

**ASL Services Holdings, LLC.**

Headquarters  
3700 Commerce Blvd.  
Kissimmee, FL 34741



Via Electronic Comment Filing System

December 5, 2011

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

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

Dear Secretary Dortch:

ASL Services Holdings, LLC ("ASL") responds to a November 18, 2011 letter submitted to the Commission by Mr. Joseph Brzezowski, President and CEO of myVRS Relay Central LLC ("myVRS") in this proceeding, purportedly seeking clarification of certain "issues" regarding video relay service ("VRS") provider federal Telecommunications Relay Service Fund ("Fund") eligibility certification. myVRS's letter contains numerous mischaracterizations and unsubstantiated allegations specifically attacking ASL Services Holdings LLC's integrity and reputation, which begs response.

On November 15, 2011, the Commission conditionally granted ASL's application for certification as a VRS provider eligible for compensation from the Fund.<sup>[1]</sup> ASL demonstrated to the Commission that it complies with applicable rules and orders, pending inspection of ASL Holdings' facilities and confirmation of ASL Holdings' compliance. ASL welcomes the Commission's diligent review of ASL's operations in anticipation of final Commission certification.

myVRS makes several unsubstantiated allegations specifically regarding ASL and its operations in an apparent effort to characterize ASL as a disreputable company. Such allegations are entirely misplaced in light of the fact that ASL's operations are a matter of record with the Commission, and public inspection copies of its filings are readily available. Those records serve as ASL Holdings LLC's (GraciasVRS) responses, provides the "clarity" myVRS purportedly seeks, and clearly shows the appropriateness of the Commission's actions.

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<sup>[1]</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, *Notice of Conditional Grant of Application of ASL Services Holdings, LLC for Certification as a Provider of Video Relay Services Eligible for Compensation from the Interstate Telecommunications Relay Service Fund*, Public Notice, DA 11-1902 (November 15, 2011)

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ASL's services focus serving English, ASL, and Spanish speaking communities. The GraciasVRS name is intended to convey the Company's emphasis on services Spanish translation which too often has been treated as an "appendage service." Functional equivalency must apply to all three communities. ASL acknowledges that it had, until September 2011 served as a Z VRS subcontractor, and continued to serve in this capacity pending submission of its Application for Fund eligibility certification. ASL acknowledges that on September 29, 2011, GraciasVRS was cited by the Commission's Enforcement Bureau<sup>[2]</sup> specifically for violation of Section 64.604(c)(5)(iii)(N)(1)(ii) of the Commission's rules,<sup>[3]</sup> for the Company's failure to fully identify the Fund eligible certified provider. Each of these facts are not only known to the Commission, but fully available to the public via the Commission's electronic comment filing system to which myVRS submitted its letter.

ASL elected to cease provision of VRS as a subcontractor as of September 30, 2011 not only with Z VRS, but chose not to enter into any subcontracting relationship with any entity. Instead the Company made an affirmative decision to cease providing services pending a grant of certification, to ensure that its subsequent operations would be fully compliant, and so advised the Commission and its customers. ASL has conditionally demonstrated compliance with applicable Commission rules and orders as set forth in its Application and October 17, 2011 Supplement, and is prepared to further demonstrate compliance through the Commission's on-site visit(s).

ASL prides itself on, and has built a reputation for, integrity and the highest standards of professionalism. In light of the foregoing, myVRS professed desire to seek "clarification" begs credulity and raises questions regarding its true intent, if not to malign GraciasVRS. That the Commission has granted ASL conditional certification is testament to the Commission's determination that ASL Services Holdings and its operations are – and will be further demonstrated to be – compliant with Commission regulations and orders, and that GraciasVRS stands ready to serve the public responsibly.

ASL fully agrees that all parties should carefully scrutinize activity with the VRS industry, with an eye to protect subscribers, the public, and Public. If that is myVRS's intent, then we welcome and support the scrutiny of any real, fact based concerns. By the same token, we espouse that negative unfounded allegations are not a substitute for critical analyses, unfounded allegations are not the work of concerned activism, and negative or vitriolic "commentary" not only fail to serve our industry and public, but raises questions as to the intent, motivation, and ethics of those involved who propagate such negative activity under the cloak of "concern". We and encourage the public to make clear review of comments that are posted in order to make a clear delineation between comments with a goal to serve the public interest, rather than self-serving rhetoric thinly veiled as a request for "clarification" that only serve undermine industry integrity and ethics.

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<sup>[2]</sup> EB-11-TC-100.

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Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC

A handwritten signature in black ink, appearing to read "Angela Roth". The signature is written in a cursive, flowing style with a large, prominent initial 'A'.

Angela Roth  
President and Chief Executive Officer

cc: Mr. Joseph Brzezowski, myVRS