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May 28, 2021

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: *Emergency Broadband Benefit Program, WC Docket No. 20-445  
Application for Consent to Transfer Control of International Section 214  
Authorization, GN Docket No. 21-112, File No. ITC-T/C-20200930-00173.***

Dear Ms. Dortch:

Verizon strongly supports the Emergency Broadband Benefit (EBB) program and is committed to ensuring that the program is a success. The purpose of this letter is to offer an update on Verizon's experience during the first days of the EBB program, address incorrect characterizations of Verizon's practices in implementing the EBB program, and notify the Commission of additional steps that Verizon has taken to encourage participation by eligible consumers. Contrary to the suggestions of Public Knowledge in the context of the pending TracFone acquisition, our participation in the EBB program and responsiveness to our customers confirms our commitment to meeting the needs of low-income consumers.

From the outset, Verizon has committed to make available to customers a wide range of broadband service choices eligible for the EBB benefit. Although the Commission's EBB rules require only that carriers offer the EBB discount on at least one broadband service, our original list of EBB-eligible services reflected a broad range of Verizon's current fixed and mobile broadband service offerings, including widely available Fios fixed broadband plans (which we call "Mix & Match") currently in the market;<sup>1</sup> all Mix & Match (current and legacy) unlimited mobile broadband plans; LTE Home and 5G Home fixed wireless plans; and standalone mobile hotspot plans.

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<sup>1</sup> Verizon is not offering the EBB discount on 50/50 Mbps or below Mix & Match plans, which are offered only on a limited basis where technical limitations preclude higher speed offerings.

Our original list of EBB-eligible services not only offered our customers a range of robust broadband choices, but facilitated Verizon's ability to implement the program in the short 60-day interval between the adoption of the EBB rules and the anticipated launch date. Extending our list of EBB-eligible services to our many legacy plans would have required additional and more complex system changes, partly because our legacy Fios plans (in contrast to our current plans) include double-play and triple-play bundles that under EBB rules must be allocated between the broadband service that is eligible for the subsidy and the video service that is not.

Despite Verizon's decision to offer the EBB discount on nearly all of our current fixed and mobile broadband service offerings, there have been isolated claims that Verizon viewed the EBB program as an opportunity to "upsell" customers to higher-priced plans.<sup>2</sup> Those claims are unfounded.

*First*, we offer the EBB discount on our widely-available "Mix & Match" Fios plans, including our lowest-priced Fios plan, which offers a 200/200 Mbps fiber broadband service with no data caps for \$39.99 per month.<sup>3</sup> This robust service is ideal for EBB customers because the \$50 EBB discount fully covers the cost of the service and reduces the overall cost to \$4.99 per month for customers who also choose to rent a router from us. And the price for this 200/200 Mbps service is lower than the price of any of the legacy, bundled plans that had been generally available to customers. We have instructed our customer service representatives to suggest this lowest-cost option to consumers calling to use their EBB benefit with us.

*Second*, our EBB-eligible Mix & Match Fios plans are designed to permit customers to pay for only the services and features they need. Voice and video options are available, but, consistent with the EBB program's focus on affordable *broadband* service, we anticipated that most EBB customers would elect to purchase only standalone broadband service. In addition to providing customers with flexibility to purchase only the services they need, Fios Mix & Match plans do not have data caps, do not impose additional fees, and are priced the same for new and existing customers. These are highly competitive plans that successfully win customers from other providers.

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<sup>2</sup> See, e.g., Letter from Kathleen Burke, Public Knowledge, to Marlene Dortch, FCC, GN Docket No. 21-112, IB File No. IC-T/C-20200930-00173 (filed May 21, 2021) ("*Public Knowledge Letter*").

<sup>3</sup> The \$39.99 per-month rate reflects a \$10 per-month autopay discount. For customers who elect to rent a router from Verizon, the router rental charge is \$15 per month. In some areas, customers may obtain 300/300 Mbps service for \$39.99.

*Third*, rather than paying more, most existing customers who switch from a legacy Fios plan to an EBB-eligible Mix & Match plan save money – an *average of about \$25 per month* (before the EBB discount) – by having the flexibility to choose just the services and content that they want. These savings would continue after the EBB program ends. And none of our generally available legacy bundles offered rates as low as the current \$39.99 per month Mix & Match 200/200 Mbps plan.

Rather than evincing any intent to “take advantage of low-income customers,”<sup>4</sup> as Public Knowledge suggests in an effort to raise concerns about the proposed TracFone acquisition, these facts underscore Verizon’s commitment to providing these customers the same range of robust broadband plans, both mobile and fixed, that it offers to all retail customers. And once the Commission approves Verizon’s acquisition of TracFone, we look forward to demonstrating our commitment to bringing the best network and service experiences to value-conscious customers.

Verizon’s experience during the early days of the program confirms that our original list of EBB-eligible services provides the vast majority of EBB-eligible customers with both choice and a cost-effective broadband service option. However, we have heard from some existing customers on legacy double-play or triple-play Fios bundles that they would prefer to apply their EBB discount to their legacy plan, rather than switch to one of our current plans. While most customers save money overall when they switch from a legacy plan to one of our current Mix and Match plans, there are limited cases in which that may not be the case based on the customer’s video choices. That is, the customer may seek to retain a certain set of video options which are lower on legacy plans than Mix & Match plans.

Based on the feedback from those customers and to encourage broad participation in the EBB program, Verizon has significantly expanded its list of EBB-eligible services to include *all* legacy Fios plans. Existing customers will now be able to choose to apply the EBB discount to the broadband component of their legacy plan. Although we estimate it will take about a month to make the complex billing system changes necessary to apply the EBB discount to Verizon’s many legacy Fios plans – so we will have to go back and apply credits to some customers at that time – we have already begun offering existing customers this option. Furthermore, EBB customers that contact us within 14 days of moving to a Mix & Match plan may switch back to their legacy plan.

These steps respond to our customers’ requests and confirm Verizon’s commitment to the successful implementation of the EBB program. We will continue to work with our EBB-eligible

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<sup>4</sup> *Public Knowledge Letter* at 3.

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customers to ensure that they are able to apply the EBB discount to the services and plans that best meet their needs under this important program.

This letter is being filed electronically in the above-referenced dockets pursuant to Section 1.1206 of the Commission's rules. Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan Buzacott". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

Alan Buzacott