

# ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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*Via Electronic Comment Filing System*

June 13, 2013

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

ATTN: Consumer and Governmental Affairs Bureau

RE: Request for Voluntary Service Interruption Authority

Dear Ms. Dortch:

On June 22, 2013, ASL Services Holdings, LLC (branded "Global VRS;" "ASL/Global VRS")<sup>1</sup> has scheduled installation of an update to its video relay service ("VRS") automatic call distribution platform server operating system. This scheduled installation and routine maintenance will be conducted between 10:00 PM and 11:00 PM Pacific time (1:00 AM to 2:00 AM Eastern Time), is not anticipated to require more than thirty (30) minutes to complete, and is not expected to result in a service interruption.

Yet due to the potential for unforeseen implementation issues that could result in a service interruption in excess of thirty minutes in duration, ASL/Global VRS hereby respectfully requests expedited authority for voluntary service interruption pursuant to Section 64.606(h)(2), Unauthorized service interruptions, of the Commission's rules, 47 C.F.R. § 64.604(h)(2).

Pursuant to Section 64.606(h)(2)(i) through (iii), ASL/Global VRS states as follows:

**(i) Justification for Service Interruption:** ASL/Global VRS has scheduled to install an update to its VRS call platform on June 22, 2013 between 10:00 PM and 11:00 PM Pacific time (1:00 AM to 2:00 AM Eastern Time). This update will enable the Company's VRS automatic call distribution platform pass calls onto a second, redundant server during unexpected future outages, should they occur. The Company will also install software Service Pack upgrades at this time. In the event that service should be interrupted as a result of its update, ASL/Global VRS does not anticipate a service outage exceeding one hour.

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<sup>1</sup> Fka "Gracias VRS".

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**(ii) Its plan to notify customers about the impending interruption:** ASL/Global VRS will notify all registered subscribers of the potential for service interruption via a readily apparent notice appear on the Company's web site and via electronic mail notification immediately following Commission approval of the Company's request for voluntary service interruption.

**(iii) Its plans for resuming service, so as to minimize the impact of such disruption on consumers... and restoration of its service at the completion of such interruption.** Service will be restored immediately upon installation and testing of the redundant server and attendant software. Should installation and testing prove unsuccessful then the system will be restored to its former state and service immediately restored.

In light of the fact that the Company's request for voluntary service interruption is predicated solely on the limited potential that a service interruption of more than thirty minutes may, but is not expected to, occur, and given the proximity of the scheduled implementation date, ASL/Global VRS further requests a waiver of the sixty (60) day request period. Unless this notice period requirement waiver is granted, the significant benefits of these scheduled enhancements will be delayed with no countervailing benefit to the public. No added protection to the public will be gained by delaying implementation of the proposed service enhancements until the full sixty day notice period otherwise required under rule were allowed to lapse.

ASL/Global VRS will affirmatively advise the Commission of the outcome of its scheduled update implementation. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL Services Holdings, LLC



Angela Roth  
President/CEO

cc: Greg Hlibok (via electronic delivery)