

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.

James F. Orr  
Convergys Corporation  
November 30, 2007  
Page 2

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

Sincerely,

Craig Slivka  
Attorney Advisor