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**VIA ELECTRONIC FILING**

February 24, 2011

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re:** Notice of Ex Parte: CG Docket 10-51

Dear Ms. Dortch:

On February 24, 2011, David Bahar, Director of Government and Regulatory Affairs for Convo Communications LLC ("Convo"), met with Jay Keithley and Sharon Diskin, both of the Office of the Inspector General.

During the meeting, Convo shared suggestions on how to minimize waste and fraud in the Video Relay Services ("VRS") program by reducing the number of small white brand providers and bringing the size of the VRS program down from approximately 42 providers, to a more manageable number. Convo's suggestions were as follows: (1) expand the current first tier rate, currently 0-50,000 minutes, to 0-100,000 or 150,000 minutes; (2) require that VRS providers, whether or not they are certified as a provider of VRS, operate 24 hours a day, 7 days a week, and have more than one call center to provide for redundancy should one go offline; and (3) require that VRS providers, whether or not they are certified as a provider of VRS, be certified as a common carrier.

On February 24, 2011, David Bahar met with Angela Kronenberg, Wireline Legal Advisor for Commissioner Clyburn. Convo expressed concern at the length of time its application for certification as a VRS provider has been pending. Convo urged that Commission reexamination of certification rules be completed at the earliest opportunity to avoid further delays in the processing of its application for certification.

David J. Bahar  
/s/  
Director of Government and Regulatory Affairs  
Convo Communications, LLC