Information Act,<sup>2</sup> ASL respectfully requests that the above information be deemed confidential and protected,

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<sup>1</sup> 47. C.F.R §0.459.

<sup>2</sup> 47 C.F.R.§0.457(d). See *National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); *Southern Company Request for Waiver of Section 90.629 of the Commission's Rules*, 14 FCC Rcd. 1851,1860 (1998).

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accordingly. This information constitutes “trade secrets” as set forth in Section 0.457 of the Commission’s rules,<sup>3</sup> in that the information reveals the location of Company call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL would not otherwise make these Document publically available under any circumstance. Release of these Documents to the public could cause ASL irreparable and inestimable harm. ASL requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission’s rules, ASL/Global VRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

ASL/Global VRS requests confidential treatment to the confidential data associated with its call centers.

**2. Identification of the circumstances giving rise to the submission.**

ASL/Global VRS is providing call center data as required pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2),.

**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.**

The confidential information constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

The confidential information involves video relay services, a highly competitive service.

**5. Explanation of how disclosure of the information could result in competitive harm.**

Disclosure of call center data information could cause substantial competitive harm to ASL/Global VRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company’s relative size; information that would be useful in competing against ASL/Global VRS and undermine the Company’s ability to compete.

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<sup>3</sup> 47 C.F.R. §0.457.

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**6. Identification of any measures taken to prevent unauthorized disclosure.**

ASL/Global VRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

**7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.**

ASL/Global VRS does not make the redacted information to the public or to third parties. Financial and usage information has been provided to the Commission.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

This information is being submitted by ASL/GlobalVRS. ASL/GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to ASL/Global VRS.

In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

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Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage-paid envelope enclosed for this purpose. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC



Angela Roth  
Chief Executive Officer

Enclosure (Confidential Version Only)