



Because we understand.

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Via Electronic Filing

September 19, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

*Re: Amended Waiver Request of Convo Communications, LLC
CG Docket Nos. 03-123 & 10-51*

Dear Ms. Dortch:

Convo Communications, LLC (“Convo”) is submitting the attached screenshots to the Commission to supplement its August 26, 2011 Letter¹ that amended its pending video relay service (“VRS”) waiver request. The August 26, 2011 Letter included an attachment that provided screenshots of Convo’s *planned* rebranding of its VRS products. The attachment hereto provides screenshots of the VRS products *as rebranded* by Convo and Snap Telecommunications, Inc. (“Snap”).

Should you need additional information with regard to this request, please contact the undersigned.

Respectfully Submitted,

/s/ Robin Horwitz
Robin Horwitz
Chief Executive Officer
Convo Communications, LLC

Attachment

¹ Letter from Robin Horwitz, CEO, Convo Communications, LLC, to Marlene Dortch, Secretary, FCC, CG Docket Nos. 03-123 & 10-51 (filed Aug. 26, 2011) (“August 26, 2011 Letter”) (amending Convo’s pending VRS waiver request).

SUPPLEMENT

VRS PRODUCT USER INTERFACE SCREENSHOTS

As set forth herein, Convo and Snap have rebranded the user interface of each of Convo's VRS products to eliminate all references to Convo as a VRS provider and to replace all Convo branding with the following brand/logo ("Subcontractor Logo"):



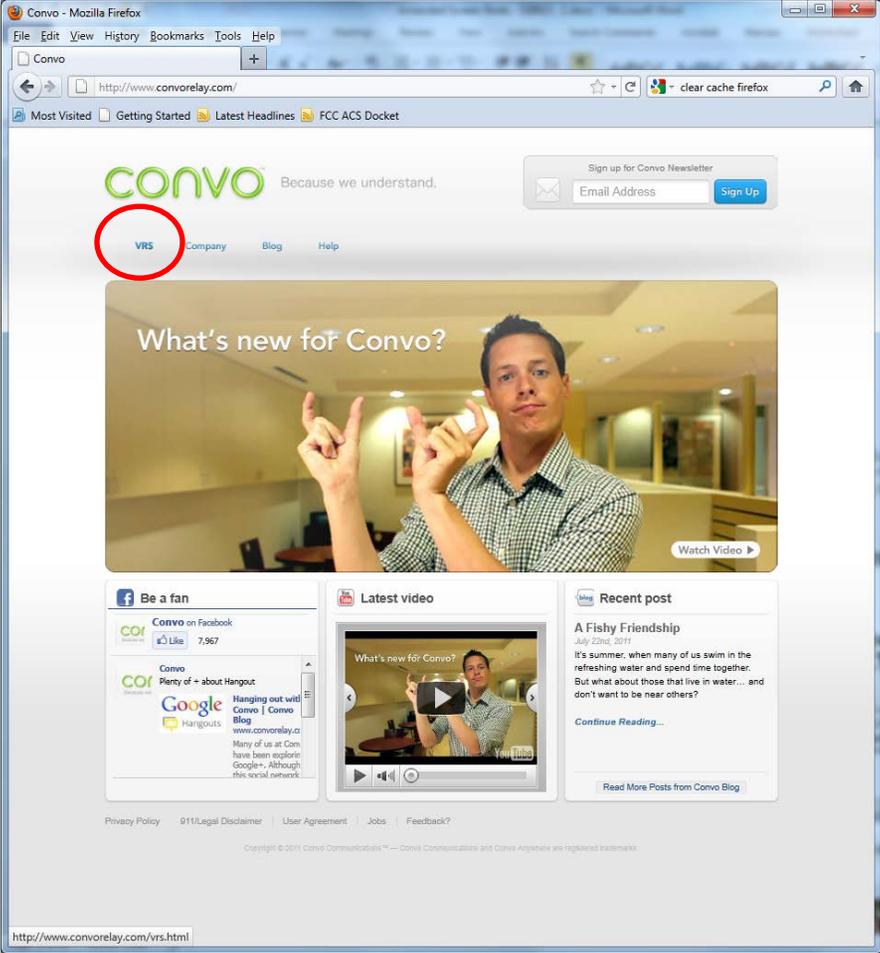
(A web page or other user interface in which Convo branding has been replaced with the Subcontractor Logo is referred to herein as "Branded".) In addition, Convo has removed all VRS information from its homepage (*i.e.*, convorelay.com) other than (i) a user notice explaining that Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS and (ii) a link to a separate, VRS-specific Branded homepage that utilizes the Subcontractor Logo and enables users to reach newly Branded versions of the various VRS products described herein. Going forward, Convo's homepage will be devoted to issues of interest to the deaf community instead of to VRS.

The rebranding of the following VRS products is described herein:

VRS Product	Page
Anywhere (web-based)	5
Snap!VRS ConvoIM (iChat/AIM-based)	10
Desktop (installed software)	17
Mobile (for iPhone, iPad 2 & iPod Touch)	22
Videophone (for third-party videophone users)	26

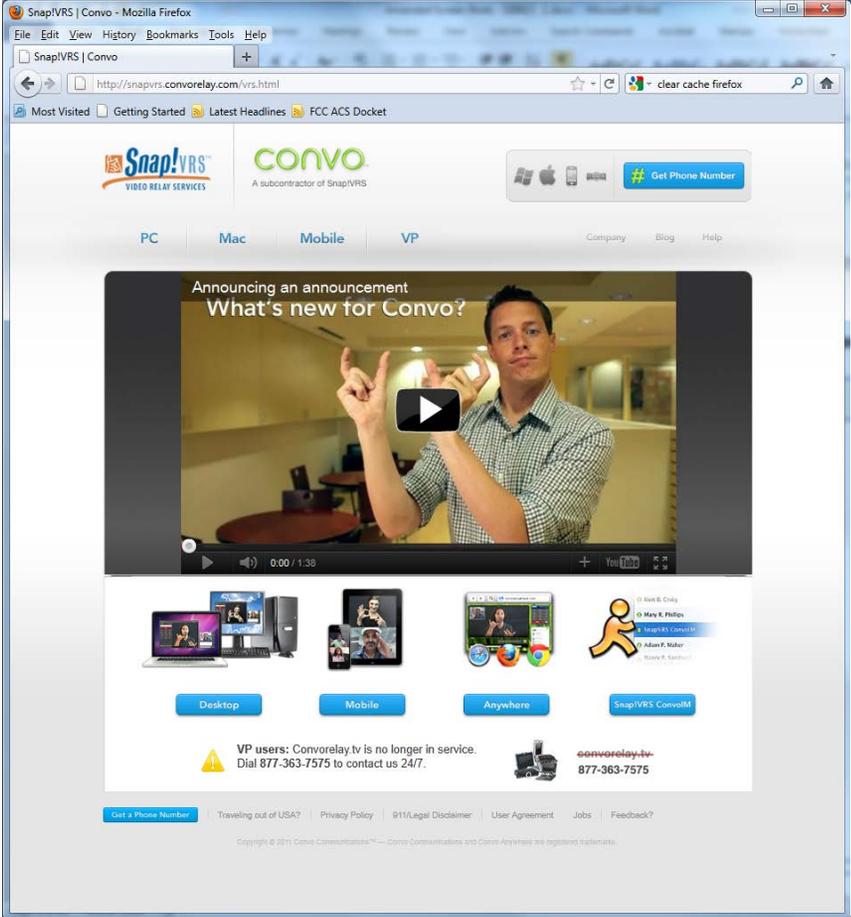
Introduction

Convo Homepage

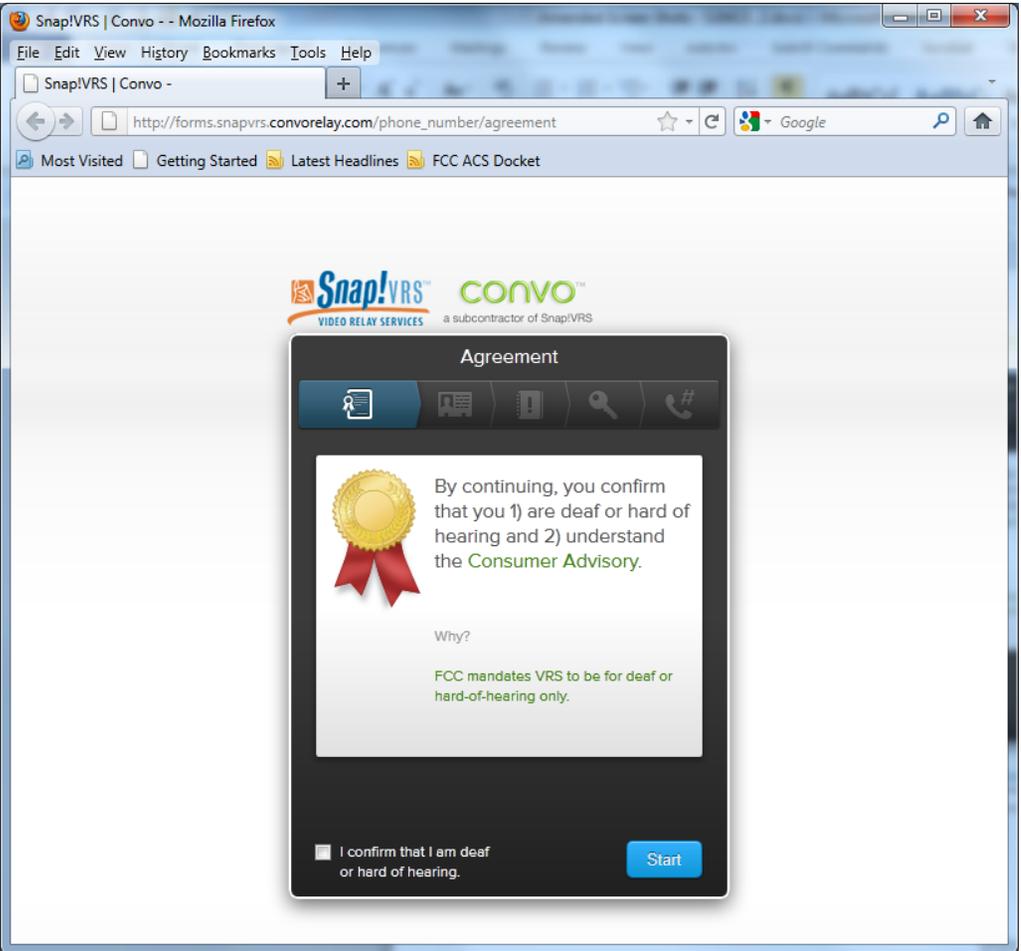
Current User Action	Illustration	Rebranding
<p>Convo's homepage primarily will deal with issues of interest to the deaf community.</p>	 <p>The screenshot shows the Convo homepage in a Mozilla Firefox browser window. The address bar displays http://www.convorelay.com/. The page header includes the Convo logo, the tagline "Because we understand.", and a newsletter sign-up form. A navigation menu contains links for "VRS", "Company", "Blog", and "Help", with "VRS" circled in red. The main content area features a video titled "What's new for Convo?" with a "Watch Video" button. Below the video are three sections: "Be a fan" (Facebook), "Latest video" (YouTube), and "Recent post" (blog). The footer contains legal links and copyright information.</p>	<p>Convo has removed all VRS information from its homepage (www.convorelay.com/), except for a "VRS" link to a VRS-specific Branded homepage (see next slide) and a short American Sign Language ("ASL") video describing Convo's role as a subcontractor of Snap.</p>

Introduction

VRS-specific Branded Homepage

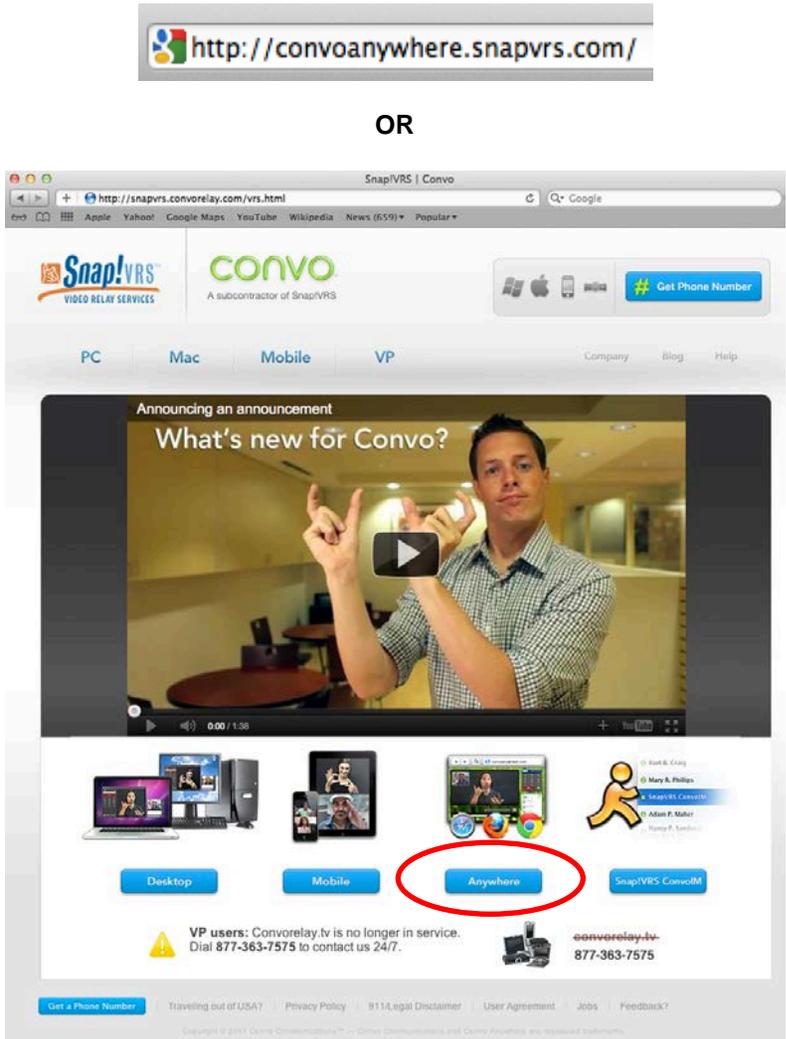
Current User Action	Illustration	Rebranding
<p>The user may click on the buttons/links for “Desktop,” “Mobile,” “Anywhere,” “Snap!VRS ConvoIM,” or Videophone (“VP”) products to reach a Branded website specific to each Branded VRS product.</p>		<p>The VRS-specific Branded homepage includes the Subcontractor Logo and utilizes a URL that includes Snap!VRS (snapvrs.convorelay.com/vrs.html). In addition, the tab label includes “Snap!VRS”.</p> <p>The Subcontractor Logo and a Snap!VRS URL are also incorporated into each specific product page:</p> <ol style="list-style-type: none"> 1. Desktop - snapvrs.convorelay.com/pc.html, snapvrs.convorelay.com/mac.html, 2. Mobile - snapvrs.convorelay.com/mobile.html, 3. Anywhere - snapvrs.convorelay.com/anywhere-pc.html, snapvrs.convorelay.com/anywhere-mac.html, 4. Snap!VRS ConvoIM - snapvrs.convorelay.com/convoim.html, and 5. Videophone - snapvrs.convorelay.com/vp.html.

Introduction

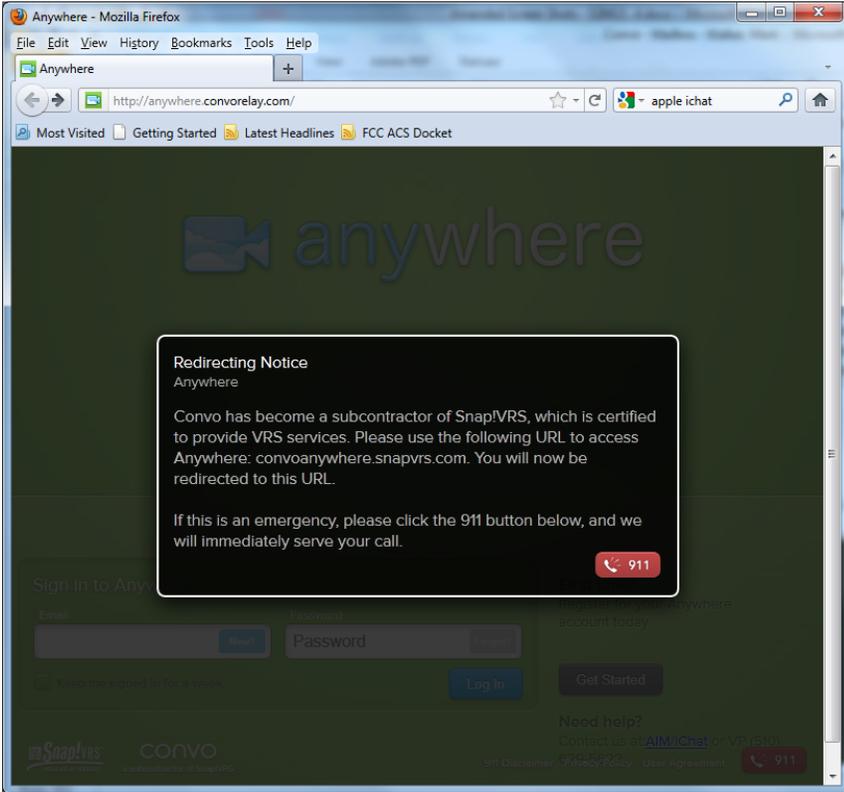
Current User Action	Illustration	Rebranding
<p>The user must certify that he or she is deaf or hard of hearing before registering to obtain a TDN.</p>	 <p>The screenshot shows a Mozilla Firefox browser window with the URL http://forms.snapvrs.convorelay.com/phone_number/agreement. The page features the Snap!VRS logo (VIDEO RELAY SERVICES) and the Convo logo (a subcontractor of Snap!VRS). The main content is an 'Agreement' dialog box with a gold seal icon. The text reads: 'By continuing, you confirm that you 1) are deaf or hard of hearing and 2) understand the Consumer Advisory.' Below this, it asks 'Why?' and states 'FCC mandates VRS to be for deaf or hard-of-hearing only.' At the bottom, there is a checkbox labeled 'I confirm that I am deaf or hard of hearing.' and a blue 'Start' button.</p>	<p>Convo and Snap have rebranded the certification page to incorporate the Subcontractor Logo and to add "snapvrs" in the URL.</p>

Introduction

Anywhere (web-based)

Step	Current User Action	Illustration	Rebranding
1	<p>The user either types the Anywhere URL into a web browser, such as Safari, Mozilla Firefox, or Internet Explorer, or clicks on the link button on the Branded VRS homepage to access the Anywhere launch page.</p> <p>Anywhere enables users to utilize any computer with a web camera to initiate VRS calls, including library or other public access computers, without first requiring the user to download specialized VRS-related software to the computer.</p>	<div style="text-align: center;">  <p style="text-align: center;">OR</p> </div>	<ol style="list-style-type: none"> 1. A new URL has been established for the Branded Anywhere VRS service (<i>i.e.</i>, convoanywhere.snapvrs.com, where “snapvrs” is the parent domain and “convoanywhere” is the subdomain). 2. A button is now included on the new Branded VRS homepage (as illustrated to the left) that automatically links to the new Anywhere URL (see item 1 above). 3. Convo has sent all users an email explaining that (i) Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS and (ii) users should use the new Anywhere URL (see item 1 above) going forward. 4. All newly registered users only will be provided the new Anywhere URL (see item 1).

Anywhere

Step	Current User Action	Illustration	Rebranding
2	A user also may enter Convo's prior Anywhere URLs into a web browser and be redirected to the current URL.	 <p>The screenshot shows a Mozilla Firefox browser window with the address bar displaying 'http://anywhere.convorelay.com/'. The main content area features a dark background with the word 'anywhere' in a large, light-colored font. A white-bordered box in the center contains the following text: 'Redirecting Notice', 'Anywhere', 'Convo has become a subcontractor of Snap/VRS, which is certified to provide VRS services. Please use the following URL to access Anywhere: convoanywhere.snapvrs.com. You will now be redirected to this URL.', and 'If this is an emergency, please click the 911 button below, and we will immediately serve your call.' Below the text is a red button with a white telephone icon and the number '911'. At the bottom of the page, there are logos for Snap/VRS and CONVO, along with a 'Need help?' section and a footer with '© December 2010 Privacy Policy User Agreement' and another '911' button.</p>	By entering either of Convo's prior Anywhere URLs (www.convoanywhere.com ; anywhere.convorelay.com) into a web browser, users are presented with the notification screen to the left informing users that they are being redirected to convoanywhere.snapvrs.com . In the case of an emergency call, the user can click the 911 button to bypass the notification screen and be immediately connected to a CA.

