



Filed Via ECFS

December 6, 2011

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

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

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Snap Telecommunications, Inc. (“Snap!VRS”) hereby reiterates its request for confidential treatment for its Application for Certification Renewal (“Application”), which was hand-delivered to the Federal Communications Commission (“Commission”) on November 23, 2011. A letter addressed to the Secretary was filed on the same date under CG Docket No. 10-51 with an outline of the contents of this Application. On this date, Snap!VRS is filing the redacted version of the Application, marked as “PUBLIC INSPECTION COPY” for the public record.

The Application contains company-specific, proprietary commercial information that is not routinely available for public inspection and is safeguarded from competitors. Accordingly, it should be protected from disclosure pursuant to 47 C.F.R. § 0.457(d) and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Below please find a statement of the reasons for withholding the materials from inspection as well as relevant facts surrounding this request.

- 1. Identification of the specific information for which confidential treatment is sought.* Snap!VRS requests that the Application submitted November 23, 2011 marked in entirety as “CONFIDENTIAL – NOT FOR PUBLIC INSPECTION” be treated as confidential.
- 2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* Snap!VRS is providing this information per the requirements of 47 C.F.R. §64.606, Internet-based TRS Provider and TRS Program Certification.
- 3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.* The information in the Application that has been marked as redacted in today’s filing is highly confidential and specific to Snap!VRS, detailing information related to its TRS operational, functional and technological capabilities. This information is sensitive for competitive reasons. It is therefore safeguarded from competitors and is not made available to the public. If this information is not protected, other VRS providers may utilize it to compete against Snap!VRS.

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4. Explanation of the degree to which the information concerns a service that is subject to competition.
The redacted information in the Application concerns a service provided by Snap!VRS that is subject to substantial competition.

5. Explanation of how disclosure of the information could result in substantial competitive harm.
Disclosure of the redacted information could cause substantial competitive harm to Snap!VRS, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against Snap!VRS and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.
Snap!VRS routinely treats this redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. Snap!VRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure. Snap!VRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Snap!VRS.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted. This information is being provided in accordance with the requirements of 47 C.F.R. §64.606. If a request is submitted for disclosure of redacted information, please provide sufficient notice to the undersigned to allow Snap!VRS to take appropriate steps to safeguard the confidentiality of the information.

If there are any questions regarding this request, please do not hesitate to contact me.

Sincerely,

/s/
Nancy J. Bloch
Chief Regulatory Liaison and Advisor
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Pearl River, NY 10965
443-438-1328 V/VP
nbloch@snapvrs.com

cc: Greg Hlibok, Chief, FCC Disability Rights Office (via email)

Attachment