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October 1, 2010

**Ex Parte**

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

**Re: In the Matter of Comment Sought on Measures Designed to Assist U.S. Wireless Consumers to Avoid “Bill Shock”  
CG Docket No. 09-158**

Dear Ms. Dortch:

Donna Epps, Vice President – Federal Regulatory Affairs, Verizon, and Catherine Hilke, Counsel – Regulatory Law, Verizon Wireless, met with Louis Peraertz of Commissioner Clyburn’s office on September 30, 2010 and Henry Gola, Charles Mathias, and Krista Witanowski of Commissioner Baker’s office on October 1, 2010.

In each of these meetings, we discussed the company’s position in the FCC’s “bill shock” proceeding and expressed concern regarding prescriptive rules in this area. Consistent with the attached presentation, we also described the variety of tools Verizon Wireless currently provides customers that allow them to access detailed information about their wireless usage. The positions expressed in the meetings were consistent with Verizon’s submissions in the above-referenced proceeding.

Please contact me if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tamara Preiss".

Attachment

cc: Louis Peraertz  
Henry Gola  
Charles Mathias  
Krista Witanowski



# Usage Management Practices

September 30, 2010

# Usage Management Tools

- Proactive Alerts

- Handset Users

- Send free text message to customers who are at or nearing voice, messaging or data allowances
      - “You are on track to incur overage charges for Minutes, Data, or Messages, Acct Owner: call 866-XXX-XXXX or dial #MIN & #DATA to check usage.”
      - Usage reviewed on or around 20<sup>th</sup> day of billing cycle
    - Customers can change plans or add/drop features at any time, retroactively and without contract extension

- Laptop Users

- Provide estimate of usage since last bill cycle each time customer logs on
    - Send text message and/or email when customer reaches 50%, 75%, 90% and 100% of monthly allowance
      - “Mobile number [XXX-XXX-XXXX] has used at least 90% of its current Mobile Broadband plan’s monthly data allowance. To get full details about the account’s data usage, please have the account owner:
        - » Log on to VZAccess Manager and click Usage.
        - » Sign on to your account at [verizonwireless.com/myverizon](http://verizonwireless.com/myverizon).
        - » Give us a call at 1.800.XXX.XXXX.”

# Usage Management Tools

- My Verizon Website
  - My Verizon is an individualized website where customers can obtain detailed information regarding their Verizon Wireless service
    - Voice, messaging, and data Usage Meters
    - Detailed information on each customer's chosen service plan
    - View bill, print bill and pay bills online
    - Add a line, change plans or features
    - Manage and synchronize contacts, including automatic backup of contacts
  - Also available on handsets through My Verizon Mobile Website or Application

# My Verizon Minutes Usage Meter



Account My Services Messages Media Shop Support
Welcome [Name] VERIZON WIRELESS Sign Out

SEARCH: Site & Support June 4, 2010

## MY VERIZON WIRELESS

**WIRELESS**

FRIENDS & FAMILY

SAFE GUARDS

CONTACTS

MY MEDIA

My Bill - Acct:

Amount Due	Last Payment	<a href="#">View Bill</a>
5/29/10	5/16/10	
\$0.00	\$64.92	

ACCOUNT ACTIONS

- [Make a Payment](#)
- [Change Address](#)
- [Change Phone Number](#)
- [Suspend / Resume Service](#)
- [Buy Accessories](#)
- [Change Calling Plan](#)
- [Update My Profile](#)
- [Activate Phone](#)
- [Assign Account Managers](#)
- [Upgrade Phone](#)
- [Add a New Line of Service](#)
- [Change Features](#)

LINE: [Dropdown]

Motorola DROID

**Phone Details**

[Review this Phone](#)

Upgrade Discounts

Eligible on 11/13/10

MINUTES USAGE    TEXT USAGE    DATA USAGE

NATIONWIDE TALK FAMILY SHARE PRIMARY 1400 \$80 \$4969 0110

[Plan Details](#)

60 of 1400 minutes used [View Usage](#)

Estimate as of 06/03/10 5:31 PM Cycle ends 07/02/10

Change Plan

Select one of our new Nationwide plans

[Change Now](#)

Assign Account Manager

Authorize a user to make updates to your account

[Assign Now](#)

Backup Your Contacts

When you download Backup Assistant

[Learn More](#)

Setup Auto Pay

WIRELESS SUPPORT

LINE: [Dropdown]

- [Phones & Devices](#)
- [Services](#)
- [Order Status](#)
- [Refer Friends & Family](#)
- [How to Use Your Phone](#)

WIRELESS MESSAGING

Send Text Message    Send Picture & Video Message    Send Animated Message    New Alert

Music    Apps    Tones    Games    WallPapers

FAQs | POPULAR FORUM THREADS

- [How do I check my balance?](#)
- [How do I check my minutes used?](#)
- [How do I upgrade my equipment?](#)
- [What do I do if my phone is lost or stolen?](#)
- [How do I download ringtones?](#)
- [How do I check my data usage?](#)
- [View all FAQs](#)

[More Support](#)    [Contact Us](#)    [My Verizon Demo](#)

