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March 25, 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 March 24, 2010, David Young, Will Johnson and I met with David Goldman, Legal Advisor to Chairman Genachowski, to discuss Verizon's innovations in video devices and home networking. We also discussed our concerns about the adoption of additional rules related to CableCARDs as recommended in the National Broadband Plan.

Specifically, as illustrated in the attachment, we described possibilities for providing access to FiOS TV (or any other MVPD's) programming to networked consumer electronics devices 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, particularly ones that would restrict the capabilities of the media server to limited gateway functionalities, would freeze these developments in their tracks and distort the pro-consumer innovation that is already well underway. We also discussed the trend toward

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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 with limited functionalities, particularly in light of the fact that previous attempts to require specific technological features in video devices have met with little practical success. In addition, in considering potential changes to current CableCARD regulations, the FCC should avoid diverting resources away from achieving the broader goal of any all-MVPD solution by imposing new technical requirements for CableCARD devices. 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.

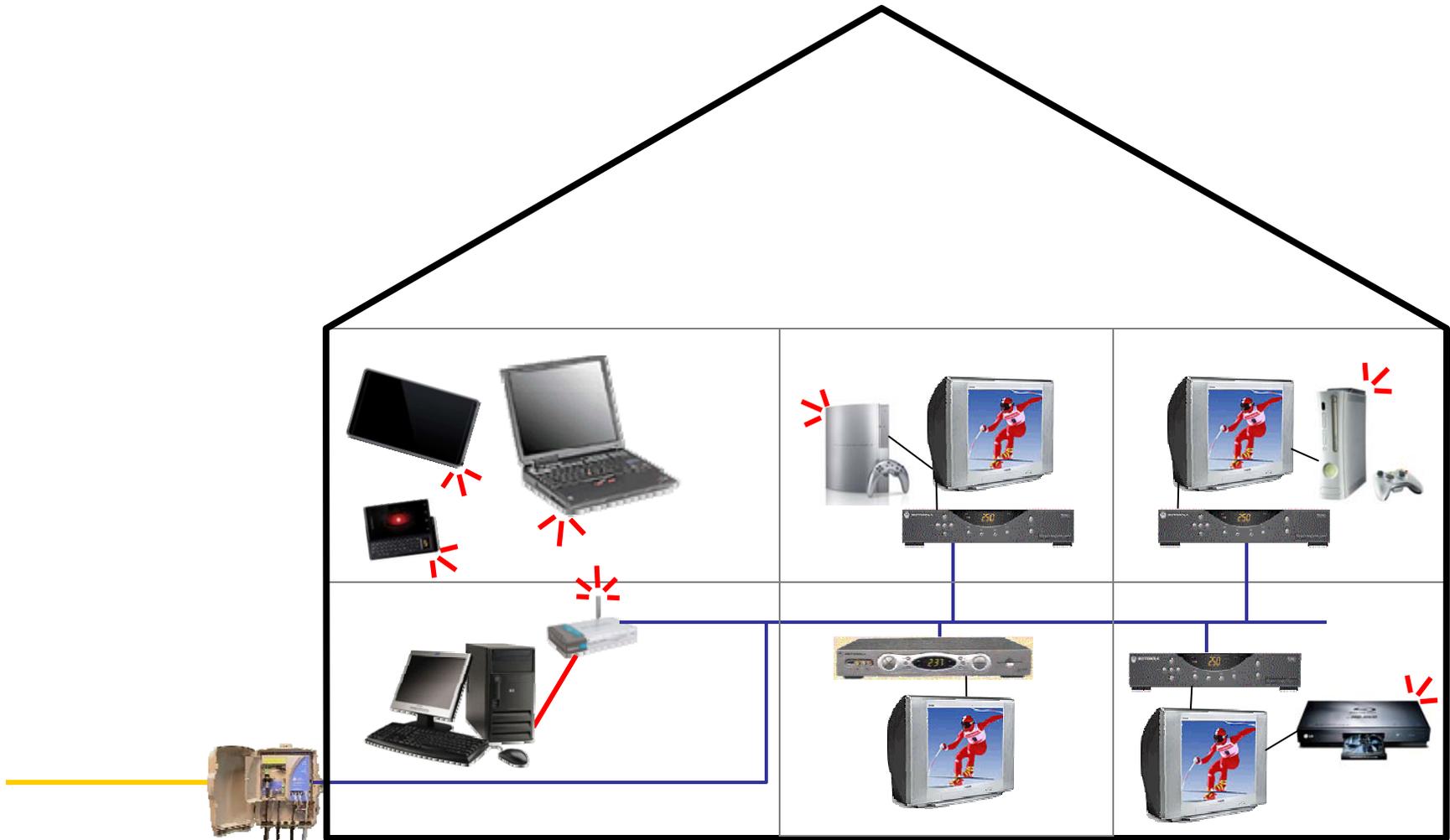
Sincerely,

A handwritten signature in black ink, appearing to read "Jon H. Roberts". The signature is written in a cursive, flowing style.

