

December 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 December 15, 2015, Jarrod Musano, CEO, and the undersigned of Convo Communications, LLC (“Convo”) met with Edward “Smitty” Smith, 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; Nicholas Degani, Legal Advisor to Commissioner Pai; Karen Peltz Strauss, Deputy Bureau Chief, and Robert Aldrich, Legal Advisor, of the Consumer and Governmental Affairs Bureau; and Gregory Hlibok, Chief of the Disability Rights Office.

Convo reviewed the information in the attached redacted statement in support of Tier I providers’ Emergency Petition for a Temporary *Nunc Pro Tunc* Waiver.¹ Rolka Loube Associates LLC (“Rolka Loube”), the TRS Fund Administrator, informed the Commission that the average permitted costs of Tier I Providers was \$.15 per-minute greater than the compensation rate effective on July 1, 2015.² Rolka Loube thoroughly reviewed the Tier I providers’ costs and did not raise any significant concerns about their cost information. Convo is incurring monthly losses despite rigorous cost controls and decreasing operating costs per-minute because it has yet to reach scale.

The forthcoming rate cut on January 1, 2015 will at least double the monthly losses for Tier I providers, posing an escalating risk to the viability of their businesses.

The Tier I providers are all minority owned businesses whom critically fill service gaps for diverse communities.

Convo requested timely action by the Commission in freezing the rate at \$5.29 per-minute for 16-months followed by a rate glide path so Tier I providers have an opportunity to grow to scale and compete.

Sincerely,

/s/

Jeff Rosen

¹ *Emergency Petition for a Temporary Nunc Pro Tunc Waiver*, Convo Communications, LLC, Hancock Jahn Lee & Puckett, LLC dba CAAG/Star VRS, and ASL/Global VRS Services Holdings, LLC, CG Docket Nos. 10-51, 03-123 (November 25, 2015)

² *Id.*, p. 10.

General Counsel

cc: Edward "Smitty" Smith
Travis Litman
Jennifer Thompson
Amy Bender
Nicholas Degani
Karen Peltz Strauss
Robert Aldrich
Gregory Hlibok

Attachment