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By email to shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: Verizon Communications Inc. 2009 Annual Meeting
Shareholder Proposals of Paul Haible and Trillium
Asset Management Corporation

Ladies and Gentlemen:

This letter is submitted on behalf of Verizon Communications Inc., a Delaware corporation ("Verizon"), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended. On November 12, 2008, Verizon received a shareholder proposal and supporting statement (the "Haible Proposal") from Paul Haible ("Mr. Haible") for inclusion in the proxy materials to be distributed by Verizon in connection with its 2009 annual meeting of shareholders (the "2009 proxy materials"). On November 17, 2008, Verizon received an identical shareholder proposal and supporting statement (the "Trillium Proposal") from Trillium Asset Management Corporation ("Trillium"), on behalf of certain of its clients, for inclusion in the 2009 proxy materials. Mr. Haible and Trillium are herein sometimes referred to collectively as the "Proponents," and the Haible Proposal and the Trillium Proposal are herein sometimes referred to collectively as the "Proponent." Copies of the Haible Proposal and all of the correspondence relating to it are attached as Exhibit A, and copies of the Trillium Proposal and all correspondence relating to it are attached as Exhibit B. For the reasons stated below, Verizon intends to omit the Haible Proposal and the Trillium Proposal from its 2009 proxy materials.

In accordance with Staff Legal Bulletin No. 14D (November 7, 2008), this letter is being submitted by email to shareholderproposals@sec.gov. A copy of this letter is being sent by overnight courier to each of the proponents as notice of Verizon's intent to omit the Proposal from Verizon's 2009 proxy materials.

I. Introduction.

On November 12, 2008, Verizon received by facsimile transmission a letter dated November 12, 2008, from Mr. Haible submitting the following proposal:

*Report on Network Management Practices,
Public Expectations of Privacy and Freedom of Expression on the Internet*

The Internet is becoming the defining infrastructure of our economy and society in the 21st century. Its potential to open markets for commerce, venues for cultural expression and modalities of civic engagement is without historic parallel.

Internet Service Providers (ISPs) are gatekeepers to this infrastructure: providing access, managing traffic, insuring communication, and forging rules that shape, enable and limit the public's Internet use.

As such, ISPs have a weighty responsibility in devising network management practices. ISPs must give far-ranging thought to how these practices serve to promote – or inhibit – the public's participation in the economy and in civil society.

Of fundamental concern is the effect ISPs' network management practices have on public expectations of privacy and freedom of expression on the Internet.

Whereas:

- *More than 211 million Americans – 70% of the population – use the Internet;*
- *The Internet serves as an engine of opportunity for social, cultural and civic participation in society;*
- *46% of Americans have used the internet, email or text messaging to participate in the 2008 political process;*
- *The Internet yields significant economic benefits to society, with online U.S. retailing revenues – only one gauge of e-commerce—exceeding \$200 billion in 2008;*
- *The Internet plays a critical role in addressing societal challenges such as provision of health care, with over 8 million Americans looking for health information online daily;*
- *72% of Americans are concerned that their online behaviors are being tracked and profiled by companies;*
- *53% of Americans are uncomfortable with companies using their email content or browsing history to send relevant ads;*
- *54% of Americans are uncomfortable with third parties collecting information about their online behavior;*
- *Our Company provides Internet access to a very large number of subscribers and is considered a leading ISP;*

- *Our Company's network management practices have come under public scrutiny by consumer and civil liberties groups, regulatory authorities and shareholders;*
- *Class action lawsuits in several states are challenging the propriety of ISPs' network management practices;*
- *Internet network management is a significant public policy issue; failure to fully and publicly address this issues poses potential competitive, legal and reputational harm to our Company;*
- *Any perceived compromise by ISPs of public expectations of privacy and freedom of expression on the Internet could have a chilling effect on the use of the Internet and detrimental effects on society;*

Therefore, be it resolved, that shareholders request the board issue a report by October 2009, excluding proprietary and confidential information, examining the effects of the company's Internet network management practices in the context of the significant public policy concerns regarding the public's expectations of privacy and freedom of expression on the Internet.

Supporting Statement

One example of an issue to be examined could be the social and political effects of collecting and selling personal information to third-parties, including information companies such as First Advantage and Equifax.

On November 17, 2008, Verizon received the identical proposal from Trillium.

Verizon believes that the Haible Proposal may be properly omitted from its 2009 proxy materials:

- under Rule 14a-8(i)(10) because Verizon has already substantially implemented the proposal;
- under Rule 14a-8(i)(7) because it deals with a matter relating to Verizon's ordinary business operations; and
- under Rules 14a-8(i)(3) and 14a-8(i)(6) because it is so inherently vague and indefinite that neither the shareholders voting on the proposal nor Verizon in implementing it (if adopted) would be able to determine with any reasonable certainty exactly what measures the proposal requires.