cc: David Goldman

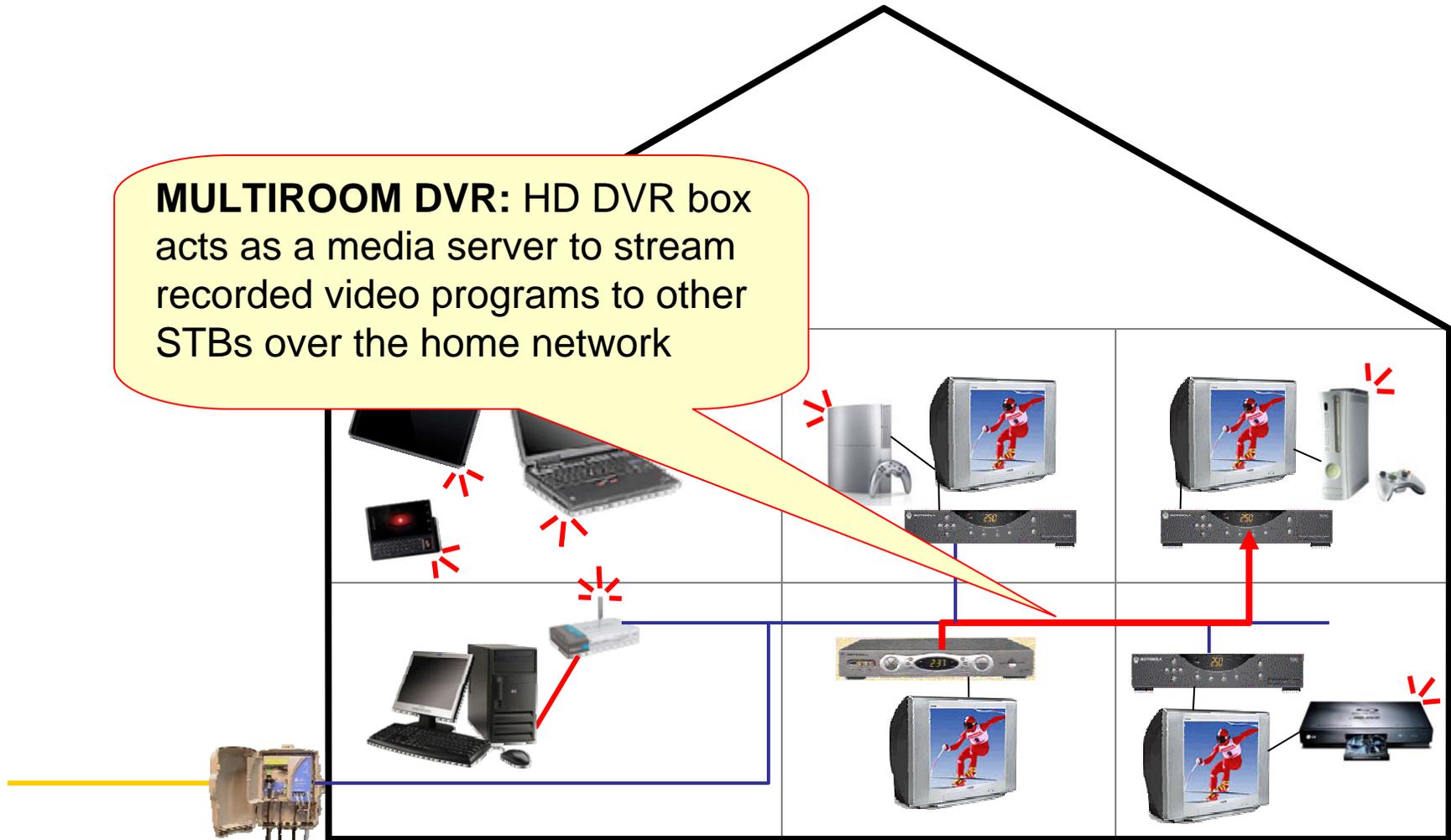
Attachment

Typical FiOS TV Home Today



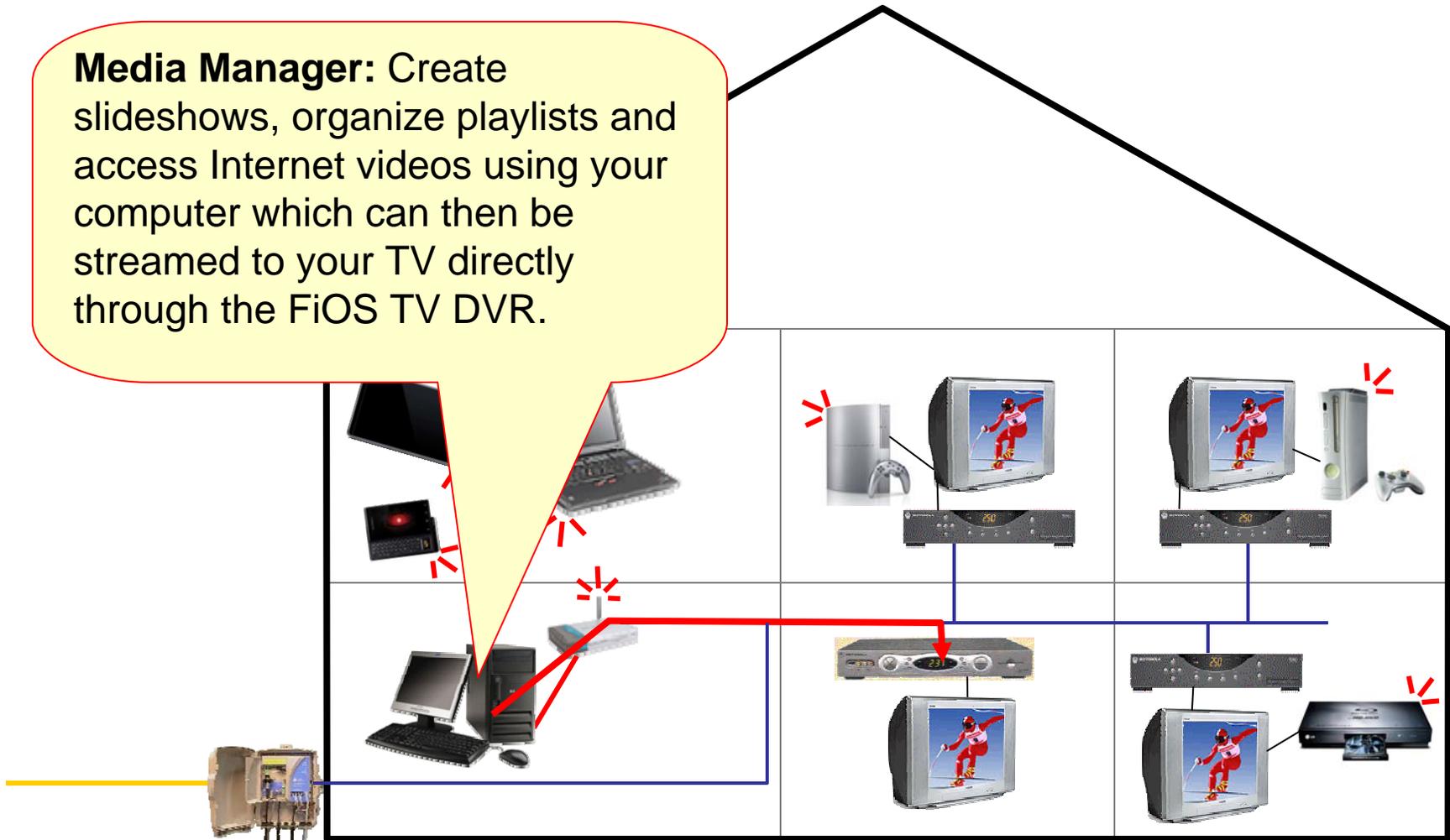
Typical FiOS TV Home Today

MULTIROOM DVR: HD DVR box acts as a media server to stream recorded video programs to other STBs over the home network



Typical FiOS TV Home Today

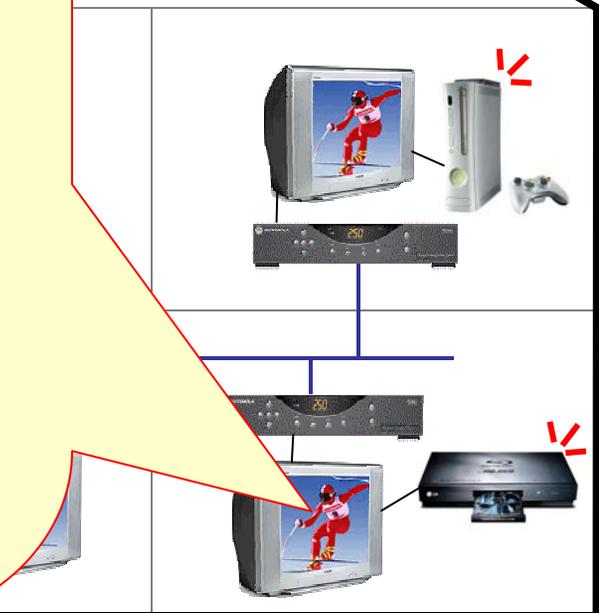
Media Manager: Create slideshows, organize playlists and access Internet videos using your computer which can then be streamed to your TV directly through the FiOS TV DVR.



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	 HSN View currently aired products, make purchases, and view deals of the day through this amazing widget! See it in Action
 WeatherBug Check out advanced forecasts with 7-day outlook, hour-by-hour and radar. 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! See it in Action
 Facebook Facebook helps you connect and share with the people in your life. See it in Action	 WeatherBug Check out advanced forecasts with 7-day outlook, hour-by-hour and radar. See it in Action
 Fantasy Football Track your ESPN fantasy football team with real-time player stats. See it in Action	 Kodak Gallery Share Kodak Gallery photo albums on your TV with family and friends. See it in Action
 Twitter Read the latest tweets on your favorite shows without having to register for a Twitter account. See it in Action	 NYC 311 Get live streetcam views throughout the five boroughs of NYC. See it in Action
 Sudoku Sudoku is a logic-based number puzzle with solutions ranging from easy to very complex. See it in Action	



