ReedSmith

Judith L. Harris
Direct Phone: +1 202 414 9276
Email: jlharris@reedsmith.com

Amy S. Mushahwar
Direct Phone: +1 202 414 9295
Email: amushahwar@reedsmith.com

Reed Smith LLP
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005-3373
+1 202 414 9200
Fax +1 202 414 9299
reedsmith.com

FILED/ACCEPTED

DEC 17 2010

Federal Communications Commission
Office of the Secretary

December 17, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: "Bill Shock" Comments
CG Docket No. 10-207; CG Docket No. 09-158

Dear Ms. Dortch:

On behalf of The Nielsen Company ("Nielsen") please find an original and four (4) copies of the above-referenced public filing.

Kindly have your staff date-stamp the extra copy of the filing and return it to the awaiting courier.

Respectfully submitted,

Judith L. Harris
Amy S. Mushahwar

JLH/ASM:lsj

Enclosures

No. of Copies rec'd 0+4
List A B C D E

Nielsen Customer Value Metrics: A closer look at overages

nielsen

Nielsen is the world's foremost provider of data and insights into the mobile market

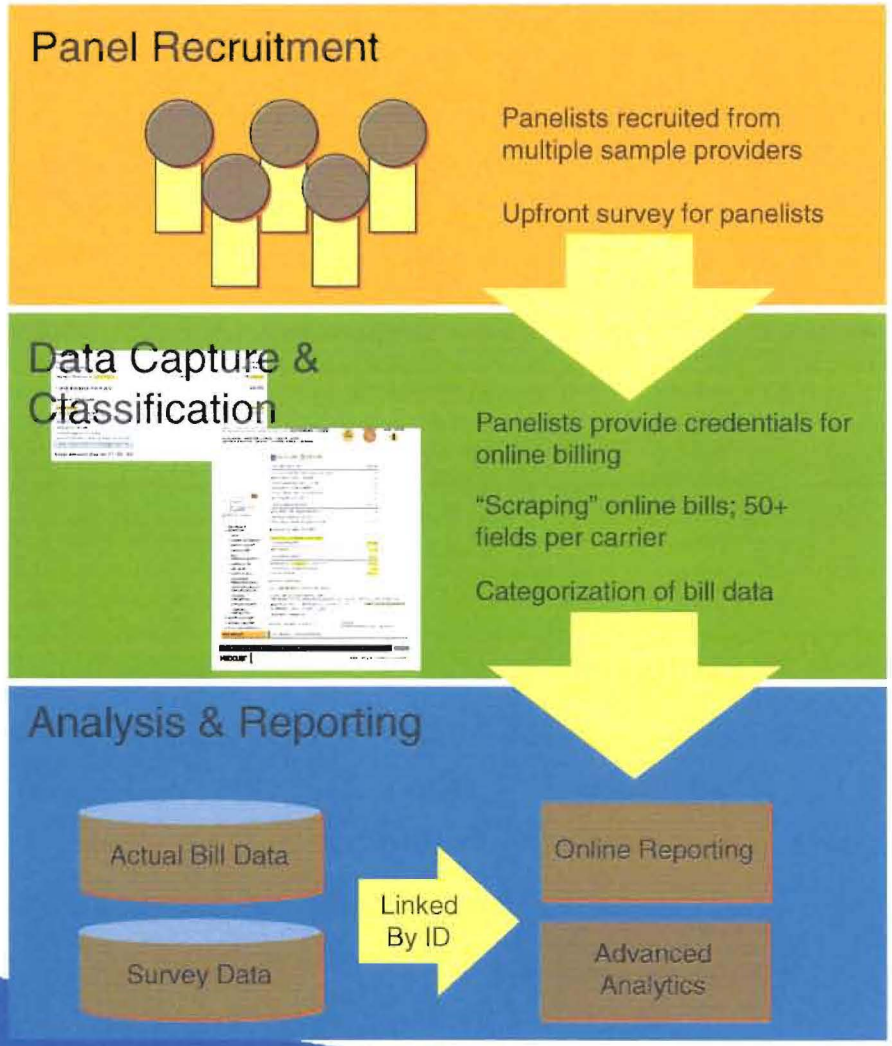
- Customer Value Metrics (CVM) service collects and analyzes 65,000+ wireless lines in the U.S. each month to determine what wireless customers do and pay for (not what they think they do/pay for)

- CVM measures three key factors when assessing overages:
  - How many people go into overages?
  - How often do they go into overages?
  - By how much do they go into overages?

nielsen

Copyright © 2010 The Nielsen Company. Confidential and proprietary.

