

May 26, 2016

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:

Jarrold Musano, Amanda Montgomery, and the undersigned of Convo Communications, LLC (“Convo”) met yesterday with Diane Cornell, Special Counsel and Amber Lucci, Intern, Chairman Wheeler; Robert Aldrich, Legal Advisor, Consumer and Governmental Affairs Bureau; and Eliot Greenwald, Deputy Chief, Darryl Cooper, Attorney Advisor and Jenny Ledig, Intern, Disability Rights Office.

Convo reviewed its current operations and future plans. Convo provided information about its experiences to date regarding the TRS-URD and urged that the validation burden for consumers be eased by supporting the use of the same unique user identification number regardless of which default provider the consumer registers with. Convo commented that the interoperability objectives of the ACE platform were critical for consumer mobility and that the defining need is to ensure consistent high video quality among different devices.

Convo reiterated its proposal that the Commission charge the Relay/Equipment Distribution Subcommittee of the Commission’s Disability Advisory Committee with preparing a report which would look at the state of functional equivalency in VRS, and recommend measures that would propel VRS to attain functional equivalency. Tasking action now will timely lay a foundation for determining new rate methodology.

Sincerely,

/s/

Jeff Rosen
General Counsel

cc: Diane Cornell
Amber Lucci
Robert Aldrich
Eliot Greenwald
Darryl Cooper
Jenny Ledig