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February 17, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, GN Docket No. 09-47; A National Broadband Plan for Our Future, GN Docket No. 09-51; 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; Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices, GN Docket No. 97-80

Dear Ms. Dortch:

On February 16, 2010, David Young, Will Johnson and I met with Brad Gillen and Millie Kerr, Legal Advisors to Commissioner Baker, to discuss Verizon's innovations in video devices and home networking.

Specifically, as illustrated in the attachment, we described possibilities for providing access to FiOS TV (or any other MVPD's) programming to any networked consumer electronics device in the home, likely through the use of an IP media gateway or similar device that can communicate with, and deliver, a providers' service to other networked devices. Standards-setting work that is currently well underway promises to enable consumers to use their existing devices – such as game consoles and networked blu-ray players - instead of leased set-top boxes to access providers' video services, and many more such devices will continue to come to market in the near future. In response to consumer demand and in order to offer innovative products that more effectively compete in the video marketplace, Verizon and some other video providers are already experimenting with these capabilities, and more will undoubtedly do so shortly. These developments – which are occurring without the presence of any new technological mandate – promise to finally achieve the objectives of Section 629 and will lead to increased competition and innovation throughout the video marketplace (including video provided over the Internet). New technology mandates, however, could freeze these developments in their tracks and distort the pro-consumer innovation that is already well underway. We also discussed the trend toward convergence of the Internet and the television and described Verizon's success in this area with the

provision of widgets, an on-screen tool that allows customers to access information derived from the Internet without interrupting their viewing of video programming.

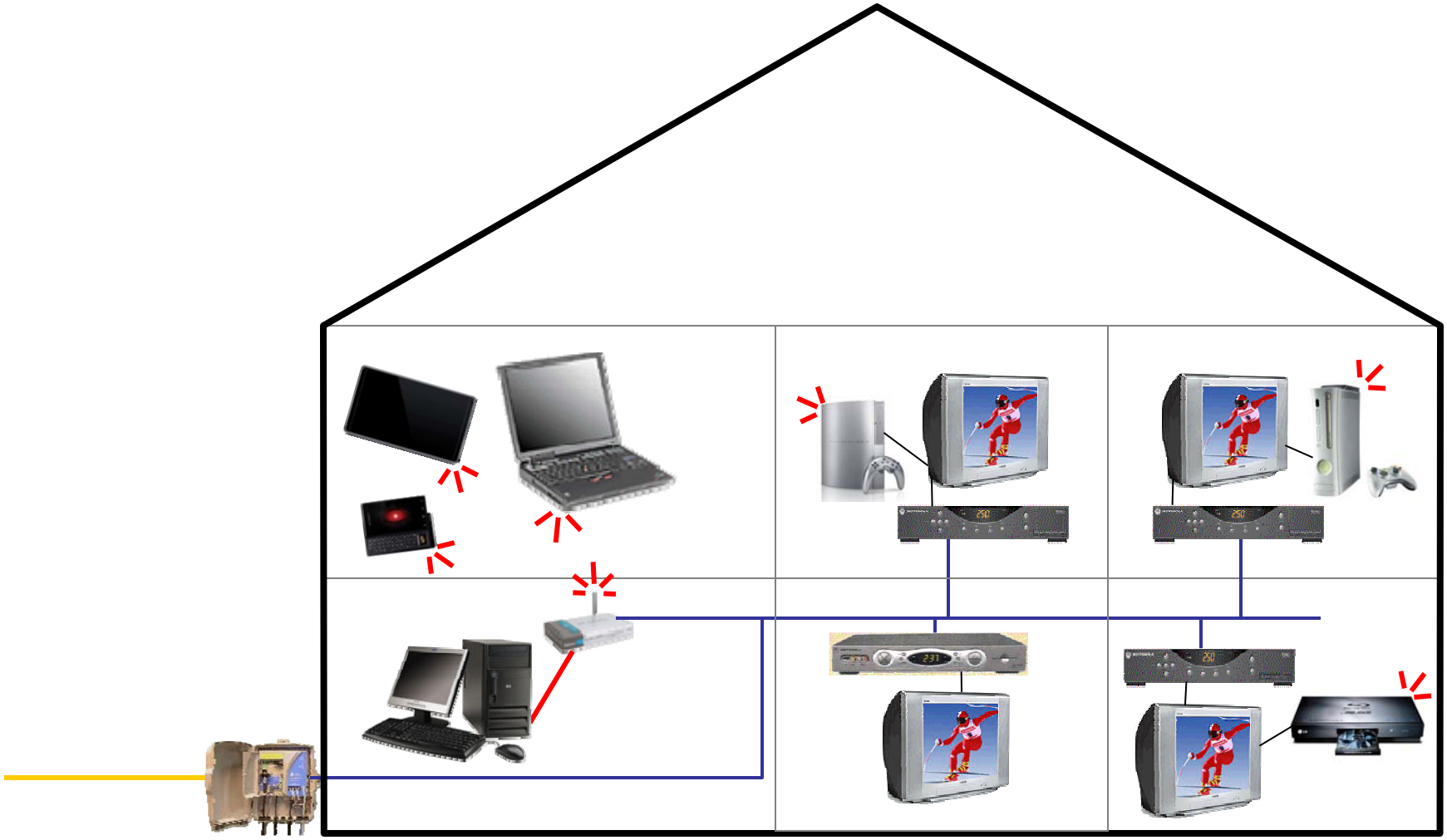
Given the progress that is being made in video device innovation, we urged the FCC to avoid adopting new rules that would require the provision of specific devices or any technological standards, particularly in light of the fact that previous attempts to require specific technological features in video devices have met with little practical success. Moreover, consumers would benefit if the Commission were to remove the current technology mandates – including the requirement to include a 1394 output in all set-top boxes and the set-top box integration ban – which add costs and inefficiencies with few if any offsetting benefits to consumers. As the Commission considers alternative ways to increase competition and innovation in this marketplace, we encouraged the Commission to work with the industry and other stakeholders to foster the evolution in the video marketplace that is already taking place.

Sincerely,

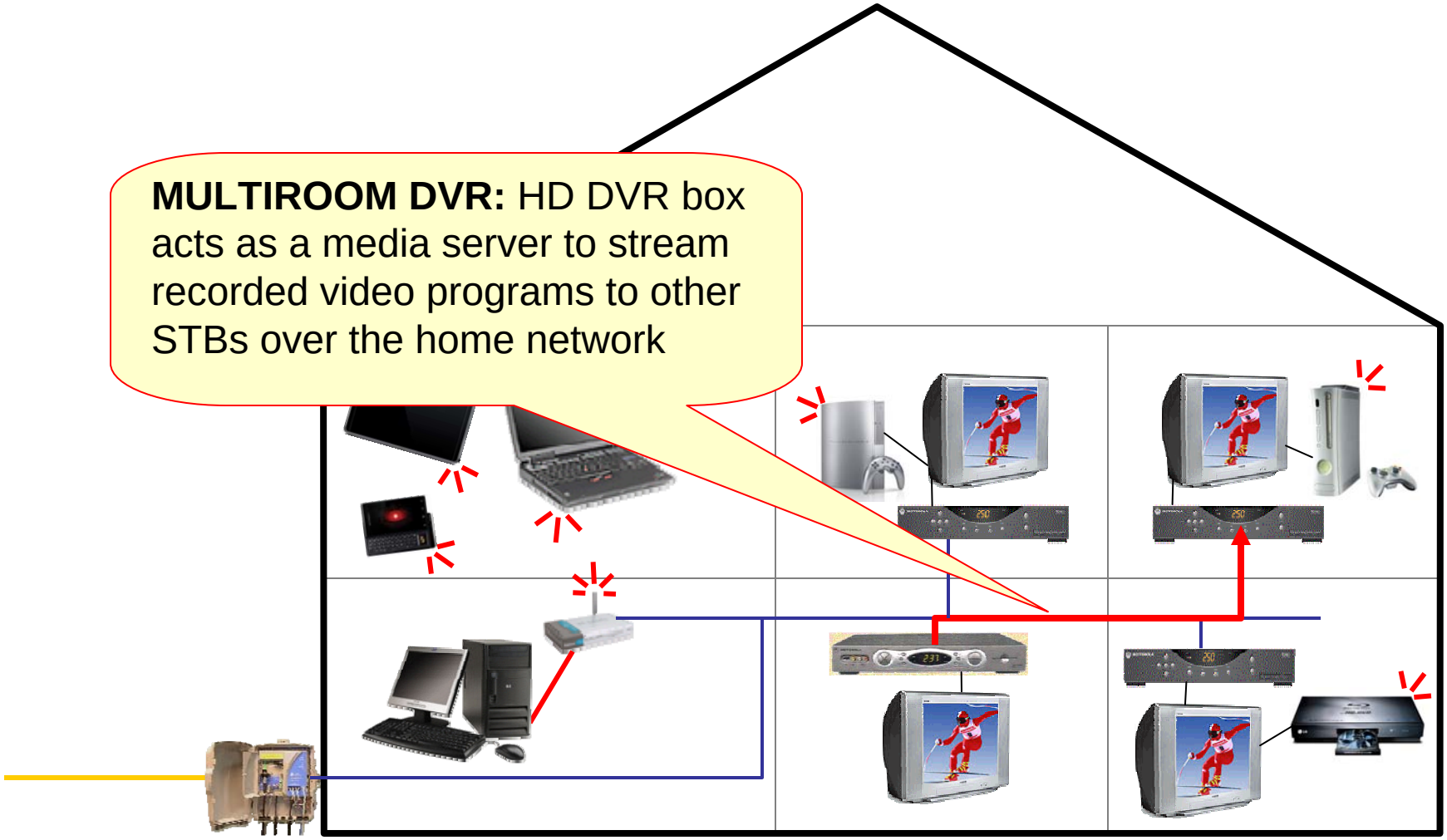
cc: Brad Gillen
Millie Kerr

Attachment

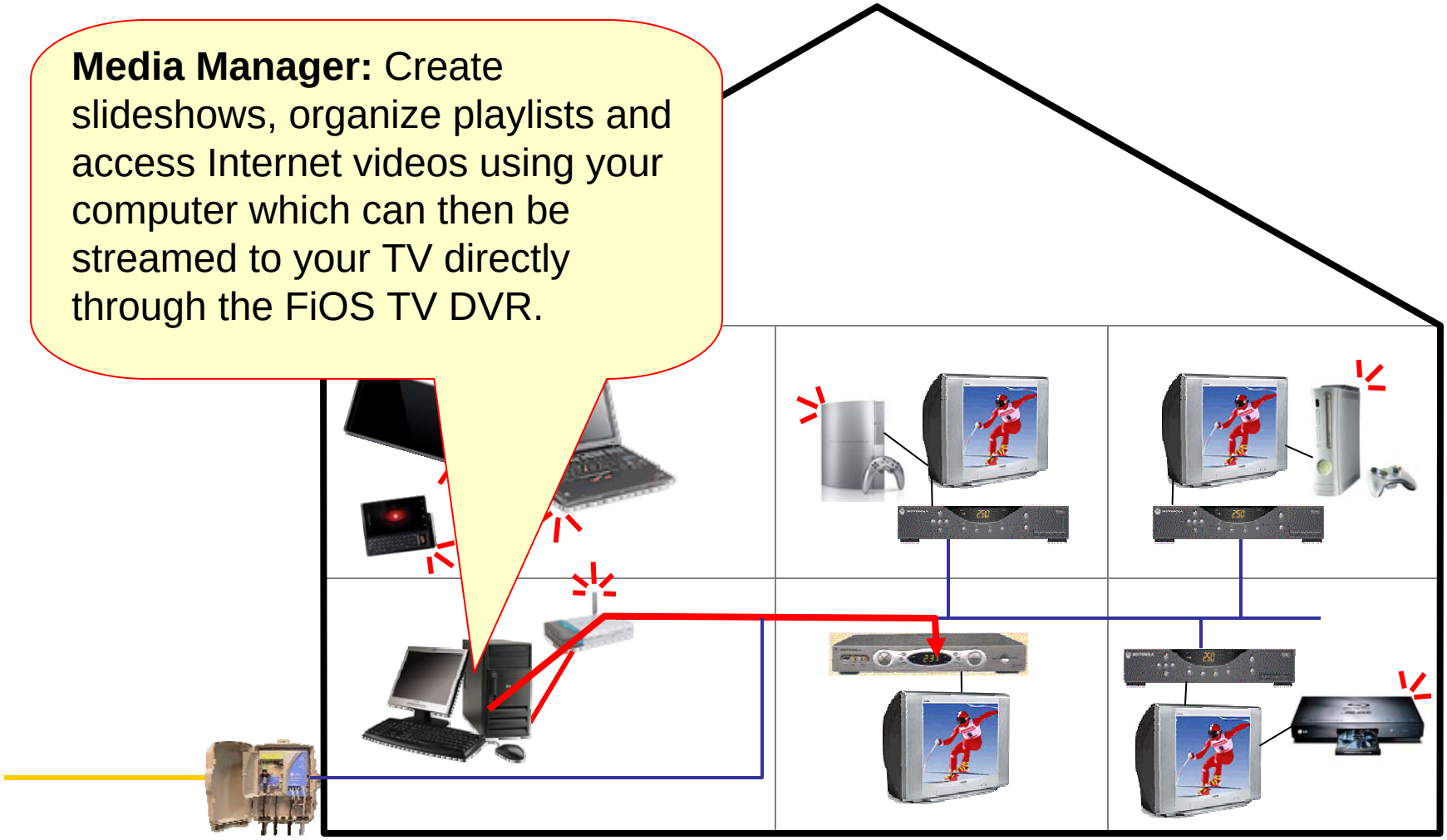
Typical FiOS TV Home Today



Typical FiOS TV Home Today

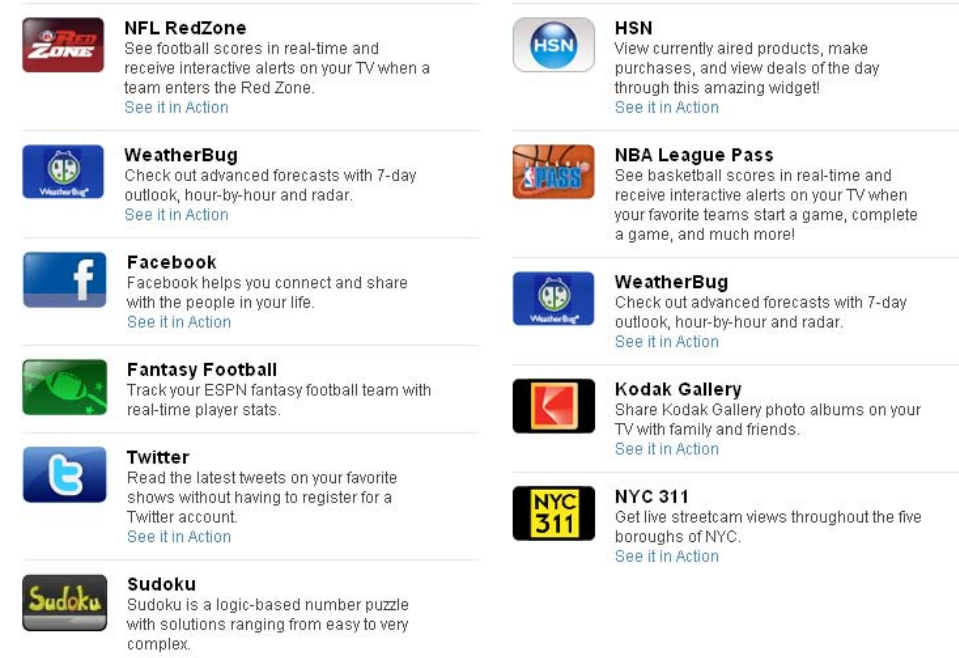


Typical FiOS TV Home Today



Typical FiOS TV Home Today

Widgets: Blending Internet and TV, a Widget is an on-screen tool that lets you view personalized information without interrupting the show you're watching.



NFL RedZone