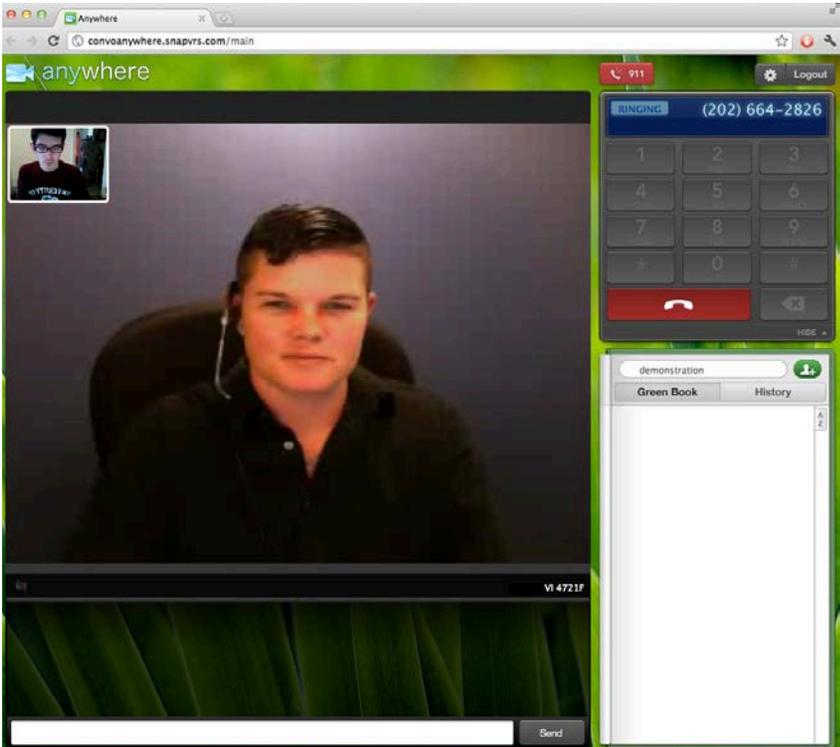
Anywhere

Step	Current User Action	Illustration	Rebranding
3	The user logs into Anywhere on the Anywhere homepage by providing the user's TDN and password.		<ol style="list-style-type: none"> 1. All Anywhere traffic is launched from a single Branded Anywhere homepage, which uses a Snap!VRS-branded URL (see slide 5, item 1 above). 2. Convo and Snap have rebranded the Anywhere homepage to delete all references to Convo as a standalone VRS provider. For example, the word "Convo" has been removed from the page tab and the Convo brand was replaced in the lower left hand corner with the Subcontractor Logo. (The video camera outline appearing in the page tab and URL line is a generic logo for web-based video services. The version of the video camera outline containing clouds that appears to the left of the word "Anywhere" is a logo specific to the Anywhere product.)

Anywhere

Step	Current User Action	Illustration	Rebranding
4	The user submits the intended call recipient's phone number and then clicks the green "phone" button.	 <p>The illustration shows a web browser window with the URL 'convoanywhere.snapvrs.com/main'. The page features a video call window on the left showing a man in a maroon t-shirt with 'UNIVERSITY OF ALABAMA' printed on it. To the right of the video call is a numeric keypad with buttons for digits 1-9, 0, *, and #, along with a green 'phone' button and a 'Logout' button. Below the keypad is a search bar containing the text 'demonstration' and a 'Green Book' button.</p>	Convo and Snap have rebranded this screen so that the word "Convo" has been removed from the page tab. In addition, the URL has been replaced with a Snap!VRS-branded URL (see slide 5, item 1 above).

Anywhere

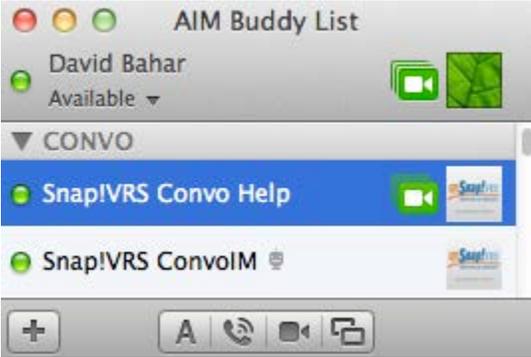
Step	Current User Action	Illustration	Rebranding
5	<p>The Communications Assistant (“CA”) appears on the screen and the user’s call is initiated.</p> <p>Upon ending a call, the user automatically is rerouted to the step 4 screen (see slide 8).</p>	 <p>The illustration shows a web browser window with the URL 'convoanywhere.snapvrs.com/main'. The page features a green header with the 'anywhere' logo and a 'Logout' button. The main content area displays a video call with a man wearing a headset. To the right of the video is a numeric keypad and a 'RINGING' indicator for the number '(202) 664-2826'. Below the keypad is a chat window titled 'demonstration' with tabs for 'Green Book' and 'History'. A 'Send' button is located at the bottom right of the chat area.</p>	<p>Convo and Snap have rebranded this screen so that the word “Convo” has been removed from the page tab. In addition, the URL has been replaced with a Snap!VRS-branded URL (see slide 5, item 1 above).</p>

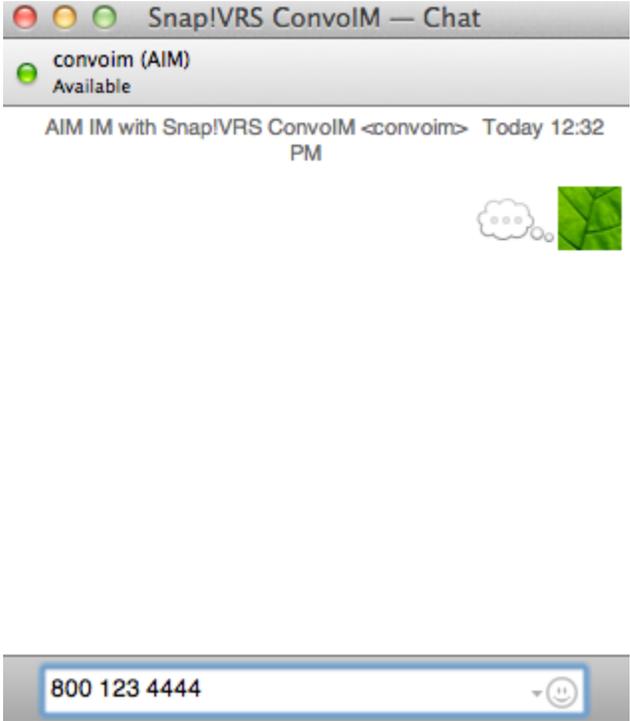
Anywhere

Snap!VRS ConvoIM (iChat/AIM-based)

