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March 16, 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:

Healinc Telecom, LLC ("Healinc"), pursuant to Section 64.606(c)(5)(iii)(N)(2) of the Commission's rules, 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), advises the Commission and TRS Fund Administrator of [REDACTED] additional permanent Healinc call center closures: [REDACTED]

]. Healinc determined that it could no longer justify retaining operations from these call centers.

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 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

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.

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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) one copy of this notice and two (2) redacted copies of this notice are enclosed. Two copies of the confidential version of this notice 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.



Andrew O. Isar

Regulatory Consultants to
Healinc Telecom, LLC

Enclosures