



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

**June 25, 2014**

**Re: Notice of *Ex Parte* Presentation**

**RE: GN Docket Nos. 14-28, 10-127, 09-191; WC Docket No. 07-52**

Dear Ms. Dortch,

This letter is to advise you, in accordance with the Commission's rules, that on June 24, 2014, Alex Fowler and Chris Riley of Mozilla met with Philip Verveer, Senior Counselor to Chairman Wheeler; Jonathan Sallet, General Counsel; Madeleine Findley, Associate General Counsel; Matthew DelNero, Deputy Bureau Chief, Wireline Competition Bureau; Walter Johnston, Division Chief, Office of Engineering and Technology; and James Miller, Associate Chief Information Officer.

The substance of our presentation was consistent with the petition submitted by Mozilla to the Commission on May 5, 2014, also filed in the above Commission dockets. Specifically, we discussed the statutory definition of telecommunications services and past Commission orders interpreting those definitions, and in particular how the Mozilla petition interprets the statute and those precedents by proposing the legal articulation of a new category of telecommunications services offered to remote edge providers. We talked about Mozilla's investments in WebRTC and the Firefox OS mobile operating system, and how these technologies help promote growth and innovation online. We also expressed our concerns with reliance on Title I for open Internet protections, including the significant risk that efforts to find a balance between strong rules that can meet the standards set by the Court of Appeals will fall short on both counts, failing to protect the open Internet while also being overturned on review.

Sincerely,

/s/ M. Chris Riley

M. Chris Riley  
Senior Policy Engineer  
Mozilla  
[mchris@mozilla.com](mailto:mchris@mozilla.com)

cc: Philip Verveer, Jonathan Sallet, Madeleine Findley, Matthew DelNero, Walter Johnston, James Miller