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September 15, 2009

Ex Parte

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

Re: International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, GN 09-47; A National Broadband Plan for our Future, GN Docket No. 09-51 and Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act, GN Docket No. 09-137

Dear Ms. Dortch:

On Monday, September 14, 2009, David Young, Larry Plumb, Will Johnson and Bob Heffron of Verizon met with Nick Sinai and Charles Worthington of the FCC's National Broadband Task Force to discuss SmartGrid (PN #2). Bob Heffron, Energy and Utility Marketing Manager, explained how existing wireline and wireless infrastructure should be used to rapidly enable SmartGrid solutions. Taking advantage of broadband providers experience in operating and securing networks will encourage more rapid deployment at lower costs. Verizon's discussion referenced the attached diagram and press releases, and was consistent the attached comments Verizon filed with the Department of Energy.

Sincerely,

A handwritten signature in black ink, appearing to be "David Young".

Attachments

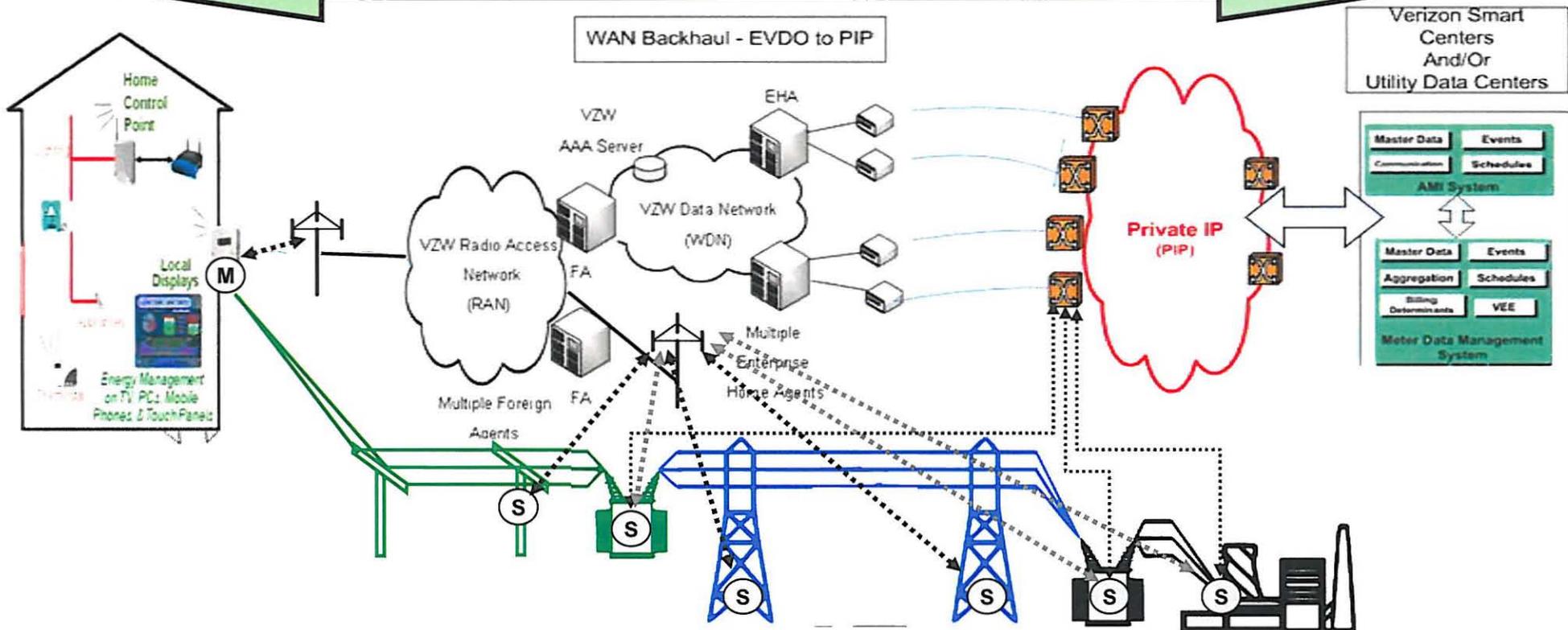
cc: Nick Sinai
Charles Worthington

ATTACHMENT 1



VZ Smart Grid Solution Set

Security is designed into the Smart Grid and actively managed



Premise

- In-Home Energy Mgt System (EMS)
- Home automation services via broadband or smart meter

