



March 24, 2014

Ex Parte

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

Re: Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269; Open Internet Remand, GN Docket No. 14-28

Dear Ms. Dortch:

On March 20, Craig Silliman, Kathleen Grillo, and Michael Glover from Verizon met with Jonathan Sallet, Acting General Counsel, and Stephanie Weiner, Associate General Counsel.

We discussed the Commission's Open Internet proceeding, and previewed the comments that Verizon filed in this docket on Friday. We reiterated Verizon's commitment to the Open Internet, and suggested that the Commission should rely primarily on consumer choice, competition, and transparency to guide Commission policy. We cautioned against applying prescriptive rules targeted at one set of actors in this dynamic and competitive marketplace, as such rules are particularly ill-suited for a dynamic marketplace like the Internet and would likely be outdated and counter-productive as soon as they are adopted. Instead of detailed rules, we suggested that the Commission exercise its authority to address practices that cause demonstrable harm to consumers or competition, should such practices ever arise, on a case-by-case basis.

We also discussed Internet interconnection, and cautioned against extending regulation to more parts of the Internet. As the Commission is aware, peering, transit, content delivery networks, and other arrangements concerning the interconnection of Internet networks and the exchange of Internet traffic have always been the province of voluntary, commercially-negotiated arrangements. The flexibility enabled by that approach has allowed the Internet to evolve over time to support changes in the way that users connect to and use the Internet, even as demand has skyrocketed. This approach has also provided incentives for all parties to seek out efficient ways to deliver and exchange traffic and encouraged the investments needed to allow Internet networks to keep pace with consumer demand. Applying prescriptive regulation in this complex and dynamic part of the Internet ecosystem is unnecessary and would have serious adverse consequences.

We also discussed Verizon's previous filings in the spectrum holdings proceeding, which demonstrate that Sprint's Broadband Radio Service (BRS) and Educational Broadband Service (BRS) spectrum in the 2.5 GHz band is suitable and available for use and should be added to the

Ms. Marlene Dortch

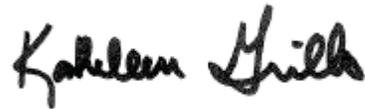
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spectrum screen.¹ By its own senior executives' statements, this spectrum is clearly being used by Sprint for mobile broadband and thus meets the test the Commission uses for inclusion in the screen. We stated that the Commission must apply its test fairly and consistently, and thus must act quickly to add the remaining 2.5 GHz spectrum to the screen.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo". The signature is written in a cursive, slightly slanted style.

cc: (via e-mail)
Jonathan Sallet
Stephanie Weiner

¹ See, e.g., Letter from Kathleen Grillo, Verizon, to Marlene H. Dortch, FCC, WT Docket No. 12-269, at Attachment: The Evolution of the 2.5 GHz Band and Its Success for Mobile Broadband Demand a Spectrum Screen Refresh (filed Mar. 5, 2014).