



May 31, 2013

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Ex Parte

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Cable Television and Operational Requirements, MB Docket No. 12-217

Dear Ms. Dortch:

On May, 29, 2013, David Young, Will Johnson, Bill Wallace and I met with Nancy Murphy, Alison Neplokh, Steven Broeckaert, John Wong, Wayne McKee, Walid Kassem, Sean Yun, Sean Mirzadegan, and Jeffrey Neumann of the Media Bureau to discuss signal quality issues in the above-referenced proceeding.

We urged the FCC not to import prescriptive signal quality regulations that were imposed on the delivery of analog cable service onto new digital technology. There is no evidence in the record of a systemic problem with respect to the quality of signals delivered by all-digital cable systems, such as Verizon's FiOS TV, and thus no basis for regulation. Robust competition in the video market creates strong incentives for video providers to deliver high quality services, particularly a service as fundamental as a good picture. If a video provider is not offering the highest quality service, its customers can and will switch to a competitor.

We discussed the all-digital, all-fiber network architecture that supports FiOS TV as well as the rigorous internal procedures we follow to monitor the quality of digital signals we pass through our network and deliver to customers. Verizon receives all national programming at two geographically distributed, fully redundant Super Head Ends (SHE). The SHEs are staffed 24/7 and all programming channels are monitored, alarmed and quality control checked so that any failures or degradations in video quality can be caught and remedied in near real-time. That programming is then distributed over fully redundant fiber rings to the regionally-based Video Hub Offices (VHO) that serve each market area. The VHO compares the signals coming from both SHEs on a channel-by-channel basis, using whichever source is best and switching instantaneously in the event of any signal degradation. The VHO is also where local broadcast signals and PEG channels are brought on to the network. Like the SHEs, the VHOs are staffed 24/7, equipped with fully-redundant systems and all programming channels are monitored, alarmed and quality control checked. Those signals are then sent over fully redundant fiber rings to the Video Serving Office (VSO) where the signals are put out over a fiber connection that runs all the way to the customer's home. At the home, the Optical Network Terminal (ONT) converts the signal into an electrical signal that is sent over the coaxial cables within the customer's home to TVs and set-top boxes.

Ms. Marlene H. Dortch

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For such a network, proof-of-performance mandates, such as semi-annual testing, would impose costs on Verizon's system but would not improve the quality of the customer's experience. It is unlikely that such testing would alert our technicians to any problem not already detected through our own stringent and continuous internal monitoring. And to the extent customers experience a problem with their signal quality due to equipment or wiring problems in the home, we use remote diagnostics to troubleshoot the issue efficiently in real time. In addition, our set-top boxes allow customers to perform self- diagnostics to correct picture quality issues.

While the FCC's current analog technical rules are outdated, there is no reason to adopt new regulations for digital cable systems such as FiOS TV, given the high quality digital signals we deliver to our customers, our rigorous internal monitoring procedures and today's competitive video environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve H. ...". The signature is written in a cursive style with a horizontal line at the end.