

Donna Epps
Vice President
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December 10, 2010

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Ex Parte

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

RE: 2009 Consumer Information and Disclosure, CG Docket No. 09-158; Truth-in-Billing and Billing Format, CC Docket No. 98-170; IP-Enabled Services, WC Docket No. 04-36

Dear Ms. Dortch:

On December 9, 2010, Donna Epps and David Young of Verizon and David McCarley and Bill Wallace of Verizon Wireless met with Walter Johnson and Michael Ha of the Office of Engineering and Technology and Jordan Usdan and Robert Alderfer of the Wireless Telecommunications Bureau to discuss the FCC's efforts to develop a methodology for measurement of mobile broadband network performance and coverage.

The Verizon and Verizon Wireless representatives emphasized that any measurement methodology adopted by the FCC for mobile networks needs to take into account multiple measures of network performance, including factors such as geographic coverage, network access, service access, reliability, throughput, and performance on end-user tasks, consistent with the comments filed by Verizon Wireless in these dockets on July 8, 2010. We also emphasized that any methodology must provide a controlled, comprehensive and neutral comparison across mobile technologies and operational networks. We noted that The Nielsen Company currently conducts such testing of mobile networks in the United States, and provides a good model for development of such data.

We recommended that the FCC continue to engage in discussions with representatives from the wireless industry as it works on developing any measurement metrics, testing process, and format for publication of results.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this *ex parte* notice is being filed with the Commission's Electronic Comment Filing System.

Respectfully submitted,

A handwritten signature in black ink that reads "Donna Epps".

cc: Jordan Usdan Walter Johnson Michael Ha Robert Alderfer