

JUN -5 2013

ASL SERVICES HOLDINGS, LLC. FCC Mail Room

3700 Commerce Boulevard
Kissimmee, Florida 34741

Via ECFS and Priority Delivery

June 4, 2013

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 Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities E911 Requirements for IP-Enabled Service Providers, Docket Nos. CG Docket No. 03-123 and WC Docket No. 05-196, Supplement to 2012 Mandatory Minimum Standards Waiver Compliance Report*

Dear Ms. Dortch:

ASL Services Holdings, LLC ("ASL," branded "Global VRS" fka "Gracias VRS"), submits the attached supplement to its April 11, 2013 *2012 MMS Waiver Compliance Report* annual report regarding Mandatory Minimum Standards ("MMS") currently waived for Video Relay Services ("VRS") and Internet Protocol ("IP") Relay services ("Supplement"). By this *Supplement*, ASL/Global VRS further clarifies its previous statements regarding maintaining waiver extensions for the Company.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC



Angela Roth
President and Chief Executive Officer

Attachment

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List ABCDE

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
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
)	

**SUPPLEMENT TO
ASL SERVICES HOLDINGS, LLC
2011 MMS WAIVER COMPLIANCE REPORT**

ASL Services Holding, LLC (now branded “ASL/Global VRS”),¹ hereby submits this supplement to its *2012 MMS Waiver Compliance Report*² (“Supplement”) to further clarify the Company’s statement regarding the basis for maintaining Mandatory Minimum Standards (“MMS”) waivers currently extended for other Internet-Protocol enabled Telecommunications Relay Service Fund (“Fund”) eligible providers pursuant to the Commission’s *2012 TRS Waiver Order*³ for ASL/Global VRS. Though ASL/Global VRS had originally indicated that it did not *require* waivers of the requirements to provide the waived MMS, the Company’s statement was an expression of the internal technical capabilities of ASL/Global VRS’s platform to process the

¹ fka ASL/Gracias VRS.

² *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; E911 Requirements for IP-Enabled Service Providers, CG Docket No. 03-123 and WC Docket No. 05-196,, Mandatory Minimum Standards Waiver Annual Report (April 11, 2013) [*2012 MMS Waiver Compliance Report*]

³ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; E911 Requirements for IP-Enabled Service Providers, CG Docket No. 03-123 and WC Docket No. 05-196, Order, DA 12-988A1, (CGB/WCB 2012) (*2012 TRS Waiver Order*); (1) one-line Voice Carry Over (VCO), VCO-to-TTY, and VCO-to-VCO; (2) one-line Hearing Carry Over (HCO), HCO-to-TTY, and HCO-to-HCO; (3) call release; (4) pay-per-call (900) calls; (5) types of calls; (6) equal access to interexchange carriers; and (7) Speech-to-Speech (STS).

types of calls which are subject to the MMS extension in isolation, e.g. calls from its own subscribers, or through alternative operational procedures, and not a request to allow the waiver exemptions to expire. A lack of interoperability with other video relay services (“VRS”) providers or current industry-wide technical impediments in some instances demands procedural alternatives to purely technological solutions, necessitating the continued MMS waiver extension for ASL/Global VRS, which ASL/Global VRS.

ASL/Global VRS⁴ April 16, 2012 *2011 MMS Waiver Compliance Report*⁵ responses to each waived requirement stated for waived MMS - with the exception of Types of Calls (Operated Assisted Calls and Long Distance Calls) and Equal Access to Interexchange Carriers - stated that “ASL does not require a waiver to comply.” Nevertheless, the Company did not intend, nor did it request, expiration of the waivers. As ASL/Global VRS’ *2011 MMS Waiver Compliance Report* underscored,

The Commission notes that this waiver is granted for default Internet-based TRS providers that are unable to meet such standards for newly-registered Internet-based TRS users who port their Customer Premises Equipment (“CPE”) from a former default provider. Though the waiver remains warranted to account for such a situation, ASL maintains that the waiver should be finite, thus compelling all manufacturers **to have interoperable equipment**, designed under Commission technical standards [emphasis supplied].⁶

⁴Then “ASL/Gracias VRS.”

