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

Via Electronic Comment Filing Submission (ECFS)

November 15, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, 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

Dear Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC. ("ASL/Global VRS") is pleased to submit its *Annual Compliance Report*, attached. By this submission, ASL/Global VRS demonstrates and certifies its continued compliance with the Commission's Mandatory Minimum Standards for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS").

In 2013, ASL/Global VRS significantly enhanced its operations, expanded its efforts to attract new subscribers, and broadened its outreach. Among its significant accomplishments, ASL/Global VRS proudly transitioned from "GraciasVRS" to "GlobalVRS" to more accurately represent the Company's expanding VRS service reach. In July 2013, the Company moved its [REDACTED] interpreting center to [REDACTED], which accords the Company greater scalability in its operations. This year, the Company successfully launched a [REDACTED] VRS application in English and Spanish on tablets and Android devices. Today the Company employs more than [REDACTED] video interpreters and support personnel focused on the provision of VRS to serve an ever-increasing subscriber base.

ASL/Global VRS is actively engaged in ongoing video interpreter training, including processing of emergency 911 calls, to maintain exceptional levels of service and professionalism. All video interpreters are scheduled to be HIPPA[1] certified by January 2014. In 2013 Company has also been involved in Commission rulemaking and participated in industry sessions to standardize and promote infrastructure interoperability; has supported and been directly involved with Deaf Community Consumer Groups including TDI, ALDA,NAD, RID, FAD, SERID, among others; and participated in national and local community events that support community needs in VRS and other facets of linguistic access within the Deaf Community. And ASL/Global VRS has undertaken a number of initiatives to help the Deaf Community and its video interpreters better understand the regulatory framework governing VRS.

Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,[2] and "Exemption 4" of the Freedom of Information Act,[3] ASL respectfully requests confidential treatment of the confidential version of its *Annual Compliance Report.* The confidential version contains proprietary information not intended for public consumption. ASL would not make such information public under any circumstance. Release of the confidential version of its *Annual Compliance Report* to the public could cause ASL irreparable and inestimable harm. ASL requests that the confidential version of its *Annual Compliance Report* be withheld from public inspection, accordingly. Should disclosure of the confidential version of its *Annual Compliance Report* be requested, ASL requests that it be informed of such request so that ASL may take appropriate action to safeguard its interests.

A redacted public version of the enclosed Petition has been filed electronically via the Commission's Electronic Comment Filing System in this proceeding.

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

Sincerely,

ASL SERVICES HOLDINGS, LLC

Gabrielle Joseph
Vice President

Attachment

cc: Ms. Karen Peltz Strauss (via electronic delivery, Karen.Strauss@fcc.gov)
Mr. Greg Hlibok (via electronic delivery, Gregory.Hlibok@fcc.gov)

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[1] Health Insurance Portability and Accountability Act of 1996.
[2] 47. C.F.R §0.459.
[3] 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).

ASL Services Holdings, LLC
2013 Annual Compliance Report

I. INTRODUCTION

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC ("ASL/Global VRS") is pleased to submit its initial *Annual Compliance Report* ("Report").[4] This Report demonstrates ASL/Global VRS' continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Internet-based video relay services ("VRS").

ASL/Global VRS is a privately-held woman and minority-owned Florida limited liability company. ASL/Global VRS is also an Interpreter-owned and operated VRS company currently operating within the industry. The Company employs trilingual (English, Spanish and American Sign Language) interpreters with strong ties to the Deaf and Hard-of-Hearing community. ASL/Global VRS currently serves thousands of individuals with speech or hearing impairments, including underserved Spanish-language users.

ASL/Global VRS submits this initial Report demonstrating that the Company meets and/or exceeds the MMS for the provision of Fund eligible VRS. In the past year, ASL has applied its unique trilingual, skill set[5] to interpret more than [REDACTED] calls representing [REDACTED] conversation minutes. ASL/Global VRS has experienced a steady increase in call volumes representing a [REDACTED] percent annual usage growth rate. In 2013 ASL/Global VRS successfully passed two key audits: 1) a usage projection methodology by the Commission's appointed auditors; and 2) an Office of Inspector General audit of VRS fund usage.

