

Donna M. Epps
Vice President
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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 Andrew McBride of Wiley, Rein and Fielding met with Tom Navin, Renee Crittendon, William Dever, Marcus Maher, Tim Stelzig, Adam Kirschenbaum, and Cindy Spiers of the Wireline Competition Bureau to discuss the above-referenced proceeding. Verizon explained that it is committed to protecting customers' privacy and that it has taken comprehensive measures to protect customer information. Verizon urged 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 addition, Verizon explained the First Amendment implications of the FCC's adoption of an opt-in requirement. Verizon also urged the FCC to provide adequate time for providers to implement any new CPNI rules it adopts. In particular, Verizon explained the various steps it would need to take to successfully implement new rules, including the training of customer service representatives and various IT systems changes.

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".