See football scores in real-time and receive interactive alerts on your TV when a team enters the Red Zone.
See it in Action

WeatherBug
Check out advanced forecasts with 7-day outlook, hour-by-hour and radar.
See it in Action

Facebook
Facebook helps you connect and share with the people in your life.
See it in Action

Fantasy Football
Track your ESPN fantasy football team with real-time player stats.

Twitter
Read the latest tweets on your favorite shows without having to register for a Twitter account.
See it in Action

Sudoku
Sudoku is a logic-based number puzzle with solutions ranging from easy to very complex.

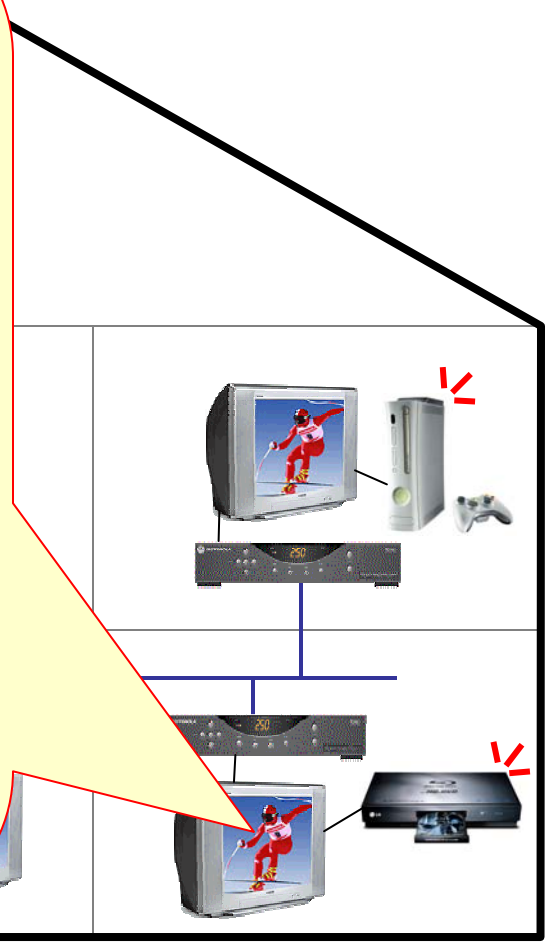
HSN
View currently aired products, make purchases, and view deals of the day through this amazing widget!
See it in Action

NBA League Pass
See basketball scores in real-time and receive interactive alerts on your TV when your favorite teams start a game, complete a game, and much more!