Access

- VZW Private Data Network
 - Alternative required in areas with no VZW coverage
- Wired connections required for some grid monitoring & control

Backbone

- Private IP (PIP) Network

Data Center / NOC

- VZ Smart Centers
 - Managed hosting
 - Data center outsourcing and collocation
 - Remote Application Management

ATTACHMENT 2

Verizon Wireless And Itron Combine Forces To Harness The Power Of Wireless Technology In Advanced Metering And Smart Grid Market

Joint Marketing Agreement Allows Utilities to Leverage Energy Communications Solution on the Nation's Most Reliable 3G Wireless Network

04/01/2009

LAS VEGAS, NV, BASKING RIDGE, NJ, and LIBERTY LAKE, WA — From CTIA WIRELESS 2009®, Verizon Wireless and Itron Inc. (NASDAQ: ITRI) today announced a joint marketing agreement for development of secure, two-way communications that support utilities' access to energy usage data and advance their smart grid projects. Operating on Verizon Wireless' network, the Itron OpenWay® Cell Relay now allows utilities to more quickly collect, measure and manage energy data, while providing a reliable and affordable supply of power without having to build and operate proprietary communications networks.

A primary component of Itron's advanced metering infrastructure (AMI) solution, OpenWay by Itron, the OpenWay Cell Relay is the router for the Itron radio frequency local-area network (RFLAN). The relay, which has passed the Verizon Wireless open development compliance process, solidifies integration between the OpenWay RFLAN and the wide-area network (WAN) provided by Verizon Wireless' nationwide, high-speed CDMA (1x EV-DO and 1xRTT) wireless data network. The Verizon Wireless network is now available as a WAN backhaul connection option in the OpenWay architecture. Ultimately, this provides a secure approach to data collection and communications with the meter or other smart grid devices.

"AMI is a key foundational component of the smart grid. And given recent legislation that provides \$4.5 billion in funding for smart grid investments, this is a big initiative," said Philip Mezey, senior vice president and chief operating officer of Itron North America. "Working side by side with Verizon Wireless, harnessing the expertise of both companies, we're more effectively expanding the power of wireless technology, thus, broadening smart grid opportunities for our customers."

The OpenWay Cell Relay is available either incorporated within the OpenWay CENTRON® meter or in pole-mounted, ruggedized housing. The OpenWay architecture delivers operational efficiency, empowers all customers to participate in energy management and conservation, and serves as a cornerstone in connecting utilities to the smart grid.

"As the demand for smart grid technologies continues to grow, we recognize that our utility customers need the latest technology to better serve their customers," said Mark Bartolomeo, vice president of enterprise data at Verizon Wireless. "Our joint marketing agreement with Itron helps Verizon Wireless provide customers with an important part of their smart grid platform. Combined with the speed and reliability of the Verizon

Wireless network, this offers utilities a cost-effective advanced metering infrastructure solution.”

The communications architecture of OpenWay is fully compliant with the American National Standards Institute C12.22 protocol for transport of device data over a network and remains independent of any particular communications technology. This means multiple transport technologies, including mobile networks, can be seamlessly integrated into a single architecture to deliver the best combination of reliability and cost effectiveness.

For more information about Verizon Wireless, customers can visit www.verizonwireless.com or contact a Business Sales Representative at 1-800-899-4249.

For more information about Itron, visit www.itron.com.

About Verizon Wireless

Verizon Wireless operates the nation’s most reliable and largest wireless voice and data network, serving more than 80 million customers. Headquartered in Basking Ridge, N.J., with more than 85,000 employees nationwide, Verizon Wireless is a joint venture of Verizon Communications (NYSE: VZ) and Vodafone (NYSE and LSE: VOD). For more information, visit www.verizonwireless.com. To preview and request broadcast-quality video footage and high-resolution stills of Verizon Wireless operations, log on to the Verizon Wireless Multimedia Library at www.verizonwireless.com/multimedia.

