

CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS.
03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION



ANDREW O. ISAR

4423 POINT FOSDICK DRIVE, NW
SUITE 306
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 866.474.3630
WWW.MILLERISAR.COM

Via ECFS and Overnight Delivery

March 20, 2012

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

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

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), enclosed for submission to the Commission is Healinc Telecom, LLC's ("Healinc") October 2011 Call Center Report. On October 4, 2011, Healinc submitted its Deactivated Communication Assistant report to the Commission. The Company's October 2011 Call Center Report was to have been submitted contemporaneous with the Deactivated Communication Assistant report, but was inadvertently omitted. Upon so discovering, Healinc now makes this submission to correct the omission and attaches its Call Center Report. Healinc regrets any inconvenience.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,¹ and "Exemption 4" of the Freedom of Information Act,² Healinc respectfully requests that the above information be deemed confidential and protected, accordingly. This information constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules,³ in that the information

¹ 47. C.F.R §0.459.

² 47 C.F.R.§0.457(d). *See National Parks and Conservation Ass '11. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); *Southern Company Request for Waiver of Section 90.629 of the Commission's Rules*, 14 FCC Rcd. 1851,1860 (1998).

³ 47 C.F.R. §0.457.

CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS.
03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Ms. Marlene H. Dortch
March 20, 2012
Page 2

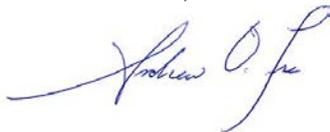
reveals the location of Company call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. Healinc would not otherwise make these Documents publically available under any circumstance. Release of these Documents to the public could cause Healinc irreparable and inestimable harm. Healinc requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, Healinc requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In accordance with the Commission's March 14, 2012 *Protective Order* in the above-referenced proceeding, DA 12-402, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this notice are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage-paid envelope enclosed for this purpose. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Andrew O. Isar

Regulatory Consultants to
Healinc Telecom, LLC

Enclosure

CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS.
03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION