

essential to providing high-quality trilingual VRS service. Accordingly, ASL has hired a mix of Latino backgrounds within its personnel to have a well rounded management, marketing, and interpreting team to enable it to effectively communicate with the various sub-communities within the Latino community. ASL believes that its attention and sensitivity to the cultural dynamics within the Latino community (and its sub-communities) distinguishes ASL from other VRS providers servicing Spanish speaking VRS clients.

In addition to educating the Deaf and Hard-of-Hearing communities to learn more about how VRS can help them, ASL's founder, Angela Roth, has written articles intended to educate others working the VRS industry. For instance, Ms. Roth's articles on multi-culturalism have been published in the trade publication RID VIEWS. It is Ms. Roth's and ASL's hope that such educational articles would ultimately result in the provision of better overall services to clients using VRS services, regardless of the provider used by the client.

ASL provide public outreach via its website, online and print advertising, consumer trade show presentations, meetings with user communities, distribution of informational materials, direct mailing to consumers, online communication (including Twitter and Facebook), and other promotional methods. ASL has also created and frequently hosts workshops who are open to the public and focus on educating the public about the Americans with Disabilities Act.

Specifically, ASL engages in the following bi-lingual consumer outreach initiatives:

- Website: ASL's Website (www.graciasvrs.com) includes information on the VRS Industry and stays up to date with all new information within the VRS Industry.
- Expo Education: ASL supports various expos and tradeshow throughout the country. Its sponsorship assists in supporting the venue to showcase various products and services

within the Deaf and Hard-of-Hearing community. In addition, ASL sends teams of interpreters to work at its booth and talk one-on-one with the Deaf and Hard-of-Hearing attendees in order to answer their questions regarding VRS. ASL also provides products, such as educational handouts, that clearly explain common questions about VRS raised within the Deaf and Hard-of-Hearing community. ASL has also participated in live stage presentations where the ASL team has taught the audience on a variety of subjects (CPR survival skills, VRS vs. VRI Interpreting, ADA Laws, VRS Services and many other topics).

- Email Blasts: ASL sends periodic “email blasts” to customers in their database describing ASL’s services and ways to access VRS.
- Meetings/Workshops: ASL sends representatives to a variety of locations to give in-services and workshops to interpreters, the Deaf and Hard-of-Hearing, and business communities, explaining the differences between VRS and VRI services to promote user compliance with FCC rules.
- Remote Area Education: ASL recognizes that there are many remote areas where Deaf (and Hard-of-Hearing) and Spanish Deaf (and Hard-of-Hearing) individuals live. ASL strives to reach out to Deaf and Hard-of-Hearing persons residing in rural areas, as it recognizes that other VRS providers may focus their educational efforts and resources to attract current (and potential) VRS users living in larger metropolitan areas.
- Direct Customer Service Follow-Up: ASL utilizes its Deaf and Hard-of-Hearing customer service representatives to make direct contact with VRS clients to ensure that they understand the services offered to them.

- English-Spanish Translation: Indicative of its commitment to public education about the availability of trilingual VRS services, ASL invests considerable time and financial resources translating its educational materials, maintaining both Spanish and English versions of the ASL website, and engaging in the above community outreach activities both in English and in Spanish.

4. Rates. (47 C.F.R. §64.604(c)(4)).

Standard: “TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.”

ASL Compliance: Inapplicable. ASL’s subscribers will not be charged for ASL’s VRS service.

See, Compliance with Types of Calls (47 C.F.R. §64.604(a)(3)), *supra*.

5. Jurisdictional Separation of Costs. (47 C.F.R. §64.604(c)(5)(iii)(C)).⁴⁶

Standard (1): “*Data Collection and Audits from TRS Providers.* TRS providers seeking compensation from the TRS Fund shall provide the administrator with true and adequate data, and other historical, projected and state rate related information reasonably requested to determine the TRS Fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS investment in general in accordance with part 32 of this chapter, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements.