About Itron

Itron Inc. is a leading technology provider to the global energy and water industries. Itron Inc. consists of Itron in North America and Actaris outside of North America. Our company is the world’s leading provider of metering, data collection and utility software solutions, with nearly 8,000 utilities worldwide relying on our technology to optimize the delivery and use of energy and water. Our products include electricity, gas and water meters, data collection and communication systems, including automated meter reading (AMR) and advanced metering infrastructure (AMI); meter data management and related software applications; as well as project management, installation, and consulting services. To know more, start here: www.itron.com.

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Verizon Wireless And Ambient Corporation Join Forces To Offer Utilities Smart Grid Communications Solution

Smart Grid Projects to Use the Network to Read Residential and Commercial Meters and Transmit Data

03/04/2009

BASKING RIDGE, NJ, and BOSTON, MA — Verizon Wireless and Ambient Corporation (OTCBB: ABTG) today announced a joint marketing agreement intended to facilitate the deployment of a host of smart grid projects around the country. The projects will allow utilities to transmit data from both residential and commercial meters over the nation's most reliable network to the utility companies' in-house systems.

Significant to the utility industry's move to the more efficient open standards-based technologies necessary for smart grid applications is access to a robust communications platform. According to Mark Bartolomeo, vice president enterprise data sales for Verizon Wireless, the company's Evolution-Data Optimized (EV-DO) 3G network provides a secure, high-speed path for carrying data today and as the demand increases in the future.

"We've seen significant interest and growth in the utility sector for smart technologies," Bartolomeo added. "This joint marketing agreement helps us provide utility customers with a solution designed to aid them in planning for long-term growth and profitability. This comprehensive platform holds great promise for extending smart grid applications nationwide."

Ambient's X-3000 node, running on Verizon Wireless' network, provides the communications platform that enables data from residential and commercial smart meters, appliances and other applications to be transported via IP-based technologies over a utility's smart grid system. This platform allows for two-way efficient collection, analysis and management of energy data to promote more reliable, affordable and environmentally friendly operations.

"As the demand for smart grid applications and bandwidth expands and becomes part of the nation's energy infrastructure, having the opportunity to offer a solution that allows for such growth in demand should significantly enhance the utilities' ability to more efficiently serve their customers and reduce their carbon footprint," said John J. Joyce, president and chief executive officer of Ambient Corporation.

The Verizon Wireless network provides Ambient's X-3000 with a ubiquitous, reliable and secure data communications backhaul for the Ambient Smart Grid™ platform, which is designed to support such services as advanced metering infrastructure (AMI), energy management, real-time pricing, demand side management (DSM) / direct load control, and system monitoring.

In January, the X-3000 was certified to run on the Verizon Wireless network through its open development program. Verizon Wireless' open development program is driven by the company's desire to encourage innovation, give businesses new wireless choices, and quickly address opportunities to expand the wireless market.

About Verizon Wireless

Verizon Wireless operates the nation's most reliable and largest wireless voice and data network, serving more than 80 million customers. Headquartered in Basking Ridge, N.J., with more than 85,000 employees nationwide, Verizon Wireless is a joint venture of Verizon Communications (NYSE: VZ) and Vodafone (NYSE and LSE: VOD). For more information, visit www.verizonwireless.com. To preview and request broadcast-quality video footage and high-resolution stills of Verizon Wireless operations, log on to the Verizon Wireless Multimedia Library at www.verizonwireless.com/multimedia.

About Ambient Corporation

Ambient designs, develops and markets Ambient Smart Grid™ communications technologies and equipment. Utilizing proprietary, open standards-based technologies along with in-depth industry experience, Ambient provides utilities with solutions for creating smart grid communication platforms and technologies. Headquartered in Newton, M.A., Ambient is a publicly traded company (OTCBB: ABTG). More information on Ambient is available at www.ambientsmartgrid.com.