CVM Methodology Overview



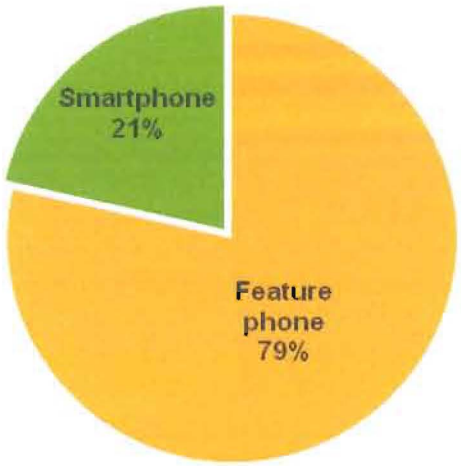
- Approach
  - Consumers recruited from 6 large sample providers, plus Nielsen's own panels
  - 65,000+ line-level bills each month using advanced "e-bill scraping" technology
  - Panelists surveyed for demographic and (supplemental) device info
  - Biases mitigated by weighting sample against universe benchmarks
    - US Census Bureau demographics
    - Carrier market share
    - Penetration of Family Plans
    - Penetration of iPhones
  - Consistent categorization of data reported on bills
  - Billing data collected monthly and reported quarterly and monthly

nielsen

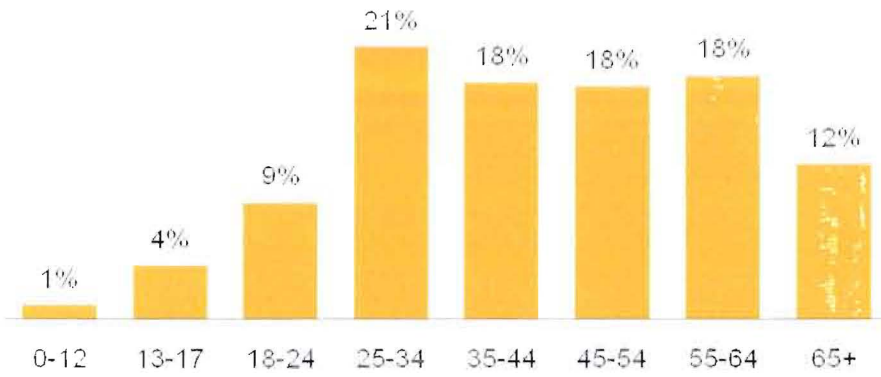
Copyright © 2010 The Nielsen Company. Confidential and proprietary.

Panel Composition

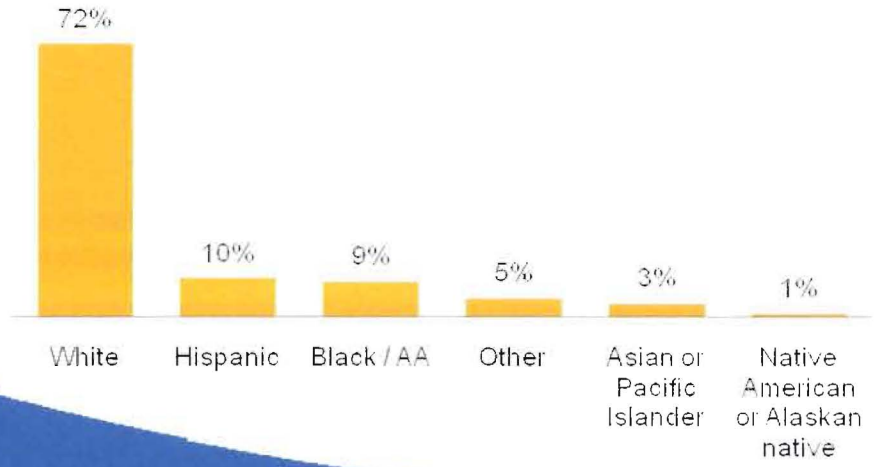
Phone Type



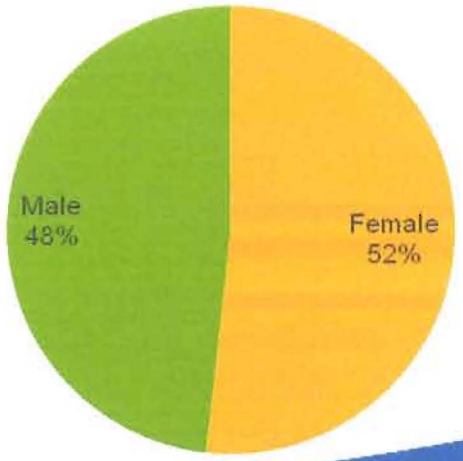
Age



Race / Ethnicity



Gender



nielsen

Copyright © 2010 The Nielsen Company. Confidential and proprietary.

