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November 9, 2009

Ex Parte

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

Re: GN Docket Nos. 09-47, 09-51, and 09-137

Dear Ms. Dortch:

On November 6, 2009, Mr. Craig Mundie, Mr. Scott Charney, Mr. Peter Haynes, Mr. Eric Wenger, and Mrs. Paula Boyd of Microsoft discussed Internet security issues with Mr. Carlos Kirjner and Mr. Peter Bowen of the FCC's Broadband Team.

During the discussion, Mr. Mundie stated that there are two fundamental challenges with respect to Internet security: determining identity and being able to attribute behavior. He noted that if you cannot identify people, programs, and machines operating on the Internet, then it will be difficult to attribute behavior and take appropriate legal action.

Mr. Mundie went on to discuss the similarities between the World Health Organization structure and the kind of global structure needed to address Internet security threats, including botnets. He noted that on the Internet, there is an epidemic of infections not unlike pandemics in the health environment. In the health environment, we use quarantines, but we do not have a quarantine process for devices connected to the Internet. Lastly, he stressed the importance of having an automated structure and global governance agreements for Internet security in order to exchange information and take action—including denying Internet access—to those machines that undermine the security of the Internet.

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Pursuant to the Commission's rules, a copy of this letter is being filed electronically in the above-referenced dockets. Please let me know if you have any questions.

Sincerely,

/s/ Paula Boyd

Paula Boyd
Regulatory Counsel for Microsoft Corp.