This press release contains forward-looking statements that involve substantial uncertainties and risks. These forward-looking statements are based upon our current expectations, estimates and projections about our business and our industry, and that reflect our beliefs and assumptions based upon information available to us at the date of this release. We caution readers that forward-looking statements are predictions based on our current expectations about future events. These forward-looking statements are not guarantees of future performance and are subject to risks, uncertainties and assumptions that are difficult to predict. Our actual results, performance or achievements could differ materially from those expressed or implied by the forward-looking statements as a result of a number of factors, including but not limited to, market acceptance of new products, changes in economic conditions generally and the smart grid market specifically, changes in technology, legislative or regulatory changes that affect us, the introduction of competing products and services, capital expenditure plans, the availability and sufficiency of working capital, and the risks and uncertainties discussed under the heading "RISK FACTORS" in Item 1 of our Annual Report on Form 10-KSB for the fiscal year ended December 31, 2007, and in our other filings with the Securities and Exchange Commission. We undertake no obligation to revise or update any forward-looking statement for any reason.

Ambient, Ambient Smart Grid, It's Time to Teach an Old Grid New Tricks and AmbientNMS are registered trademarks of Ambient Corporation with the U.S. Patent and Trademark Office.

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nPhase Selected as Name for Qualcomm and Verizon Wireless Joint Venture to Provide Advanced M2M Solutions

08/20/2009

SAN DIEGO, CA — The new joint venture between Verizon Wireless and Qualcomm Incorporated (Nasdaq: QCOM), announced at the Smart Services Leadership Summit on July 28, 2009, was named today – nPhase – and formally became an operational company. The joint venture draws the nPhase name from the original Chicago-based machine-to-machine (M2M) pioneer launched in 2003 as a start-up focused on providing customized M2M communications solutions to meet the unique needs of OEM clients.

The new nPhase will be led by original founder and CEO Steve Pazol, who will serve as the company president. Pazol most recently served as the vice president and general manager of the acquired nPhase group, which was renamed Qualcomm Global Smart Services.

“When we originally selected the name nPhase back in 2002, we knew this industry would be constantly changing and evolving, and we felt the name nPhase communicated this concept,” said Steve Pazol president of nPhase. “We have been very fortunate to have been a part of Qualcomm for the last three years. Now with a 50/50 joint venture between Verizon Wireless and Qualcomm, we look forward to providing M2M wireless communication and smart service offerings to this rapidly growing market.”

nPhase’s management team includes a combination of original nPhase founding executives, former Qualcomm executives, and a Verizon Wireless executive. The company’s Board of Directors includes:

- Steve Pazol, president, nPhase
- Len Lauer, chief operating officer, Qualcomm
- Jack Plating, chief operating officer, Verizon Wireless
- Andrew Gilbert, executive vice president and president, QIS and Europe, Qualcomm
- Anthony Lewis, vice president, Open Development, Verizon Wireless

For more information, go to www.nphase.com. Check back frequently as this exciting new business will be undergoing rapid change and development in the weeks and months to come.

About Verizon Wireless

Verizon Wireless operates the nation’s most reliable and largest wireless voice and data network, serving more than 87.7 million customers. Headquartered in Basking Ridge, N.J., with more than 87,000 employees nationwide, Verizon Wireless is a joint venture of Verizon Communications (NYSE: VZ) and Vodafone (NYSE and LSE: VOD). For more information, visit www.verizonwireless.com. To preview and request broadcast-quality

video footage and high-resolution stills of Verizon Wireless operations, log on to the Verizon Wireless Multimedia Library at www.verizonwireless.com/multimedia.

About Qualcomm

Qualcomm Incorporated (Nasdaq: QCOM) is a leader in developing and delivering innovative digital wireless communications products and services based on CDMA and other advanced technologies. Headquartered in San Diego, Calif., Qualcomm is included in the S&P 100 Index, the S&P 500 Index and is a 2009 FORTUNE 500® company. For more information, please visit www.qualcomm.com.

About nPhase

nPhase, a 50/50 joint venture between Qualcomm and Verizon Wireless, provides advanced M2M wireless communications and smart services offerings across a wide variety of market segments, including healthcare, manufacturing, utilities, distribution, and consumer products. This new company leverages the global leadership in advanced connectivity technologies provided by Qualcomm and the world's largest and most reliable 3G network provided by Verizon Wireless to deliver the most reliable end-to-end M2M solutions with the best coverage globally. nPhase headquarters are located at 5355 Mira Sorrento Place, Suite 100, San Diego, CA, 92121. For more information visit www.nphase.com.

Qualcomm is a registered trademark of Qualcomm Incorporated. All other trademarks are the property of their respective owners.

