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October 21, 2013

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 October 17, 2013, Chris Miller, Mark Montano, and the undersigned of Verizon met with Rebekah Goodheart, Legal Advisor to Chairwoman Clyburn, and Travis Litman, Wireline Competition Bureau, to discuss the pending Notice of Proposed Rulemaking (NPRM) in the above referenced docket.

In the meeting, 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. In August, Verizon carried approximately 105 million long distance calls *daily*. Of these calls, around 94 million were to non-rural destinations, and 11 million were to rural destinations. That means that a requirement to retain non-rural call detail records for up to seven months would force Verizon to retain nearly 20 billion individual call detail records in a readily retrievable format.

What's more, 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. The overall call answer rate of non-rural calls is the only relevant data point from these records, and providers, including those that take advantage of a safe harbor, could be required to calculate and retain that figure as part of the record retention requirements.

In addition, Verizon asserted that to the extent any periodic reporting may be required, a holding company should have the flexibility to file a single report for all affiliates (both wireline and wireless) for traffic carried by the company's affiliated long distance provider. Because the long distance affiliate determines the routing for calls from all its wireline and wireless affiliates in the exact same manner, it would make little sense to require long distance providers to expend the effort to segregate the traffic from their affiliates to allow for the filing of separate reports, particularly when a single report would be likely to provide more meaningful data due to its larger sample size. To the extent that an affiliate also delivers some calls directly to a

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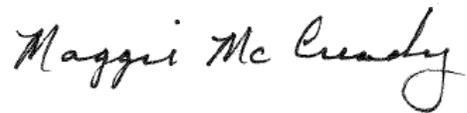
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terminating tandem or uses a different, non-affiliated intermediate provider to carry some traffic, the affiliate should be permitted to file a separate report for such calls.

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 cursive script that reads "Maggi McCreedy".

cc: Rebekah Goodheart
Travis Litman