

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Motion Picture Association of America)	CSR-7947-Z
)	
Petition for Expedited Special Relief;)	MB Docket No. 08-82
Petition for Waiver of 47 C.F.R. § 76.1903)	
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REPLY COMMENTS OF VERIZON¹ ON MPAA PETITION

The Motion Picture of America, Inc’s (MPAA) proposal for a limited waiver of the Commission’s rule prohibiting the use of selectable output control (SOC) could result in an intriguing new service for consumers. As MPAA and other commenters note, a narrow waiver could permit the creation of a new business model, with the potential to increase the programming choices available to consumers. The ability to offer first-run movies at an earlier date for home viewing – subject to appropriate protections to prevent unlawful piracy – could provide a benefit for consumers, including in particular those who are home-bound or otherwise unable to attend movies in theaters. Therefore, we urge the Commission to seriously consider this petition.

Although supportive of initiatives that offer the potential for new services for consumers, Verizon recognizes the legitimacy of some concerns raised by consumer groups and electronics

¹ The Verizon companies participating in this filing (“Verizon”) are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

manufacturers about the potential for consumer confusion or disruption, particularly given that most television sets in consumers' homes would not currently support the use of SOC. The Commission should make sure that the impact on consumers and their ability to use their home electronics equipment is fully understood, and any legitimate concerns addressed, as it considers the MPAA waiver petition.

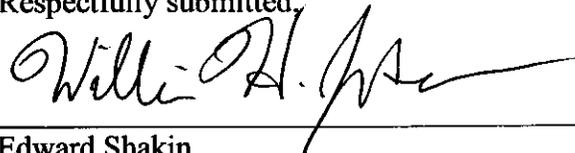
Furthermore, although Verizon is not aware of any current arrangements between movie studios and video providers to offer the type of service that the MPAA petition describes, it notes that the Commission should also consider that the interests of consumer choice would only be served if MPAA's members offer such services in a manner that does not serve to entrench the largest cable operators. Instead, to the extent that consumers would benefit from an opportunity to view first-run movies in their home at an earlier date than is currently available, all video providers should have a comparable opportunity to offer such services. Among other things, the opportunity to offer such services could help encourage the adoption of high definition technology and provide additional incentive for competitive video providers to deploy the next-generation broadband networks capable of delivering the type of service that MPAA describes.

As the Commission considers this important topic, Verizon is anxious to work with the Commission, MPAA, the Consumer Electronics Association, and all other stakeholders to meet consumers' demands for innovative video and broadband services, while ensuring that those services are made available in a way that serves consumers' interests.

Michael E. Glover
Of Counsel

July 31, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Johnson", written over a horizontal line.

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