Defining the potentially affected universe

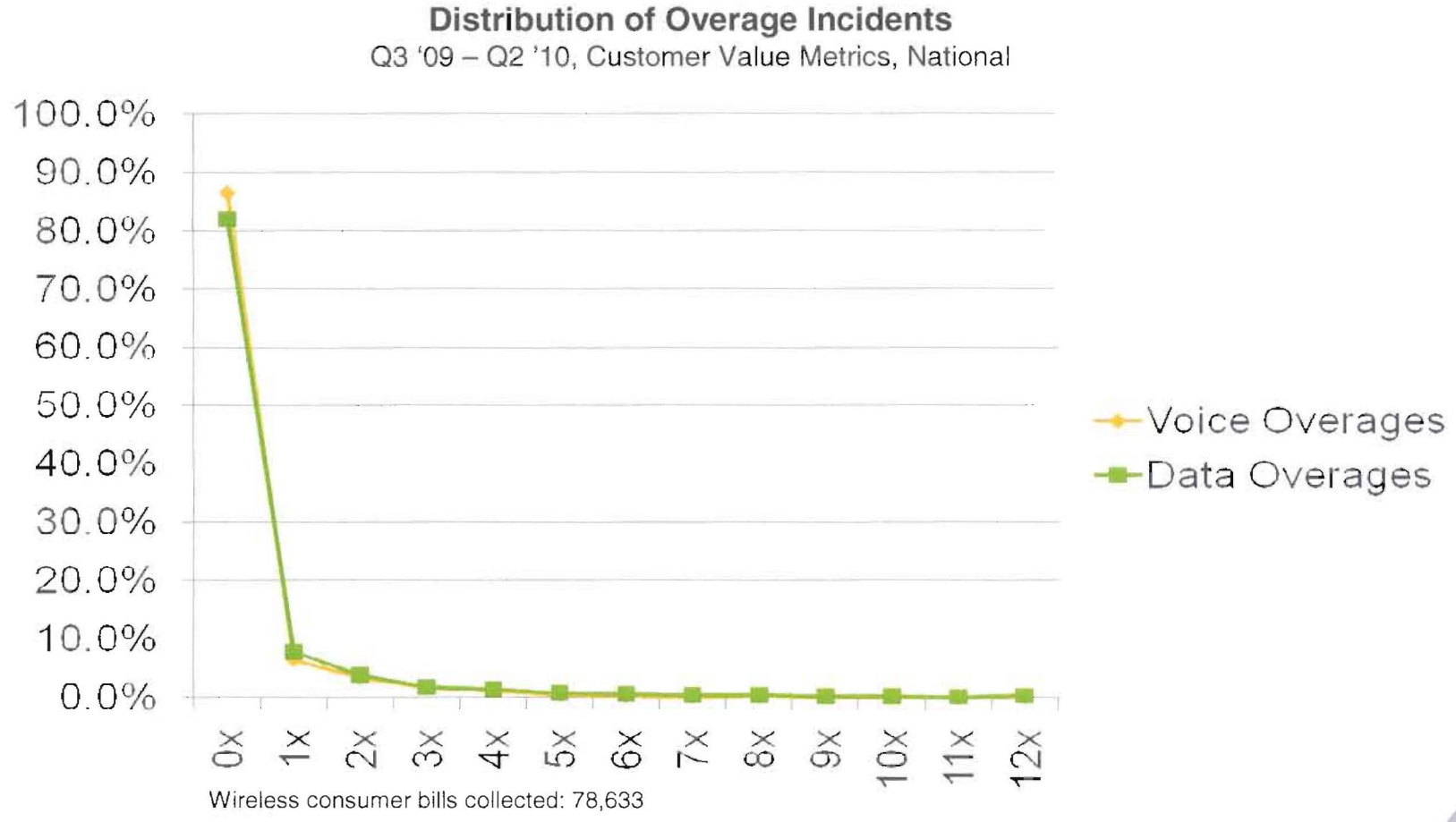
How many people are potentially affected by overages?

Only 115 million once you exclude pre-paid subscribers, corporate lines, individual lines on family/group plans, etc.

Active wireless connections in the United States (Q3 2010)	**292 million**
Prepaid lines	(61 million)
Laptops on unlimited plans	(16 million)
Connected devices	(15 million)
Active connections associated with people	**200 million**
Corporate lines (30% of lines)	(60 million)
Consumer connections	**140 million**
Family plans (40% of lines)	(56 million)
Family accounts (2.3 lines per account)	24 million
Potentially affected consumer accounts	**115 million**

Copyright © 2010 The Nielsen Company. Confidential and proprietary.