Standard (2): “*Call data required from all TRS providers.* In addition to the data requested by section 64.604(c)(5)(iii)(C)(1), TRS providers seeking compensation from the TRS Fund shall submit the following specific data associated with each TRS call for which compensation is sought: (1) the call record ID sequence; (2) CA ID number; (3) session start and end times noted at a minimum to the nearest second; (4) conversation start and end times noted at a minimum to the nearest second; (5) incoming telephone number and IP address (if call originates with an IP-based device) at the time of the call; (6) outbound

⁴⁶ Standards (i), (ii), (iii)(A) and (iii)(B) require no response, and are acknowledged by Applicant.

telephone number (if call terminates to a telephone) and IP address (if call terminates to an IP-based device) at the time of call; (7) total conversation minutes; (8) total session minutes; (9) the call center (by assigned center ID number) that handled the call; and (10) the URL address through which the call is handled.

ASL Compliance: ASL affirmatively acknowledges its obligation to provide the administrator with true and adequate data and other historical, projected and state rate related information reasonably requested to determine the TRS Fund revenue requirements and payments in accordance with the requirements set forth in 47 C.F.R. §64.604(c)(5)(iii)(C)(1) and (2) and any such additional procedures adopted by the administrator. ASL has been providing such data through its certificated partner provider and is experienced in the reporting process.

Standard (3): *Additional call data required from Internet-based Relay Providers.* In addition to the data required by section 64.604(c)(5)(iii)(C)(2), Internet-based Relay Providers seeking compensation from the Fund shall submit speed of answer compliance data.

ASL Compliance: ASL affirmatively acknowledges its obligation to provide speed of answer compliance data to the Fund Administrator and Commission.

Standard (4): “Providers submitting call record and speed of answer data in compliance with sections 64.604(c)(5)(iii)(C)(2) and (3) shall (i) employ an automated record keeping system to capture such data required pursuant to section 64.604(c)(5)(iii)(C)(2) for each TRS call for which minutes are submitted to the fund administrator for compensation; and (ii) submit such data electronically, in a standardized format. For purposes of this subparagraph, an automated record keeping system is a system that captures data in a computerized and electronic format that does not allow human intervention during the call session for either conversation or session time.”

ASL Compliance: ASL affirmatively acknowledges its obligation to provide data through an automated record keeping system which captures required data, formats for reporting, and reports. All reporting is currently automated and is submitted in electronic format. Report data is generated from the electronic call detail records generated during each call and saved on the

VRS platform database. Upon initiation of a call, all actions are automatically logged and time-stamped in the platform trace files. After a call has been terminated/completed, the call detail record data is electronically written to the platform database. Each call creates a unique charging record. The charging record data is then automatically formatted and finally reviewed prior to submission.

Standard (5): *Certification.* The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of a TRS provider with first hand knowledge of the accuracy and completeness of the information provided, when submitting a request for compensation from the TRS Fund must, with each such request,” certify the truth and accuracy of the data and that such requests for compensation to not result from “impermissible financial incentives or payments to generate calls” pursuant to Section 225 of the Communications Act and the Commission’s rules and orders .

ASL Compliance: ASL affirmatively acknowledges its obligation to, and will, certify through its President and Chief Executive Officer that each and every requests for compensation are truthful, accurate, and do not result from any impermissible financial incentives or payments to generate calls.

Standard (6): *Audits.* The fund administrator and the Commission, including the Office of Inspector General, shall have the authority to examine and verify TRS provider data as necessary to assure the accuracy and integrity of TRS Fund payments. TRS providers must submit to audits annually or at times determined appropriate by the Commission, the fund administrator, or by an entity approved by the Commission for such purpose. A TRS provider that fails to submit to a requested audit, or fails to provide documentation necessary for verification upon reasonable request, will be subject to an automatic suspension of payment until it submits to the requested audit or provides sufficient documentation.

ASL Compliance: ASL affirmatively acknowledges its obligation to, and will, submit to annual or at times determined by the auditing entity, to audits from the fund administrator and the

Commission, including the Office of Inspector General. ASL will provide all such data and documentation as requested by the auditing entity to for examination and verification of the data submitted as necessary to assure the accuracy and integrity of TRS Fund payments.

Standard (7): *Call data record retention.* Internet-based TRS providers shall retain the data required to be submitted by this section, and all other call detail records, other records that support their claims for payment from the TRS Fund, and records used to substantiate the costs and expense data submitted in the annual relay service data request form, in an electronic format that is easily retrievable, for a minimum of five years.

