

October 29, 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 27, 2015, Angela Roth of ASL Services Holdings, LLC, Jeremy Jack of CAAG/STARVRS, and Jeff Rosen of Convo Communications, LLC met with Karen Peltz Strauss and Robert Aldrich of the Consumer and Governmental Affairs Bureau to express our profound concern that the timeframe of the imminent Further Notice of Proposed Rulemaking would take us beyond at least another scheduled rate cut before the Commission determines the rate for at least our three smallest, emergent and minority-owned businesses who are now being compensated at a rate lower than our reasonable and necessary costs of providing VRS according to the information provided the Commission by the TRS Fund Administrator. We requested an expedited process by the Commission so that we can make an informed decision soonest about whether to stay in the business rather than continue to suffer significant losses on the possibility that we may receive a temporary reprieve on the rates so we can continue to grow to scale or to the time the Commission resets to a sustainable rate for all providers in the VRS program.

Sincerely,

/s/

Jeff Rosen

cc: Karen Peltz Strauss  
Robert Aldrich