



DIVISION OF  
CORPORATION FINANCE

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

Via fax: (513) 723-6566

August 20, 2010

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

**Re: Convergys Corporation**  
**Form 10-K for Fiscal Year Ended December 31, 2009**  
**Filed February 26, 2010**  
**Form 10-Q for Fiscal Quarter Ended March 31, 2010**  
**Filed May 5, 2010**  
**File No. 001-14379**

Dear Mr. Shanks:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Kathleen Collins  
Accounting Branch Chief