

Nneka Ezenwa
Director
Federal Regulatory Affairs



April 30, 2009

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Ex Parte

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

Re: Petition of Verizon New England for Forbearance Pursuant to 47 U.S.C. 160 (c) in Rhode Island WC Docket No. 08-24; Petition of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160 (c) in Cox's Service Territory in the Virginia Beach Metropolitan Statistical Area WC Docket No. 08-49

Dear Ms. Dortch:

On April 29, 2009, Dee May and Ed Shakin of Verizon met with Nick Alexander, Legal Advisor to Commissioner McDowell, and separately with Mark Stone, Legal Advisor to Commissioner Adelstein to discuss its forbearance petitions.

First, Verizon emphasized the importance of considering wireless competition in the forbearance analysis. Verizon also emphasized that several prior Commission orders considered wireless cut-the-cord competition, and that nothing has changed that would support the exclusion of wireless competition from the Commission's analysis in the above-captioned proceedings. Approximately 18% of households have cut-the-cord altogether, and many more use wireless for a large portion of their phone minutes. Even a recent article in the New York Times notes that "to keep customers from deserting their landlines, the traditional phone companies like AT&T and Verizon offer a slew of discounts." (*Talk is Cheap*, Eric A. Taub, April 29, 2009)

In addition, Verizon explained that requiring competitors to obtain a certain market share before eliminating unbundling, with all its attendant costs, would conflict with the 1996 Act's language and purposes.

Finally, Verizon highlighted that there is no rational basis to subject Verizon to the most burdensome form of economic regulation, while imposing no comparable regulation on Cox. Verizon urged the Commission, as it considers its forbearance petitions, to ensure that regulatory parity exists as cable companies and telephone companies compete directly for the provision of similar services.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nneka Ezenwa".

cc: Nick Alexander
Mark Stone