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Via Electronic Comment Filing Submission (ECFS)

PUBLIC INSPECTION COPY

June 20, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Healinc Telecom, LLC Annual Consumer Complaint Log Submission, Docket No. 03-123

Dear Secretary Dortch:

Pursuant to the Federal Communications Commission's ("Commission") 47 C.F.R. §64.604(c)(1)(i) and (ii), Healinc Telecom, LLC's ("Healinc"), hereby submits the attached consumer Complaint Log submissions for the periods June 1, 2009 through May 31, 2010 and June 1, 2010 through May 31, 2011. Section 64.604(c)(1)(i) requires relay service providers, including providers of video relay services who have been granted certification as federal Telecommunications Relay Service Fund eligible providers such as Healinc, *inter alia* to maintain a complaint log which at a minimum contains, "the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution." Further, the Commission has requested that reporting providers include "at a minimum, the total number of interstate relay calls by type of TRS" for the review period.

In 2010, Healinc experienced a change in senior management. A subsequent comprehensive review of the Company's operations by Healinc's new Chief Operations Officer ("COO") revealed that although the Complaint Log had been maintained, it had ultimately not been filed with the Commission for the June 1, 2009 through May 31, 2010 period. The Company's late-filed submission is now submitted concurrently with the current June 1, 2010 through May 31, 2010 Complaint Log submission. Healinc has instituted a reporting calendar and procedures for which the COO, operations personnel, and others are responsible for compliance, to ensure that future reporting is timely submitted.

During the June 1, 2009 through May 31, 2010 reporting period, Healinc processed [redacted] calls. The Company experienced [redacted] complaints, a complaint to call ratio of less than one percent [redacted]. Nearly half of the complaints [redacted] pertained to "Abuse Calls," *e.g.* calls that - in Healinc's estimation - were inconsistent with Commission regulations and guidelines including, but not limited to, Podcast calls,[1] calls with excessive hold times, and other similar types of calls that were not individual-to-individual conversation calls, and were not interpreted. In each instance, communications assistants explained the basis for not interpreting the call.

Following Healinc's operational reorganization in 2010, the Company experienced a precipitous decline in complaints. Of the [redacted] calls interpreted between June 1, 2010 and May 31, 2011, Healinc received [redacted] complaints or a complaint to call ratio well below one percent [redacted]. This significant reduction in complaints reflects the efforts Healinc has taken to implement changes in operations and policies to better serve its customers.

User complaints remain an exceptionally helpful tool in the identification of operational issues. The Company has been able to resolve operational issues immediately in virtually all cases. Each complaint was resolved to the caller's satisfaction, where possible. Otherwise the caller was informed of the Company's practices or efforts to resolve the issue, where a resolution was required.

Pursuant to pursuant to 47 C.F.R. § 64.604(c)(2), Healinc's contact person for VRS consumer information and complaints about intrastate service is now:

Lamar Stewart
Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A
Riverdale, N.Y. 10463
Telephone: 212.714.2965
TTY Telephone: 212.714.9889 (9TTY) or 360.750.7412
Facsimile: 212.714.2906
E-mail: lstewart@lifelinks.net

[1] Healinc extended the prohibition on interpreting company-sponsored Podcast calls to interpreting Healinc partner-sponsored Podcast calls.

The Commission contact remains:

Dr. Stanley Schoenbach
Healinc Telecom, LLC
3333 Henry Hudson Parkway, Suite 1A
Riverdale, N.Y. 10463
Telephone: 718.543.4100
TTY Telephone: 212.714.9889 (9TTY) or 360.750.7412
Facsimile: 718.601.5400
E-mail: s.schoenmd@lifelinks.net

Request for Confidential Treatment. Healinc reiterates its request for confidentiality. Pursuant to Section 0.459 of the Commission's rules,[2] data contained in the spreadsheets, Attachments B, D, E, and F should deemed confidential and protected accordingly. In support of its request, Healinc states as follows. The data submitted in these documents contain sensitive proprietary information including, but not limited to, usage data. These data reveal company operations and scope that would be useful to competitors. Healinc would not otherwise make these data publically available. Release of these data to the public could cause Healinc inestimable and irreparable harm.

Thank you for your attention to this matter. Questions may be directed to Mr. Stewart or Dr. Schoenbach.

Sincerely,

MILLER ISAR, INC.

Andrew O. Isar

Regulatory Consultants to
Healinc Telecom, LLC

Attachment

cc: Greg Hlibok, Disability Rights Office, FCC (confidential version via electronic delivery)

[2] 47. C.F.R §0.459.

LIFELINKS

VIDEO RELAY SERVICE

"Communications for a better world"

Complaint Log June 1, 2009 to May 31, 2010

Report #	Date	Nature of Complaint	Explanation of Resolutions/Follow up needed if any

[Redacted]

LIFELINKS
VIDEO RELAY SERVICE
"Communications for a better world"

Complaint Log June 1, 2010 to May 31, 2011

Date Received	Category	Sub-Category	Description of the inquiry	Date of Solution	Description of the Solution

[Redacted]