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February 18, 2015

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EX PARTE

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

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

Dear Ms. Dortch:

On February 12, 2015, Michael Glover and I from Verizon met with Commissioner Ajit Pai and Nicholas Degani, legal advisor to Commissioner Pai, to address issues related to the open Internet proceeding.

We explained that the Commission can achieve all of its goals for an open Internet by applying its authority under Section 706, as that provision has been interpreted by the D.C. Circuit. There is no reason to reverse course and subject any aspect of broadband Internet access service to Title II. We stated that not only would Title II reclassification be unlawful, but it would also be a radical and risky change to light-touch regulatory policy that has been pursued on a bipartisan basis for the last two decades and that has encouraged massive private investments in broadband infrastructure. The record, both in this country and internationally, is clear: heavy regulation reduces incentives to invest in communications networks.

On the flip side, shifts away from heavy regulation consistently have increased incentives to invest. We noted that Verizon dramatically increased its investments in next-generation fiber networks only after the Commission had adopted in 2002 the first in a series of orders confirming that broadband Internet access service is an information service and had confirmed in 2003 that unbundling obligations would not apply to the broadband capabilities of next-generation fiber networks. In reliance on the longstanding approach which the Commission crafted with the express purpose of encouraging facilities investment, Verizon invested tens of billions of dollars deploying fixed and mobile broadband facilities. Rather than reversing course and applying burdensome Title II requirements that would depress investment in broadband, the Commission should continue the light-touch policy that has promoted investment.

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We also explained that neither open Internet rules nor Title II regulation should apply to Internet interconnection arrangements. The current system of voluntary, commercially negotiated arrangements has a proven track record of accommodating new business models such as content delivery networks, encouraging more efficient interconnection arrangements, creating incentives for the deployment and upgrade of broadband networks, and ultimately enhancing and improving end users' experiences. Regulation of interconnection agreements would only cripple this flexible, market-based dynamic that has played a key role in the explosive growth of the Internet.

Finally, we explained that the Commission should not adopt rules that restrict or create uncertainty regarding specialized services, which provide valued services to end users and drive additional private investment in broadband networks.

The points we made during the meeting were consistent with Verizon's previous filings.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo". The signature is written in a cursive, slightly slanted style.

cc: Nicholas Degani