

**change in a center's location, including the opening, closing, or relocation of any center, at least 30 days prior to any such change.**

PAH Relay Compliance: PAH Relay 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.**

PAH Relay Compliance: Applicant so acknowledges.

**(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.**

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

**IV. COMPLIANCE WITH WAIVED MANDATORY MINIMUM STANDARDS FOR THE PROVISION OF FEDERALLY-FUNDED VRS (47 C.F.R. §64.606(a)(2)(ii))<sup>43</sup>**

PAH Relay Compliance: PAH Relay will comply with certain mandatory minimum standards that have been waived for VRS subscribers, as follows:

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

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<sup>43</sup> See 2011 VRS Waiver Extension Order.

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

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

PAH Relay Compliance: PAH Relay has and will continue to comply with the *One-line HCO, HCO-to-TTY, and HCO-to-HCO* requirement.

**3. *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.

PAH Relay Compliance: PAH Relay has the capability to process pay-per-call in the event such calls are placed, but does not place them unless the call can be paid for by a consumer using their own payment method, consistent with the waiver of this rule.

**4. *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.

PAH Relay Compliance: Applicant's VRS platform enables compliance with the *Types of Calls* requirement. Applicant maintains the capability of providing any type of call function otherwise available from common carriers including, but not limited to, operator assisted calls and the ability to support pay-per call services. Applicant has established procedures that enable use of operator assisted calling through the caller's preferred carrier or Applicant's default presubscribed carrier's operator services if not otherwise specified, and the ability to pass along caller credit card information for purposes of billing pay-per-call calls. Applicant will not bill callers for long distance services, consistent with Equal Access VRS waiver obligations.

**5. *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.

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PAH Relay Compliance: Applicant already meets the standard. Please refer to response to equal access to interexchange carriers (47C.F.R. § 64.604(b)(3)), page 38, *supra*.

**6. *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.**

PAH Relay Compliance: PAH Relay continues to provide STS for its IP Relay offering and, consistent with the waiver of this requirement for VRS, does not handle STS for VRS calls.

### **V. ADDITIONAL COMPLIANCE REQUIREMENTS.**

In addition to the foregoing, Applicant affirmatively acknowledges that it has and will continue to 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. SHOWING OF PUBLIC INTEREST.**

Although certification of compliance with federal mandatory minimum standards pursuant to sections 64.604 and 64.606 is fact-based and does not impose a public interest standard test, Applicant maintains that the granting of this application is in the public interest and will benefit the public throughout the U.S.

- A. PAH Relay's Service Will Maintain A Technologically-Advanced VRS Option To the Public That Brings Deaf and Disabled Users a Step Closer to "Functionally Equivalent" Communications.

Applicant's deployment of a retail VRS, made possible through the grant of this Petition, will enable consumers to continue to have access to greater flexibility in communications. As

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PAH Relay's software VoIP-based VRS is accessible from any computer having a wireline or wireless broadband connection, consumers gain mobility and enhanced ease in connection. Consumers do not require specialized equipment, but will be able to expand the utility of their computers for sight-based, interactive communications from a home, office, or remote location. These capabilities bring the speech and hearing disabled a major step closer to the "functionally equivalent" communications they deserve and that Congress and the FCC have established as a matter of public policy.

### **B. The Granting of this Application Will Promote Innovation and Improved Service by All Providers**

The granting of the Application and PAH Relay's continued provision of VRS services will provide the public, and Deaf consumers in particular, with expanded options of service providers. The PAH Relay alternative creates competitive pressure on existing providers to innovate, incorporate new advanced technology approaches, and improve service offerings and capabilities, to the ultimate benefit of consumers. While PAH Relay uses the same basic VRS technology used by other providers, the key to its success is how the Company differentiates itself from other providers, consistent with basic competitive business practices. Applicant maintains that the experience of its senior management team, its CA's and management team's deep and established connection with the Deaf Community, and dedication to providing an exceptional consumer experience by focusing on consumer needs through service and technology, among other factors, directly contributes toward making PAH Relay a desirable provider of VRS services.

### **C. The Granting of this Application Will Enhance Access to Information Through PAH Relay's Outreach Efforts**

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PAH Relay engages in an extensive outreach program, which includes information regarding VRS accessibility and moreover, a host of information that will benefit the speech impaired and Deaf community, as discussed above. PAH Relay commits to continue funding an outreach program that increases the accessibility of information and program content geared to enhancing the lives of speech impaired and Deaf individuals.

