

October 7, 2015

**VIA ECFS**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 October 6, 2015, Jarrod Musano, CEO, and the undersigned of Convo Communications, LLC (“Convo”) met with Maria Kirby, Legal Advisor to Chairman Wheeler, Travis Litman, Senior Legal Advisor, and Jennifer Thompson, Special Advisor to Commissioner Rosenworcel; Amy Bender, Legal Advisor to Commissioner O’Rielly; and Nicholas Degani, Legal Advisor to Commissioner Pai to underscore the necessity of the Commission’s immediate action on the circulating item on functional equivalency and rate stabilization for video relay services (“VRS”). Convo provided them a confidential handout (attached) which summarized its steady growth to scale and details about the reasonable costs of its operations including information about the fiscal impact of the rate reductions. Convo explained that as an emergent provider operating with no margin, the rate reduction has caused a financial shortfall which we have managed to temporarily cover but cannot sustain much longer without a reprieve from the rate reduction.

We also mentioned to Ms. Kirby that consumer groups have filed for a waiver of the requirement to collect the last 4 digits of VRS registrants’ social security number, which follows a similar petition filed by VRS providers.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Maria Kirby  
Travis Litman  
Jennifer Thompson  
Amy Bender  
Nicholas Degani

Attachments

## REDACTED ATTACHMENTS

Slides 1 & 2 – Convo Growth Charts

Slide 3 - Convo Fiscal & Operational Information