ASL Compliance: ASL affirmatively acknowledges its obligation to, and will, retain the data required to be submitted by this section, and all other call detail records, other records that support its claims for payment from the TRS Fund, and records used to substantiate the costs and expense data submitted in the annual relay service data request form, in an electronic format that is easily retrievable, for a minimum of five years.

D. Information filed with the administrator. (47 C.F.R. 64.604(c)(5)(iii)(I))⁴⁷

ASL Compliance: ASL affirmatively acknowledges the obligation of its Chief Executive Officer (CEO), Chief Financial Officer (CFO), or other senior executive to each instance, certify, under penalty of perjury, that the minutes for which Fund compensation is requested are in

⁴⁷ Sections 64.604(c)(5)(iii)(D)(Reserved), 64.604(c)(5)(iii)(E), Payments to TRS providers, 64.604(c)(5)(iii)(F), TRS providers eligible for receiving payments from the TRS Fund, 64.604(c)(5)(iii)(G) intention to notify the Fund Administrator of participation in the Fund, 64.604(c)(5)(iii)(H) Administrator reporting, monitoring, and filing requirements, 64.604(c)(5)(iii)(J) The administrator's performance and this plan shall be reviewed by the Commission after two years, and 64.604(c)(5)(iii)(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules, require no response, and are acknowledged by Applicant.

compliance with section 225 and the Commission's rules and orders, and are not the result of impermissible financial incentives or payments to generate calls. The CEO, CFO, or other senior executive will certify under penalty of perjury to the TRS Fund administrator that such information is true and correct.

E. Procedures for the suspension/withholding of payment. (47 C.F.R. 64.604(c)(5)(iii)(L))

Standard (1): The Fund administrator will continue the current practice of reviewing monthly requests for compensation of TRS minutes of use within two months after they are filed with the Fund administrator.

Standard (2): If the Fund administrator in consultation with the Commission, or the Commission on its own accord, determines that payments for certain minutes should be withheld, a TRS provider will be notified within two months from the date for the request for compensation was filed, as to why its claim for compensation has been withheld in whole or in part. TRS providers then will be given two additional months from the date of notification to provide additional justification for payment of such minutes of use. Such justification should be sufficiently detailed to provide the Fund administrator and the Commission the information needed to evaluate whether the minutes of use in dispute are compensable. If a TRS provider does not respond, or does not respond with sufficiently detailed information within two months after notification that payment for minutes of use is being withheld, payment for the minutes of use in dispute will be denied permanently.

Standard (3): If, the VRS provider submits additional justification for payment of the minutes of use in dispute within two months after being notified that its initial justification was insufficient, the Fund administrator or the Commission will review such additional justification documentation, and may ask further questions or conduct further investigation to evaluate whether to pay the TRS provider for the minutes of use in dispute, within eight months after submission of such additional justification.

Standard (4): If the provider meets its burden to establish that the minutes in question are compensable under the Commission's rules, the Fund administrator will compensate the provider for such minutes of use. Any payment by the Commission will not preclude any future action by either the Commission or the U.S. Department of Justice to recover past payments (regardless of whether the payment was the subject of withholding) if it is determined at any time that such payment was for minutes billed to the Commission in violation of the Commission's rules or any other civil or criminal law.

Standard (5): If the Commission determines that the provider has not met its burden to demonstrate that the minutes of use in dispute are compensable under the Commission's rules, payment will be permanently denied. The Fund administrator or the Commission will notify the provider of this decision within one year of the initial request for payment.

ASL Compliance: Applicant affirmatively acknowledges, and avers compliance with, the promulgated procedures for suspension/with holding of payment under amended Commission rules.

F. Whistleblower protections. (47 C.F.R. 64.604(c)(5)(iii)(M))

Standard: Providers shall not take any reprisal in the form of a personnel action against any current or former employee or contractor who discloses to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity, any information that the reporting person reasonably believes evidences known or suspected violations of the Communications Act or TRS regulations, or any other activity that the reporting person reasonably believes constitutes waste, fraud, or abuse, or that otherwise could result in the improper billing of minutes of use to the TRS Fund and discloses that information to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity. Providers shall provide an accurate and complete description of these TRS whistleblower protections, including the right to notify the FCC's Office of Inspector General or its Enforcement Bureau, to all employees and contractors, in writing. Providers that already disseminate their internal business policies to its employees in writing (*e.g.* in employee handbooks, policies and procedures manuals, or bulletin board postings – either online or in hard copy) must include an accurate and complete description of these TRS whistleblower protections in those written materials.