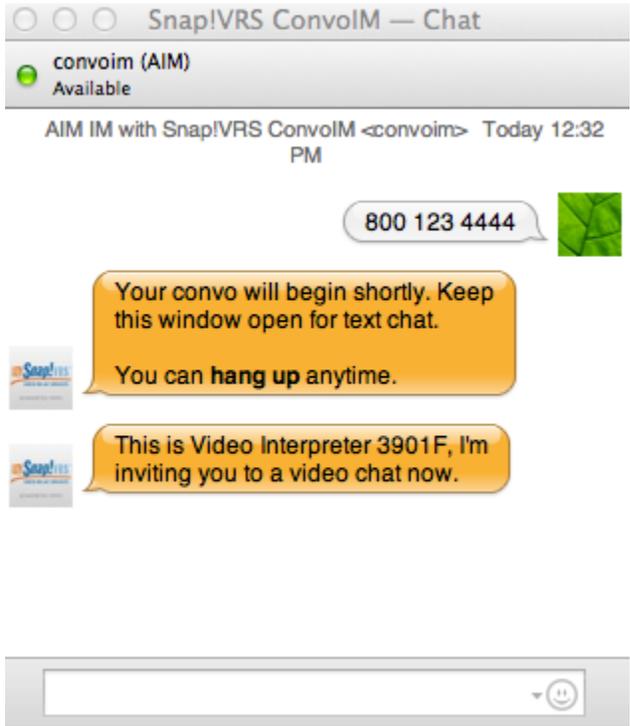
Step	Current User Action	Illustration	Rebranding
1	<p>The user launches from his desktop iChat (for Apple computers) or an AOL Instant Messenger (“AIM”) product (for Windows computers) that previously was installed on the computer.</p>	<div style="text-align: center;">  </div> <div style="text-align: center;">  </div>	<p>No changes were required for this screen, and no changes were made.</p> <p>(Contrary to the text in slide 6 of Attachment 1 to Convo’s VRS waiver amendment (filed Aug. 26, 2011) (“Amendment”), the logo to the left (i.e., a video camera outline in a speech bubble) is an Apple iChat logo and is not a Convo logo (see http://en.wikipedia.org/wiki/IChat).</p>

IM

Step	Current User Action	Illustration	Rebranding
2	<p>The user selects "Snap!VRS ConvoIM" from the user's "buddy list."</p> <p>No URL is inputted by a user to connect to a CA for purposes of placing a VRS call using this product.</p>	 <p>The screenshot shows a window titled "AIM Buddy List". At the top, there is a user entry for "David Bahar" with a status of "Available" and a green online indicator. Below this is a group header "CONVO" with a downward arrow. Under the "CONVO" group, there are two entries: "Snap!VRS Convo Help" which is highlighted with a blue background, and "Snap!VRS ConvoIM". Each entry has a green online indicator and a small profile picture icon. At the bottom of the window, there is a toolbar with icons for adding a buddy (+), text chat (A), voice call, video call, and screen sharing.</p>	<ol style="list-style-type: none"> 1. Convo has "pushed" (i) a new buddy list reference to change the product's buddy list reference from "ConvoIM" to "Snap!VRS ConvoIM" and from "Convo Help" to "Snap!VRS Convo Help" and (ii) a logo in the right-hand column based on the Snap!VRS logo. 2. Convo has sent all users an email explaining that Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS.

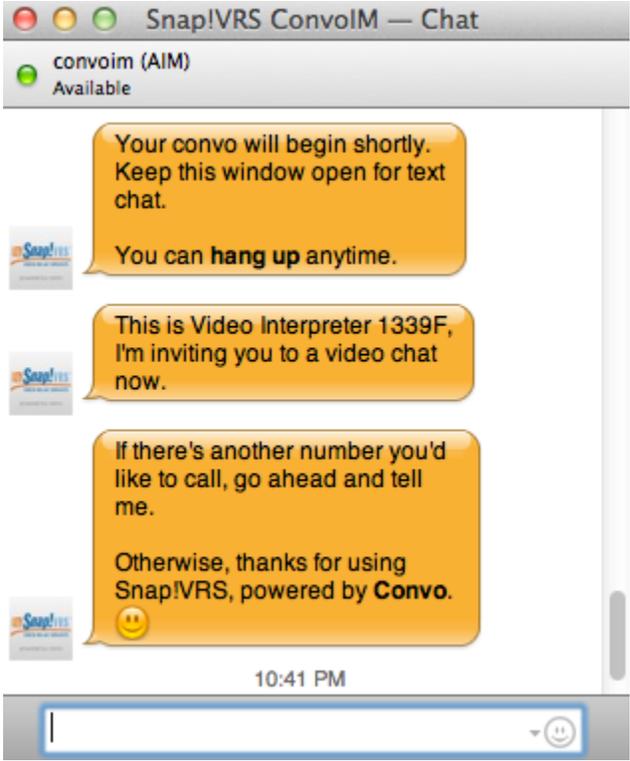
Step	Current User Action	Illustration	Rebranding
3	The user logs into Snap!VRS Convo IM by providing the user's TDN and password.		<p>Convo and Snap have rebranded this screen and replaced “ConvoIM” with “Snap!VRS ConvoIM”.</p> <p>The term “convoim (AIM)” is the unique “buddy” that initially was installed by users of this product on their iChat/AIM buddy list. Convo and Snap can (and have) pushed to users a replacement of the proxy reference for this “buddy” identifier that actually appears on users’ buddy lists. As a result, this “buddy” now appears on each user’s buddy list as “Snap!VRS ConvoIM” rather than “ConvoIM”. However, the only way to alter the underlying identifier (<i>i.e.</i>, “convoim (AIM)”), is for each user to delete their current VRS-related “buddy” and install a new buddy. Convo does not have the unilateral ability to alter this identifier, push a new “buddy” to users, or prevent iChat/AIM from displaying the identifier on a user’s interface. Note, however, that the “Snap!VRS ConvoIM” brand prominently is displayed above and below this identifier.</p>

