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The Honorable Edward J. Markey
The Honorable Joe Barton
United States House of Representatives
Washington, DC 20515

Dear Representatives Markey and Barton:

I am writing in response to your August 5, 2010 letter to Lowell McAdam, CEO of Verizon Wireless. Verizon Wireless appreciates the opportunity to describe our practices with respect to verizonwireless.com and to discuss our general policies and views regarding the protection of consumer privacy online.

At Verizon Wireless, protecting privacy is a key priority. We are committed to maintaining strong and meaningful privacy protections for consumers in an era of rapidly changing technological advances. We are strong proponents of transparency and we provide consumers with meaningful information about the kinds of information we collect and use, as well as effective tools that allow them to control how their information is used. We have worked to craft – and communicate to consumers – responsible policies aimed at protecting online privacy. We also remain committed to the establishment of responsible, Internet-wide industry standards – applicable to all types of Internet providers – that will best serve the interests of consumers by ensuring adequate safeguards are in place to protect the privacy and security of information that is gathered, while encouraging the continued innovation and the development and growth of the Internet and its service providers.

It is our understanding that verizonwireless.com was included on a list in the Wall Street Journal articles simply because it is one of the 50 most popular Web sites in the United States, not based on any identified concern with our privacy practices. Approximately 2 million people visit Verizon Wireless' Web site each day. This popularity, in turn, is driven by the remarkable variety of things that existing and prospective customers can accomplish on the site. Existing customers access the site to review and pay bills, track usage of services, add or delete lines on accounts, upgrade devices, change service plans, purchase accessories, set up ringtones and ringback tones, ask customer service questions, send text messages, implement content filters and usage controls, and much more. Prospective customers use the site to check out the latest device offerings, find a local store, compare voice, messaging and/or data plans, sign up for service, and much more.

Because all the information available on our verizonwireless.com Web site relates to Verizon Wireless' or Verizon's own products and services, we believe that visitors to our site are either current customers or are interested in learning more about our products and services. There is no third party advertising on our site. Thus, all the features and functionalities of the Web site -- including the use of cookies and similar tools -- are designed to promote and support Verizon Wireless' or Verizon's¹ own products and services, and nothing more.

Our Web site, like the vast majority of Web sites, uses cookies and beacons for three purposes:

First, these tools help Verizon Wireless analyze the effectiveness of our site for future improvements, including such things as improving traffic flows and highlighting the site's most popular features and pages.

Second, we use cookies and beacons to make the site more consumer-friendly and easy to use. For example, a cookie will remember a visitor's zip code and help provide geographically relevant information about products and services or responses to consumer inquiries without the need for the customer to re-enter that zip code with every visit to the site. Consumers have come to expect such features on Web sites and would likely be frustrated if they were taken away.

Third, these tools are used to help market Verizon Wireless' own products and services to visitors to our Web site who demonstrate an interest in particular products and services. One component of this is to measure the effectiveness of Verizon Wireless' on-line marketing campaigns by assessing how well our banner advertisements drive consumers to come to our site and sign up for service. Additionally, cookies and beacons are used to help us deliver more relevant Verizon Wireless advertisements to a prior verizonwireless.com visitor when that visitor is on another site where a Verizon Wireless advertisement is displayed. These advertisements are usually placed through the advertising networks that Verizon Wireless employs using cookies or beacons that are placed on a user's computer or device solely for the purpose of delivering more relevant Verizon Wireless advertisements.

Verizon Wireless does not currently permit advertising networks or other third parties to use any data collected on verizonwireless.com to help target or assist in the delivery of non-Verizon-related advertising. The cookies or beacons used on verizonwireless.com do not identify an individual but instead identify only the computer or device used to access our site.

These types of advertising practices have long been a significant economic engine underpinning the tremendous growth, variety, and accessibility of Internet services and content. Verizon Wireless explains these advertising practices in plain language in the privacy policy that is readily accessible from every page on our Web site. (See <http://www22.verizon.com/privacy>.) We also provide information and instructions that allow Web visitors to opt-out of these advertising practices, including a requirement that all of the advertising networks we engage participate in the National Advertising Initiative ("NAI") opt-out processes.