ASL Compliance: ASL affirmatively acknowledges, and avers compliance with the Whistleblower protections promulgated under amended Commission rules. ASL avers further that it shall not take any reprisal in the form of a personnel action against any current or former employee or contractor who discloses to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity, any information that the reporting person reasonably believes evidences known or suspected violations of the Communications Act or TRS regulations, or any other activity that the reporting person

reasonably believes constitutes waste, fraud, or abuse, or that otherwise could result in the improper billing of minutes of use to the TRS Fund and discloses that information to a designated manager of the provider, the Commission, the TRS Fund administrator or to any federal or state law enforcement entity. ASL provides an accurate and complete description of its whistleblower protections, including the right to notify the FCC's Office of Inspector General or its Enforcement Bureau, to all employees and contractors in writing. A copy of ASL's whistleblower policies is attached as **Exhibit G**.

G. Additional Obligations. (47 C.F.R. 64.604(c)(5)(iii)(N))

(1) Eligibility for reimbursement from the TRS Fund.

Standard (i): Only an eligible VRS provider, as defined in subsection (c)(5)(iii)(F), may hold itself out to the general public as providing VRS.

Standard (ii): VRS service must be offered under the name by which the eligible VRS provider offering such service became certified and in a manner that clearly identifies that provider of the service. Where a TRS provider also utilizes sub-brands to identify its VRS, each sub-brand must clearly identify the eligible VRS provider. Providers must route all VRS calls through a single URL address used for each name or sub-brand used.

ASL Compliance: Applicant affirmatively acknowledges, and avers compliance with its obligation to identify itself to the Public as the Fund eligible certified entity. ASL plans to introduce sub-brands to more clearly distinguish between Spanish and English language VRS. When sub-brands are to be used, ASL will comply with its obligations to clearly and identify each sub-brand as a sub-brand of "ASL Services Holdings, LLC," the certificated entity, to ensure that the Public recognizes "ASL Services Holdings, LLC" as the certified provider. ASL will also inform the Commission at such time as it introduces a sub-brand. Further, ASL will create a single URL address for each sub-brand used. ASL currently maintains a single sub-brand, "GraciasVRS."

Standard (iii): An eligible VRS provider may not contract with or otherwise authorize any third party to provide interpretation services or call center functions (including call distribution, call routing, call setup, mapping, call features, billing, and registration) on its behalf, unless that authorized third party also is an eligible provider.

ASL Compliance: ASL does not now, nor will it, contract with or otherwise authorize any third party to provide interpretation services or call center functions (including call distribution, call routing, call setup, mapping, call features, billing, and registration) on its behalf, unless that authorized third party also is an eligible provider. ASL has since its inception employed its CAs. As documented in Exhibit A and C, and discussed *supra*, ASL will only contract with Fund eligible providers for all call center functions.

Standard (iv): To the extent that an eligible VRS provider contracts with or otherwise authorizes a third party to provide any other services or functions related to the provision of VRS other than interpretation services or call center functions, that third party must not hold itself out as a provider of VRS, and must clearly identify the eligible VRS provider to the public. To the extent an eligible VRS provider contracts with or authorizes a third party to provide any services or functions related to marketing or outreach, and such services utilize VRS, those VRS minutes are not compensable on a per minute basis from the TRS fund.

ASL Compliance: ASL does not contract for any services or functions related to the provision of VRS, as may be verified by the Commission through a review of the entirety of ASL's contracts.

Standard (v): All third-party contracts or agreements entered into by an eligible provider must be in writing. Copies of such agreements shall be made available to the Commission and to the TRS Fund administrator upon request.

ASL Compliance: ASL so acknowledges and is prepared to provide all contracts or agreements to the Commission or designated auditor upon request.

(2) *Call center reports.* VRS providers shall file a written report with the Commission and the TRS Fund administrator, on April 1 and October 1 of each year for each call center that handles VRS calls that the provider owns or controls, including centers located outside of the United States, that includes: (a) the complete street address of the center; (b) the number of individual CAs and CA managers; and (c) the name and contact information (phone number and email address) of the manager(s) at the center. VRS providers shall also file written notification with the Commission and the TRS Fund administrator of any change in a center's location, including the opening, closing, or relocation of any center, at least 30 days prior to any such change.

