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Ex Parte

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

Today, Mark Montano, and I met with Nicholas Degani, legal advisor to Commissioner Pai, to discuss Verizon's position in the above docket. As we described in our comments, wireless third-party billing is fundamentally different from wireline third-party billing.¹ In particular, 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 that utilizes the handset. We also explained the important protection from unauthorized third-party charges that wireline and wireless customers can get from Verizon's free bill blocks. As such, anti-cramming rules in addition to those in the Commission's April 27, 2012 order are not necessary.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ann D. Berkowitz".

cc: Nicholas Degani

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