¹ We reference Verizon (in addition to Verizon Wireless) in the statements above because certain information collected on verizonwireless.com may be shared within the Verizon family of companies pursuant to the FCC's CPNI rules regarding notice and the customer's right to opt out of such sharing.

Verizon ranks among the most trusted companies for protecting privacy. Most recently, in a two-part study that included consumer surveys as well as a detailed review of the privacy practices of some of the largest brands in the United States, Verizon was ranked as the top telecommunications company, and second among all sectors.²

Responses to Specific Questions:

1. What specific information about consumers does your company collect, either through your own website or through business relationships with third parties?

When consumers use verizonwireless.com to sign up for service, purchase devices or accessories, request product updates (e.g., “please let me know when the Droid 2 will be available in my area”), or the like, Verizon Wireless collects the information supplied by the customer and uses that information as explained in our privacy policy, quoted below:

When you place an order for Verizon products or services, we collect information from you that we use to deliver, provide, confirm, change, bill, monitor, and repair those products or services and to resolve issues with your order or with our products and services. The information we collect may include your name and address and the telephone numbers and email addresses where you may be reached, as well as Social Security Number or payment information necessary to establish credit or set up billing. We also use this information to establish your customer account, maintain a record of the products and services you buy from us, and maintain billing records for your account. We may use your address, e-mail address, and phone number information to contact you about products and services that we offer.

We also collect information on consumers’ interactions with our Web site. This interaction data, which is only associated with an IP address or cookie, is never linked with any other information we may have on the consumer, such as demographic consumer data, except when an existing customer has logged into his or her Verizon Wireless account on-line with a user name and password. The collection of this data is also fully explained in our privacy policy, quoted below:

Information Collected When on Verizon Web Sites:

When you browse Verizon Web sites, information is collected about your computer and your visit. In addition, data about your browsing and buying activity is collected as you interact with our Web sites. This information does not identify you personally. We may collect and use your [IP address](#) and the Web site address of your point of entry to our sites, as well as other information about your connection, including your

² This is based on the 2009 results from the annual Most Trusted Companies in Privacy survey conducted by the Ponemon Institute and TRUSTe. The Ponemon Institute is a pre-eminent research organization dedicated to privacy, data protection, and information security policy. TRUSTe is the leading privacy seal provider for online safety and trust, helping consumers identify sites that best protect their online privacy.

computer's browser and platform type and your Internet connection speed. We use this information to monitor statistics such as how many people visit our Web sites; which pages people visit on our sites and how much time is spent on each page; which Web domains our visitors come from and which browsers are used to visit our sites.

2. If you have business relationships with third parties, please list the names of those third parties, including analytics firms.

Verizon Wireless currently has relationships with the following third parties with respect to verizonwireless.com:

- Moxie Interactive – digital advertising agency for internet sales and marketing; hosting Web site content; creating Web content; developing Web applications; managing Verizon Wireless advertising campaigns through advertising networks.
- Omniture (acquired by Adobe) – provides software that Verizon Wireless uses to analyze the site's performance.
- Live Person – provides software that Verizon Wireless uses for web-based customer service chat.
- Adobe – vendor for testing new Web site designs.
- Motionpoint – Spanish language translator for Web content.
- TeleCommunications Systems, Inc. – hosts messaging, alerts, and family locator platforms.
- Lithium – provides software and hosts platform for customer forums.
- Bazaarvoice – provides software and hosts platform for customer ratings of devices.
- Cellhire – vendor for global satellite phones.
- Verizon Business – vendor for hosted email solutions.
- Autodesk – vendor for location-based products and services, including VZ Navigator.

