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**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 Wednesday, April 18, Mark Montano and the undersigned met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell to discuss Verizon's efforts to protect its customers from unauthorized charges on their telephone bills.

In particular, we described our recently-announced plans to cease providing third-party billing services for "miscellaneous" or "enhanced" services offered to wireline customers.¹ We urged the Commission to allow a sufficient implementation period for any new anti-cramming rules so that Verizon (and other wireline providers that have subsequently announced similar measures) could efficiently wind down this third-party billing.

Moreover, we explained that additional rules relating to third-party charges on wireless bills are not necessary. As we described in our comments, wireless third-party billing is fundamentally different from wireline third-party billing and is the source of far fewer customer complaints.² The majority of third-party charges billed by wireless providers are ordered directly from the handset itself, and the end user must complete a double opt-in or equivalent verification process. Such a process is required by the Mobile Marketing Association's Consumer Best Practices Guidelines for Cross-Carrier Mobile Content Services, and this key protection is widely deployed by wireless providers. We encouraged the Commission to avoid regulation and to allow the mobile industry, including third-party service providers that may not be subject to the Commission's jurisdiction, to continue to use and update existing industry best practices to protect consumers from cramming.

Sincerely,

A handwritten signature in black ink that reads "Ian Dillner".

cc: (via e-mail)
Christine Kurth

¹ See Verizon Ex Parte (Mar. 23, 2012).

² See Verizon Comments at 5-11; Verizon Reply Comments at 3-5.