VIA ELECTRONIC FILING

January 14, 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 January 12, 2011, Robin Horwitz, CEO, David Bahar, Director of Government and Regulatory Affairs, both of Convo Communications, LLC (“Convo”), and Phil Marchisello, Convo’s legal counsel, met with Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis, Nicholas Alexander, Wireline Competition Bureau, Diane Mason, Consumer and Governmental Affairs Bureau, and Gregory Hlibok, Chief, Disability Rights Office.

During the meeting, Convo provided the participants with background information regarding Convo and its operations, and introduced the participants to many of Convo’s staff. Further, Convo provided the participants with some descriptions of the problems present in the VRS industry, and some possible solutions for addressing those problems and increasing competitiveness within the VRS industry. Finally, Convo shared its vision for the future of VRS. The substance of the discussion during the meeting is further set forth in the attached presentation, which Convo presented during the meeting.

This letter as well as the keynote presentation used during the meeting are being filed for inclusion in the public record of the Commission’s docket CG 10-51.

David J. Bahar
/s/
Director of Government and Regulatory Affairs
Convo Communications, LLC
The People Behind Convo
Ed Bosson
VP of Regulatory
Chad W. Taylor
VP of Technology
David Bahar
Director of Government & Regulatory Affairs
Jewel Jauregui
VP of Call Center
Jeff Neable
System Administrator
Scott Haines
Lead Software Engineer
Joshua Shaffner
Software Architect
Jerry Cardoso
Call Center Specialist
100% DEAF-OWNED
ZERO
PRIVATE FUNDING
0.07% MINUTES WITHHELD

(0.07% = 70 minutes per 100,000)

(average over August, September, October billing cycles)
2nd
TIER RATES
5th LARGEST PROVIDER
Convo-owned Call Centers

Call centers coming in 2011
Convo-owned Call Centers

Seattle, WA

Roseville, CA

San Ramon, CA

Mobile, AL

Call centers coming in 2011
- Developed in-house
- Most accessible web-based software
- 100% empowered telephony tool
Developed in-house
Most accessible web-based software
100% empowered telephony tool
Emergency Service E-911
24/7 Service
ASA Compliant
Customer Care
Applied for certification: October 30, 2009
State of the VRS Industry

- White labeling; no alternative for new entrants
- Difficulty identifying source of minutes
- Frozen certification system
Possible Solutions

- Make it easier to identify source of minutes

- Establish provisional certification system; more direct contact with providers

- Require periodic reviews to maintain certification; probation?

- Reward efficiency
How to Enhance Competitiveness

- Periodic performance reviews; greater information sharing by providers to FCC

- Incentives for highly performing, efficient providers

- Keep tiered rate, but optimize it
Convo’s Vision of the Future of VRS

- Services and Equipment separated
- Platform independence encouraged
- Off-the-shelf (commercial) products encouraged
- Video standards encouraged; functional equivalency redefined