Verizon believes that the Trillium Proposal may be properly omitted from its 2009 proxy materials:

- under Rule 14a-8(i)(10) because Verizon has already substantially implemented the proposal;

- under Rule 14a-8(i)(7) because it deals with a matter relating to Verizon's ordinary business operations;
- under Rules 14a-8(i)(3) and 14a-8(i)(6) because it is so inherently vague and indefinite that neither the shareholders voting on the proposal nor Verizon in implementing it (if adopted) would be able to determine with any reasonable certainty exactly what measures the proposal requires; and
- under Rule 14a-8(f) because Trillium failed to provide documentary support that Trillium meets the eligibility requirements of Rule 14a-8(b).

Verizon respectfully requests the concurrence of the Staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") that it will not recommend enforcement action against Verizon if Verizon omits the Haible Proposal and the Trillium Proposal, each in its entirety, from its 2009 proxy materials.

If the Staff is unable to agree that the Haible Proposal may be excluded from the 2009 proxy materials, then, in addition, Verizon believes it would be proper to exclude the Trillium Proposal from the 2009 proxy materials pursuant to Rule 14a-8(i)(11) because it substantially duplicates a previously received proposal (the Haible Proposal) that would be included in the 2009 proxy materials. In that event, Verizon respectfully requests the concurrence of the Staff that it will not recommend enforcement action against Verizon if Verizon omits the Trillium Proposal in its entirety from its 2009 proxy materials.

II. Bases for Excluding the Proposals.

A. The Proposal May Be Excluded Under Rule 14a-8(i)(10), Because Verizon Has Substantially Implemented It.

The Proposal calls for a report discussing Verizon's internet management practices in the context of the public's expectations of privacy and freedom of speech on the Internet. Verizon believes that it may exclude the Proposal under Rule 14a-8(i)(10) because Verizon has already substantially implemented the request of the Proposal by making extensive materials addressing these issues available on its corporate and Verizon Online websites set forth below.

The "substantially implemented" standard reflects the Staff's interpretation of the predecessor rule (allowing omission of a proposal that was "moot") that a proposal need not be "fully effected" by the company to meet the mootness test so long as it was "substantially implemented." See SEC Release No. 34-20091 (August 16, 1983). Pursuant to the 1983 interpretation, the Staff has stated that "a determination that the company has substantially implemented the proposal depends upon whether its particular policies, practices and procedures compare favorably with the guidelines of the proposal." *Texaco, Inc.* (March 28, 1991). See, also, *Nordstrom Inc.* (February 8, 1995 (proposal that company commit to code of conduct for overseas suppliers that

was substantially covered by existing company guidelines) and *The Gap, Inc.* (March 8, 1996) (same). Other Staff no-action letters have established that a company need not comply with every detail of a proposal in order to exclude it under Rule 14a-8(i)(10). Differences between a company's actions and a proposal are permitted so long as a company's actions satisfactorily address the proposal's underlying concerns.

Customer privacy issues are central to the success of each of Verizon's lines of business, and Verizon devotes substantial management resources to the development and implementation of policies and procedures that address customer privacy expectations. The home page of Verizon's internet website (www.verizon.com) contains a link entitled "Privacy Policy." That link brings the reader to Verizon's "Privacy and Customer Security Policies." Through additional links, readers may access numerous pages explaining Verizon's general privacy principles and specific policy and procedures with respect to internet privacy. The principles govern all aspects of how individual customer information is handled across Verizon's businesses, including how it is collected and used, how customers are informed of their rights, when and to whom customer information may be disclosed and how Verizon implements its privacy practices. Verizon's general privacy principles and policies and procedures for internet privacy can also be accessed from the homepage of Verizon Online's internet website (www.verizononline.net). A copy of the general privacy principles and policies and procedures is attached as Exhibit C.

Verizon has adopted a set of core principles with respect to its treatment of communications content provided over its networks. These guidelines, which can be found at <http://responsibility.verizon.com/home/contentpolicy/>, offer Verizon's customers, business partners and others interested in its views on content management insight into how Verizon views and approaches the important policy issues involving content. The guidelines address freedom of expression, the use of ratings and other standards, and the use and availability of parental controls and other means Verizon makes available to help its customers control the content that they and their families can access and view over Verizon's network. A copy of these guidelines and Verizon's content management policies is attached as Exhibit D.

Verizon believes that all of these publicly available materials, taken together, substantially implement the Proposal's request for a report discussing Verizon's internet management practices in the context of user expectations and rights regarding privacy and freedom of speech. Because the materials clearly address the underlying concern expressed by the Proposal, Verizon is of the view that the Proposal may be properly omitted from its 2009 proxy materials pursuant to Rule 14a-8(i)(10).

B. The Proposal May be Excluded Under Rule 14a-8(i)(7) Because It Deals with a Matter Relating to Verizon's Ordinary Business Operations.

