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November 30, 2010

**ELECTRONIC FILING**

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

**Re: GN Docket No. 09-191, WC Docket No. 07-52**

Dear Ms. Dortch:

This is to inform you that, on November 30, 2010, Neal Goldman, Chief Legal and Regulatory Officer, Christopher Libertelli, Senior Director, Government and Regulatory Affairs - Americas, and Staci Pies, Director, Government and Regulatory Affairs - North America, all of Skype Communications S.A.R.L. ("Skype"), met with Austin Schlick, General Counsel, and Julie Veach, Deputy General Counsel.

The purpose of the meeting was to discuss the views of Skype in the open Internet proceeding as reflected in the reply comments filed by Skype on November 4th, 2010, in the above-captioned proceeding.

The Skype representatives also requested that the Commission incorporate the Skype Petition docket, RM-11361, into the above-captioned proceeding and grant the relief requested therein as part of the resolution of this proceeding.

The Skype representatives discussed the importance of Skype in providing consumers with an option for affordable international calling. For example, in announcing a strategic relationship between Verizon Wireless and Skype earlier this year, both parties emphasized the importance of Skype in providing broadband consumers with free Skype-to-Skype voice calls and competitive rates for SkypeOut calls to international PSTN numbers.<sup>1</sup> The Commission has long played an important role, under Section 201 of the Communications Act, in ensuring that U.S. consumers have access to just and reasonable international calling rates.<sup>2</sup> Thus, were the Commission to adopt a rule under Title I that prohibits the blocking of Skype (and similar voice applications), such a rule would be reasonably ancillary to the Commission's statutorily mandated responsibility of ensuring just and reasonable international calling rates.<sup>3</sup>

Please direct any questions regarding this matter to the undersigned.

Respectfully,



Devendra T. Kumar  
*Attorney for Skype Communications S.A.R.L.*

cc: Austin Schlick  
Julie Veach

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<sup>1</sup> *Verizon Wireless and Skype Join Forces to Create a Global Mobile Calling Community*, Press Release, Feb. 16, 2010, available at <http://about.skype.com/press/2010/02/verizon.html> (describing strategic relationship between Skype and Verizon Wireless announced at the 2010 Mobile World Congress in Barcelona, Spain). A copy of this press release is attached.

<sup>2</sup> See generally *International Settlements Policy Reform; International Settlement Rates*, First Report and Order, IB Docket Nos. 02-324 & 96-261, FCC 04-53, at 21-22, ¶ 41 (rel. Mar. 30, 2004) ("In addition to the general regulatory oversight of international communications set forth in Section 2(a), Section 201 of the Communications Act gives the Commission authority to ensure that 'all charges, practices, classifications, and regulations for and in connection with' the provision of 'interstate or foreign communications by wire or radio' be 'just and reasonable.'").

<sup>3</sup> See *Comcast Corp. v. FCC*, 600 F.3d 642, 646 (D.C. Cir. 2010) (citing *American Library Ass'n v. FCC*, 406 F.3d 689, 691-92 (D.C. Cir. 2005) in setting forth the Commission's two-part test for exercise of its ancillary jurisdiction under Title I).

# Verizon Wireless and Skype join forces to create a global mobile calling community

New Skype Mobile product for Verizon Wireless smartphones brings more value to US mobile consumers

**BARCELONA, Spain; BASKING RIDGE, NJ, United States; and LUXEMBOURG, Luxembourg, 16 February 2010** – At the 2010 Mobile World Congress in Barcelona, Verizon Wireless and Skype today announced a strategic relationship that will bring Skype to Verizon Wireless smartphones in March. The new Skype mobile™ product enhances Verizon Wireless’ smartphones for users who have data plans by offering a new way to call around the globe, while also giving hundreds of millions of Skype users around the world the opportunity to communicate with friends, family and business colleagues in the United States using Verizon Wireless.

The two companies have created an exclusive, easy-to-use Skype mobile offering for 3G smartphones. Verizon Wireless 3G smartphone users with data plans can use Skype mobile to:

- make and receive unlimited Skype-to-Skype voice calls to any Skype user around the globe on America’s most reliable wireless network;
- call international phone numbers at competitive Skype Out calling rates;
- send and receive instant messages to other Skype users; and
- remain always connected with the ability to see friends’ online presence.

Initially, Skype mobile will be available on millions of best-selling Verizon Wireless 3G smartphones with data plans, including the BlackBerry® Storm™ 9530, Storm2™ 9550, Curve™ 8330, Curve™ 8530, 8830 World Edition and Tour™ 9630 smartphones, as well as DROID by Motorola, DROID ERIS™ by HTC and Motorola DEVOUR™.

John Stratton, executive vice president and chief marketing officer for Verizon Wireless, said, “Skype mobile on Verizon Wireless changes the game. For Verizon Wireless’ more than 90 million customers, Skype mobile adds great value because we’re effectively giving customers with smartphones and data plans the option to extend their unlimited calling community to hundreds of millions of Skype users around the globe. And you’re not limited to using a single type of phone; we’ll have nine smartphones ready right at launch in March.”

Josh Silverman, chief executive officer of Skype, noted, “People want to take their Skype conversations with them wherever they go, whether it’s on a PC, TV or increasingly mobile phones. Verizon Wireless will give US consumers the best Skype experience on mobile phones and will truly change the way people call their friends and family internationally.”

Customers interested in learning more about Skype mobile for Verizon Wireless smartphones can visit [www.verizonwireless.com/skypemobile](http://www.verizonwireless.com/skypemobile). Additional information about the service will be available next month.

Visit [www.verizonwireless.com](http://www.verizonwireless.com) for more information about Verizon Wireless or follow the company at [twitter.com/verizonwireless](https://twitter.com/verizonwireless). Learn more and download Skype at [www.skype.com](http://www.skype.com) or follow the company at [twitter.com/skypemobile](https://twitter.com/skypemobile).

## **About Verizon Wireless**

Verizon Wireless operates the nation's most reliable and largest wireless voice and 3G data network, serving more than 91 million customers. Headquartered in Basking Ridge, NJ, with 83,000 employees nationwide, Verizon Wireless is a joint venture of Verizon Communications (NYSE: VZ) and Vodafone (NASDAQ and LSE: VOD). For more information, visit [www.verizonwireless.com](http://www.verizonwireless.com). To preview and request broadcast-quality video footage and high-resolution stills of Verizon Wireless operations, log on to the Verizon Wireless Multimedia Library at [www.verizonwireless.com/multimedia](http://www.verizonwireless.com/multimedia).

## **About Skype**

Skype is software that enables the world's conversations. Millions of individuals and businesses use Skype to make free video and voice calls, send instant messages and share files with other Skype users. Everyday, people everywhere also use Skype to make low-cost calls to landlines and mobiles. Download Skype to your computer or mobile phone at [skype.com](http://skype.com).