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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Portals
Washington, DC 20554

RE: Implementation of Section 304 of the Telecommunications Act of 1996, Commercial Availability of Navigation Devices, CS Docket 97-80

Dear Ms. Dortch:

Yesterday, Will Johnson, Assistant General Counsel for Verizon, and I met with William Freedman, Legal Advisor to Commissioner Tate, to provide an engineering overview of Verizon's FiOS TV network architecture and to discuss Verizon's positions on two-way plug-and-play issues. Verizon encouraged the Commission to ensure that any two-way plug-and-play approaches that it endorses or requires would be platform agnostic and would be compatible with the services of video providers using differing technological approaches, including not only traditional cable companies but also IPTV providers, hybrid QAM/IP providers, or others. In particular, Verizon explained that any cable-centric standard that assumes the existence of an RF return path would be incompatible with Verizon's approach of delivering a hybrid IPTV/QAM service over a fiber network. Verizon cautioned that adopting technologies specific to only one segment of the video delivery market will adversely affect innovation and consumer choice. Verizon explained that a network agnostic approach for two-way plug-and-play will allow for nationwide compatibility of devices across satellite, xDSL, FTTP, HFC, and other video delivery networks.

The discussion was limited to issues described in the attached presentation and Verizon's other filings in the referenced proceeding. If you have any questions about this matter or need more information, please do not hesitate to contact me.