ASL Compliance: ASL affirmatively acknowledges its responsibility to, and will make semi-annual call center reports to the Commission and Fund Administrator on or before April 1 and October 1 of each year.

(3) *Compensation of CAs.* VRS providers may not compensate, give a preferential work schedule or otherwise benefit a CA in any manner that is based upon the number of VRS minutes or calls that the CA relays, either individually or as part of a group.

ASL Compliance: ASL has never in the past, nor does it now, compensate, give a preferential work schedule or otherwise benefit a CA in any manner that is based upon the number of VRS minutes or calls that the CA relays, either individually or as part of a group, as can be verified by the Commission.

(4) *Remote training session calls.* VRS calls to a remote training session or a comparable activity will not be compensable from the TRS Fund when the provider submitting minutes for such a call has been involved, in any manner, with such a training session. Such prohibited involvement includes training programs or comparable activities in which the provider or any affiliate or related party thereto, including but not limited to its subcontractors, partners, employees or sponsoring organizations or entities, has any role in arranging, scheduling, sponsoring, hosting, conducting or promoting such programs or activities.

ASL Compliance: ASL affirmatively acknowledges that VRS calls to a remote training session or a comparable activity will not be compensable from the TRS Fund. ASL states further that it has at no time sought Fund compensation for such calls.

IV. COMPLIANCE WITH THE WAIVED MANDATORY MINIMUM STANDARDS FOR THE PROVISION OF FEDERALLY-FUNDED VRS (47 C.F.R. §64.606(a)(2)(ii))⁴⁸

ASL continues to comply with those MMS that have been waived for VRS subscribers, as follows.

1. *One-line VCO, VCO-to-TTY, and VCO-to-VCO.*

ASL Compliance: ASL has complied with the *One-line VCO, VCO-to-TTY, and VCO-to-VCO* requirement since its inception. ASL has the capability of providing VRS for all call types.

2. *One-line HCO, HCO-to-TTY, and HCO-to-HCO.*

ASL Compliance: ASL has complied with the *One-line HCO, HCO-to-TTY, and HCO-to-HCO* requirement since its inception.

3. *Call Release.* Call release allows a CA to set up a TTY-to-TTY call that, once established, does not require the CA to relay the conversation.

ASL Compliance: ASL has complied with the *Call Release* requirement since its inception. Although ASL maintains this capability through call bridging, it has never had to process a TTY-to-TTY call.

⁴⁸ See 2011 VRS Waiver Extension Order.

4. *Pay-Per-Call (900) calls.* Pay-per-call (900) calls are calls that the person making the call pays for at a charge greater than the basic cost of the call.

ASL Compliance: ASL has processed no such calls, but has the capability to do so in the event such calls are placed.

5. *Types of Calls (Operated Assisted Calls and Long Distance Calls).* Commission rules require TRS providers to handle any type of call normally handled by common carriers.

ASL Compliance: ASL maintains procedures that enable use of operator assisted calling through the caller's preferred carrier or ASL's default presubscribed carrier's operator services and the ability to pass along caller credit card information for purposes of billing pay-per-call calls. Since its inception, ASL has not billed callers for long distance services, consistent with Equal Access obligations.

6. *Equal Access to Interexchange Carriers.* The TRS rules require that providers offer TRS users their interexchange carrier of choice to the same extent that such access is provided to voice users. Providers should specifically address the effect of the numbering and registered location requirements on the continuing need for this waiver.

ASL Compliance: ASL has complied with the *Equal Access to Interexchange Carriers* requirement since its inception by not charging callers to place long distance calls. ASL maintains that the new numbering and registered location requirements adopted in 2009 moot the very need to maintain this exemption. Subscribers are effectively presubscribed to each VRS provider. It is virtually inconceivable that a subscriber would request to be routed to an interexchange carrier. The Deaf community has come to expect that interexchange calls placed

via VRS will not be subject to separate charges. Those subscribers who may also maintain separate interexchange services are otherwise not impacted. ASL has not experienced an instance where a caller has requested to be routed over a specific interexchange carrier before or after implementation of the numbering and registered location requirements. Nevertheless, ASL urges the Commission to solicit public comment before removal of the waiver to build a record supporting a decision to terminate the waiver.