⁵ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; E911 Requirements for IP-Enabled Service Providers, CG Docket No. 03-123 and WC Docket No. 05-196, Mandatory Minimum Standards Waiver Annual Report (April 16, 2012) [*2011 MMS Waiver Compliance Report*].

⁶ *2012 MMS Waiver Compliance Report* at page 1.

In its *2012 TRS Waiver Order*, the Commission concluded that in light of the Company's statement that the waivers were not required, the applicable Company MMS waiver extensions would be allowed to expire.⁷

Of the Commission's conclusions, ASL/Global VRS' *2012 MMS Waiver Compliance Report* stated that,

Contrary to its original assessment, ASL maintains that the continued waiver of the MMS subject to the *2012 TRS Waiver Order* remains appropriate pending further development of technological solutions enabling full compliance and requests that the expiration of those waivers for ASL be rescinded. Yet ASL maintains that achievement of full compliance with these MMS is **also a direct function of industry interoperability** and development of a clear, caller primary communication modality preference policy...⁸

At the heart of ASL/Global VRS' technologic challenges with waived MMS compliance is interoperability; a challenge facing all Fund eligible providers as the Commission itself acknowledges in extending several MMS waivers. The Company's *2011 MMS Waiver Compliance Report* statements that waiver extensions were not required were factually correct from the Company's own ability to process subscriber calls, but did not apply from an industry-wide view, as was subsequently clarified in its *2012 MMS Waiver Compliance Report*.

In order to be fully compliant with all MMS requirements for all providers through fully interoperable capabilities, waived MMS continue to require development within ASL/Global VRS' platform technology, which the Company continues to pursue with other carriers and its platform vendor, necessitating sufficient time to for development, testing, and implementation. Other waived MMS such Pay-Per (900) Calls, Operator Assisted Calls and Long Distance Calls,

⁷ *2012 TRS Waiver Order*, footnotes 49, 60, 65, 72, and 81, *i.e.* foot note 60, "...ASL Holdings (ASL Report at 2) state that they do not require a waiver of the one-line HCO, HCO-to-TTY, and HCO-to-HCO requirements.. Therefore, we will allow ...ASL Holdings' waivers to expire. "

⁸ *2012 MMS Waiver Compliance Report* at page 1.

and Speech to Speech cannot be accomplished directly through currently available technology, but require “work around” procedures to achieve functional equivalency.

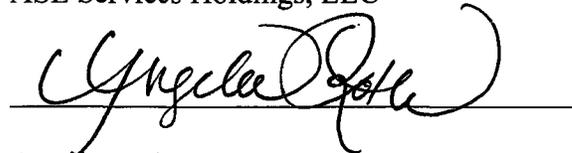
ASL/Global VRS’ statement that it did not require a waiver to comply with the waived MMS was intended as a factual statement of the Company’s ability to process waived MMS calls from its own subscribers and through supplemental procedures that approximated functional equivalency. Its statement was neither a request for expiration of the waiver, nor an expression of its technological capabilities to support such calls for all providers. Indeed, the Company continues to pursue interoperability with other providers to varying degrees of success, and maintains that the current MMS waiver extensions granted under the *2012 TRS Waiver Order* for other providers remain equally necessary and important for ASL/Global VRS to achieve functional equivalency through technology and interoperability rather than through alternative means.

For the foregoing reasons, ASL/Global VRS clarifies that it has not sought expiration of the *2012 TRS Waiver Order* MMS waiver extensions and that such extensions should continue to apply to ASL/Global VRS as they do for other Fund-eligible providers.

Respectfully submitted this 4th day of June, 2013,

ASL Services Holdings, LLC

By:



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