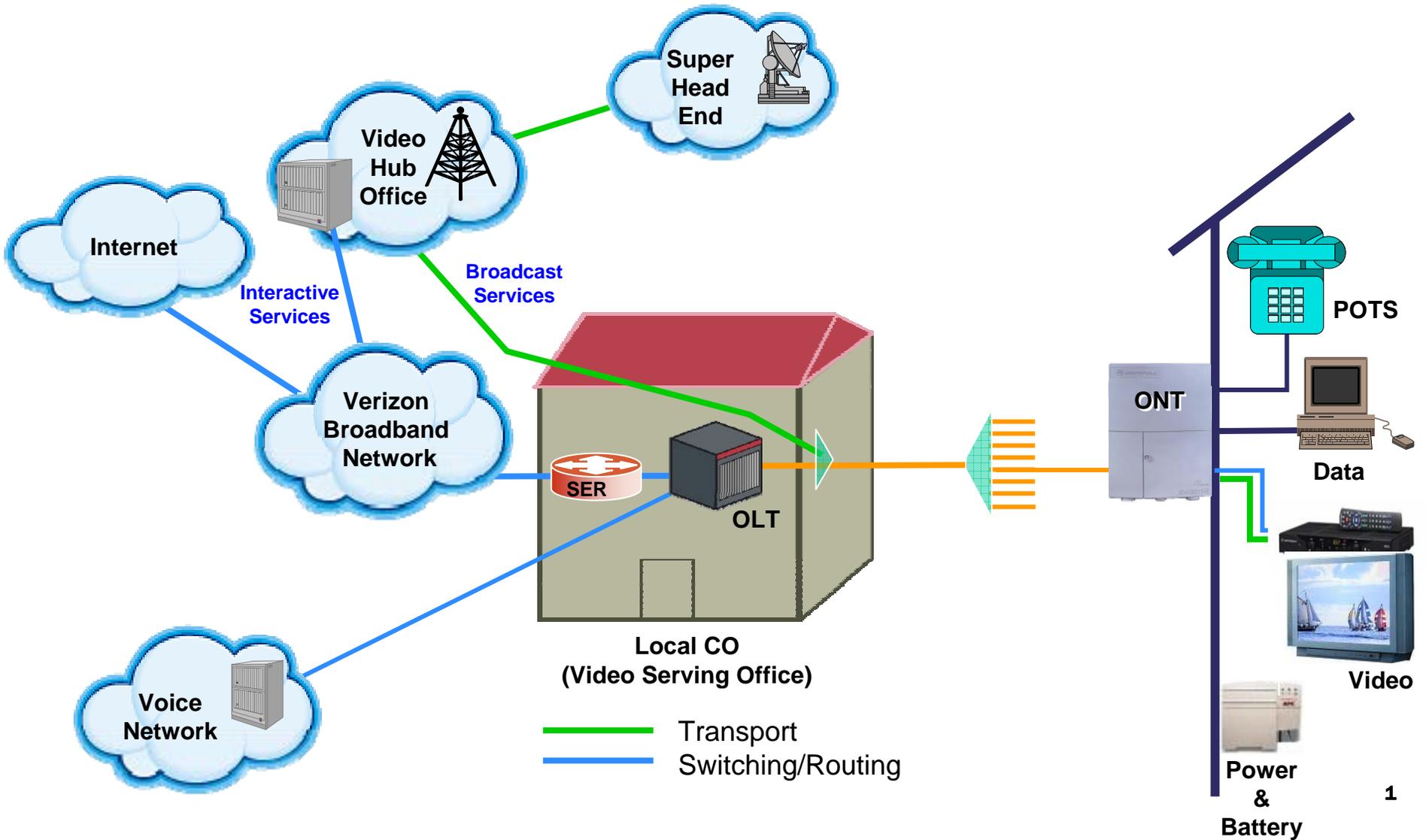
Sincerely,

A handwritten signature in black ink that reads "Paul Brigner".

