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February 21, 2013

**Ex Parte**

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

**Re: Modernizing the FCC Form 477 Data Program - WC Docket No. 11-10**

Dear Ms. Dortch:

On Tuesday, February 19, 2013, Ann Berkowitz, William Johnson, Bill Wallace, and the undersigned of Verizon participated in a conference call with Lisa Gelb, Travis Litman, Carol Simpson, Rodger Woock, Chelsea Fallon, Kenneth Lynch and Ellen Burton of the Wireline Competition Bureau and Nese Guendelsberger, Susan Singer, Mitali Shah, Eliot Maenner, and Mike Janson of the Wireless Telecommunications Bureau to discuss the above captioned proceeding.

During the call, Verizon provided feedback to a number of potential new data collections and modifications to the existing Form 477 data collections the FCC raised in our February 11, 2013 call, including the delineation of wireline broadband availability by residential and business services. Staff also described potentially collecting maps of wireless service availability in shape files, by technology and by spectrum band. Verizon questioned the justification for collecting this granular, and in some cases competitively sensitive, information. We recommended that, if the Commission nonetheless collects such information, that it continue to collect it in the format used by NTIA and not expand the information currently sought by this data collection. Commission staff also described proposals to collect wireless subscriber device information, potentially by county (based on billing address), by the highest technology on the device, and segregated between pre-paid and post-paid devices. Verizon explained some of the difficulties in attempting to assign a location to mobile devices by subscriber billing addresses, particularly for prepaid subscriptions. The FCC staff also described a proposal to collect on a nationwide basis a count of machine-to-machine wireless devices. Verizon questioned the purpose and utility of collecting this information, particularly given that many machine-to-machine services do not use broadband connections. But we noted that, if the FCC goes forward with such a data collection, the FCC would need to clearly define what devices constitute "machine-to-machine" devices and should be consider how quickly the device market changes. Finally, FCC staff discussed the feasibility of reporting wireless subscriptions sold as a part of a bundle with other services, such as wireline broadband or video. Verizon noted that, again, that the FCC would have to clearly define what it means by "bundle" and that there may be situations where parts of a multi-line bundle are billed by different providers, making tracking difficult.

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Finally, we expressed concern about the increased burdens associated with these new potential collections, both individually and collectively, and noted that it was not clear at this time that each of these proposals served a useful purpose for tracking broadband. The FCC's current broadband reporting requirements, which were updated in 2008, already provide the Commission with substantial, granular data concerning the broadband marketplace, as do other public sources of information concerning broadband. The substantial, additional collections that staff is contemplating, some of which is very competitively sensitive, would dramatically increase the burdens on providers, but the public benefits of such reporting is unclear. .

Sincerely,

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

cc: Lisa Gelb  
Travis Litman  
Carol Simpson  
Kenneth Lynch  
Eliot Maenner  
Chelsea Fallon  
Nese Guendelsberger  
Susan Singer  
Mitali Shah  
Mike Janson  
Rodger Woock  
Ellen Burton