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September 23, 2016

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Protecting the Privacy of Customers of Broadband and Other Telecommunications Services, WC Docket No. 16-106

Dear Ms. Dortch:

On September 21, 2016, Maggie McCreedy, Kathleen Ramsey, and I from Verizon met with Dan Kahn, Sherwin Siy, Melissa Kirkel, and Heather Hendrickson of the Competition Policy Division of the Wireline Competition Bureau to discuss the Commission's broadband privacy proceeding.

We discussed the benefits of harmonizing the Commission's CPNI rules for voice services with any new rules addressing broadband privacy. Many customers purchase both services from Verizon and other carriers and a single set of rules will benefit consumers and providers through simplified notices and processes. Specifically, the Commission should adopt a sensitivity-based approach to privacy and data security for both voice and broadband services. Harmonization also would provide the Commission with the opportunity to update its existing but outdated voice rules, including those related to authentication that may inhibit providers from taking advantage of new, more secure technologies. Finally, we urged the Commission to exempt business customers from any adopted rules, regardless of whether it harmonizes the voice and broadband rules.

We also urged the Commission to allow 18 months to implement any new rules. Once rules are adopted, providers must go through an extensive and complex implementation process. Specifically, providers must perform an assessment of their existing processes and systems to determine what changes must be made; review, update, and negotiate supplier and other contracts; update written requirements documents; research, design, code, and test updates to customer care, self-serve, and back-office applications and systems; train employees and suppliers; draft customer communications; develop notice methods and periods; and set up a system for ensuring ongoing compliance. These actions will take a significant amount of time to complete, requiring approximately 18 months from the date rules are adopted.

Finally, we discussed what type of documentation providers should maintain and how providers should deliver privacy notices to consumers. Specifically, the Commission should limit its records maintenance requirements to providers' own and their affiliates' sales and

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marketing campaigns that use customers' CPNI. This approach has allowed the Commission to confirm providers' compliance with the rules over the years. The Commission also should not mandate precisely how providers deliver privacy notices to their consumers. While postal and electronic notices may be the most effective means of notification for some customers in some situations, other types of electronic notification may be more effective in other situations. And the most effective means of providing notice likely will evolve over time. In addition, providers need the flexibility to send notices to any address or in any manner they reasonably believe will reach the customer to protect against potential fraudsters changing customers' notification preferences.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink that reads "Catherine Hilho". The signature is written in a cursive, flowing style.

cc: Dan Kahn
Sherwin Siy
Melissa Kirkel
Heather Hendrickson