Regarding Forward Looking Statements

This news release contains forward-looking statements that are subject to risks, uncertainties and assumptions. If such risks or uncertainties materialize or such assumptions prove incorrect, the anticipated results could differ materially from those expressed or implied by such forward-looking statements and assumptions. All statements other than statements of historical fact are statements that could be deemed forward-looking statements, including: the expected benefits of the joint venture and the technologies, products and services to be developed and offered by the joint venture; the expected growth of the smart services market; the anticipated plans, strategies and objectives of the joint venture; plans and anticipated capabilities regarding product and service integration; and any other statements of expectation or belief. The risks and uncertainties that may affect these forward-looking statements include: the possibility that expected benefits of the joint venture and service and product integration may not materialize as expected; product development and service integration risks; competitive responses by other industry participants; the effect of changing technologies; and other risks that are described more fully in Qualcomm's SEC reports, including the report on Form 10-K for the year ended September 28, 2008, and most recent Form 10-Q.

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nPhase Powers ABB's Asset Monitoring Solution

— Sophisticated Monitoring System Helps to Improve Utilities' Grid Reliability and Reduce Operational Costs —

09/01/2009

SAN DIEGO, CA — nPhase, a joint venture between Verizon Wireless and Qualcomm Incorporated (Nasdaq: QCOM), today announced a series of ongoing pilot Smart Grid programs with ABB Inc., a leader in power and automation technologies, for ABB's utility customers. nPhase is providing real-time wireless network connectivity and services coupled with technology from ABB Inc., which together are enabling program participants to improve their performance while lowering environmental impact.

The pilot programs demonstrated positive results with some of the country's largest electric utilities, such as Con Edison of New York, utilizing ABB's asset monitoring solution for high voltage circuit breakers. ABB's technology provides the utilities with feedback on their current equipment status and forecasted maintenance needs, which in turn may help the utilities comply with future environmental regulations and provides them potential cost savings and a layer of protection from unplanned power outages.

The utility industry is facing an aging grid system that will benefit from the ability to monitor assets efficiently and in real-time. With nPhase solutions, companies like ABB can prevent power outages, provide advanced condition-based maintenance, maintain environmental compliance standards, and reduce costs by wirelessly monitoring dispersed assets such as circuit breakers.

The ABB solution, Circuit Breaker Sentinel (CBS), gathers critical information from the utility asset to determine the health of the electricity transmission equipment. nPhase extracts the crucial data via a secure cellular wireless network and forwards the data to ABB's Asset Insight hosted web platform. This combination of sophisticated monitoring technology, smart services connectivity and complex analytics enables a true smart grid.

"Transmission networks already utilize sophisticated protection and control systems to ensure reliable power flow," said Chris Reinbold, vice president and general manager at ABB. "ABB's Asset Insight solution provides real-time, actionable information to our customers beyond what is available today. nPhase's Smart Services are an important factor in connecting these widely distributed assets. The initial feedback from the pilot applications has been very positive."

"ABB came to us wanting to create an intelligent network that allows monitoring and data analysis without requiring a lot of human intervention" said Steve Pazol, president of nPhase. "The customized solution we created is just one example of how nPhase is leading the evolution of the 'Internet of Things,' which is connecting products, objects, tools and appliances to improve the way people live."

About nPhase

nPhase, a 50/50 joint venture between Qualcomm and Verizon Wireless, provides advanced M2M wireless communications and smart services offerings across a wide variety of market segments, including healthcare, manufacturing, utilities, distribution, and consumer products. This new company leverages the global leadership in advanced connectivity technologies provided by Qualcomm and the 3G network provided by Verizon Wireless to deliver the most reliable end-to-end M2M solutions with the best coverage globally. nPhase headquarters are located at 5355 Mira Sorrento Place, Suite 100, San Diego, CA, 92121. For more information visit www.nphase.com.