IM

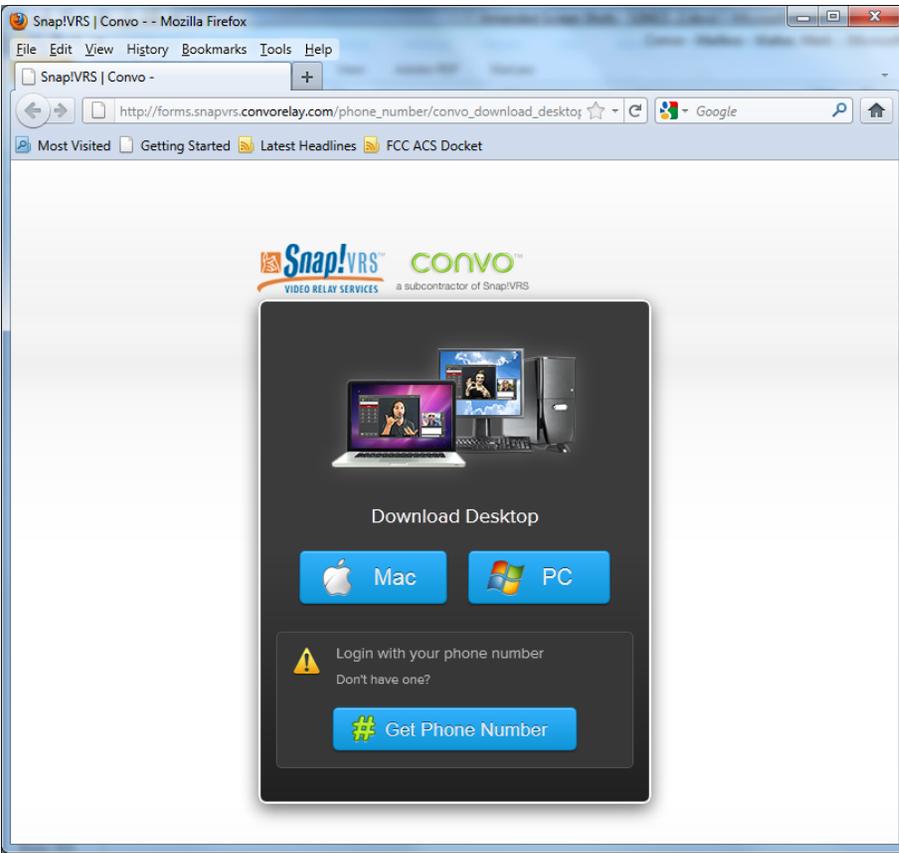
Step	Current User Action	Illustration	Rebranding
4	The user submits the intended call recipient's phone number then waits for a CA.		<ol style="list-style-type: none"> 1. Convo and Snap have rebranded this screen by replacing “ConvoIM” with “Snap!VRS ConvoIM”. 2. The generic iChat logo in the left-hand column next to the text bubbles has been replaced with a Snap!VRS logo.

Step	Current User Action	Illustration	Rebranding
5	The user receives and accepts an invitation from a CA to commence a video chat.		Convo has changed the identifier for the CA (e.g., vrs1102) by replacing "convo#####" with "vrs#####".

Step	Current User Action	Illustration	Rebranding
6	<p>The CA appears on the screen and the user's call is initiated.</p> <p>Upon ending a call, the user automatically is provided with the screen set forth in slide 16.</p>		<p>At the top of this user interface, Convo has changed the identifier for the CA (e.g., vrs1102) by replacing "convo####" with "vrs####".</p>

Step	Current User Action	Illustration	Rebranding
7	The user closes the window set forth in slide 15 to end a call and then receives this closing message.		<ol style="list-style-type: none"> 1. Convo and Snap have rebranded this screen so that the header reference to “ConvoIM” is replaced with “Snap!VRS ConvoIM”. 2. Convo has replaced the reference to “Convo” in the standard closing dialogue (i.e., the final speech bubble to the left) with “Snap!VRS, powered by Convo”.

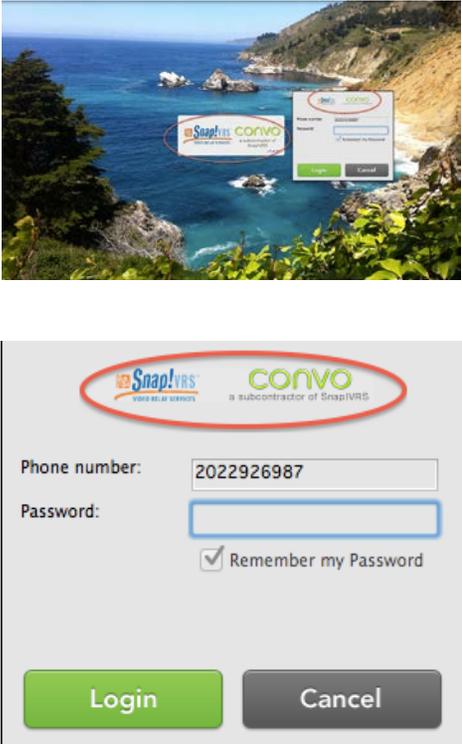
Desktop (installed software)

Step	Current User Action	Illustration	Rebranding
1	<p>From the Branded Desktop-specific webpage, the user can download the required Desktop software.</p>		<p>Convo and Snap have rebranded the Desktop download page to incorporate the Subcontractor Logo and to add “snapvrs” in the URL and tab.</p>

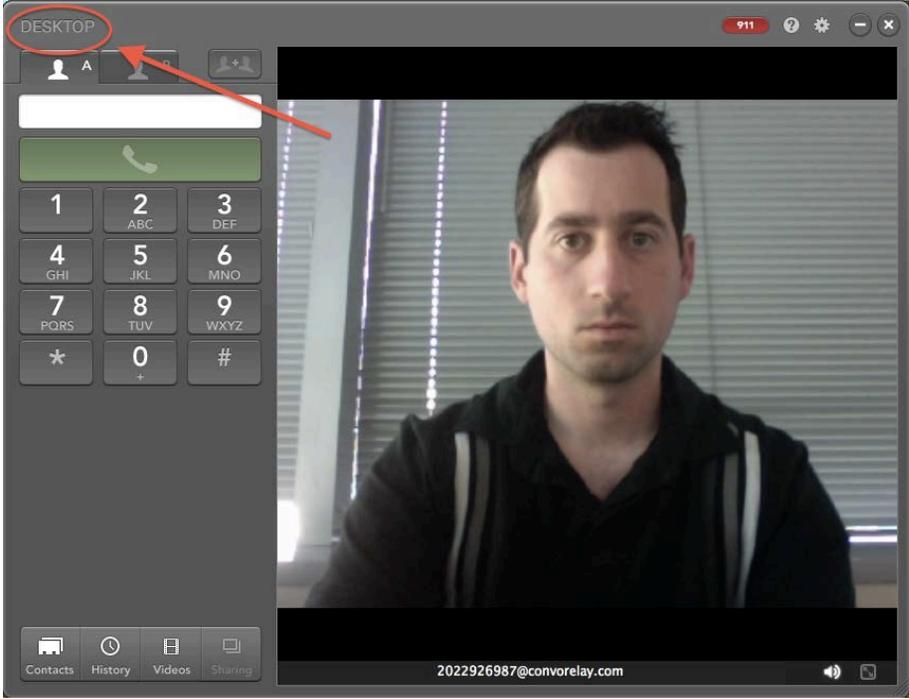
Desktop

Step	Current User Action	Illustration	Rebranding
2	<p>The user launches Desktop from his desktop by clicking on the Snap!VRS logo. The user is required to have previously downloaded the software.</p> <p>No URL is inputted by a user when using Desktop.</p>		<ol style="list-style-type: none"> 1. Convo has pushed a new icon based on the Snap!VRS logo to replace the prior generic video camera icon previously appearing on users' desktops. (The generic video camera icon mistakenly was characterized as a Convo logo in slide 12 of Attachment A to the Amendment.) 2. Convo has sent all users an email explaining that (i) Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS and (ii) the Desktop software has been rebranded accordingly. 3. All newly registered users only will be provided access to a rebranded version of Desktop (see slide 19 below) upon registering.