As authorized under Section 64.606(g)(1), the following verified Report updates compliance information, where applicable. Otherwise ASL/Global VRS certifies that there are no changes to the information and documentation submitted with its Application for certification.[6] A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President, an ASL/Global VRS officer and minority owner, is attached pursuant to Section 64.606(g)(2).

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[4] *Notice of Conditional Grant of Application of ASL Services Holdings, LLC for Certification as a Provider of Video Relay Service Eligible for Compensation from Interstate Telecommunications Relay Service Fund*, CG Docket No. 10-51, *Public Notice*, DA 11-1902 (November 15, 2011).

[5] American Sign Language, Spanish, and English.

[6] *See, e.g. 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, *Application Of ASL Services Holdings, LLC* (September 6, 2011)(*Supp.* November 9, 2011)["Application"].

II. SECTION 64.606(a)(2) UPDATE

ASL/Global VRS provides the following updates to the information contained in the Company's Application, as cited, pursuant to Section 64.606(a)(2) of the Commission's rules, 47 C.F.R. §64.606(a)(2):

(i) A description of the forms of Internet-based TRS to be provided (*i.e.*, VRS, IP Relay, and/or IP captioned telephone relay service);

There is no change in ASL/Global VRS's provision of VRS services as a conditional Fund eligible provider; Application page 8.

(ii) A detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered, including documentary and other evidence, and in the case of VRS, such documentary and other evidence shall demonstrate that the applicant leases, licenses or has acquired its own facilities and operates such facilities associated with TRS call centers and employs communications assistants, on a full or part-time basis, to staff such call centers at the date of the application. Such evidence shall include, but not be limited to:

(A) In the case of VRS applicants or providers,

(1) Operating five or fewer call centers within the United States, a copy of each deed or lease for each call center operated by the applicant within the United States;

No change. ASL/Global VRS continues to operate [REDACTED] interpreting centers; Application page 9, Exhibit A, though the [REDACTED] interpreting center was moved to [REDACTED]. [7]

(2) Operating more than five call centers within the United States, a copy of each deed or lease for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States, together with a list of all other call centers that they operate that includes the information required under §64.604(c)(5)(iii)(N)(2);

Inapplicable.

(3) Operating call centers outside of the United States, a copy of each deed or lease for each call center operated by the applicant outside of the United States;

Inapplicable. ASL/Global VRS does not operate call centers outside of the U.S.; Application page 9.

[7] *See* ASL Services Holdings, LLC Call Center Address Change Notice (June 18, 2013).

(4) A description of the technology and equipment used to support their call center functions-including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration-and for each core function of each call center for which the applicant must provide a copy of technology and equipment proofs of purchase, leases or license agreements in accordance with paragraphs (a)(2)(ii)(A)(5) through (7) of this section, a statement whether such technology and equipment is owned, leased or licensed (and from whom if leased or licensed);

In 2013 the Company implemented a platform function that requires video interpreters to affirmatively authenticate the validity of each call at the end of the call and identify the call as BILLABLE or NON-BILLABLE. The Company also successfully launched a [REDACTED] VRS application in English and Spanish on tablets and Android devices. Otherwise there were no material changes. Application page 10, Exhibit B.

(5) Operating five or fewer call centers within the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant within the United States;

See attached [REDACTED] interpreting center lease. Other two interpreting center leases remain unchanged; Application page 10, Exhibit C.

(6) Operating more than five call centers within the United States, a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States; a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for all call centers operated by the applicant within the United States must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;

Inapplicable. *See* item (2), *Supra*.

(7) Operating call centers outside of the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant outside of the United States; and

Inapplicable. *See* item (3), *Supra*.

(8) A complete copy of each lease or license agreement for automatic call distribution.

No change; Application page 10, Exhibits B.

(B) For all applicants, a list of individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant, a description of the applicant's organizational structure, and the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company);

No change; Application page 11.

(C) For all applicants, a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities;

There was no change in senior management team in 2013. The Company currently employs [REDACTED] individuals responsible for the provision of VRS.

(D) For all applicants, copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the applicant for five years from the date of application, and submitted to the Commission upon request; and

No change; Application page 12. ASL will provide the Commission with a copy of all employment agreements immediately upon request.

(E) For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements; copies of all such arrangements and agreements must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;

No change; Application page 12.

