



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

October 28, 2009

Via U.S. Mail and Facsimile (513-723-7734)

Earl C. Shanks  
Chief Financial Officer  
Convergys Corporation  
201 East Fourth Street  
Cincinnati, OH 45202

**Re: Convergys Corporation**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed February 27, 2009**  
**File No. 1-14379**  
**Response Letter Filed October 14, 2009**

Dear Mr. Shanks:

We refer you to our comment letter dated September 30, 2009 regarding business contacts with Syria. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Barbara Jacobs  
Assistant Director  
Division of Corporation Finance