Widget Developers

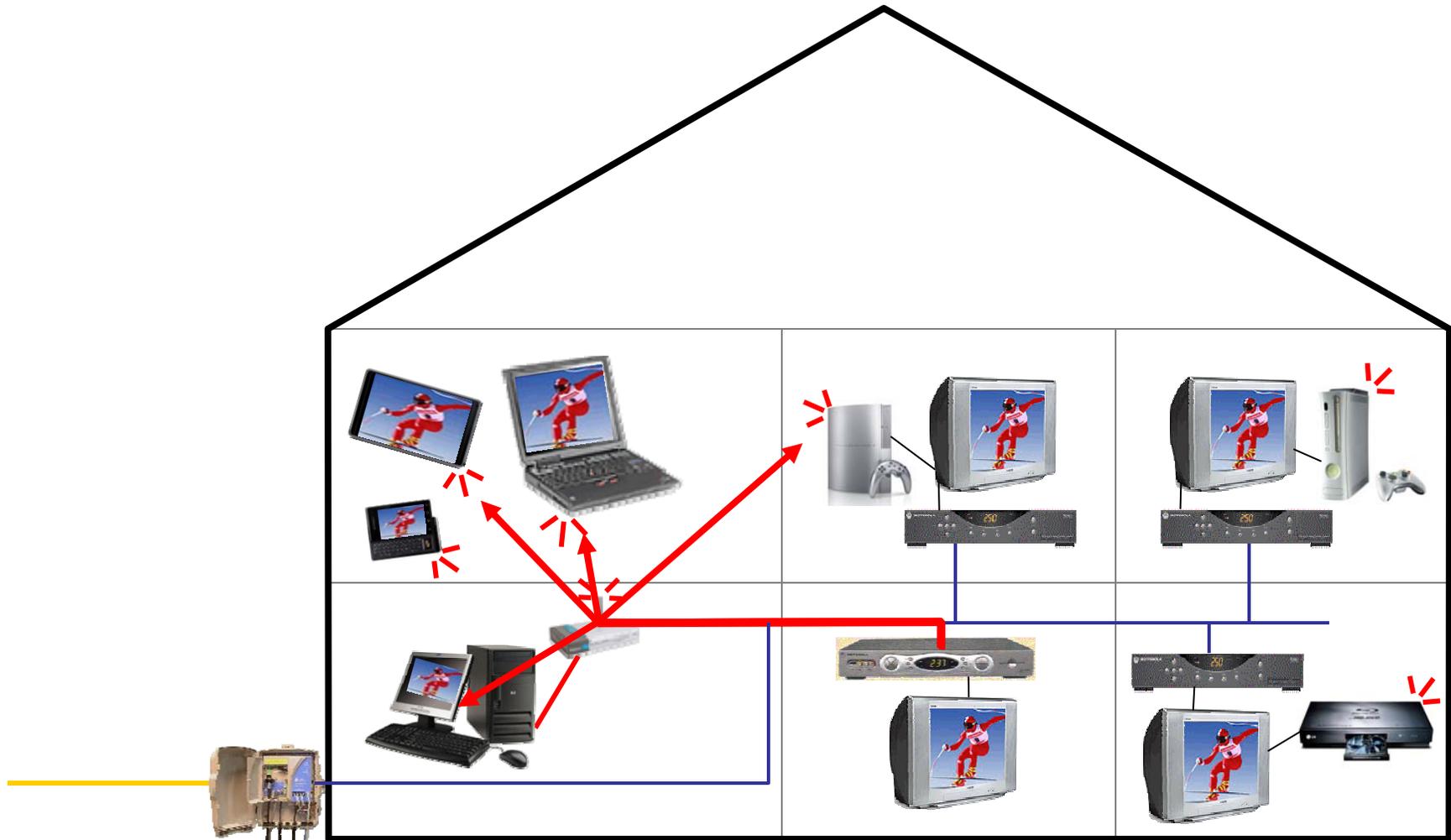
The screenshot shows a Microsoft Internet Explorer browser window displaying the Verizon Developer Community website. The browser's address bar shows the URL: <https://www22.verizon.com/fiosdeveloper/General/FiosDevCenterExt.aspx>. The website header features the Verizon logo and the text "Verizon Developer Community - FiOS TV Development Center". Below the header is a red navigation bar with links for "Home", "Resources", "News", and "FAQ".

The main content area is divided into several sections:

- FiOS TV:** An open platform for interactive television. It features an image of a TV screen displaying various widgets. Text below the image states: "FiOS TV enables next-generation interactive content and applications."
- FiOS TV SDK:** Build and test your widgets using the FiOS TV Widgets SDK. A yellow banner next to it says "COMING SOON".
- FiOS TV Widgets:** Publish your widgets to nearly 8 million interactive FiOS TV screens. Below this text is a "SIGN UP" button and a link to watch how-to videos on creating widgets for FiOS TV.
- FiOS TV Widget Bazaar:** FiOS TV Widgets are small, Internet-enabled applications that run on a FiOS TV Set-Top Box. Widgets are written using the [Lua scripting language](#).
- Latest News:** A section with a "Subscribe to FiOS TV Development News" button and a news item titled "Verizon FiOS TV Launches New Widget Featuring AP News and Photos".

Evolving Home Network Architecture

Enabling Networked CE Devices



Evolving Home Network Architecture

Networked CE Devices Replace Traditional STBs