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ATTACHMENT 3

**Before the
U.S. DEPARTMENT OF ENERGY
Washington, D.C.**

In the Matter of)	
)	
Notice of Intent to Issue a Funding Opportunity)	
Announcement for the Smart Grid Investment)	
Grant Program)	
)	
Recovery Act – Smart Grid Demonstrations)	DE-FOA-0000036
Funding Opportunity)	
_____)	

COMMENTS OF VERIZON ON SMART GRID GRANT PROGRAMS

As Congress and the Administration have recognized, the development and deployment of smart grid technology hold tremendous promise towards improving the efficiency and reliability of our nation’s electrical grids and empowering consumers to make better decisions about the use of electricity. Given the need for real-time transmission and processing of vast amounts of information to and from consumers and the producers and distributors of electricity in order to make smart grids work – and the need for high levels of cybersecurity as that data transmission and processing takes place – effective communications networks and services will be central to the success of smart grid technology.

As the Department of Energy (DOE) implements the grant programs established by the Energy Independence and Security Act of 2007 (EISA) and the American Recovery and Reinvestment Act of 2009 (Recovery Act), DOE should explicitly take into account the significant experience and capabilities that established communications providers could offer in the development and operation of smart grid technology and encourage generators and distributors of electricity or other applicants to work closely with such providers in order to

hasten the development and deployment of smart grids. DOE should give extra consideration to proposals that leverage these existing resources. It makes little sense to expend precious taxpayer dollars to fund the creation of new broadband networks, when widespread broadband communications networks – both wireline and wireless – exist today.

I. Communications Capabilities Are At the Core of Any Smart Grid

In its Notice of Intent, DOE recognized that “[t]he goal of a smart grid is to collect and provide the optimal amount of information necessary for customers, distributors, and generators to change their behavior in a way that reduces system demands and costs, increases energy efficiency, optimally allocates and matches demand and resources to meet that demand, and increases the reliability of the grid.”¹ As this stated goal reflects, the collection, movement, and use of “information” is at the core of any smart grid.

In fact, most of the smart grid “functions” identified by Congress rely on communications networks and services. Among others, these include:

- the “ability to *develop, store, send and receive digital information* concerning electricity use, costs, prices, time of use, nature of use, storage, or other information relevant to device, grid, or utility operations”;
- the “ability to *develop, store, send and receive digital information* concerning electricity use, costs, prices, time of use, nature of use, storage, or other information relevant to device, grid, or utility operations *to or from a computer or other control device*”;
- the “ability to sense and localize disruptions or changes in power flows on the grid and *communicate such information instantaneously and automatically* for

¹ DOE, “Notice of Intent to Issue a Funding Opportunity Announcement for the Smart Grid Investment Grant Program,” at 4 (Notice of Intent).

purposes of enabling automatic protective responses”; and

- the “ability to *detect, prevent, communicate* with regard to, respond to, or recover from system security threats, including *cyber-security threats* and terrorism, using digital information, media, and devices.”

Notice of Intent at 5-6 (quoting EISA § 1306(d)) (emphasis added). Indeed, the Notice of Intent recognizes “information networks” as one of the four “areas” of smart grid technology, including the “application of information technology and pervasive communications technology to enhance network functions.” *Id.* at 4.

Similarly, the report from DOE’s Smart Grid Implementation Workshop conducted last summer recognizes the importance of communications networks and services to smart grid. Among other things, that report noted that a “[k]ey implementation metric[]” included the “level of development of common communications infrastructure,” and recognized the “broad-based need for communications standards for the interoperability of equipment across utilities, regions and the country.”²

II. DOE Should Encourage Applicants to Work Closely With Established Communications Providers in the Development and Implementation of Smart Grid Technology.

Communications providers, particularly those with the size, scale and reliability to provide national network coverage, have much to offer as smart grid technology is developed and deployed. This is particularly true in the case of providers, like Verizon, that have substantial experience in managing and operating wireline, wireless, and private communications networks; transmitting and processing vast amounts of data; and defending the security and integrity of the networks and data against all manner of threats. DOE should encourage

² DOE Office of Electricity Delivery and Energy Reliability, “Metrics for Measuring Progress Toward Implementation of the Smart Grid,” at 24 (June 2008).

applicants for smart grid grant funds to work closely with established communications providers as they develop and deploy smart grids. Established communications providers offer the benefits of both scale and scope that will be essential to provision smart grid technology in an effective and efficient manner, and DOE should give extra consideration to proposals that would leverage these existing resources. DOE should not devote the limited federal funding for smart grids to projects that would create new broadband communications networks when existing networks – both wireline and wireless – exist today.

