

November 16, 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 behalf of Convo Communications, LLC (“Convo”), I met today with Travis Litman, Senior Legal Advisor, and Jennifer Thompson, Special Advisor to Commissioner Rosenworcel to provide information about Convo’s current operational circumstances. We greatly appreciate the reaffirmation in the Commission’s FNPRM and Commissioner Rosenworcel’s accompanying statement of the benefit to VRS consumers in supporting quality-of-service competition among multiple providers.¹ Convo’s challenge is that it needs to invest in its operations and technology so that it can continue to grow to a level of efficiency where it has a sustainable business at a lower rate. A temporary rate freeze is necessary for the three newest, smallest, minority owned and community-based providers to have the opportunity to grow and match the economies of the scale applicable to the larger VRS providers who have had the benefit of building their business with historically higher rates. Convo described how it is working hard to steadily lower its per minute costs through greater efficiencies and rigorous cost controls.

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Travis Litman
Jennifer Thompson

¹ *Structure and Practices of the Video Relay Services Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, FCC 15-143, Further Notice of Proposed Rulemaking (‘FNPRM’) (released November 3, 2015).