7. *Speech-to-Speech.* In the 2000 TRS Report & Order, the Commission recognized STS as a form of TRS and required that it be offered as a mandatory service. The Commission waived this requirement indefinitely for VRS, noting that STS is a speech-based service, whereas VRS is a visual service using interpreters to interpret in sign language over a video connection.

ASL Compliance: As is the case with TTY-to-TTY calls, ASL maintains the technical capability to process such calls, though its experience with such calls is virtually non-existent.

V. ADDITIONAL COMPLIANCE REQUIREMENTS.

In addition to the foregoing, Applicant affirmatively acknowledges, and will comply with, all applicable regulations associated with the provision of VRS including but not limited to, Section 64.611, Internet-based TRS registration, and 64.613, Numbering directory for Internet-based TRS users, as amended, applicable Commission orders and policies, as may be amended from time to time.

VI. PUBLIC INTEREST SHOWING.

Though no public interest showing is explicitly required under the Commission's certification rules as amended, ASL maintains that the grant of the instant Application is in the public interest. ASL is the only *native* Spanish language VRS provider. Its vast experience in providing VRS, coupled with its core Spanish language capabilities, uniquely position ASL to be

the premier provider of both English and Spanish language ASL particularly to underserved Spanish callers. ASL's certification will provide the Public generally, and Deaf Community specifically, with a real choice of responsible compliant provider. The provision of ASL's services bring Deaf and Hard of Hearing callers and Spanish language Deaf callers in particular, even closer to the functional equivalency to non-Deaf or Hard of Hearing callers mandated by the U.S. Congress

VII. CONCLUSION

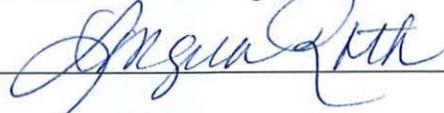
By the instant Application, Exhibits, and statements made by the Company's Chief Executive Officer subject to penalty of perjury, ASL hereby demonstrates that it meets or exceeds the Commission's MMS and waived MMS, has met the Commission's certification requirements, as amended, and is otherwise in compliance with Commission orders and policies governing the provision of video relay services as a federal Telecommunications Relay Service Fund eligible certificated provider. ASL respectfully requests that the Commission now grant ASL certification as a Telecommunications Relay Service Fund eligible provider, accordingly. ASL further requests that it be granted certification as a Telecommunications Relay Service Fund eligible provider on or before October 1, 2011, to ensure the seamless provision of VRS to its subscribers and Public.

A Verification attesting to the truth, accuracy, and completeness of this Application under penalty of perjury signed by me as President and Chief Executive Officer of ASL and notarized, is attached.

Respectfully submitted this 6th day of September, 2011,

ASL Services Holdings, LLC

By:

A handwritten signature in blue ink, appearing to read "Angela Roth", is written over a horizontal line.

Angela Roth
President and Chief Executive Officer
3700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
Telephone: 407.518.7900 ext. 201

STATE OF FLORIDA)
) ss.
COUNTY OF OSCEOLA)

VERIFICATION

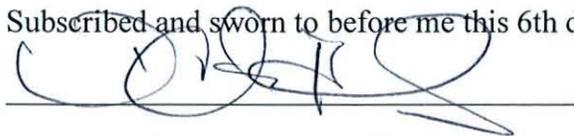
I swear under penalty of perjury that I am Angela Roth, President and Chief Executive Officer of ASL Services Holdings, LLC, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

ASL Services Holdings, LLC

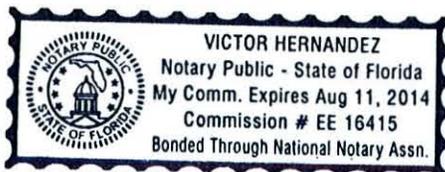
By: 

Angela Roth
President and Chief Executive Officer
3700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
Telephone: 407.518.7900 ext. 201

Subscribed and sworn to before me this 6th day of September, 2011



Notary Public in and for the State of Florida



**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
)
Telecommunications Relay Services and)
Speech-to-Speech Services for)
Individuals with Hearing and) CG Docket No. 10-51
Speech Disabilities)
)

