

November 23, 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:

Jarrold Musano, CEO and I of Convo Communications, LLC (“Convo”) met today with Edward “Smitty” Smith, Legal Advisor to Chairman Wheeler to provide an introductory overview of Convo’s operational and financial information. Convo provided a confidential handout (attached) about its organizational structure, mission, its steady growth to scale and details about the reasonable costs of its operations including information about the fiscal impact of the rate reductions

We greatly appreciated the affirmation in the Commission’s FNPRM and the Chairman’s accompanying statement of the benefit to VRS consumers in a rate freeze for the three newest, smallest, minority-owned and community-based providers which will ensure that they have an opportunity to make VRS a competitive market and to include more of the underserved communities in VRS.<sup>1</sup> Convo needs the flexibility afforded by a rate freeze to be able to continue investing in its operations and technology so that it can grow to a level of efficiency where it has a sustainable business at a lower rate. At the same time Convo is working hard to steadily lower its per minute costs through greater efficiencies and rigorous cost controls. A rate freeze will allow Convo to roll out in 2016 a number of innovative product and service enhancements which will better support consumers in realizing the ADA’s goals of full participation, independent living, economic self-sufficiency, and equal opportunity.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Edward “Smitty” Smith

Attachments

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<sup>1</sup> *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).

## REDACTED ATTACHMENTS

Slide 1 – Mission

Slide 2 - Organizational Chart

Slide 3 – Department Specialization Chart

Slide 4 - Growth Charts

Slide 5 – Roadmap

Slide 6 - Fiscal & Operational Information