



**CSDVRS, LLC**  
**600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755**  
**VideoPhone: 727-431-9692 Voice: 727-254-5600 Fax: 727-443-1537**

June 24, 2014

Via Courier and Electronic Filing

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

**RE: Request of CSDVRS, LLC for additional information and Request for Confidential Treatment: CG Docket Nos. 10-51 and 03-123**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.606(g), CSDVRS, LLC (d/b/a ZVRS, "ZVRS") hereby submits its annual report as a provider of video relay services ("VRS") that is eligible for compensation from the Interstate Telecommunications Relay Service ("TRS") Fund. **Attached as Exhibit A is a copy of the report in its confidential form and is not for public inspection.** Exhibit B attaches the document in its redacted form. The redacted version of the report has been electronically filed by ZVRS in the Commission's dockets.

Pursuant to 47 C.F.R. § 0.459, ZVRS requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the exhibits accompanying the report and withhold that information from any public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

**2. Identification of the circumstance giving rise to the submission.**

ZVRS is providing updated corporate proprietary information per the requirements of 47 C.F.R. §64.606(g).

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in the exhibits of ZVRS' report is highly sensitive commercial information specific to the operational, functional and technological capabilities of ZVRS. This information is therefore safeguarded from competitors and is not made available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information involves TRS, a highly competitive service.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against ZVRS and undermine the company's position in the VRS marketplace.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to ZVRS.

Sincerely,

/s/

Aaron Wegehaupt  
Vice President of Operations

Attachments

cc: Robert Aldrich (via electronic delivery)  
Karen Peltz Strauss (via electronic delivery)

Exhibit B – FOR PUBLIC INSPECTION

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CSDVRS, LLC

600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755  
Voice: 727-254-5600 Fax: 727-443-1537 Toll Free: 888-927-3877

June 26, 2014

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Request for Expedited, [REDACTED], CG Docket No. 10-51

Dear Ms. Dortch:

CSDVRS, LLC d/b/a “ZVRS” herby submits a request for expedited, [REDACTED]  
[REDACTED] It is in the public’s best interest for the  
Commission to grant, expeditiously, ZVRS [REDACTED] as one of the  
industry’s top tier providers.

Respectfully submitted,



Sean Belanger  
Chief Executive Officer  
ZVRS

Cc: Robert Aldrich  
Karen Peltz Strauss