### **D. PAH Relay Will Contribute to the Expansion of the Pool of Certified CAs.**

PAH Relay devotes a variety of resources to the interpreting and Deaf communities designed to assist in expanding the pool of Certified CAs. PAH Relay interpreters are recognized as leaders in their interpreting communities and perform numerous volunteer hours mentoring and training interpreters-to-be in a variety of community settings, assisting them with gaining the kind of diverse experiences that will lead them to be highly qualified interpreters and CAs. PAH Relay interpreters are in high demand in their areas as mentors and work hard to serve their up and coming counterparts. In addition, PAH Relay executives and CAs have given a number of training workshops for interpreters and give presentations at Interpreter Training Programs, helping interpreters in training to get insight and understanding as to what makes an outstanding interpreter and ideas of how to advance themselves to that level.

### **E. PAH Relay Will Contribute to the Deployment of Broadband Access.**

As PAH Relay's VRS is broadband-based, use of PAH Relay's VRS has and will continue to increase demand for broadband services across the country. This will accelerate broadband deployment, consistent with federal and state policies.

## VII. CONCLUSION

The Commission's *Report and Order and Order on Reconsideration* establishes a process whereby a VRS - and IP relay - provider may seek Commission certification of compliance with applicable minimum mandatory standards. This certification process enables companies like PAH Relay, to draw from the federal TRS fund for the provision of compensable VRS, when demonstrating compliance with the MMS and meeting the other requirements under section 605(a)(2).

PAH Relay, from its inception, has delivered a comprehensive VRS service. PAH Relay invested nearly a year in researching technology platforms, including effort towards building its own platform. The very first VRS call handled by PAH Relay was handled by one of its own CAs in its own call center. PAH Relay made a significant investment into call centers, technology, staff, training and development of its product prior to launching its VRS operation. PAH Relay submitted its original application within days of launching its operations and after months of extensive work to prepare the application and ensure that it could meet the MMS and other rules associated with TRS. Three years later, PAH Relay continues to demonstrate a commitment to serving our consumers and compliance with the rules, first and foremost. Throughout our operation nearly all of PAH Relay's minutes have been handled by its own interpreters. We have always maintained and exercised control of the quality and nature of our product.

PAH Relay's ability to make its services generally available to the Deaf Community and other callers is predicated on its ability draw from the federal TRS fund to recoup the costs associated with the provision of these services. PAH Relay's growth has been slow yet steady.

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It has clung steadfastly to its principles of providing VRS the way the Commission intended. Though small, it has a very loyal and grateful consumer base. Drawing directly from the fund will level the playing field and allow PAH Relay to bring its high-caliber service to an even greater number of consumers.

PAH Relay has ensured ongoing compliance with the Commission's Mandatory Minimum Standards, currently waived Standards, and Orders, through a plan that incorporates complementary tools, adequate procedures and remedies. PAH Relay has implemented a process for providing consumers with information regarding complaint procedures, and maintains a fully staffed customer service center and complaint logging capabilities, consistent with existing complaint logging requirements.

PAH Relay has demonstrated that its services do not differ from, or in any way violate, the Commission's applicable Mandatory Minimum Standards.

PAH Relay further covenants to comply with ongoing reporting and audit requirements and such additional requirements as may from time to time be imposed by the Commission with respect to VRS services, including reports or response to *ad hoc* information requests, on-site visits, inspection of books, materials, and operations.

PAH Relay acknowledges Commission certification of compliance is not static, but entails ongoing verification. PAH Relay will at all times cooperate with the Commission and assist the Commission in verification of compliance, response to complaints and inquiries, and in any such requirement or request as may be made by the Commission to PAH Relay. PAH Relay will also provide the Commission with such information regarding PAH Relay's operations as

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will be needed by the Commission to comply with FCC state TRS/VRS re-certification requirements pursuant to sections 64.604 and 64.606, as amended, of the FCC's rules.

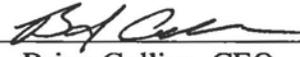
*[Remainder of page intentionally left blank]*

WHEREFORE, PAH! VRS Support Services, LLC d/b/a PAH Relay hereby respectfully requests that the Commission certify that PAH Relay is eligible to receive reimbursement directly from the Fund as a provider of Internet-based VRS and IP Relay Services.

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

Respectfully submitted this 19<sup>th</sup> day of September, 2011,

PAH! VRS SUPPORT SERVICES, LLC  
d/b/a PAH Relay

By:   
Brian Collins, CEO

STATE OF Indiana )  
 ) ss.  
COUNTY OF Johnson )

**VERIFICATION**

I swear under penalty of perjury that I am Brian Collins, a manager and chief executive officer of PAH! VRS Support Services, LLC d/b/a PAH Relay 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.

