October 7, 2015

Via Email and Electronic Filing

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

RE: Convo Request for the Confidential Treatment of its October 7, 2015 Meeting Ex Parte Filing, CG Docket Nos. 03-123 and 10-51.

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Convo Communications, LLC ("Convo") requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the attachment accompanying its ex parte regarding its meetings with Commission staff on October 6, 2015 and withhold that information from any public inspection. **Attached is a copy of the ex parte in its confidential form and is not for public inspection.** The redacted version of the ex parte has been electronically filed in the Commission's dockets.

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, Convo states as follows:

1. Identification of the specific information for which confidential treatment is sought.
Convo requests confidential treatment with respect to the confidential information provided in the ex parte attachments.

2. Identification of the circumstance giving rise to the submission.
Convo is providing corporate proprietary information.

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 ex parte attachments is highly sensitive commercial information specific to Convo's operations and finances. 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 information in the exhibits could cause substantial competitive harm to Convo, because other VRS providers would have access to the company's critical infrastructure, operations and financial information, and providers could use such information to compete against Convo and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken to prevent unauthorized disclosure.
Convo 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.
Convo does not make the information in the attachments 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.
Convo requests that the information in the attachments 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 Convo.

Sincerely,

/s/

Jeff Rosen
General Counsel

Attachment

cc: Gregory Hlibok, Chief
Disability Rights Office

Attachment