

December 16, 2015

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 03-123 and 10-51.**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Convo Communications, LLC (“Convo”) requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information set forth in the *ex parte* presentation Convo distributed to Commission personnel in our December 15, 2015 meetings and is attached to the *ex parte* Convo is electronically filing in the above-referenced dockets regarding those meetings. The *ex parte* presentation provides certain non-public and competitively sensitive information about the effect on Convo’s finances and operations of the July 1, 2015 video relay service (“VRS”) per-minute compensation rate reduction applicable to Tier I VRS providers. As such, Convo’s *ex parte* presentation constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act (“FOIA”). Consequently, Convo requests that this material be withheld from public inspection.

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Convo states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

Convo requests confidential treatment with respect to the attached written *ex parte* presentation.

**2. Identification of the circumstance giving rise to the submission.**

The attached written *ex parte* presentation is being filed with the Commission to provide the Commission with information about the effect on Convo’s finances and operations of the July 1, 2015 per-minute compensation rate reduction applicable to Tier I VRS providers.

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

Convo’s *ex parte* presentation contains highly sensitive, proprietary, and non-public commercial information specific to Convo’s operations and finances. Convo safeguards information of this type from competitors and does not make it available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information set forth in the *ex parte* presentation concerns Convo's VRS operations, and VRS a highly competitive telecommunications relay ("TRS") service.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the attached written *ex parte* presentation could cause substantial competitive harm to Convo because other VRS providers could use the critical infrastructure, operational, and financial information set forth therein to acquire a competitive advantage over Convo and thereby undermine Convo's position in the VRS marketplace.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

Convo routinely treats information of the type set forth in the attached written *ex parte* presentation as highly confidential, and Convo systematically exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

Convo has not disclosed the confidential information set forth in the attached written *ex parte* presentation to the public or to any third parties in any context.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

Convo requests that the attached written *ex parte* presentation be treated confidential on an indefinite basis because Convo cannot identify a specific date on which this information could be disclosed without causing competitive harm to Convo.

Sincerely,

/s/

Jeff Rosen  
General Counsel

Attachment

cc: Gregory Hlibok, Chief  
Disability Rights Office

Attachment