WeatherBug
Check out advanced forecasts with 7-day outlook, hour-by-hour and radar.
See it in Action

Kodak Gallery
Share Kodak Gallery photo albums on your TV with family and friends.
See it in Action

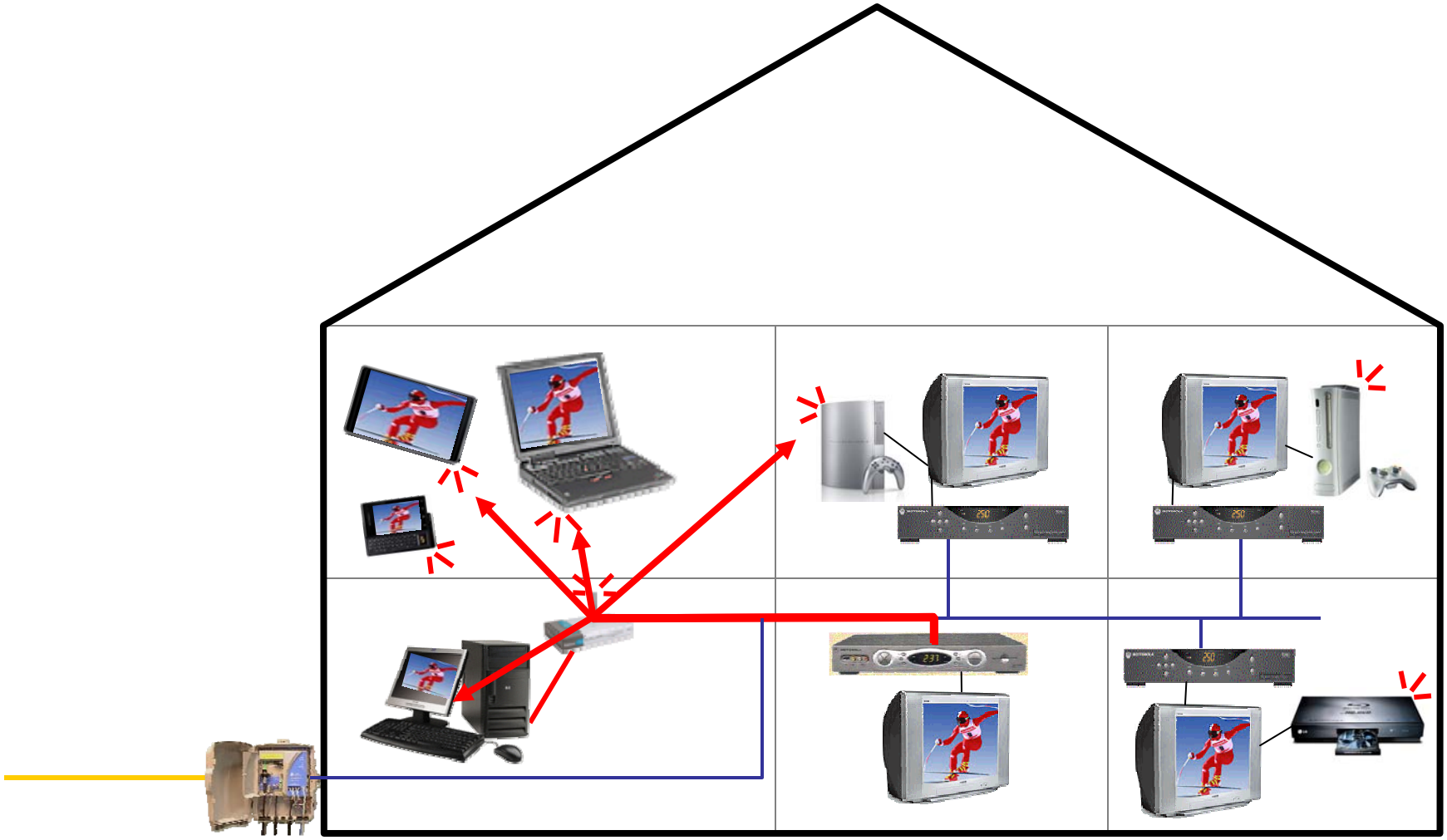
NYC 311
Get live streetcam views throughout the five boroughs of NYC.
See it in Action

