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June 19, 2013

## **Ex Parte**

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

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

Dear Ms. Dortch:

On Monday, June 17, 2013, William Wallace and the undersigned of Verizon met separately with Nicholas Degani, Legal Advisor to Commissioner Pai, and Rebekah Goodheart, Legal Advisor to Chairwoman Clyburn, Louis Peraertz, Legal Advisor to Chairwoman Clyburn and Travis Litman of the Wireline Competition Bureau to discuss the above proceeding.

During the meetings, we discussed providing the Commission with broadband deployment information currently collected by NTIA. To the extent that the Commission decides to require the reporting of data concerning broadband deployment and availability, Verizon recommended that the Commission continue to collect this information in the format used by NTIA and not to expand the information currently sought by this data collection. We also discussed the collection of maps of wireless service availability in shape files, by technology and by spectrum band. Verizon questioned the need for such a collection – particularly with respect to spectrum band information -- and encouraged the Commission to permit requests for confidential treatment of the maps and other data in cases of competitively sensitive information.

In addition, we discussed changes to the Form 477 voice subscriber reports. Verizon expressed concern about the increased burdens associated with reporting wireline voice subscriber counts by census tract. We also discussed the development of a client-side application to collect data from carriers' data systems. Verizon questioned the feasibility of such an approach, and advocated that the Commission include industry in the development of any such application and that use of an application must be voluntary.

Verizon also expressed concern about an apparent new data collection for a county-by-county identification of where a wireless telephony and/or mobile broadband provider offers its services to consumers through third-party retail outlets and/or its own branded stores. On the one hand, it is not clear that any notice has been provided or comment received on such a data collection. On the other hand, it is not clear what, if any, useful information would be gained by such a data

collection because wireless service can be offered in areas without brick-and-mortar sales outlets, and sales outlets are no proxy for subscribership data.

Finally, Verizon urged the Commission not to seek broadband provider subscription price data in future modifications. Verizon stated that the specific prices consumers pay vary based on factors such as promotions, bundled discounts and unique circumstances of prospective customers. Also, broadband prices change quickly and repeatedly throughout the year making and reporting prices in the biannual Form 477 filings would be outdated. Verizon pointed out that other parties, such as private analysts, are in a better position to collect pricing data.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne D. Burk". The signature is fluid and cursive, with a large initial "A" and "B".

cc: Nicholas Degani  
Rebekah Goodheart  
Louis Peraertz  
Travis Litman  
Priscilla Delgado Argeris