- Motricity – vendor for Mobile Web portal (i.e., wireless internet access).
- VeriSign – vendor for picture messaging.
- Motorola – vendor for push to talk services.
- Parago – vendor for device rebate programs.
- SkinIt – vendor for device “skins” (i.e., device wrapping).
- Smith Micro – vendor for VZAccess Manager, the software used to support internet access through PC data cards.
- TMP Worldwide Advertising & Communications, LLC – vendor for employee recruiting.
- WeatherBug – provides local weather information for customers who are logged into their Verizon Wireless online accounts.
- Google Affiliates Network – agent program for referrals among Web sites.
- Commission Junction -- agent program for referrals among Web sites.
- Akamai – hosting web content; delivery of content.
- Acerno – Akamai’s advertising network for delivering Verizon Wireless advertising.
- AOD/Invite Media – platform for buying and selling online advertising impressions directly from an exchange marketplace.
- Doubleclick (Google) – tool for serving, tracking, and reporting on Verizon Wireless advertisements delivered on third party sites.
- Google Analytics – tool for analyzing site activity and performance; testing new web designs to improve the customer experience.
- Turn, Inc. -- advertising network for delivering Verizon Wireless advertising.

- Tribal Fusion -- advertising network for delivering Verizon Wireless advertising.
- ValueClick Media -- advertising network for delivering Verizon Wireless advertising.
- AOL / Advertising.com, Inc. -- advertising network for delivering Verizon Wireless advertising; content publisher.
- Traffic Marketplace -- advertising network for delivering Verizon Wireless advertising.
- interCLICK -- advertising network for delivering Verizon Wireless advertising.
- SpecificMEDIA, Inc. -- advertising network for delivering Verizon Wireless advertising.
- Adconion Media Group -- advertising network for delivering Verizon Wireless advertising.
- Fox Interactive / Fox Audience Network – advertising network for delivering Verizon Wireless advertising.
- Microsoft Online L.P. – advertising network for delivering Verizon Wireless advertising.
- Revenue Science / AudienceScience, Inc. – advertising network for delivering Verizon Wireless advertising.
- Yahoo! Inc. – content publisher; advertising network for delivering Verizon Wireless advertising.

3. How does your company collect consumer information (e.g., direct consumer input, cookies, beacons, Flash cookies, other surveillance technologies)?

On verizonwireless.com, Verizon Wireless collects consumer information through direct consumer input, cookies, and beacons. We do not use flash cookies or any “surveillance technologies.”

4. How does your company use the information it collects, both directly or through third parties, if applicable?

When consumers enter their information on verizonwireless.com so they can sign up for service, purchase a product, request product updates, or the like, Verizon Wireless uses that information to provide the products and services requested by the customer and as described in response to questions 1 and 6.

As described in response to question 1, Verizon Wireless also uses cookies and beacons to collect information on consumers' interactions with verizonwireless.com ("Interactions Data"). Interactions Data is used for three purposes. First, some of this information – including data like the pages visited, how long it takes to navigate through a page, and common activity on each page – helps us monitor the effectiveness of the site and make improvements to it. Second, we use information that we collect and store in cookies to make it easier for consumers to use the site. For example, when a customer selects a device for purchase and puts it in a shopping cart, the site "remembers" that selection and, as the customer progresses through the check out process, will present only those service plans and accessories that are compatible with the selected device.

The third use of Interactions Data is for marketing Verizon Wireless' or Verizon's own products and services to the consumer. No Interactions Data is currently used to customize marketing messages to users on our site except when an existing customer has logged into his or her Verizon Wireless account on-line with a user name and password. That data is used, however, to deliver more targeted Verizon Wireless banner advertisements to a consumer on a third party site that participates in the same advertising networks as Verizon Wireless. When a consumer is about to receive a banner advertisement from Verizon Wireless on a third party site, a cookie or beacon may identify that consumer as a previous visitor to verizonwireless.com and the advertising network may then use that information to deliver a more relevant Verizon Wireless advertisement to that consumer. For example, a consumer who demonstrated an interest in smartphones when on verizonwireless.com might receive a banner advertisement for the Droid instead of a more general Verizon Wireless marketing message. Interactions Data is also used to measure the effectiveness of Verizon Wireless' banner advertising by noting how often consumers click on certain banner advertisements, come to our Web site, and sign up for service. All of this is fully explained in our privacy policy, quoted below:

Verizon Marketing Using Information Collected on Verizon Sites:
Verizon and its vendors also use information collected on Verizon Web sites (discussed above) for other Verizon-related purposes, such as delivering more relevant Verizon marketing messages on our Web sites, on third-party Web sites, or on other Verizon services or devices. We use this information in order to, among other things, ensure that you see the correct products and pricing applicable to the geographic area in which you live, manage the frequency with which you see an advertisement, tailor advertisements to better match your interests, and to understand the effectiveness of our advertising. We also may use this information to assess the effectiveness of our sites and to help you should you request help with navigation problems on these sites.