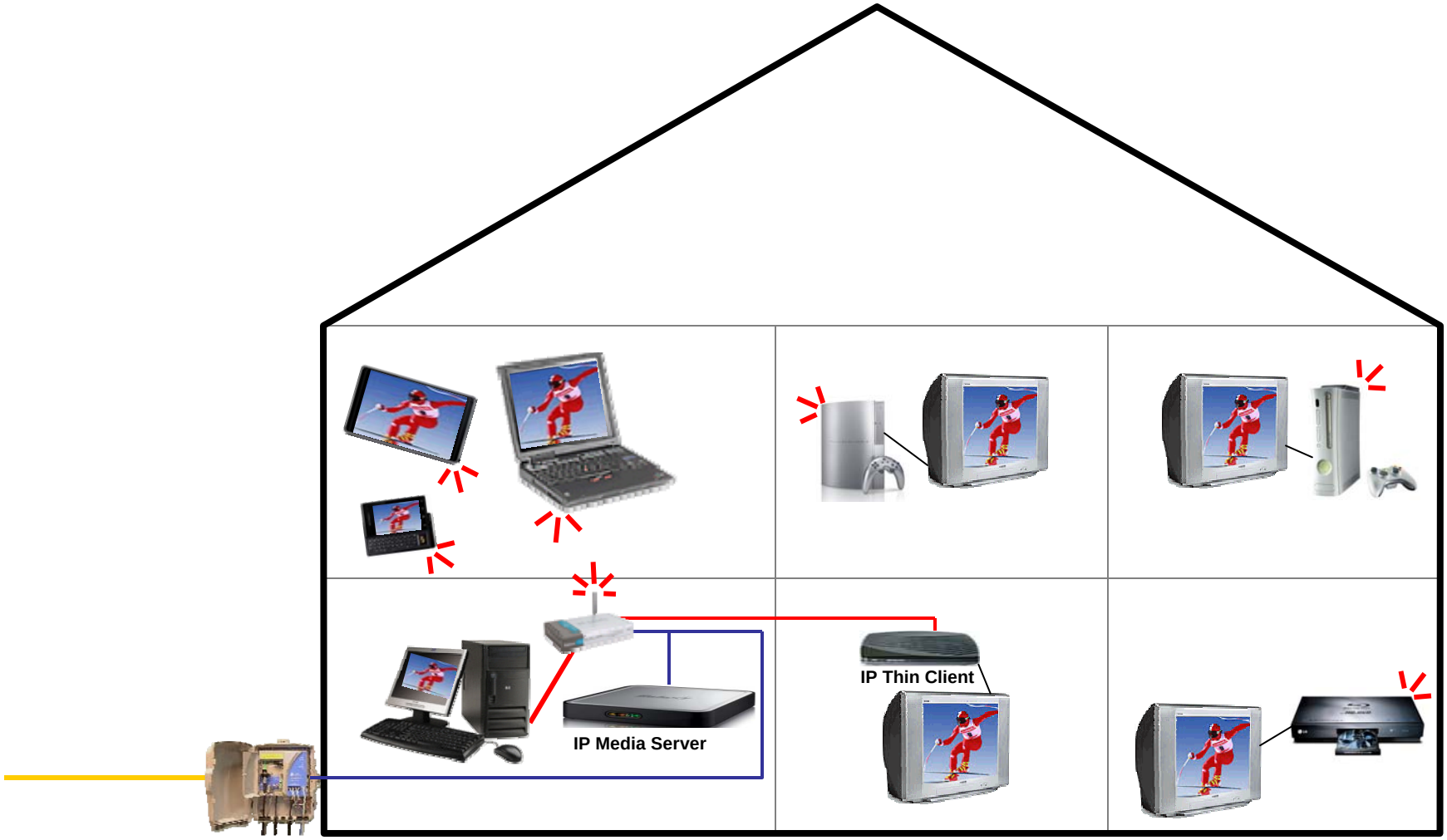


Widget Developers

Evolving Home Network Architecture

Enabling Networked CE Devices



Evolving Home Network Architecture

Networked CE Devices Replace Traditional STBs