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**Ex Parte**

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

**Re: Technology Transition Policy Task Force, GN Docket 13-5**

Dear Ms. Dortch:

On December 2, 2013, William H. Johnson and I met with Daniel Alvarez, Legal Advisor to Chairman Wheeler to provide an update on Verizon's network evolution and on IP VoIP interconnection developments.

We provided an update of our network evolution efforts that we originally presented to the FCC's technology transition policy task force on February 22nd. These efforts allow Verizon to employ the best technologies available to provide quality service to customers experiencing issues with their copper based services. We explained that through these efforts – combined with the long-running movement of our customers away from traditional copper-based services – we will have fewer than 1 million customers remaining on copper facilities in areas where Verizon fiber is available as of the end of this year. As fewer and fewer of our customers receive their services over legacy copper facilities and the costs and challenges of keeping these older facilities continue to rise, the time is approaching when it will make sense to retire duplicative facilities where the more advanced fiber is available. By moving to a fiber network customers benefit from increased reliability as well as access to advanced broadband, video, or other services enabled by this next-generation IP network. Also, we discussed Verizon VoiceLink service as an option for customers experiencing problems with their copper based services in areas where fiber is not available.

We also discussed the work that Verizon has done to facilitate IP VoIP interconnection through voluntary commercial agreements, and we reported that Verizon and Vonage have entered into a commercial agreement for the exchange of voice traffic in IP format. This is Verizon's second voluntarily negotiated commercial IP interconnection agreement for VoIP, and we expect other agreements will follow.

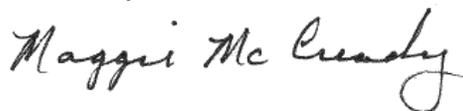
We explained Verizon's market-based incentives to enter into IP interconnection arrangements for VoIP traffic. When we exchange FiOS Digital Voice traffic with another VoIP provider, it is more efficient for both parties to exchange that traffic in IP format, which allows Verizon to exchange FiOS Digital Voice traffic at a small number of mutually agreed upon points of interconnection for the entire country. Our FiOS Digital Voice VoIP customer base continues to grow as customers upgrade from TDM-based service, and as they do, we expect more and more of our traffic will be exchanged with other providers over interconnections in IP.

In 2012 and 2013, Verizon laid the groundwork for IP VoIP interconnection. We explained that in early 2012 Verizon and Comcast entered into a commercial agreement for the exchange of VoIP traffic. We spent a year working through detailed technical implementation issues. Building off of what we learned through the implementation of the Comcast agreement, we put together a model agreement and an IP interconnection technical workbook that we now use as the starting point for commercial negotiations with VoIP providers. As a result we currently are in various states of commercial negotiations with close to twenty companies.

In addition, we explained that Verizon wants to negotiate IP interconnection agreements. However, some of the providers that have most stridently argued for regulation in this area have refused to negotiate with us on a commercial basis unless we agree in advance that the negotiations and any resulting agreements would be subject to Sections 251 and 252 of the Communications Act, demonstrating that even the possibility of regulation is adversely affecting commercial negotiations. The work we have done in this area and the agreements that we have negotiated and continue to negotiate demonstrate that Verizon is serious about commercially negotiating VoIP interconnection arrangements with other providers who are similarly serious.

Please contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy".

cc: Daniel Alvarez