Many of the “functions” that will be required in order for smart grids to achieve their potential fall within the core competence of communications providers like Verizon. For example, smart grids will rely on a combination of real-time, wireless and wireline communications between customers – or more likely, the appliances and other devices on a customer’s home network – and the electricity generators and distributors that serve them, as well as real-time communication between the smart grids themselves. This will involve the transport of massive amounts of data, likely over private and secured private IP or other broadband networks. Existing communications providers have experience – and facilities in place – to provide precisely such services. DOE should give special consideration to eligible applicants that partner with communications providers like Verizon who provide such services every day in a secure and reliable manner to businesses throughout the country.

Communications companies also have substantial, national networks in place that could be used (and supplemented, as necessary) to meet many smart grid needs, without requiring the use of taxpayer or ratepayer funds to re-create the wheel. For example, Verizon Wireless’ existing EV-DO wireless broadband network already reaches 281 million people in this country, and its coverage area continues to spread. Moreover, Verizon Wireless later this year will begin

its rollout of its Fourth Generation wireless broadband service, using LTE technology, thus increasing substantially its wireless capabilities. Verizon's wireline operations likewise already reach millions of businesses and residents, and carry data around the country. These existing networks and facilities provide an important resource for the transmission of smart grid data. For example, a customer could remotely monitor and adjust the electricity use at his or her home from a computer or wireless device while at work or travelling, all over Verizon's networks.

Similarly, established communications companies already have substantial experience with other functions that will be integral to smart grids. For example, communications companies have substantial experience and technical know-how with respect to systems integration and the management of complex, data-intensive programs. They also are experienced at handling the interoperability of complex systems and networks and at administering, collecting and managing large amounts of data through data centers, as will likely be required by smart grids.

Congress and DOE have also recognized repeatedly the significance of cybersecurity to future smart grids. *See, e.g.*, Notice of Intent at 4; EISA § 1301(2) (noting that smart grids should have "full cyber-security"). Verizon and other communications providers devote considerable resources to – and have expertise at – promoting cybersecurity and defending against all manner of network threats. Indeed, Verizon was recently positioned in the "Leaders" quadrant in leading analyst firm Gartner's report concerning managed security service providers (MSSPs).³ According to the report, "Each of the service providers in the Leaders quadrant has significant 'mind share' among enterprises looking to buy [a managed security service] as a discrete offering. . . . MSSPs in the Leaders quadrant are typically appropriate options for enterprises requiring frequent interaction with the MSSP for analyst expertise and advice, portal-

³ Gartner, Inc., "Magic Quadrant for MSSPs, North America," at 2 (April 16, 2009).

based correlation and workflow support, and flexible reporting options.” *Id.* Gartner assessed providers based on their “completeness of vision” – which included consideration of criteria such as market understanding, offering strategy, business model, innovation and geographic strategy – and their “ability to execute” – which included consideration of product/service capabilities, customer experience, market responsiveness and track record, overall viability and operations. Verizon rated highly by each of these measures based on its suite of managed security services that includes monitoring and management for numerous devices (including anti-virus, anti-spam, anti-spyware, application log monitoring and management); Denial of Service defense, firewall, router, virtual private network, image and content control; intrusion detection and protection; proxy service; and unified threat management.

Given the substantial experience, competence and resources that communications companies such as Verizon potentially bring to the table as smart grid technology is developed and deployed, DOE should explicitly recognize in its final funding opportunity announcements that communications companies are preferred partners for those eligible to participate in the DOE smart grid programs. Moreover, in order to ensure the efficient and effective use of limited resources, DOE should encourage the electricity generators and distributors to work closely with established communications companies towards the development and deployment of smart grid technology, and should favor proposals that do so. Such an approach will help to hasten advances in smart grids, as well as the many societal benefits that will flow from them, in a timely and efficient manner.

III. Conclusion

As it releases its final funding opportunity announcements related to smart grids, DOE should take into account the central role of communications networks and services, and should

encourage electricity generator and distributors or other applicants to work closely with established communication providers in the development and deployment of smart grids. DOE should give extra consideration to proposed projects that leverage these existing resources and partner with established communications providers.

Respectfully submitted,

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Of Counsel

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May 6, 2009