## Usage Management Tools

- Self-serve Interactive Voice Response from handset followed by free text message
  - # MIN: Estimate of minutes used in current billing cycle and end date of the billing cycle
  - # DATA: Estimate of messages sent/received, and estimate of data sent/received, in current billing cycle
- Customer Service
- Usage Controls - \$4.99 / line
  - Set personalized limits for voice and messaging usage
  - Set times of the day when line is prevented from calling, messaging, or accessing data
  - Block unwanted calls and messages from or to certain numbers
  - Allow “Trusted Numbers” to go through despite Usage Controls restrictions

# Usage Controls Overview

## Usage Controls

[Overview](#) | **Usage Controls** | [Family Locator](#) | [Content Filters](#) | [Help: Home](#)

**The comfort of control.**  
Usage Controls gives you the tools to control your child's cell phone usage.  
[Learn More](#)

**\$4.99** | Monthly Access per line | [+ Add to Your Account](#)



▶ | [What Are Usage Controls?](#) | [How It Works](#) | [Get Usage Controls](#)

### Get the Full Usage Controls Suite



**Usage Allowance**  
Usage Allowances enable you to set limits for voice minutes and messages that can be used during a billing cycle.



**Time Restrictions**  
Time Restrictions limit and control your child's use of his or her cell phone during a certain time of day or day of week.



**Blocked Numbers**  
Blocked Numbers are phone numbers that are restricted from calling or messaging your child at any time. Your child will also not be able to call or message those numbers at any time.



**Trusted Numbers**  
Trusted Numbers are phone numbers that are available for calling and messaging regardless of Usage Allowances or Time Restrictions.

# Usage Controls > Usage Allowance

## Parental Controls

- Overview
- Usage Controls**
- Family Locator
- Content Filters
- Profiles

[Dashboard](#) | [Usage Allowance](#) | [Time Restrictions](#) | [Blocked Numbers](#) | [Trusted Numbers](#) | [Service Blocks](#)

### Usage Allowance

[Help: Usage Allowance](#)

Set limits and view usage

- Minutes**
- Messages

#### Minutes Allowance

Keep track of the monthly anytime minutes your child is using. This allowance applies to the minutes included in your calling plan and usage associated with applicable Friends & Family<sup>®</sup> calling. It does not apply to Unlimited Mobile to Mobile and Unlimited Night and Weekend Minutes.

Set up a minute allowance below, and when your child reaches the allowance you will receive a free text message. By setting an allowance threshold you are not restricting the number of anytime minutes your child can use, rather you are setting an alert to inform you of your child's usage. Your child will also receive free text alerts when he/she is within 15 minutes of their allowance threshold and again when they reach the allowance threshold you set.

#### Anytime Minutes Usage Summary - This billing cycle (6 days remaining)



#### Set Anytime Minutes Allowance - 1400 total minutes in your plan

	Not Set	Set Minutes Allowance	Current Usage
<input checked="" type="checkbox"/> Test 2.0_0328	<input type="radio"/>	<input type="radio"/> <input type="text" value=""/> Minutes	3 Mins

0 Total Minutes Allowance

Cancel

Save Changes

# Usage Controls > Message Allowance

**Parental Controls**

Overview
**Usage Controls**
Family Locator
Content Filters
Profiles

[Dashboard](#) | [Usage Allowance](#) | [Time Restrictions](#) | [Blocked Numbers](#) | [Trusted Numbers](#) | [Service Blocks](#)

**Usage Allowance** Help: [Usage Allowance](#)

Set limits and view usage

Minutes   **Messages**

### Messages Allowance

Set a limit on the number of text, picture and video messages your child is allowed to send and receive each month. This limit applies to accounts on a pay as you go messaging plan or messaging bundle with an included number of messages. For example, if your child has a \$10 monthly access bundle that includes 500 messages and Unlimited "IN", the message allowance would apply to the 500 messages only.

Your child will receive free text alerts when he/she is within 15 messages of their allowance threshold and again when they reach the allowance you set. If the message limit is reached, you will be notified via a free text message and your child will no longer be able to send or receive messages. This restriction does not apply to phones on your wireless account the Trusted Numbers list that you will be able to send and receive messages to each other at all times.

**Messages Usage Summary** - This billing cycle (8 days remaining)

0 Messages Used   Pay As You Go Plan

**Set Messages Allowance - Pay As You Go Plan**

	Not Set	Set Messages Allowance	Current Usage
<input checked="" type="checkbox"/> Test 2.0_0328	<input checked="" type="radio"/>	<input type="radio"/> <input style="width: 60px; border: 1px solid #ccc;" type="text"/> Messages	0 Msgs

Cancel
Save Changes

# Usage Management Tools



- International Roaming Alerts
  - Free messages to customers that are traveling internationally alerting them that they are roaming and providing the data rates for that particular country (CDMA and GSM).
    - “Welcome to France. Dial+1 and the number to dial the US. Local Calls Dial (33) the City Code and the Number. For Roaming Support +1-908-559-4899. All pay per use data, including apps or tethering, is \$0.02 KB or \$20.48 MB.”
  - Free alert when a customer reaches \$100 and \$250 in international data roaming charges
    - “As of mm/dd/yyyy, Mobile Number XXX-XXX-XXXX has incurred approx. \$100.00 in data roaming charges. For plan options, visit [www.verizonwireless.com/global](http://www.verizonwireless.com/global) or call +1-908-559-4899 to speak to a Global specialist.”