Certain authorized Verizon vendors may help us with the delivery of Verizon marketing messages by placing and reading cookies. We require that these vendors participate in the opt-out process established by the

Network Advertising Initiative (NAI). To learn more or to limit the automatic collection of information by these parties, you may visit the [NAI advertising industry site](#) and opt out of this collection. Please note that this opt-out is cookie-based. If you buy a new computer, change Web browsers or delete cookies, you will need to perform the opt-out task again.

5. Does your posted privacy policy fully explain these data collection and use practices?

Yes. See the quoted privacy policy statements above. The privacy policy is accessible with one click from every page on verizonwireless.com.

6. Does your posted privacy policy identify for consumers all affiliated and unaffiliated entities with which you share or provide access to consumer data, whether through direct disclosure, cookies, or some other means?

Our privacy policy does not specifically name the entities with which we share consumer data because those entities are subject to change. But the policy clearly states that Verizon Wireless “does not sell, license or share information that individually identifies our customers, people using our networks, or Web site visitors with others outside the Verizon family of companies for non-Verizon purposes without your consent.” To quote the relevant privacy policy section in full, it states:

Information Shared Outside the Verizon Family of Companies:

Verizon uses vendors and partners to help us offer, provide, repair and bill for services we deliver to you. We share information with those vendors and partners to the extent necessary for them to perform work on our behalf or to participate in joint marketing offers with Verizon. For example, we may provide your credit card information and billing address to our credit card processing company solely for the purpose of processing payment for a transaction you have requested. In our contracts with vendors and partners, we require them to protect the privacy and security of Verizon customer information we may provide to them and to limit their use of this Verizon customer data to the purposes for which it was provided. They may not use this information for their own marketing purposes.

Verizon provides the names, addresses and telephone numbers of landline telephone subscribers to directory publishers and directory assistance services unless a non-published or non-listed phone number has been requested.

We may disclose information that individually identifies our customers in certain circumstances, such as:

- *to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law;*
- *in cases involving danger of death or serious physical injury to any person or other emergencies;*
- *to protect our rights or property, or the safety of our customers or employees;*
- *to protect against fraudulent, abusive, unauthorized or unlawful use of or subscription to our products and services and protect our network, services and users from such use;*
- *to advance or defend against legal claims, in court and elsewhere;*
- *to credit bureaus or collection agencies in order to obtain payment for Verizon billed products and services;*
- *to a third-party that you have authorized to verify your account information;*
- *to outside auditors and regulators; or*
- *with your consent.*

Except as explained in this privacy policy or in agreements with our customers, Verizon does not sell, license or share information that individually identifies our customers, people using our networks, or Web site visitors with others outside the Verizon family of companies for non-Verizon purposes without your consent.

The privacy policy also explains how we share information with affiliates:

Information Shared Within the Verizon Family of Companies:

Verizon shares customer information within our family of companies for marketing purposes unless you [advise us not to](#). Sharing this information allows us to provide you with the latest information about our products and services and to offer you our latest promotions. [Special provisions](#) apply with respect to sharing of FiOS TV customer information among affiliates.

There are additional important protections that apply with regard to certain information we collect and maintain about the telecommunications and Voice over Internet Protocol (VoIP) services you buy from us and how you use them. This information is categorized by the federal government as [Customer Proprietary Network Information](#) or CPNI. Specific laws govern our sharing and use of this type of information.

Verizon Wireless residential customers and Verizon Telecom residential and small business customers receive a privacy notice regarding CPNI when they first order service and every two years thereafter. For more information, please read the [Verizon Telecom](#) and [Verizon Wireless](#) CPNI notices. As described in more detail in the notices, you may choose to opt out of the sharing of your CPNI within the Verizon family of companies for certain marketing purposes.

