



3700 Commerce Boulevard  
Kissimmee, Florida 34741

Via Electronic Comment Filing System

November 16, 2012

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51;  
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with  
Hearing and Speech Disabilities, CG Docket No. 03-123, Notification of Substantive Change

Dear Ms. Dortch:

Pursuant to Section 64.606(f) of the Commission's rules, 47 C.F.R. § 64.606(f), ASL Holdings Services, LLC ("ASL/Gracias VRS") submits this Notification of Substantive Change, notifying the Commission that on, or shortly after, January 16, 2013, ASL/Gracias VRS will change its "Gracias VRS" video relay service branding to "Global VRS." ASL/Gracias VRS has determined that through this change, it will maintain a brand name that is easier for the public to remember and more accurately characterizes the scope of the Company's services. ASL/Gracias VRS will inform the Commission of the exact date on which the Company's name is changed if not on January 16, 2013.

ASL/Gracias VRS will contemporaneously change its unified resource locator ("URL") to [globalvrs.tv](http://globalvrs.tv), pursuant to Section 64.604(c)(5)(iii)(F), 47 C.F.R. §64.604(c)(5)(iii)(F). The Company has initiated an outreach initiative to inform subscribers and the public of its change in branding and new URL. ASL/Gracias VRS is also coordinating with the Fund Administrator to support a seamless transition for reporting purposes. ASL/Gracias VRS will continue to utilize its current URL until January 16, 2013. Those accessing Company's current URL will be forwarded to [globalvrs.tv](http://globalvrs.tv), though the [globalvrs.tv](http://globalvrs.tv) will not become visible or directly accessible until January 16, 2013. On January 16, 2013, those accessing ASL/Gracias VRS's [graciasvrs.tv](http://graciasvrs.tv) URL will be directed to the new [globalvrs.tv](http://globalvrs.tv) URL.

Thank you for your attention to this matter. Questions may be directed to Jeremy Jack, ASL/Gracias VRS's Vice President of VRS Operations at 916.225.4944 or via email to [jeremy@aslservices.com](mailto:jeremy@aslservices.com).

Sincerely,

ASL Holdings Services, LLC

  
Angela Roth  
Managing Member  
President and Chief Executive Officer

cc: Karen Strauss and Greg Hlibok (via electronic delivery)