

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

November 20, 2015

Re: Comment regarding petition seeking a declaratory ruling clarifying the regulatory status of mobile messaging services (WT Docket No. 08-7)

Dear Chairman Wheeler:

We, Zillow Group, Inc. ("Zillow"), write in support of the petition filed on August 28, 2015, asking the Commission to declare that messaging services are governed by Title II of the Communications Act. This letter describes how Zillow uses text messaging to reach consumers and the impact of the current practices by wireless providers on our business.

Text messaging is critical to connecting buyers with real estate agents, and to getting quality listings on our site. Zillow uses text messaging in the following ways:

- **Connecting agents with buyers.** When a potential buyer contacts a real estate agent via email, they are looking for a response right away. Agents are busy professionals who often don't have time to check their email constantly. The quickest and most reliable way we've found to get potential buyers' inquiries to real estate agents is via text. With the information in a text message, agents can quickly figure out what a potential buyer needs and call them back.
- **Offering an alternative to phone calls.** When a consumer sees a phone number on our website, they expect to be able to both call and text it. We want to add texting support to the phone numbers we display and guarantee to consumers that it will be delivered, just like a phone call.
- **Preventing spam.** One of the best methods we've found for preventing spam in our listings is to require users to validate their identity by receiving a text message on their cell phone.

When text messages that we send through Twilio aren't delivered, we fail to meet consumers' basic expectation that the messages they send will be received. The result is any of the following poor customer experiences:

- Agents don't find out right away that a potential buyer wants to talk to them.

- Potential buyers are frustrated that they don't receive responses from agents.
- Users can't verify their identity, so their listings don't get posted to our site.

Text messaging provides a fast, reliable and efficient means of communication that has become integral to the satisfaction of our customers and the success of our business. We urge the Commission to support innovation and ensure consumer choice by declaring that messaging services are governed by Title II of the Communications Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Gordon", with a long horizontal flourish extending to the right.

Sarah Gordon
Corporate Counsel
Zillow Group, Inc.