National, major and government account customers of Verizon Wireless and corporate and government customers of Verizon Business in the United States receive a CPNI consent form or service agreement requesting affirmative approval to share CPNI information. As described in the request, you may decline or withdraw CPNI consent by not signing the consent form or by following instructions in the consent form or service agreement. Your choice on CPNI consent will remain in effect unless you change it.

In Arizona, as required by state law, Verizon Wireless does not share your CPNI within the Verizon family of companies [unless you provide consent using a form](#). Customers who provide such consent are reminded annually of their current CPNI choices.

Please note that if you remain a retail customer of MCI, your CPNI will not be shared within the Verizon family of companies for marketing purposes except to provide you with information about other services of the type you currently buy from us. In addition, when you are speaking with a customer service representative, we may ask your permission to review your records, including your CPNI, to provide you with information about the full array of services provided by the Verizon family of companies.

Finally, the privacy policy explains the use of data collected by cookies. (See the privacy policy section entitled *Verizon Marketing Using Information Collected on Verizon Sites*, quoted in response to question 4.)

7. Does your company sell or otherwise monetize the information it collects:

No.

a. If yes, to which companies does it sell or otherwise disclose the personal information it collects?

b. What were the revenues associated with this sale or monetization for the last 12 months, or the most recent year for which your firm has such data?

8. Is your company aware of all third-party tracking devices that may be installed on a user's computer when the user visits your site?

Verizon Wireless understands "third party tracking devices" to mean tracking cookies, beacons, or other such tools served by third parties on verizonwireless.com. We approve and test these tools before allowing them on our site and, therefore, believe we are aware of the cookies, beacons, or other tools that may be served onto a user's computer from our site.

a. If yes, what evaluations does your company perform to discover such devices? If no, why not?

Verizon Wireless monitors its Web site for any unusual behavior and investigates as needed. We do not have issues with unauthorized tracking cookies, beacons, or other similar tools on our Web site.

b. What actions does your company take upon discovery of a previously unknown third party tracking system?

Verizon Wireless has not had issues with any unauthorized tracking cookies, beacons, or other similar tools on our Web site.

9. Does your company serve different pages, content, or advertisements to visitors, based on information derived from tracking devices? If yes, please explain.

For existing customers or visitors to verizonwireless.com who provide us their information when they sign up for service, purchase a product, request product updates, or the like, the site frequently serves different pages or content based on information derived from cookies or beacons. Examples include remembering a visitor's zip code to provide geographically relevant content and presenting only applicable options as a customer signs up for service (e.g., price plans that can be used with a selected device). Customers who log into their Verizon Wireless account on line with user name and password also receive customized pages, content, and marketing messages, which may be derived in part from cookies. Moreover, users who click on a Verizon Wireless banner advertisement may be taken to the most relevant page of our Web site, not necessarily the home page. These tools are used only to make our site easier to use. Aside from the situations described above, Verizon Wireless does not currently serve different pages or content to different users on verizonwireless.com for marketing or advertising purposes.

10. Does your company target individuals based on their health or financial status?

No. Verizon Wireless does not target individuals based on health or financial status, either on verizonwireless.com or based on information derived from verizonwireless.com.

11. Are there any user searches or use habits that your company will not use for targeting purposes or tracking? If yes, what are they?

The “user search” on verizonwireless.com searches only the content of our site to help visitors navigate and find what they want. “Use habits” are used only in the aggregate to monitor the effectiveness of the site in meeting customer needs, and relate only to visitors’ activities on our site. As we understand these terms, no “user search or use habits” are used for any “targeting” or “tracking” on verizonwireless.com.

12. Has your company conducted a legal analysis of the applicability of communications and consumer privacy laws to the targeting and/or tracking practices utilized by your firm? If yes, please explain what this analysis concluded.

We have conducted legal analyses of communications and consumer privacy laws relating to our policies and practices on verizonwireless.com, and have concluded that those policies and practices comply with applicable communications and privacy laws.

