

**Maggie McCreedy**  
Vice President  
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**Ex Parte**

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

**Re: Notice of Oral Ex Parte Communications, WC Docket No. 13-39**

Dear Ms. Dortch:

On September 27, 2013, Mark Montano and the undersigned of Verizon met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, to discuss the pending Notice of Proposed Rulemaking (NPRM) in the above referenced docket.

In the meeting, Verizon asserted that to the extent any periodic reporting may be required, carriers should be able to rely on reports filed by a long distance affiliate if the affiliate is the carrier's only intermediate provider. This should be true regardless of whether the provider is wireline or wireless – the long distance affiliate routes and delivers calls from both in the exact same manner. It would make little sense to require long distance providers to expend the effort to segregate the traffic from its affiliates and file separate reports, particularly when a single report would be likely to provide more meaningful data due to its larger sample size. And to the extent that segregating the data may raise technical challenges, a single report could avoid the production of duplicative data.

In addition, Verizon explained that if required, it would be able to assemble the call answer data necessary to complete a report similar to that contained in Figure 1 of the NPRM; however, any call detail record retention requirement should only apply to calls to rural destinations. The retention of call detail records for calls to non-rural destinations for up to seven months as proposed in the NPRM would impose a considerable burden on providers to collate, process, and store vast quantities of records with no countervailing benefit. For Verizon, the volume of call detail records to retain would increase by almost nine times if non-rural calls were included, and the ability to retrieve records of individual calls to non-rural locations is not likely to be relevant to investigations into issues in rural areas.

Finally, Verizon discussed why the Commission should allow providers the flexibility to exclude auto-dialers from its reported data.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCreedy".

cc: Priscilla Delgado Argeris