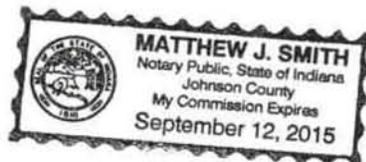
PAH! VRS SUPPORT SERVICES, LLC  
d/b/a PAH Relay

By: *Brian Collins*  
Brian Collins, CEO

Subscribed and sworn to before me this 19<sup>th</sup> day of September, 2011

*Matthew J. Smith*

Notary Public in and for the State of Indiana



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

In the matter of

Application of PAH! VRS Support  
Services, LLC d/b/a PAH Relay -  
Structure and Practices of the  
Video Relay Services Program

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CG Docket No. 10-51

Internet-based TRS Certification Application  
of PAH! VRS SUPPORT SERVICES, LLC d/b/a PAH Relay

LISTING OF EXHIBITS

Exhibit	Content
A	Overview of Current Management and Curriculum Vitae of Representative Employee
A1	CONFIDENTIAL List of Full and Part-time Employees and Copies of Employment Agreements
B	CONFIDENTIAL Description of Applicant's Platform and Sample Call Detail and Conversation Minute Reports
C	CONFIDENTIAL A copy of each lease for each call center operated by PAH Relay
D	CONFIDENTIAL A description of the technology and equipment used to support call center functions and Emergency Call Handling Procedures
E	CONFIDENTIAL Proofs of purchase, leases or license agreements for all technology and equipment used to support their call center functions, including a complete copy of any lease or license agreement for automatic call distribution is attached as confidential

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**LISTING OF EXHIBITS  
(continued)**

Exhibit	Content
F	Statement that PAH Relay will file annual compliance reports demonstrating continued compliance with Commission rules.
G	Text of 911 and 10 Digit Number Instructions
H	CONFIDENTIAL Whistleblower Policy

**EXHIBIT A**

**Overview of Current Management  
and Curriculum Vitae of Representative Employee**

**(Attached)**

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### Chief Executive Officer, Manager: Brian Collins

Mr. Collins is a nationally certified Interpreter for the Deaf with over 20 years of interpreting experience as well as a CODA (Child of Deaf Adults). Brian is one of the three co-founders of PAH Relay. Based on his extensive industry experience, determined that there had to be a better way to provide Video Relay Services with an emphasis on Serving. As a result he and his two partners founded PAH Relay in 2007. Brian processed PAH Relay's first call on October 31<sup>st</sup>, 2011 and has not looked back since. Brian's role within PAH Relay is that of CEO where he is responsible for the overall direction of the company. In addition he is also responsible for the oversight of the day to day business activities including business contract negotiations, regulatory affairs and marketing direction. Prior to his involvement with PAH Relay Brian worked 3 years for a leading video relay service provider. During that time, Brian performed duties ranging from Video Relay Interpreter, a Call Center Director (with more than 50 staff interpreters) to Central Region District Manager. As the Central Region District Manager Brian was responsible for managing as many as six VRS centers. In Addition, Brian was charged with the implementation of multiple new call centers. Including all responsibilities ranging from site feasibility studies and selection through launch. Prior to his career in video relay, Brian also worked at the Indiana School for the Deaf as a Staff Interpreter and an Interpreting Services Supervisor for more than 10 years.

### Chief Financial Officer, Secretary, Manager: David Jeffers

Mr. Jeffers has played a critical role over the past 4 years helping to guide the start up of PAH Relay and ensure its financial health. He has been instrumental in guiding the company through this time period. Dave also has been a key person in understanding and evaluating IT components of the business. He draws upon experience over the last 35 years as an IT professional serving in a variety of industries including banking, credit cards and insurance. As an IT professional, Dave has held various senior management positions, provided consulting services and managed major project initiatives. Additionally, Dave has been a partner and franchisee for Cartridge World. Cartridge World is the largest and fastest growing ink remanufacturing franchise in the US. The Cartridge World store in Columbus, Georgia, has consistently been rated in the top 25% of more than 650 US stores in its third year of operation.

