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EX PARTE

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

Re: *Open Internet Remand Proceeding*, GN Docket No. 14-28

Dear Ms. Dortch:

On February 13, 2015, William H. Johnson and I from Verizon spoke by phone with Rebekah Goodheart, legal advisor to Commissioner Clyburn, to discuss the above captioned proceeding. During the call we explained that Verizon continues to believe that the Commission should follow the D.C. Circuit's roadmap for open Internet rules based on Section 706. As Verizon has previously explained, any attempt to "reclassify" broadband Internet access service as a Title II telecommunications service would be a radical and risky change to communications policy. Such action will cause significant, harmful consequences, and it is unlikely to withstand judicial review. Moreover, we noted that the possibility of forbearance from some subset of Title II regulation is no panacea. Even extensive forbearance would do nothing to solve the intractable legal problem, nor fully address the harms and uncertainty, associated with reclassification. Still worse would be reclassification without forbearance or where any forbearance does not withstand appeal.

We also explained that Internet interconnection should not be subject to open Internet rules. These inherently individualized arrangements have always been the product of commercial negotiations, and this approach has worked well. Finally, we explained that the Commission should not apply new rules or strict definitions to "specialized services." Because these services, by definition, are distinct from broadband Internet access, other Internet companies can continue to offer their online content, applications, and services to consumers over the open Internet without fear of being blocked or throttled. At the same time, specialized services provide consumers with additional options that they can choose from.

The points we made during the call were consistent with our previous filings.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCready".

cc: Rebekah Goodheart