

**Alan Buzacott**  
Executive Director  
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**Ex Parte**

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

**Re: Modernizing the E-Rate Program for Schools and Libraries  
WC Docket No. 13-184**

Dear Ms. Dortch:

On November 20, 2014, Kathleen Grillo of Verizon spoke with Trent Harkrader and Patrick Halley of the Wireline Competition Bureau regarding the above-captioned proceeding.

She discussed Verizon's Petition for Reconsideration in the above-captioned proceeding and CTIA's July 14, 2014 Application for Review of the *Bureau Order* regarding cost allocation of bundled devices.

Ms. Grillo reiterated Verizon's view that the FCC should grant the relief requested in the pending CTIA Application for Review of the *Bureau Order* with respect to discounted wireless phones. She stressed that the *Bureau Order* was adopted before the *Modernization Order* substantially revised the eligibility rules for wireless services. Because the *Modernization Order* phases out support for wireless voice service (and imposes limits on support for wireless data services), the policy considerations underlying the *Bureau Order* are now far outweighed – in the case of wireless phones -- by the cost allocation burdens for carriers, customers, and USAC reviewers.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

/s/ Alan Buzacott

cc: Patrick Halley  
Trent Harkrader