### Chief Operations Officer: Herbert L. Pickell, III

Mr. Pickell has spent the last 4 years as COO of PAH Relay. He has lent his skills into every aspect of the business. He has maintained primary responsibility for recruiting, hiring, and training of interpreters as well as serving as a vital link to the deaf community. His role includes working with members of the community and consumers to better understand how PAH Relay's provisioning of VRS services can be improved and better serve the consumers it was intended to. His experience at PAH Relay and in previous positions has provided extensive understanding of the consumers, the interpreting community and the technology necessary for high quality relay services. Bert has also served as a key executive for marketing and as Compliance Officer and ensuring that the company operates with integrity and in full compliance with the rules and the

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intent of the TRS program to provide a valuable service to consumers. He has previously served as is co-CEO of the ClubDeaf.com, LLC in La Jolla, California. Both of his parents are deaf and he has a significant hearing loss himself. He has pursued studies toward a PhD. in Language and Communicative Disorders, at the San Diego State University and University of California, San Diego, CA. Bert has been recognized by the Gallaudet University Alumni Association as an Alice Cogswell Award Recipient, for outstanding service of the Deaf Community, 2004. Mr. Pickell is also active with several local Deaf organizations, the Academy of Aphasia, and CODA (Children of Deaf Adults) International.

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**CONFIDENTIAL EXHIBIT A1**

List of Full and Part-time Employees and Copies of Employment Agreements

(Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 0.459 of the Commission's Rules, PAH Relay states that Exhibits A1, B, C, D, E, and H (collectively, the "Confidential Documents") to the Company's Application are confidential, and respectfully requests that these documents be protected accordingly. In support of its request, PAH Relay states that these Confidential Documents constitute "trade secrets" as set forth in Section 0.457(d) of the Commission's Rules, and that the documents contain sensitive proprietary information including, but not limited to, highly confidential leases and technology descriptions. These documents further reveal sensitive company operations and scope that would be useful to competitors. Additionally, these documents contain highly confidential personal information not intended for public consumption. PAH Relay would not otherwise make these documents publicly available under any circumstances. Release of any of such information to the public could cause PAH Relay irreparable and inestimable harm.

**CONFIDENTIAL EXHIBIT B**

Description of Applicant's Platform and Sample Call Detail and Conversation Minute Reports

(Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

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**CONFIDENTIAL EXHIBIT C**

A copy of each lease for each call center operated by PAH Relay

1. Ft. Wayne, Indiana Lease and Addendum (Attached)
2. Indianapolis, Indiana Lease and Lease Amendment (Attached)
3. Little Rock, Arkansas Lease (Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

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**CONFIDENTIAL EXHIBIT D**

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

(Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

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**CONFIDENTIAL EXHIBIT E**

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

(Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

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**EXHIBIT F**

**Statement that PAH Relay will file annual compliance reports demonstrating continued compliance with Commission rules.**

**(Attached)**

STATE OF )  
 ) ss.  
COUNTY OF )

STATEMENT OF COMPLIANCE REGARDING ANNUAL REPORTS

I, Brian Collins, first being duly sworn upon oath, depose and say I am a manager and Chief Executive Officer of PAH Relay (“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,<sup>44</sup> 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, PAH Relay, Inc. 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)(1)(interim) of the Commission’s rules<sup>45</sup> “such [annual compliance] reports must update the information required in paragraph (a)(2) of this section<sup>46</sup> 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 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, PAH Relay will file annual compliance reports in accordance with the entirety of Section 64.606(g) of the Commission’s

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<sup>44</sup> 47 C.F.R. §64.606(a)(2)(iv).

<sup>45</sup> 47 C.F.R. §64.606(g).

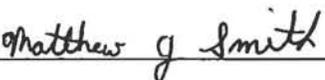
<sup>46</sup> 47 §64.606(a)(2).

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 Chief Executive Officer of PAH Relay 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.

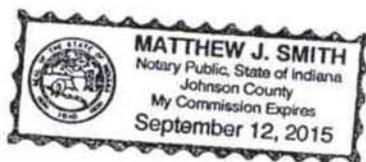
PAH! VRS SUPPORT SERVICES, LLC  
d/b/a PAH Relay

By:   
Brian Collins, CEO

Subscribed and sworn to before me this 19<sup>th</sup> day of September, 2011



Notary Public in and for the State of Indiana



**EXHIBIT G**

**Text of 911 and 10 Digit Number Instructions**

**(Attached)**

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### Text of 911 and 10 Digit Number Instructions

All VRS users are required to have a registered 10 digit number.

- Safety – This facilitates smooth handling of 911 emergency calls
- Valid and up to date address information is required
- This ensures that your call is sent to the right 911 center and provides the 911 operator will have automatic address information to assist with the emergency
- In order to make or receive non-emergency VRS calls, you must have a 10 digit number assigned to you by a VRS provider

Have you moved? It is important that you update this address information so that the correct address information can be used if you have an emergency and call 911.

To make changes to your address information just go to [www.pahrelay.com](http://www.pahrelay.com) and log into your profile and update the address information.

**CONFIDENTIAL EXHIBIT H**

**Whistleblower Policy**

(Attached)

**REQUEST FOR CONFIDENTIAL TREATMENT**

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