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April 7, 2011

Ex Parte

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

Re: CG Docket Nos. 09-158 & 10-207

Dear Ms. Dortch:

On April 6, 2011, Catherine Hilke and Jerry Karnick of Verizon Wireless and Ann Berkowitz and Donna Epps of Verizon Communications met with Joel Gurin, Bill Freedman, Colleen Heitkamp, Arthur Scrutchins, Richard Smith, and Mark Stone of the Consumer and Governmental Affairs Bureau and David Tannenbaum of the Office of General Counsel regarding the proceedings indicated above.

The discussions during the meeting were consistent with the attached presentation. Specifically, we detailed the wide variety of usage management tools Verizon Wireless and other wireless providers currently offer subscribers. We also discussed the problems associated with providing real-time usage alerts.

In addition, Verizon responded to a number of staff questions regarding third party applications that are designed to help consumers track their wireless phone usage. Staff asked about the advantages and disadvantage of encouraging consumer to use these apps. We indicated that Verizon Wireless also offers subscribers that use an Android or BlackBerry smartphone a My Verizon application that allows them to track their wireless usage. We also noted that while these third party applications may be helpful to consumers, they have significant limitations in their ability to track chargeable wireless usage.

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Finally, Verizon Wireless discussed its ongoing efforts to better inform consumers regarding the wide variety of usage management tools available today. For example, Verizon Wireless recently released a video showing consumers how to check their wireless usage by dialing #MIN and #DATA. This video is available at <http://www.youtube.com/user/VerizonWirelessTV#p/u/6/O1693KQQ3lc>.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne D. Burk". The signature is fluid and cursive, with a large initial "A" and "B".

Attachment

cc: Joel Gurin
Bill Freedman
Colleen Heitkamp
Arthur Scrutchins
Richard Smith
Mark Stone
David Tannenbaum

Usage Management Tools

April 6, 2011

Verizon Wireless Currently Provides a Variety of Usage Management Tools



- Proactive Alerts
 - Handset Users:
 - Review usage around 20th day of billing cycle
 - 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.”
 - 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.
 - » Give us a call at 1.800.XXX.XXXX.”

Verizon Wireless Currently Provides a Variety of 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
 - Also available on handsets through My Verizon Mobile Website or Application
- #MIN / #DATA
- 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

Consumers Have the Information and Tools They Need to Control their Wireless Usage

- Other providers offer similar usage management tools
- Consumers have ready access to information regarding service plans and these usage management tools
- Third-party vendors offer usage management applications
- Carriers should have the flexibility to decide whether and when to send alerts to respond to customer demands
- A mandatory usage cut-off mechanism could result in severe consequences for consumers

The Harms of a Real-Time Alerting Requirement Outweigh Potential Consumer Benefit

- Mandating real-time alerts would result in unintended, negative consequences for consumers
 - Two-stage dialing will be required when roaming in certain areas
 - Call setup time for voice, messaging and data will increase, increasing call times and congestion on the network
 - Deployment of new services will be delayed as the Usage Control system will need to be incorporated upfront
 - Adds a point of failure to the network and can impact performance measures such as incomplete and dropped calls
- Cost of providing real-time alerts is substantial
- Consumers have a good understanding of voice and messaging usage

Verizon Wireless Currently Provides International Roaming Alerts

- Welcome Message – Free messages to customers that are traveling internationally alerting them that they are roaming and may incur additional charges.
 - “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.”
- International Data Roam Monitor – Free alert when a customer reaches \$50, \$200, \$500, \$2000, and every \$1500 thereafter in international data roaming charges
 - “As of mm/dd/yyyy, Mobile Number XXX-XXX-XXXX has incurred approx. \$50.00 in data roaming charges. For plan options, visit www.verizonwireless.com/global or call +1-908-559-4899 to speak to a Global specialist.”

Consumers Already Receive Detailed Roaming Information

- Existing tools, such as Verizon Wireless' international welcome messages, appropriately inform customers that they may incur international roaming charges that are not covered by their monthly plans
- The harms of a domestic roaming alerting requirement outweigh the benefits
 - Nationwide plans that do not charge for domestic roaming are abundant
 - The costs associated with implementing domestic roaming alerts are substantial
 - The benefits of a domestic roaming alert requirement do not outweigh the costs

The FCC and Industry Should Partner on Consumer Education Efforts



- On April 5, CTIA and multiple wireless carriers released two checklists summarizing the information that consumers should know when considering a new wireless plan or device
- Verizon Wireless recently released a series of video clips outlining the various usage management tools available
- Verizon Wireless looks forward to partnering with the FCC and other wireless carriers on future consumer education efforts