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January 30, 2007

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Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: Implementation of the Telecommunications Act of 1996-Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115; Petition for Rulemaking to Enhance Security and Authentication Standards for Access to Customer Proprietary Network Information, RM 11277

Dear Ms. Dortch:

Today, Susanne Guyer, Karen Zacharia, and the undersigned of Verizon, and John Scott of Verizon Wireless, met with Commissioner Adelstein, Scott Bergmann and Barry Ohlson of Commissioner Adelstein's office to discuss the above-referenced proceeding. We explained that Verizon and Verizon Wireless are committed to protecting customers' privacy and that they have taken comprehensive measures to protect customer information. We urged the FCC to provide adequate time for providers to implement any new CPNI rules it adopts, and explained the various steps they would need to take successfully implement new rules, including the training of customer service representatives and various IT systems changes.

Verizon also encouraged the FCC not to adopt an opt-in rule requiring carriers to obtain customers' affirmative consent before sharing certain customer information with independent contractors that assist carriers in their marketing efforts. Verizon explained that pretexters are not interested in the type of marketing-related customer data that it provides to its third party marketing partners and that there is nothing in the record to suggest that pretexters are obtaining call detail information from carriers' third party marketing partners. In particular, Verizon explained the First Amendment implications of the FCC's adoption of an opt-in requirement.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".