



May 20, 2011

*Via Electronic Filing*

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

*Re: Convo Communications, LLC Waiver Request, CG Docket Nos. 03-123 and 10-51 (filed on May 18, 2011)*

Dear Ms. Dortch,

Snap Telecommunications, Inc. ("Snap!VRS") is submitting this letter in support of the waiver request filed on May 18, 2011 by Convo Communications, LLC ("Convo") in CG Docket Nos. 03-123 and 10-51 seeking waivers of certain video relay service ("VRS") rules adopted by the Federal Communications Commission ("Commission"). See *Structure and Practices of the Video Relay Service Program*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket 10-51 (released April 6, 2011).

Convo, as a non-certified VRS provider, currently receives funding for applicable VRS minutes through subcontractual arrangements with Snap!VRS, a certified VRS provider. Snap!VRS is also responsible for Convo's compliance with applicable Commission regulations. The *VRS Order*, however, prohibits such arrangements effective June 1, 2011, absent Commission grant of a waiver pursuant to the criteria set forth in the order. See *VRS Order*, ¶¶ 54-63 (which prohibits certified VRS providers from subcontracting core VRS functions to non-certified providers and sets forth waiver criteria).

Consistent with the *VRS Order*, Convo has submitted its waiver request to the Commission. Snap!VRS supports Convo's waiver request. In the view of Snap!VRS, Convo has proven to be a diligent and reliable partner and an effective industry participant. Further, Snap!VRS is prepared to continue its relationship with Convo in accordance with the regulations set forth in the *VRS Order*, including any applicable Commission waiver-related regulations.

Should the Commission have further questions or seek clarification, please do not hesitate to contact the undersigned.

Respectfully submitted,

Thomas W. Kielty  
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/s/ Nancy J. Bloch \_\_\_\_\_  
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