Mail Stop 4561 via fax (513) 723-3402

September 12, 2006

Mr. James F. Orr Chief Executive Officer Convergys Corporation 201 East Fourth Street Cincinnati, OH 45202

> Re: Convergys Corporation Form 10-K for Fiscal Year Ended December 31, 2005 Filed March 6, 2006 File No. 001-14379

Dear Mr. Orr:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Very truly yours,

Kathleen Collins Accounting Branch Chief