

DOCKET NO. 03-123, 1051

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# ASL SERVICES HOLDINGS, LLC.

3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

Via Electronic Comment Filing Submission (ECFS)

June 25, 2014

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, S.W.

Washington, D.C. 20554

Received & Inspected

JUN 30 2014

FCC Mail Room

RE: ASL Services Holdings, LLC Annual Consumer Complaint Log Submission, Docket Nos. 03-123; 10-51

Dear Secretary Dortch:

Pursuant to the Federal Communications Commission’s (“Commission”) 47 C.F.R. §64.604(c)(1)(i) and (ii), ASL Services Holdings, LLC (“ASL/Global VRS”), hereby submits the attached consumer Complaint Log submissions for the periods June 1, 2013 through May 31, 2014. Section 64.604(c)(1)(i) requires relay service providers, including providers of video relay services who have been granted certification as federal Telecommunications Relay Service Fund eligible providers such as ASL/Global VRS, *inter alia* to maintain a complaint log which at a minimum contains, “the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.” Further, the Commission has requested that reporting providers include “at a minimum, the total number of interstate relay calls by type of TRS” for the review period.

ASL was granted provisional certification by the Commission in November of 2011 and began operations in December 2011. During the June 1, 2013 through May 31, 2014 reporting period, ASL processed [REDACTED] calls. The Company experienced [REDACTED] calls into Customer Care. This represents a customer complaint to call ratio of less than [REDACTED]. The majority of the complaints pertained to pixilation and interoperability issues with other providers resulting in a black screen that prohibited calls from being processed.

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ASL feels that user complaints remain an exceptionally helpful tool in the identification of operational issues. ASL has been able to resolve operational issues immediately in virtually all cases. Each complaint was resolved to the caller's satisfaction, where possible. Otherwise the caller was informed of the Company's practices or efforts to resolve the issue, where a resolution was required.

Pursuant to pursuant to 47 C.F.R. § 64.604(c)(2), ASL's contact person for VRS consumer information and complaints about intrastate service is:

Gabrielle Joseph

VP-Operations

3700 Commerce Blvd

Kissimmee, FL 34741

Email: [gabrielle@aslservices.com](mailto:gabrielle@aslservices.com)

Office: 407-518-7900 ext 321

Fax: 407-518-7903

**Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules,<sup>[1]</sup> the attached report contains confidential information. ASL Services Holdings, LLC respectfully requests that this information be protected, accordingly. In support of its request, ASL Services Holdings LLC states as follows. The confidential information constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules,<sup>[2]</sup> in that the data constitutes sensitive proprietary information including, but not limited to, highly confidential customer and operational data. These data reveal sensitive company operations and scope that would be useful to competitors or harmful to customers. Further, these data

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<sup>[1]</sup> 47 C.F.R §0.459.

<sup>[2]</sup> 47 C.F.R. §0.457.

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contain highly confidential personal information not intended for public consumption. The Company would not otherwise make these data publically available under any circumstance. Release of these data to the public could cause ASL Services Holdings, LLC./GlobalVRS irreparable and inestimable harm. A redacted Public Inspection copy has been filed via the Commission's Electronic Comment Filing System.

Pursuant to the Commission's *Second Protective Order* in CG Docket Nos. 10-51 and 03-123,<sup>[3]</sup> an original and one (1) paper and electronic copy of the Confidential version and original and two (2) redacted public inspection copies of this Application are enclosed. Two confidential copies have been delivered to Mr. Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Thank you for your attention to this matter. Questions may be directed to Gabrielle Joseph.

Sincerely,

ASL SERVICES HOLDINGS, LLC

Attachment

cc: Greg Hlibok, (confidential version via electronic delivery)

cc: Karen Pelz Strauss (confidential version via electronic delivery)

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<sup>[3]</sup> *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, *Second Protective Order*, DA 12-858 (May 31, 2012)

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Customer Care information from June 1, 2013-May 31, 2014  
[REDACTED]