

Nneka Ezenwa
Director
Federal Regulatory Affairs



May 7, 2009

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2466
(202) 336-7922 (fax)
nneka.n.ezenwa@verizon.com

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 May 7, 2009, Susanne Guyer and Mike Glover of Verizon met with Commissioner McDowell 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.

Indeed, the CDC yesterday released its latest figures on the number of households that have cut the cord and are wireless only. According to the CDC, that figure topped 20 percent for the first time in the second half of 2008, and the rate of growth in the number of households that have cut the cord accelerated to its highest level yet during that same period.

Finally, Verizon discussed the need for a consistent/predictable standard or test under which unbundling obligations can be reduced. The Act's unbundling requirements were imposed as a transition mechanism until it is possible for facilities based entry to occur. Where that objective has been achieved, and where facilities based competition is firmly established as it is in the areas at issue here, there has to be some mechanism to remove those requirements.

Please let me know if you have any questions.

Sincerely,

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

cc: Nick Alexander