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March 23, 2012

Ex Parte

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Empowering Consumers to Prevent and Detect Billing For Unauthorized Charges
("Cramming), CG Docket Nos. 11-116, 98-170, and 09-158**

Dear Ms. Dortch:

On Thursday, March 22, Ann Berkowitz, Mark Montano, and the undersigned met with Kris Monteith, Mark Stone, Michael Jacobs, Kurt Schroeder, Lynn Ratnavale, and Melissa Conway of the Consumer and Governmental Affairs Bureau to discuss Verizon's revision of its business practices to further protect its customers from unauthorized charges on their telephone bills.

In particular, we described our plans to cease providing third-party billing services for "miscellaneous" or "enhanced" services. Such services are unrelated to the use of Verizon's network and include services such as web hosting, voicemail, and email. We explained that although cramming complaints to Verizon for miscellaneous or enhanced services comprise only a small fraction of bills containing third-party charges, even that figure is too high.

Verizon will continue to provide billing services for its affiliates, strategic partners, and third parties whose charges generally relate to telecommunications or information services that use Verizon's network, including long distance services, conference calling services, telephone services to hospitalized patients, coin telephone services and collect calling services.

Finally, we explained that third-party charges on Verizon Wireless bills are not affected by this decision. As we described in our comments, wireless third-party billing is fundamentally

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different from wireline third-party billing and is the source of far fewer customer complaints.¹ The majority of third-party charges billed by wireless providers are ordered directly from the handset itself, and the end user is directly involved in a double opt-in or equivalent verification process. For those wireless customers who do not want any third-party charges on their accounts, we will continue to offer the ability to block such charges. As such, neither similar steps to discontinue providing third-party billing services nor additional rules are necessary.

Sincerely,

A handwritten signature in black ink that reads "Ian Dillon". The signature is written in a cursive, slightly slanted style.

cc: Kris Monteith
Mark Stone
Michael Jacobs
Kurt Schroeder
Lynn Ratnavale
Melissa Conway

¹ See Verizon Comments at 5-11; Verizon Reply Comments at 3-5.