

April 15, 2015

VIA ECFS

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

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51

Dear Ms. Dortch:

On April 14, 2014, Jarrod Musano, Chief Executive Officer, Evan Winegard, Chief Financial Officer, Wayne Betts Jr., Chief of User Experience and I of Convo Communications, LLC (“Convo”) met with Karen Peltz Strauss, Gregory Hlibok, Bob Aldrich and Eliot Greenwald of the Consumer and Governmental Affairs Bureau and David Schmidt (by telephone) and Andrew Mulitz of the Office of Managing Director.

Convo reviewed organizational and mission information which reflects its consumer and interpreter-centric business. Convo described its unique technology and service innovations which are significant steps in achieving functional equivalency in video relay services (“VRS”). As a result, Convo has had robust organic growth of consumers and volume in the past 2 years.

Convo presented its fiscal information which shows that while its operational costs are increasing well within the industry parameters commensurate with its volume growth, it is operating with no margin and plunging back into negative revenue with each rate decrease. Convo explained that it will not compromise on the essential operational costs that consumers and interpreters require to experience an adequate level of service. In addition, Convo has declined to bring in venture capitalists who could float Convo until a period of sustainability because that would risk Convo’s focus of a consumer and interpreter-centric relay services.

Convo’s operational and fiscal information was also made available through the attached handouts. This highly sensitive and proprietary commercial information was redacted in the version of the ex parte electronically filed in the Commission’s dockets.

Convo began and ended its meeting with two requests as substantiated by its information: (i) the immediate stabilization of the rate so Convo would not be put out of business before it had the opportunity to mature to become a large provider with a sustainable economy of scale; and (ii) a modest rate tier specifically for small providers to preserve and encourage innovation and choice in relay products and services such as those Convo described.

We appreciate the Commission's commitment to consumers and interpreters in progressing the VRS program to achieve equal telecommunications access goals while protecting the integrity and long-term sustainability of the program. We look to continuing our support of the Commission in that collaborative effort.

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Bob Aldrich
Eliot Greenwald
Gregory Hlibok
Andrew Multz
Karen Peltz-Strauss
David Schmidt

Attachments

REDACTED ATTACHMENTS

Slide 1 – Convo Organizational Chart

Slide 2 – Convo Specialization Chart

Slide 3 – Convo Mission Statement

Slide 4 – Convo Growth Charts

Slides 5-6 – Convo Fiscal Information