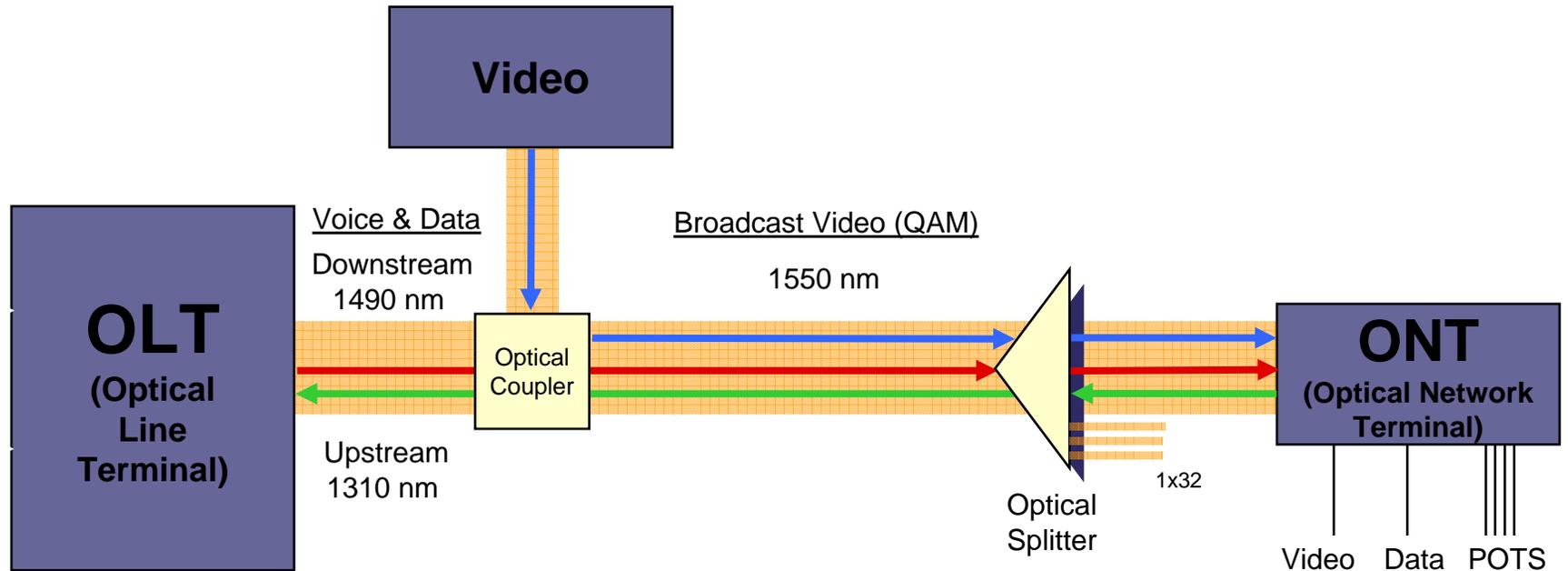
Attachment

cc: William Freedman

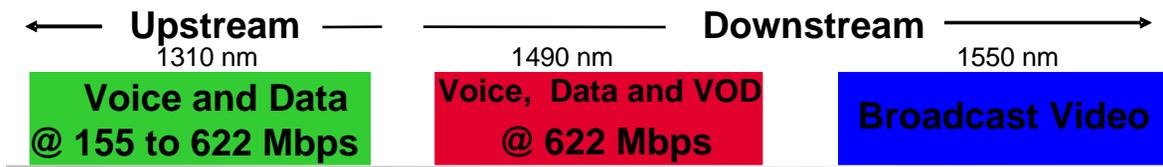
FTTP Architecture



FTTP Architecture



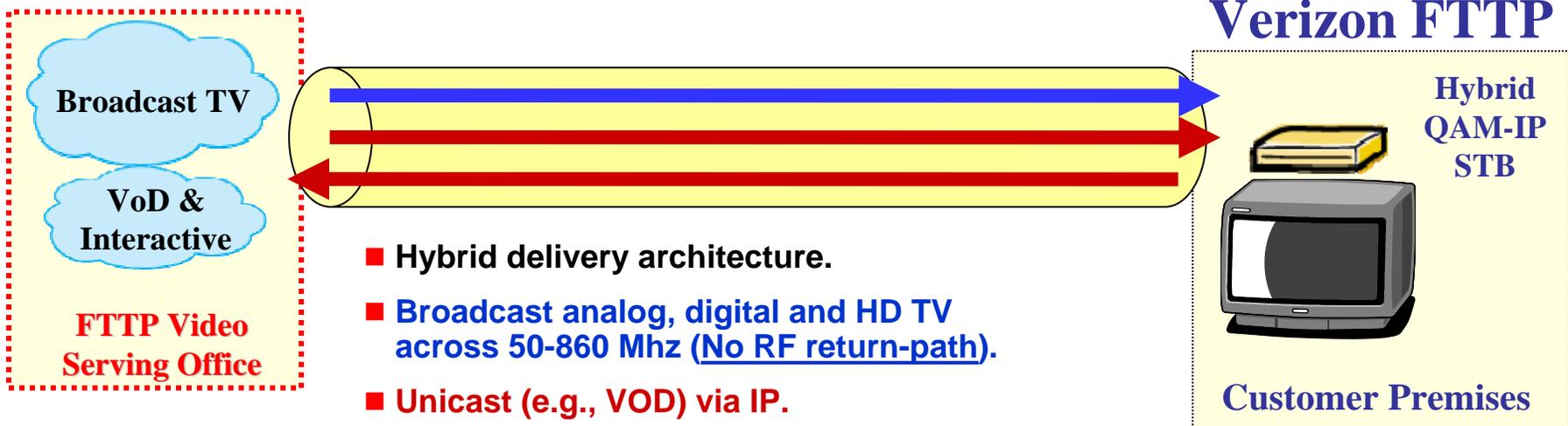
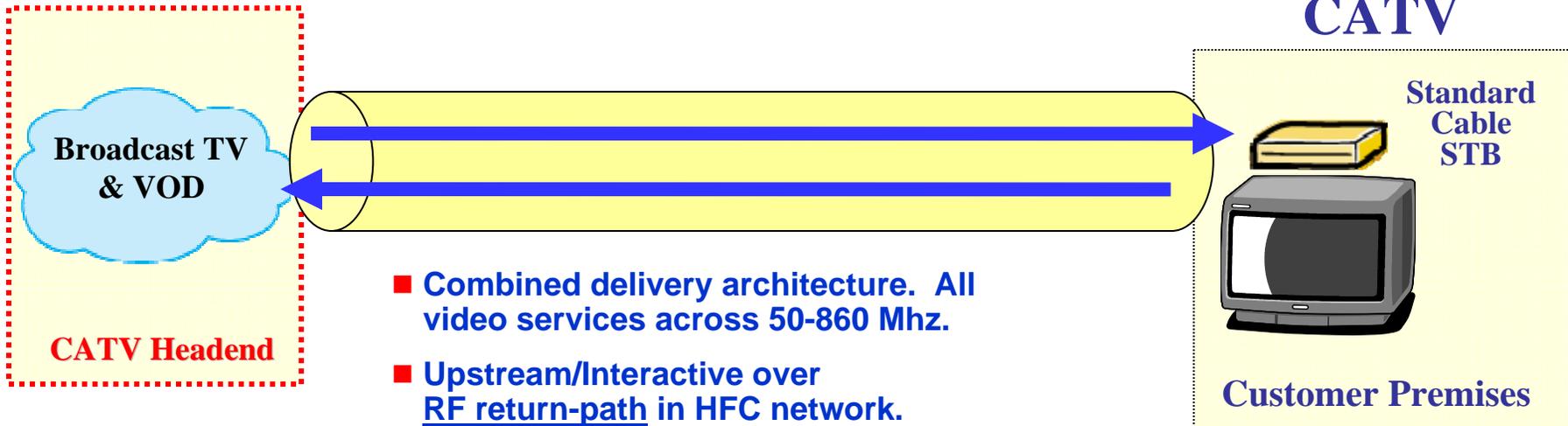
Bandwidths & Services