Desktop

Step	Current User Action	Illustration	Rebranding
3	The user logs into Desktop by providing the user's TDN and password.		Convo has pushed a rebranded Desktop "skin," including the login screen to the left, to existing users' computers. The rebranded skin utilizes the Subcontractor Logo. The version of Desktop downloaded by newly registered users will include the rebranded skin.

Desktop

Step	Current User Action	Illustration	Rebranding
4	The user submits the intended call recipient's phone number then clicks the green "phone" button.		<p>Convo has pushed the newly rebranded Desktop skin to existing user's computers, removing the Convo name from this screen. The version of Desktop downloaded by newly registered users will include the newly rebranded skin.</p> <p>The reference to "#####@convorelay.com" located at the bottom of the illustration to the left is a unique SIP identifier assigned to each user upon registration. The unique identifier enables the video transmission between the user and call centers and cannot be easily modified. Any change to the appearance of this unique SIP identifier at the bottom of this user interface would necessitate also revising it for each user in the iTRS database. Such a change in the iTRS database to thousands of prior Convo customers may cause disruption to their access to VRS for an interim period.</p>

Desktop

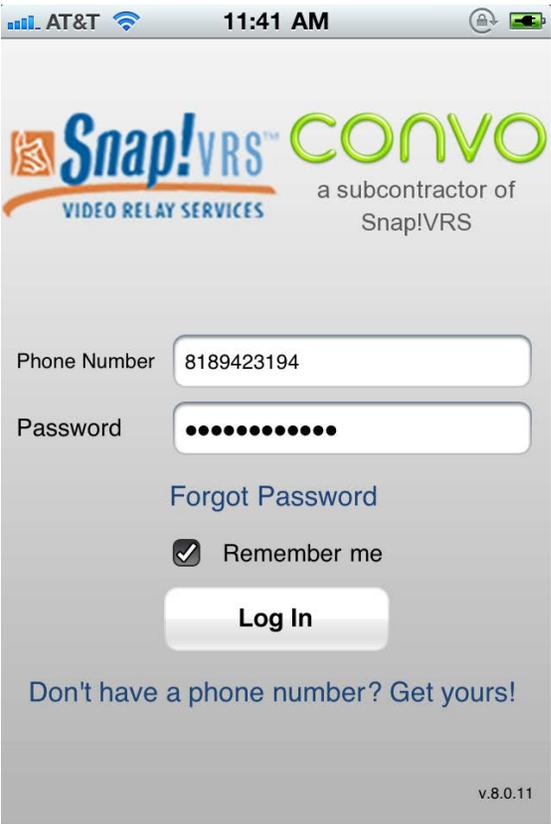
Step	Current User Action	Illustration	Rebranding
4	<p>The CA appears on the screen and the user's call is initiated.</p> <p>Upon ending a call, the user automatically is provided with the screen set forth in slide 20.</p>	 <p>The illustration shows a desktop application window titled 'DESKTOP' with a red border. The window contains a video call interface. On the left is a numeric keypad with letters above the numbers. In the center is a large video feed of a woman with glasses and a black top, labeled 'Agent 2003'. On the right is a smaller video feed of a man. At the bottom, there are icons for 'Contacts', 'History', 'Videos', and 'Skating', along with a 'SEND' button. The background of the desktop is a scenic landscape with a beach and hills.</p>	<p>Convo has pushed the newly rebranded Desktop skin to existing user's computers, removing the Convo name from this screen. The version of Desktop downloaded by newly registered users will include the newly rebranded skin.</p>

Desktop

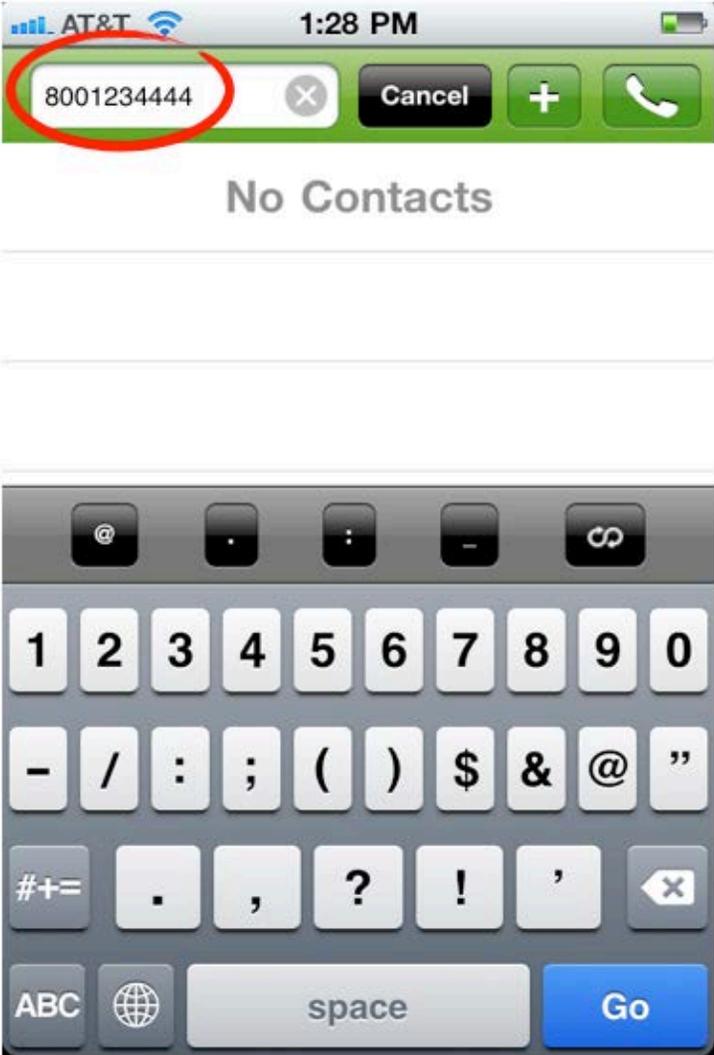
Mobile (for iPhone, iPad 2 & iPod Touch)

Step	Current User Action	Illustration	Rebranding
1	<p>The user launches Mobile from his home screen by clicking on the Snap!VRS logo. The user is required to have previously downloaded the application.</p> <p>No URL is inputted by a user when using Mobile.</p>		<ol style="list-style-type: none"> 1. Convo has pushed a new icon based on the Snap!VRS logo to replace the prior generic video camera icon previously used for the Mobile application. (The generic video camera icon mistakenly was characterized as a Convo logo in slide 16 of Attachment A to the Amendment.) However, Convo is unable to rename the app from “Convo Mobile” to “Mobile” without substantial user disruption. Such a revision would require the deletion and re-installation of the Mobile application by every user and cannot be accomplished through a mere update. 2. Convo has sent all users an email explaining that (i) Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS and (ii) the Mobile application will route users to a Snap!VRS branded interface going forward. 3. All newly registered users only will be provided access to the rebranded version of the Mobile application (see slide 23) upon registering.

