



William H. Johnson
Senior Vice President
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 400 West
Washington, DC 20005
Phone 202.515.2492
Fax 202.336.7922
will.h.johnson@verizon.com

April 18, 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 April 14, 2016, Kathy Grillo, SVP and Deputy General Counsel for Public Policy and Government Affairs; John Frantz, SVP and General Counsel of Product and New Business Innovation; Karen Zacharia, Chief Privacy Officer; and I from Verizon met with Ruth Milkman, Chief of Staff to the Chairman; Matt DelNero, Bureau Chief for the Wireline Competition Bureau; and Jennifer Tatel, Associate General Counsel and Chief of Staff to the General Counsel to discuss the Commission's broadband privacy proceeding. We expressed general agreement with the use of a notice and consent framework for addressing the privacy practices of broadband providers but expressed significant concerns with the Commission's lead proposal for implementing such a framework.

We noted that the broad opt-in requirements proposed in this proceeding are unnecessary to protect consumers and inconsistent with the practices of other Internet companies. The proposed opt-in requirement – including for the marketing of a provider's own products and services to its customers and for the internal sharing of customer information with affiliates – would create substantial practical challenges for broadband providers and would make it more difficult for these providers to bring new competition to the market for online advertising. We suggested that any opt-in requirement should be limited to the most sensitive use cases. In other instances, meaningful notice combined with opt-out (or implied) consent would protect consumers while allowing flexibility for providers to operate, innovate, and compete more effectively.

Sincerely,

CC: Ruth Milkman

Matthew DelNero

Jennifer Tatel