

ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via ECFS Delivery

March 27, 2014

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 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, Semi-annual Call Center Report

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 64.604(c)(5)(iii)(N)(2), enclosed for submission to the Commission is ASL Services Holding, LLC's ("ASL/Global VRS") semi-annual Call Center Report.

Request for Confidential Treatment. Request for Confidential Treatment. Pursuant to Section 0.459 of the Commission's rules,¹ and "Exemption 4" of the Freedom of Information Act,² ASL/Global VRS respectfully requests that the above information be deemed confidential and protected, accordingly. This information constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules,³ in that the information reveals the location of Company call centers that would be useful to competitors. Further, these Documents contain highly confidential information not intended for public consumption. ASL would not otherwise make these Documents publically available under any circumstance. Release of these Documents to the public could cause ASL/Global VRS irreparable and inestimable harm. ASL/Global VRS requests that the Documents be withheld from public inspection, accordingly. Should disclosure of the Documents be requested, ASL requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

¹ 47 C.F.R. §0.459.

² 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).

³ 47 C.F.R. §0.457.

CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CG DOCKET NOS. 03-123
AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

Public Inspection Copy

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Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system. Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC

A handwritten signature in black ink that reads "Angela Roth". The signature is written in a cursive style with a large, sweeping flourish at the end.

Angela Roth
Managing Member,
President and Chief Executive Officer

Enclosure (Confidential Version Only)