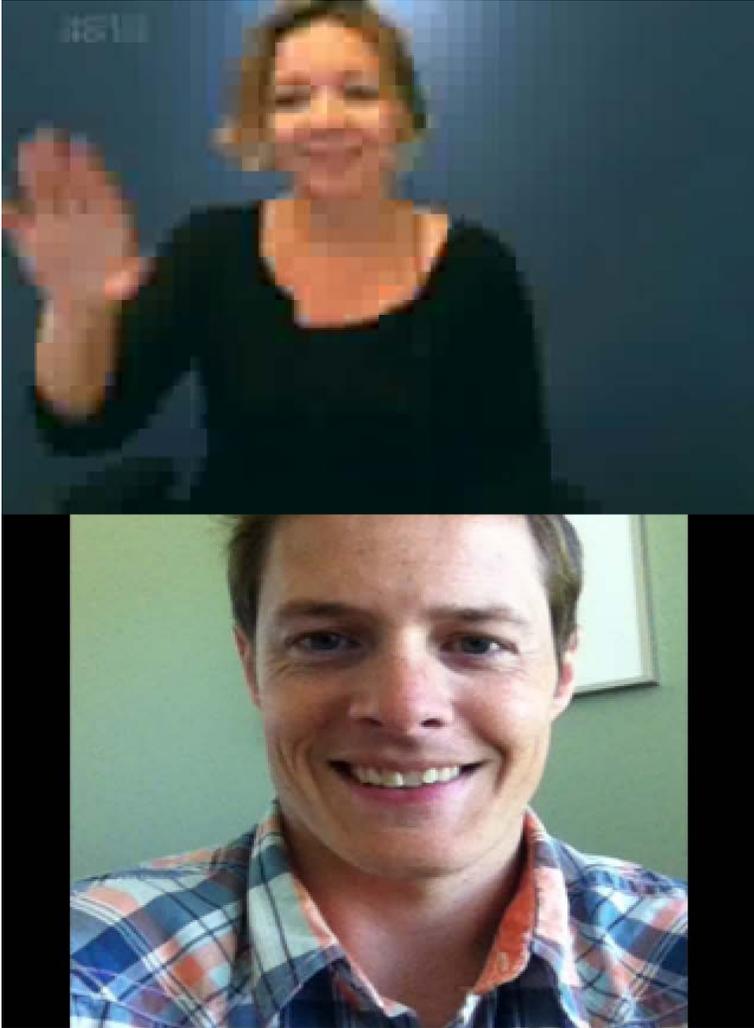
Mobile

Step	Current User Action	Illustration	Rebranding
2	The user logs into Mobile by providing the user's TDN and password.		<ol style="list-style-type: none"> 1. Convo has pushed a newly rebranded Mobile “skin,” including the login screen to the left, to existing users’ smart phones causing Convo’s name to be replaced with a Subcontractor Logo and the prior “Let’s Convo” button to be replaced with a “Log In” button. 2. The version of the Mobile application downloaded by newly registered users will include the newly rebranded skin.

Mobile

Step	Current User Action	Illustration	Rebranding
3	The user submits the intended call recipient's phone number then clicks the green "phone" button.		No changes were required for this screen, and no changes were made in the new Mobile skin.

Mobile

Step	Current User Action	Illustration	Rebranding
4	<p>The CA appears on the screen and the user's call is initiated.</p> <p>Upon ending a call, the user automatically is provided with the screen set forth in slide 24.</p>	 <p>The illustration consists of two vertically stacked screenshots from a video call. The top screenshot shows a woman with short brown hair, wearing a black top, waving her right hand. The bottom screenshot shows a man with short brown hair, wearing a blue and white plaid shirt, smiling broadly at the camera.</p>	<p>No changes were required for this screen, and no changes were made in the new Mobile skin.</p>

Mobile

Videophone (for third-party videophone users)

Step	Current User Action	Illustration	Rebranding
1	<p>User enters into videophone (by keyboard or remote control depending on the videophone) either a phone number or URL (www.convorelay.tv) to reach a Convo CA.</p> <p>Convo does not distribute videophones. As a result, this VRS service primarily is used by registered customers of other VRS providers to reach Convo's CAs. The initial screen of a Sorenson videophone is used as an example to the right.</p>	 <p>The screenshot shows a video call in progress with a man on the screen. The interface includes a 'Home' button, 'Received Calls', 'Missed Calls', and 'Dialed Calls' sections. A 'Dial' field contains the number '(510) 314-9030'. At the bottom, there are icons for 'VP' and 'SVRS', and the 'sorensonvrs' logo.</p>  <p>Due to FCC rules, you need to dial 877-363-7575 for an interpreter See vlog at convorelay.com</p> <p>Need help? Call 510-629-5622</p> <p>Snap!VRS VIDEO RELAY SERVICES CONVO A subcontractor of Snap!VRS</p>	<ol style="list-style-type: none"> 1. The convorelay.tv URL is no longer in service. Users only can access the videophone product by dialing 877-363-7575. 2. When users enter the convorelay.tv URL, they are forwarded to a screen that requires them to call 877-363-7575 (see Branded notification to the left). Users will not be automatically forwarded to a CA unless they dial this number. 3. Convo has sent all users an email explaining that (i) Convo has become a subcontractor to Snap!VRS and no longer independently offers VRS and (ii) users should use the new phone number (see items 1 and 2 above) going forward. 4. All newly registered users only are provided the new access phone number and are not provided with a URL (see items 1 and 2 above).

Videophone

Step	Current User Action	Illustration	Rebranding
2	<p>The process for logging in and submitting the intended call recipient's phone number varies depending on which videophone the user is utilizing. Once completed, the CA appears on the screen and the user's call is initiated.</p>		<p>Convo cannot control the format of, or push branding to, a third-party videophone. However, to the extent that any branding is present on a user's third-party videophone interface, such branding will reflect the Snap logo or a Subcontractor Logo. Also, the identifier for the CA does not include a "convo" prefix.</p> <p>The typical videophone only displays the number or URL entered by the user. Now that the convorelay.tv URL is no longer in service, only the access number, "877-363-7575," will be displayed on a videophone interface.</p>

Videophone