



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2458
Fax 202 336-7922
ian.dillner@verizon.com

February 19, 2013

Ex Parte

VIA ECFS

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

Re: Review of Foreign Ownership Policies, IB Docket No. 11-133

Dear Ms. Dortch:

On February 14, 2012 Verizon representatives Jacquelynn Ruff, Katharine Saunders, and I spoke with Mindel De La Torre, Troy Tanner, James Ball, Francis Gutierrez, David Krech, Susan O'Connell, Kathleen Collins, and Howard Griboff of the International Bureau and Kate Dumouchel of the Office of General Counsel to discuss the above-captioned proceeding to streamline the Commission's foreign ownership review process under Section 310(b)(4) of the Communications Act. During the meeting, we discussed whether the Commission might require entities with prior foreign ownership approvals to return to the Commission to obtain the benefit of any new rules adopted in this proceeding.¹ We explained that, particularly in instances where an entity's existing foreign ownership status has been approved repeatedly, further review would be unwarranted, inefficient, and contrary to the Notice's goals of streamlining these procedures. In particular, no further review should be necessary for entities whose foreign ownership structure has been reviewed and approved in the past twelve months, particularly those with existing national security agreements.

However, if the Commission chooses to require additional review, such review should be strictly limited and should not require a stand-alone petition. Rather, any further review that is required should be targeted and eligible for streamlined processing, subject to coordination with the appropriate Executive Branch agencies on matters related to national security, law enforcement, foreign policy and trade policy.² In accordance with the Notice's request for

¹ See Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licenses under Section 210(b)(4) of the Communications Act, as Amended, *Notice of Proposed Rulemaking*, 26 FCC Rcd 11703, ¶ 78 (2011) ("Notice").

² See *id.* ¶ 75.

Marlene H. Dortch
February 19, 2013
Page 2

comment on “ways to accelerate the section 310(b)(4) review process,”³ the Commission – to the extent it requires any further review – should therefore extend to Section 310(b)(4) requests the streamlined authorization procedures that apply to international Section 214 applications.⁴

Sincerely,



cc: Mindel De La Torre
Troy Tanner
James Ball
Francis Gutierrez
David Krech
Susan O'Connell
Kathleen Collins
Howard Griboff
Kate Dumouchel

³ See *id.* ¶ 76.

⁴ See 1998 Biennial Regulatory Review – Review of International Common Carrier Regulations, *Report and Order*, 14 FCC Rcd 4909, ¶¶ 9-15 (1999).