**Internet-based TRS Certification Application
Of ASL Services Holdings, LLC**

LISTING OF EXHIBITS

Exhibit	Content
A	CONFIDENTIAL ASL Call Center Leases
B	CONFIDENTIAL A description of the technology and equipment used to support call center functions
C	CONFIDENTIAL Proofs of purchase, leases or license agreements for all technology and equipment used to support call center functions, including a complete copy of any lease or license agreement for automatic call distribution.
D	Statement that ASL will file annual compliance reports demonstrating continued compliance with Commission rules.
E	CONFIDENTIAL 911 Call Procedures
F	CONFIDENTIAL Complaint Report and Form
G	Whistleblower Policy

H CONFIDENTIAL Additional Corporate
 Information

CONFIDENTIAL Exhibit A

ASL Call Center Leases

(Attached)

CONFIDENTIAL Exhibit B

A description of the technology and equipment used to support call center functions

(Attached)

CONFIDENTIAL Exhibit C

Proofs of purchase, leases or license agreements for all technology and equipment used to support call center functions, including a complete copy of any lease or license agreement for automatic call distribution

(Attached)

Exhibit D

Statement that ASL will file annual compliance reports demonstrating continued compliance with Commission rules.

(Attached)

STATE OF FLORIDA)
) ss.
COUNTY OF OSCEOLA)

STATEMENT OF COMPLIANCE REGARDING ANNUAL REPORTS

I, Angela Roth, first being duly sworn upon oath, depose and say I am President and Chief Executive Officer of ASL Services Holdings, LLC (“Applicant”), an Applicant for certification as a federal Telecommunications Relay Service Fund (“Fund”) provider eligible for compensation from the Fund. Pursuant to section 64.606(a)(2)(iv) of the Commission’s rules,⁴⁹ applicants for certification as a Fund eligible provider are to make a statement that the applicant will file annual compliance reports demonstrating continued compliance with applicable Commission rules following certification. I swear under penalty of perjury that upon a grant of certification, ASL Services Holdings, LLC will file annual compliance reports demonstrating continued compliance with applicable Commission rules for the provision of video relay services on or before the date on which such compliance reports are due.

Pursuant to Section 64.606(g) of the Commission’s rules⁵⁰ “such [annual compliance] reports must update the information required in paragraph (a)(2) of this section⁵¹ and include updated documentation and a summary of the updates, or certify that there are no changes to the information and documentation submitted with the

⁴⁹ 47 C.F.R. §64.606(a)(2)(iv).

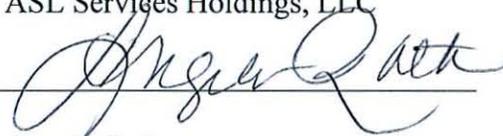
⁵⁰ 47 C.F.R. §64.606(g).

⁵¹ 47 §64.606(a)(2).

application for certification, application for renewal of certification, or the most recent annual report, as applicable.” I further swear under penalty of perjury that upon a grant of certification, ASL Services Holdings, LLC will file annual compliance reports in accordance with the entirety of Section 64.606(g) of the Commission’s rules. Such annual reports will be examined by me first hand, and the accuracy and completeness thereof will be further verified by me under oath as President and Chief Executive Officer of ASL Services Holdings, LLC subject to penalty of perjury in accordance with the specific officer certification language set forth in Section 64.606(g)(2)(interim) of the Commission’s rules.

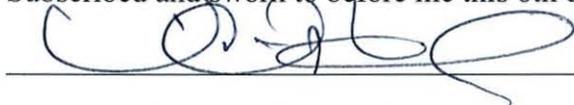
ASL Services Holdings, LLC

By: _____

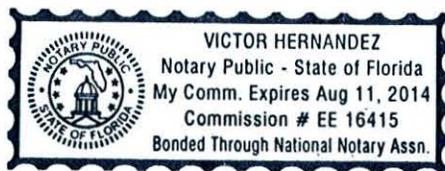


Angela Roth
President and Chief Executive Officer
3700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
Telephone: 407.518.7900 ext. 201

Subscribed and sworn to before me this 6th day of September, 2012



Notary Public in and for the State of Florida



CONFIDENTIAL Exhibit E

911 Call Procedures

CONFIDENTIAL Exhibit F
Sample Complaint Report and Form
(Attached)

Exhibit G
Whistleblower Policy
(Attached)

Exhibit H
Additional Corporate Information
(Attached)