

December 11, 2014

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

Re: Notice of Ex Parte Submission, GN Docket No. 14-28, *Protecting and Promoting the Open Internet.*

Dear Ms. Dortch:

Today the Washington Post reports that Verizon's chief financial officer, Francis Shammo, told investors in a conference call yesterday that the Commission's use of Title II would not impact the investment that Verizon makes in either its wireline or wireless networks.¹ Specifically, Mr. Shammo stated:

"I mean to be real clear, I mean [regulation] does not influence the way we invest. I mean we're going to continue to invest in our networks and our platforms, both in Wireless and Wireline FiOS and where we need to. ***So nothing will influence that.*** I mean if you think about it, look, I mean we were born out of a highly regulated company, so we know how this operates."²

Given that Verizon has claimed in this proceeding that "[r]eclassification would endanger today's high level of investment and innovation in broadband infrastructure," it is important that the Commission consider this disclosure and discount the claims that network investment will decline if the Commission reclassifies broadband Internet access services.³ Reclassification, with appropriate forbearance, will provide the legally sustainable framework for the rules that are necessary to ensure an open Internet. A similar light-touch approach has been extremely successful in the wireless industry and

¹ Brian Fung, Washington Post, "Verizon: Actually, strong net neutrality rules won't affect our network investment," available at <http://www.washingtonpost.com/blogs/the-switch/wp/2014/12/10/verizon-actually-strong-net-neutrality-rules-wont-affect-our-network-investment/?wpisrc=nl-swbd&wpm=1>. A transcript of the investor conference is available at <http://www.verizon.com/about/investors/ubs-42nd-annual-global-media-and-communications-conference/>

² *Id.* (emphasis added).

³ See, e.g., Reply Comments of Verizon and Verizon Wireless filed in GN Docket No. 14-28 on September 15, 2014 at 4-5.

can work in this context as well. Given that Verizon's wireless business has thrived under this model, it is not surprising that Verizon has acknowledged that Title II reclassification will not impact its network investments.

Sincerely,

/s/Angie Kronenberg
Angie Kronenberg

cc: Jonathan Sallet