ASL SERVICES HOLDINGS, LLC.
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via ECFS and Overnight Delivery

September 28, 2012

Ms. Marlene H. Dortch
Office of the 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 ASL Services Holding, LLC's ("ASL" branded "Gracias VRS") October 2012 Call Center Report.

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] ASL 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

[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.

call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL would not otherwise make these Documents publically available under any circumstance. Release of these Documents to the public could cause ASL irreparable and inestimable harm. ASL requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL 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 letter 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,

ASL SERVICES HOLDINGS, LLC

Jeremy Jack
VP-Operations

Enclosure

ASL Services Holdings LLC. **CONFIDENTIAL**

October 2012 Call Center Report

Address 1	Address 2	City	State	Zip Code	Country	Manager	Title	Phone	Email	VRS	# of Managers	Numbers of CA's	Date Opened	Date Relocated	Date Closed