How often are consumers affected by overages in a year?



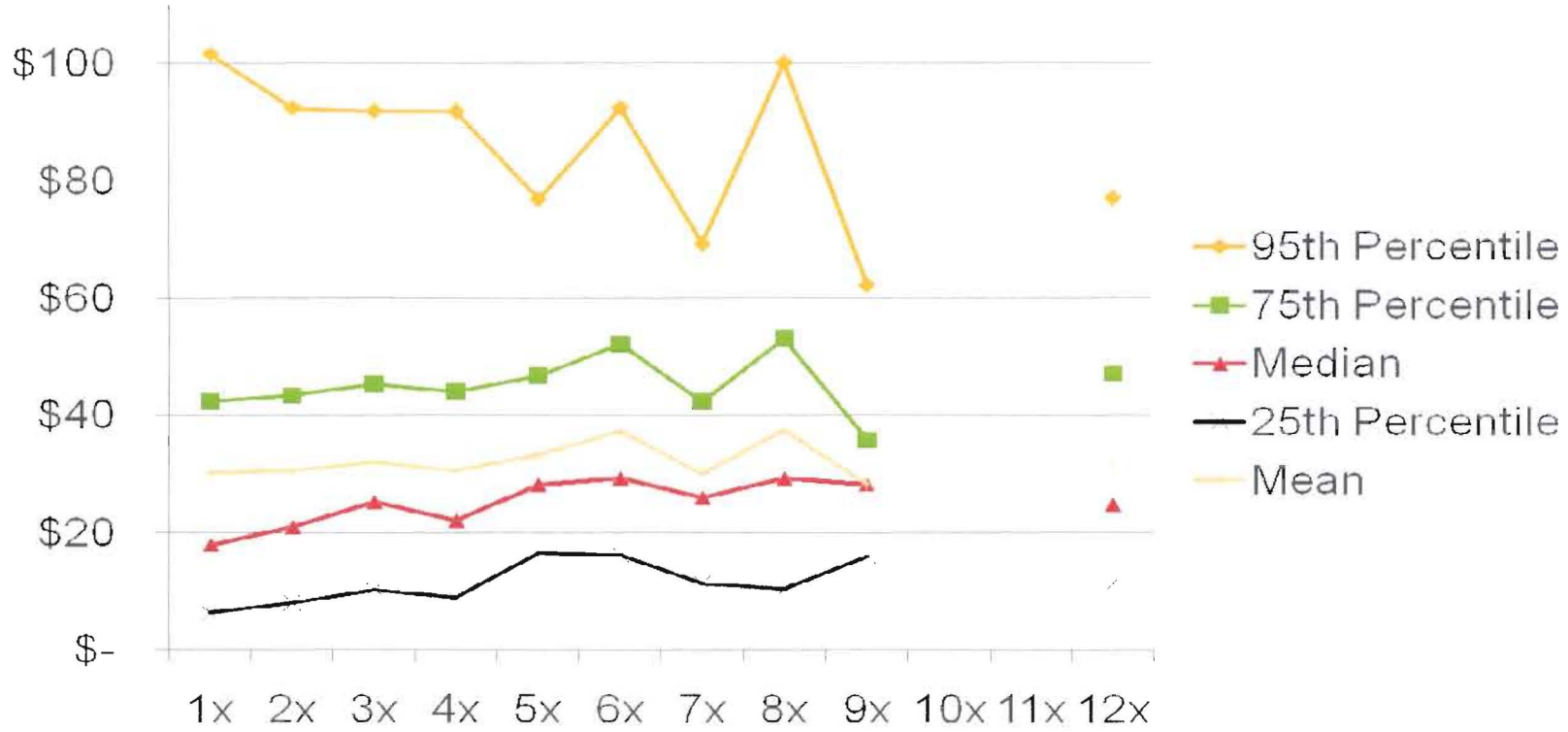
nielsen

Copyright © 2010 The Nielsen Company. Confidential and proprietary.

The more often a consumer goes into voice overage the higher the overage

Voice Overage by Percentile

Q3 '09 – Q2 '10, Customer Value Metrics, National



10x and 11x overage in a 12 month period suppressed due to samples of 20 and 1 and hence not statistically reliable.
10x values were 95th percentile $63.14, 75th percentile $49.76, median $27.61, 25th percentile $17.01, average $31.63
11x value was $1.42 for the single observation collected

Copyright © 2010 The Nielsen Company. Confidential and proprietary.