

November 30, 2007

Mail Stop 7010

By U.S. Mail and facsimile to (513)723-2441

James F. Orr
Chairman and Chief Executive Officer
Convergys Corporation
201 East Fourth Street
Cincinnati, Ohio 45202

**Re: Convergys Corporation
Definitive 14A
Filed March 13, 2007
File No. 001-14379**

Dear Mr. Orr:

We have reviewed your response letter dated September 21, 2007 and have the following comments. Please respond to our comments by December 14, 2007 or tell us by that time when you will provide us with a response. If the comments request revised disclosure in future filings, please confirm in writing that you will comply with the comments in your future filings and also explain to us how you intend to comply. We welcome any questions you may have about our comments or any other aspect of our review.

1. We reissue comment 3 of our August 21, 2007 letter.
2. Please clarify your response to comment 5 of our August 21, 2007 letter in future filings. Specifically, you do not appear to disclose in the filing that Messrs. Hawkins' and Shanks' termination and change of control packages were influenced by the level of Mr. Dougherty's package nor does there appear to be disclosure regarding the fact that termination and change in control benefits have not been an influencing factor in decisions regarding other elements of compensation.

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Please contact me at (202) 551-3729 with any questions.

Sincerely,

Craig Slivka
Attorney Advisor