

ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via Electronic Comment Filing System

October 21, 2013

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

RE: In the Matter of Structure and Practices of the Video Relay Service Program
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with
Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Notice of Ex Parte
Presentation

Dear Ms. Dortch,

On October 21, 2013, Angela Roth, President & CEO of ASL Services Holdings, LLC ("ASL/Global VRS") met telephonically with Gregory Hlibok, Chief Disability Rights Division, and Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau, to discuss deployment of the Commission's video relay service access technology reference platform and recently-adopted phased in Speed of Answer ("SoA") and SoA measurement requirements, 47 C.F.R. §64.604 (b)(2)(iii)(2) and (3).

Ms. Roth expressed ASL/Global's interest in the video relay service access technology reference platform and discussed how the Company could support the Commission's initiatives for platform deployment and test trials. Ms. Roth next addressed ASL/Global VRS' concern with the SoA requirements promulgated under 64.604 (b)(2)(iii)(2) and (3). She stressed that the attendant daily compliance measurement and associated penalties represent significant concerns. Ms. Roth explained that in light of the Company's rapid growth and provision of Spanish language interpretation, it may be challenging to ensure compliance on a daily basis due to potentially unprecedented fluctuation in calling volume. Even limited potential loss of an entire day of reimbursement for non-compliance could have dire financial consequences. Ms. Roth advised that ASL/Global would provide an additional submission on this matter.

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This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). Questions may be directed to the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Angela Roth".

Angela Roth
Managing Member, President and
Chief Executive Officer

cc: Gregory Hlibok, Karen Peltz Strauss, (via electronic delivery)