

# NorthStar Relay

Via Email and Overnight Delivery

May 24, 2011

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Attention: Consumer & Government Affairs Bureau, Office of Disability Rights

RE: *In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51

Dear Ms. Dortch:

Pursuant to the Section 1.3 of the Commission's Rules<sup>1</sup> and the Commission's April 6, 2011 *Report and Order and Further Notice of Proposed Rulemaking* in the above-referenced proceeding,<sup>2</sup> enclosed for filing with the Commission is one confidential and one redacted public copy of NorthStar Relay, LLC's ("NorthStar") *Petition for Waiver*, as well as one complete copy of Communications Access Center's ("CAC") *Petition for Temporary Waiver* (the "Petitions"). By these Petitions, NorthStar and CAC together request temporary waiver of newly promulgated Section 64.604(c)(5)(iii)(N)(1)(iii) of the Commission's Rules<sup>3</sup> so NorthStar may continue providing video relay services ("VRS") to the public under an existing arrangement with a Telecommunications Relay Service Fund ("Fund") eligible certificated VRS provider, CAC, pending a grant of NorthStar's own Fund eligibility certification by the Commission. NorthStar's Petition and CAC's Petition are being submitted in accordance with R&O paragraph 63.

**Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules,<sup>4</sup> NorthStar respectfully requests that documents supporting its Petition in exhibits 1 to 5 be deemed confidential and protected, accordingly. In support of its request, NorthStar states as follows: These documents constitute "trade secrets" as set forth in Section 0.457 of the Commission's rules,<sup>5</sup> in that the documents contain sensitive proprietary information including, but not limited to, highly confidential leases, purchase agreements, personal employee information, and financing documents. These documents reveal sensitive company operations and are of a scope that would be useful to competitors. Further, employee information contains highly confidential personal information not intended for public consumption. NorthStar would not otherwise make these documents publically available under any circumstance. Release of these data to the public could cause NorthStar, or its employees, irreparable and inestimable harm.

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<sup>1</sup> 47 C.F.R. §1.3.

<sup>2</sup> *In the Matter of Structure and Practices of the Video Relay Services, Report and Order and Further Notice of Proposed Rulemaking*, CG Docket No. 10-51, 26 FCC Rcd. 5545 (rel. April 6, 2011) ["R&O"].

<sup>3</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii).

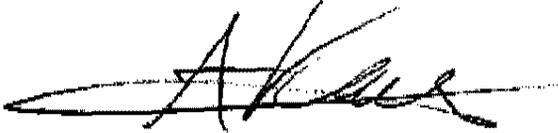
<sup>4</sup> 47 C.F.R. §0.459.

<sup>5</sup> 47 C.F.R. §0.457.

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A redacted public version of the enclosed NothStar Petition has been filed electronically via the Commission's Electronic Comment Filing System in this proceeding. Thank you for your attention to this matter. Questions regarding this matter may be directed to the undersigned

Sincerely,



Ash Kalb, Esq.  
NorthStar Relay, LLC

Enclosures

cc: Ms. Karen Peltz-Straus (via electronic delivery - karen.strauss@fcc.gov)  
Ms. Mark Stone (via electronic delivery - mark.stone@fcc.gov)  
Mr. Gregory Hlibok (via electronic delivery - gregory.hlibok@fcc.gov)