

Donna M. Epps  
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Federal Regulatory



February 22, 2007

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**Ex Parte**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> 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:

Yesterday, Susanne Guyer, Michael Glover, and the undersigned of Verizon met with Commissioner Copps, Scott Deutchman, and John Branscome of Commissioner Copps' office 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 explained that the FCC should give service providers adequate time to implement any new CPNI rules. Service providers will need time to train their customer service representatives, inform their customers of the new rules, and complete any necessary IT systems work. Additionally, Verizon outlined its concerns with any requirement that would prohibit customers from establishing online accounts using their account numbers in conjunction with certain biographical information. Lastly, Verizon raised some concerns with the DOJ's proposed notice requirements.

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".