(iii) A description of the provider's complaint procedures; and

No change; Application pages 12 and 13.

(iv) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

Please see attached certification.

(v) The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of an applicant for Internet-based TRS certification under this section with firsthand knowledge of the accuracy and completeness of the information provided, when submitting an application for certification under paragraph (a)(2) of this section, must certify as follows: I swear under penalty of perjury that I am __(name and title), _an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Please refer to attached certification.

III. ASL/GLOBAL VRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS.

Company continues to meet MMS for the provision of VRS, and hereby provides the following compliance updates to its Application, which it incorporates herein by reference as otherwise unchanged.

A. Operational Standards.

1. Communications Assistant ("CA") – Training (47 C.F.R. §64.604(a)(1)) and 64.606(g)(3)(ii).

ASL/Global VRS has continued to enhance its initial training program by introducing a five-day Introduction Training Program specifically designed to train new video interpreters on the provision of VRS as a Fund-eligible provider. Training includes a focus on regulatory compliance and related Company compliance policies as well as on proper interpretation techniques. A second "cross-over" training program is being designed for individuals who already have interpreter training, with emphasis on regulatory compliance. All video interpreters are scheduled to be HIPPA[8] certified by January 2014. The Company also urges video interpreters to pursue national professional certifications.

4. Handling of emergency calls. (47 C.F.R. §64.604(a)(4)) and amended Section 64.605.

ASL/Global VRS has expanded it emergency call process training and run 911 call exercises to ensure that video interpreters are skilled in processing such calls and the Company's capabilities remain compliant.

[8] Health Insurance Portability and Accountability Act of 1996.

6. Visual privacy screens/idle calls (47 C.F.R. §64.604(a)(6)).

Consistent with Commission rules, ASL/Global VRS has maintained its policy of terminating calls if the caller enables a privacy screen or similar feature for more than five minutes, or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 911 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. CAs are trained to announce their intent to terminate the call in such instances, unless one of the parties indicates an intent to continue the call.

B. Technical Standards

2. Speed of Answer. (47 C.F.R. §64.604(b)(2)(iii)).

ASL/Global VRS's speed of answering is for the 12 month period ending October 31, 2013 is [REDACTED] percent of calls answered within 120 seconds or less, well above the established standard. At no time during this period did the Company's percentage of calls answered within 120 seconds drop below [REDACTED] percent. This represents an increase in speed of answer time over the same 12 month period last year.

5. Technology. (47 C.F.R. §64.604(b)(5)).

ASL has continued to pursue and implement advanced-technological applications to provide the widest possible access to the English and Latino Deaf Communities. Customers maintain the option to use our website and videophone applications in English and Spanish. In addition, ASL is introducing bilingual mobile applications.

C. Functional Standards

2. Contact Persons. (47 C.F.R. §§64.604(c)(2)) and 64.606(g)(3)(i))

The senior individuals responsible to receive complaints, grievances, inquiries, and suggestions for ASL/Global VRS and officers responsible for compliance with section 64.604(c)(13) are as follows.

Representatives:
Jeremy Jack
Gabrielle Joseph
ASL Services Holdings, LLC/GraciasVRS
3700 Commerce Blvd.
Kissimmee, Florida 34741

Phone: 888-472-6768 (Spanish VRS)
888-472-6778 (English VRS)

2. Contact Persons. (47 C.F.R. §§64.604(c)(2)) and 64.606(g)(3)(i)), Continued

E-Mail: Jeremy@aslservices.com
Gabrielle@aslservices.com
Website: www.GlobalVRS.com
Facsimile: 407.518.7903
Voice Telephone: 1.877.DAME.VRS (1.877.326-3877)
English and Spanish VP Users: Globalvrs.tv

3. Public Access to Information. (47 C.F.R. §64.604(c)(3)).

ASL/Global VRS has continued to expanded its outreach efforts in educating the public and stakeholders about trilingual (English, Spanish, American Sign Language) VRS Services. The Company has supported and been directly involved with Deaf Community Consumer Groups including TDI, ALDA,NAD, RID, FAD, SERID, among others, and participated in national and local community events that support community needs in VRS and other facets of linguistic access within the Deaf Community. And ASL/Global VRS has undertaken a number of initiatives to help the Deaf Community and its video interpreters better understand the regulatory framework governing VRS.

