

June 12, 2012

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

Re: *Ex Parte* Notice
CG Docket No. 11-116 (Cramming)
CG Docket No. 09-158 (Disclosure)
CG Docket No. 98-170 (Truth-in-Billing)
CG Docket No. 10-207 (Bill Shock)
WT Docket No. 12-69 (Interoperability)
WT Docket No. 12-4 (VZW/SpectrumCo/Cox)
GN Docket No. 09-191 (Open Internet)
WC Docket No. 07-52 (Broadband Industry Practices)

Dear Ms. Dortch,

On June 11, 2012, I met with Commissioner Jessica Rosenworcel and Priscilla Delgado Argeris, Legal Advisor, Wireline. On June 12, 2012, I met with Commissioner Ajit Pai, Matthew Berry, Chief of Staff, and Nicholas Degani, Legal Advisor, Wireline. I discussed a number of issues of importance to Consumers Union.

I stated the Commission should ensure that the wireless industry is complying with the voluntary industry “bill shock” guidelines, as the first deadline approaches in October 2012. I also stated that it was important for the Commission to further act to protect consumers from cramming. The Commission’s recent action on disclosure was a good first step towards disclosure. The Commission’s disclosure rule only applies to traditional wireline service, however, consumers who utilize VoIP telephones or wireless devices are still at risk of cramming. I stated the Commission should adopt cramming rules for all devices, wireline, VoIP, and wireless, and prohibiting third party charges for all services, with narrow exemptions, will be much more effective than the current rule.

Additionally, I stated the importance of interoperability for competition and consumer choice and urged the Commission to require interoperability in the Lower 700 MHz Band. I also expressed concern with the pending transaction between Verizon Wireless, SpectrumCo, and Cox. I stated that the transaction was not in the public interest and while conditions could not make the transaction a net positive for the public interest, there are several conditions that would work to lessen the overall public interest harms. I suggested that Verizon should divest AWS spectrum in the Eastern markets where Verizon is already capable of launching a 20 x 20 MHz LTE-Advanced network using its existing AWS and upper 700 MHz C-block licenses. I also suggested the adoption of a shortened buildout requirement of the current 2021 deadline and suggested a “use it or share it” condition if the buildout requirement is not met.

Finally, I expressed concern over the growing monopoly in the wireline broadband market. I also stated that this monopoly could affect the video market since the purchase of broadband is often tied to the purchase of a video product. I stated it is critical for the Commission to look at the competitiveness of the wireline broadband and video market and its effect on the development of an over-the-top video market. An alternative to the traditional vide market would be a benefit to consumers, who are already paying higher and higher prices for video.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Parul P. Desai". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Parul P. Desai
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