CATV-Verizon FTTP Comparison



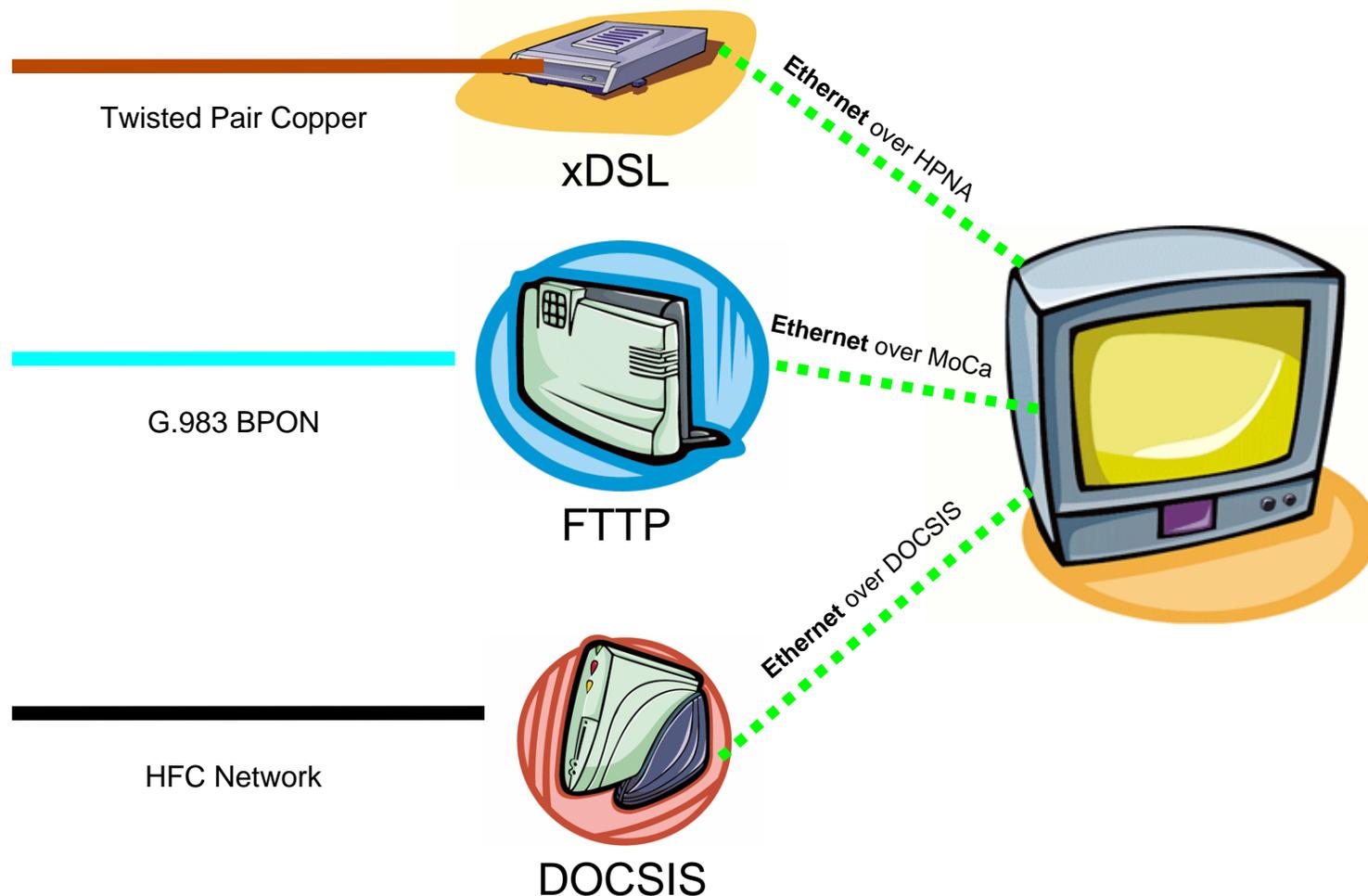
CATV



Verizon's Access Network Proposal



Implement bi-directional capability as an IP over Ethernet implementation (network agnostic)



Two-Way Plug-and-Play: Two Paths Forward



Solution Targeting Single Segment of Industry



Undue Reliance on Standards Pushed by Representatives of Only One Segment of Market



DOCSIS Return Path Solution for interactivity (favoring Cable Industry)

Cable-centric Model Severely Limits Competitive Alternatives and Defeats Purpose of PnP

Solution Focused on the Entire Industry



Open Standards venue allows full participation of all Industry Players



Standard Ethernet interface for interactivity supporting current and future IP-Enabled Devices

Open Competitive Environment, Lower Cost, Innovation!