IV. COMPLIANCE WITH SECTION 64.606(g)(3)

1. Identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with §64.604(c)(13) of this subpart; (47 C.F.R. §64.606(g)(3)(i))

Please refer to Section III.C.2. at page 6, *supra*.

2. A description of any compliance training provided to the provider's officers, employees, and contractors; (47 C.F.R. §64.606(g)(3)(ii))

Please refer section III.A.1. at page 5, *supra*.

3. Identification of any telephone numbers, Web site addresses, or other mechanisms available to employees for reporting abuses; (47 C.F.R. §64.606(g)(3)(iii))

Please refer to Section III.C.2. at page 6, *supra*. In addition to contacting Company officers, an FCC Updates page is contained in the Company's web site, http://globalvrs.com/globalvrs-fcc-updates/the-fcc-needs-you/. This page contains hyperlinks to various Commission links in English and Spanish. Additionally, employees are advised that they may also contact the Commission directly:

Federal Communications Commission
Consumer and Government Affairs Bureau
Consumer Inquiries and Complaints Division
445 12th Street
Washington DC 2055
VOICE: 1-888-CALL-FCC
TTY: 1-888-TELL-FCC
www.fcc.gov/complaints

4. A description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; (47 C.F.R. §64.606(g)(3)(iv))

All usage reporting is automated through the Company's platform. There is no capability for manual access to reported data.

ASL/Global VRS' platform has been programed to prepare a "Daily FCC Report." This report lists call detail record, speed of answer and verified conversation minutes from the previous day. These data populate the Daily Administration Report (DAR) which contains all the statistical data reported to the Fund Administrator. The "Daily FCC Report" is statistically sampled by the Company and cross-referenced to the interpreters' manual log sheets to ensure accuracy. Company and also review any reports/updates/events/feedback form our Administrative Team. A Monthly Verification Report (MVR) is created to audits the results of the DAR report analysis to verify the final monthly reports and ensure accuracy of the monthly Fund Administrator submissions.

5. A description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund. A provider that fails to file a compliance plan shall not be entitled to compensation for the provision of VRS during the period of noncompliance. (47 C.F.R. §64.606(g)(3)(v))

ASL/Global VRS has implemented an extensive screening processes to ensure service quality.

A Whistleblower Policy is incorporated into the Company's employee handbook. This policy encourages employees to immediately report any illegal activity directly to the Commission and advise senior management. Employees receive training on applicable Commission regulations.

ASL/GlobalVRS has implemented quarterly meetings where FCC employees are briefed on Commission regulations and industry activity. A copy of the Commission's Mandatory Minimum Standards and other attendant regulations are available in each video interpreter cubical as a reference. This not only ensures that video interpreters are familiar with Commission requirements but underscores the Company's stringent compliance commitment.

ASL/GlobalVRS has also implemented technical practices to prevent waste, fraud, and abuse. The Company's platform automatically screens out any non-U.S. Internet Protocol addresses or unregistered TDN. In 2013, the Company implemented a platform function that requires video interpreters to affirmatively authenticate the validity of each call at the end of the call and identify the call as BILLABLE or NON-BILLABLE. This affirmative authentication provides another layer of fundamental decision making and empowerment to the Company's video interpreters to report any call they feel would be non-compensable or breaking any form of FCC regulation.

V. CONCLUSION

As demonstrated herein, ASL continues to meet the MMS and additional requirements for the provision of Fund-eligible VRS.

STATE OF FLORIDA)
) ss.
COUNTY OF OSCEOLA)

CERTIFICATION

I swear under penalty of perjury that I am the Vice President of ASL Services Holdings, LLC, and an officer of the above-named reporting entity, and that I have personally examined the foregoing submission, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

ASL Services Holdings, LLC

By: _____

Gabrielle Joseph
Vice President and Executive Officer
38700 Commerce Blvd., Suite 216
Kissimmee, Florida 34741
Telephone: 407.518.7900 ext. 201

Subscribed and Sworn to me this 15th day of November, 2013

_____
Notary Public

MICHAEL MURPHY
Notary Public - State of Florida
My Comm. Expires Aug 27, 2016
Commission # EE 195422

ATTACHMENT 1

[REDACTED]