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October 28, 2009

**EX PARTE**

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

**Re: Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Service Rules for the 698-746, 747-762 and 777-792 Bands, WT Docket No. 06-150; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, PS Docket No. 06-229; Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers, WT Docket No. 05-265; Federal-State Joint Board on Universal Service, CC Dkt. No. 96-45; Developing a Unified Inter-carrier Compensation Regime, CC Dkt. No. 01-92; Applications of Alltel and Verizon Wireless, WT Docket No. 08-95; WC Docket No. 09-95; Review of the Commission's Program Access Rules and Examination of Programming Tying Arrangements, MB Dkt Nos. 07-29 and 07-198; National Broadband Plan for Our Future, GN Docket No. 09-51 and Preserving the Open Internet, GN Dkt. No. 09-191**

Dear Ms. Dortch:

Yesterday, Ivan Seidenberg, Chairman and Chief Executive Officer, Thomas Tauke, Executive Vice President – Public Affairs, Policy and Communications, Michael Glover, Senior Vice President and Deputy General Counsel, and the undersigned of Verizon met separately with Chairman Julius Genachowski, Edward Lazarus, Chief of Staff, and Bruce Gottlieb, Chief Counsel and Senior Legal Advisor; Commissioner Michael Copps and Jennifer Schneider, Legal Advisor; Commissioner Robert McDowell, Angela Giancarlo, Chief of Staff and Senior Legal Advisor, and Christine Kurth, Policy Director and Wireline Counsel; Commissioner Meredith Baker and Charles Mathias, Legal Advisor; and Commissioner Mignon Clyburn, and Legal Advisors Rick Kaplan and Carol Simpson.

The purpose of the meetings was not to discuss any single proceeding or issue, but during the course of the discussions Verizon did address two broad categories of issues that are the subject of ongoing proceedings. First, the Commission should address a series of spectrum related issues in a manner consistent with Verizon's previous submissions, including making more spectrum available in the market, resolving the D block issues, clearing the 700Mhz spectrum,

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tower siting, and roaming. Second, the Commission should address a number of issues related to the long-term health and structure of the industry in a manner consistent with Verizon's previous submissions, including universal service and intercarrier compensation reform, broadband adoption and deployment, pending license transfer applications relating to divestitures of certain Alltel service areas, and access to regional sports programming. Verizon also addressed the Commission's recent notice of proposed rulemaking on net neutrality. We stated our intention to work cooperatively with the FCC in the pending proceeding, but emphasized that the Commission should not adopt rules that would effectively dictate the structure of what is still a new and developing area by treating "edge" providers and "network" providers as separate parts of the broadband Internet ecosystem.

Please contact me directly if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Gillh". The signature is written in a cursive, slightly slanted style.

cc: Chairman Julius Genachowski  
Commissioner Meredith Baker  
Commissioner Michael Copps  
Commissioner Mignon Clyburn  
Commissioner Robert McDowell  
Angela Giancarlo  
Bruce Gottlieb  
Rick Kaplan  
Christine Kurth  
Edward Lazarus  
Charles Mathias  
Jennifer Schneider  
Carol Simpson