Verizon is a licensee of the TRUSTe Privacy Program. TRUSTe independently certifies that verizonwireless.com complies with its guidelines regarding fair information practices. Verizon is also accredited by the Better Business Bureau OnLine. This accreditation means verizonwireless.com abides by the BBB’s code governing sound advertising and selling practices.

13. If your company tracks or targets visitors, how does it notify visitors to your company’s site of this practice? If it does not provide notification, why not?

Any of Verizon Wireless’ practices on verizonwireless.com that could be considered “tracking” or “targeting” have been explained above and in our privacy policy that is available with one click from each page of our site. The information that we collect from users on verizonwireless.com and how we use that information are fully explained in the privacy policy sections quoted in response to questions 1 and 3.

14. If a user does not want to be tracked or targeted upon visiting your site, how would the user effectuate this preference?

With respect to the use of cookies and beacons to make verizonwireless.com easy to use or measure how well the site is meeting consumers’ needs, users cannot opt-out on our site. A

user can, however, set his or her browser to reject cookies. We explain how to do this in our privacy policy, quoted below:

Cookies and Web Beacons

Cookies:

A cookie is a small data string that is written on your computer hard drive by a Web server. (A Web server is the computer that "hosts" a Web site and responds to requests received from your computer.) This data string contains a unique user ID which allows Verizon or its vendors to customize your experiences on our sites. For example, cookies allow us to deliver advertising and other content specific to your interests, keep track of your online ordering and alert you to new products or promotional opportunities based on your current services.

Cookies are an integral piece of the Web's technical infrastructure because they enable a Web site to maintain information when a user's Web browser requests a series of Web pages. Without cookies, for example, a Web site owner would not recognize that a user just completed the first step in a given online ordering process so that the second step can be presented. Cookies facilitate a coherent, contextual, and customized Internet session.

Information gathered from cookies also helps the Web site owner know how the site is performing and provides information to support customizing and improving the site and its messages and advertisements.

Web Beacons:

Third-party advertisers also may use a technology called Web beacons to measure the effectiveness of ads. Some Verizon Web pages contain web beacons in the form of clear .gif files, which are electronic images that allow a third-party to collect anonymous information about your visits to our site. This anonymous information is used to provide advertisements about products and services of potential interest to you. No personally identifiable information is collected during this process.

How to Delete or Disable Cookies

You may choose to change your browser settings to disable cookies. Please be aware that cookies may be required to complete certain functions on Verizon sites and on other Web sites, such as ordering products and services online. To remove cookies from your browser simply choose from the list below and click on the name of the browser you use to access the Internet to find the appropriate instructions.

PC Users

Macintosh® Users

[Microsoft® Internet Explorer 8.x](#)
[Microsoft® Internet Explorer 7.x](#)
[Microsoft Internet Explorer 6.x](#)
[Mozilla Firefox™ 3.x](#)

[Safari 4.x](#)

With respect to cookies or web beacons served by the advertising networks Verizon Wireless employs, we require each of these networks to participate in the NAI opt-out processes. We explain this NAI opt-out process to visitors in our privacy policy, quoted below:

Third-party ad servers or ad networks operating on Verizon Web sites must participate in the opt-out process established by the Network Advertising Initiative (NAI). To learn more or to limit the automatic collection of information by these parties, you may visit the [NAI advertising industry site](#) and opt out of this collection. Please note that this opt-out is cookie-based. If you buy a new computer, change Web browsers or delete cookies, you will need to perform the opt-out task again.

15. Please explain whether your company provides the ability of consumers to “opt-in” to the use of these practices or “opt-out”, including whether they have an option to prevent both collection and use of their data. If your company provides the opportunity to opt-out, how many visitors have chosen this option according to your company’s most recent data?

See response to question 14 above. If a customer opts out of targeted advertising through NAI, that opt out prevents both the collection and the use of data on all sites including verizonwireless.com because the advertising network cookies are not served. NAI reports that, as of December 2009, nearly 300,000 unique visitors have opted out through its processes.

Sincerely,



Peter B. Davidson