Rule 14a-8(i)(7) permits a company to omit a shareholder proposal from its proxy materials if it deals with a matter relating to the company's ordinary business

operations. Exchange Act Release No. 34-12999 (November 22, 1976). The general policy underlying the "ordinary business" exclusion is "to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to decide how to solve such problems at an annual shareholders meeting." Exchange Act Release No. 34-40018 (May 21, 1998). This general policy reflects two central considerations: (i) "[c]ertain tasks are so fundamental to management's ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight"; and (ii) the "degree to which the proposal seeks to 'micro-manage' the company by probing too deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment." Exchange Act Release No. 34-40018 (May 21, 1998) (the "1998 Release"). Verizon believes that these policy considerations clearly justify exclusion of the Proposal. The development and implementation of policies and procedures surrounding customer privacy concerns and access to communications content are basic management functions and an integral part of Verizon's day-to-day business operations as a telecommunications company and Internet service provider. The protection of customer information and privacy rights and access to communications content are the subject of evolving laws and regulations, as well as a rapidly evolving technological landscape, and, as such, as stated in the 1998 Release, are precisely the type of matter "of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment."

1. The Proposal Impermissibly Seeks to Subject Basic Management Functions – Protecting Customer Privacy and Network Management Practices – to Shareholder Oversight.

The Staff has long recognized that proposals which attempt to govern business conduct involving internal operating policies, customer relations and legal compliance programs may be excluded from proxy materials pursuant to Rule 14a-8(i)(7) because they infringe upon management's core function of overseeing business practices. See, e.g., *AT&T Inc.* (February 7, 2008) and *Verizon Communications Inc.* (February 22, 2007), where in each case the proposal requested a report on the technical, legal and ethical policy issues pertaining to the disclosure of customer records and communications content to government agencies without a warrant and the effect of such disclosures on customer privacy rights. See also *H&R Block Inc.* (August 1, 2006) (proposal sought implementation of legal compliance program with respect to lending policies); *Bank of America Corporation* (March 3, 2005) (proposal to adopt a "Customer Bill of Rights" and create a position of "Customer Advocate"); *Deere & Company* (November 30, 2000) (proposal relating to creation of shareholder committee to review customer satisfaction); *CVS Corporation* (February 1, 2000) (proposal sought report on a wide range of corporate programs and policies); *Associates First Capital Corporation* (February 23, 1999) (proposal requested that Board monitor and report on legal compliance of lending practices); *Chrysler Corp.* (February 18, 1998) (proposal requesting that board of directors review and amend Chrysler's code of standards for its international operations and present a report to shareholders); *Citicorp* (January 9,

1998) (proposal sought to initiate a program to monitor and report on compliance with federal law in transactions with foreign entities).

The Staff's no-action letters have expressly found that policies and procedures for protection of customer information are basic customer relations matters. For example, in *Bank of America Corporation* (February 21, 2006), the Staff permitted exclusion pursuant to Rule 14a-8(i)(7) of a proposal seeking a report on policies and procedures for protecting customer information. See also *Bank of America Corporation* (March 7, 2005) (same); *Consolidated Edison Inc.* (March 10, 2003) (proposal sought to govern how employees should handle private information obtained in the course of employment); and *Citicorp* (January 8, 1997) (proposal requested report on policies and procedures to monitor illegal transfers through customer accounts).

The development and implementation of policies and procedures for the handling of customer information, including the circumstances under which such information may be collected and lawfully disclosed, is a core management function and an integral part of Verizon's day-to-day business operations. Verizon is one of the nation's largest telecommunications carriers, delivering a wide variety of wireline and wireless communication services to individual consumers, businesses, government and wholesale customers. The level of privacy provided by Verizon to its customers is fundamental to its service offerings and its ability to attract and retain customers. Management is in the best position to determine what policies and procedures are necessary to protect customer privacy and ensure compliance with applicable legal and regulatory requirements. To that end, Verizon has established a Privacy Office which oversees the development and implementation of internal privacy policies and controls that are designed to ensure that customer information is managed in a way that prevents unlawful access or disclosure. The Proposal impermissibly seeks to subject this integral piece of Verizon's ordinary business operations to shareholder oversight.

2. The Proposal Inappropriately Seeks to Engage Verizon in Political Discourse Implicating Verizon's Ordinary Business Operations.

The Staff consistently has permitted a proposal to be excluded under Rule 14a-8(i)(7) where the proposal appeared to be directed at engaging the company in a political or legislative process relating to an aspect of its business operations. See, e.g., *Microsoft Corporation* (September 29, 2006) (permitting exclusion of proposal seeking report on the company's rationale for supporting certain public policy measures concerning regulation of the internet); *Verizon Communications Inc.* (January 31, 2006) (permitting exclusion of proposal seeking report on the impact of flat tax); *International Business Machines Corporation* (March 2, 2000) (proposal seeking establishment of a board committee to evaluate the impact of pension-related proposals under consideration by national policymakers was excludable). See also *Pacific Enterprises* (February 12, 1996) (proposal that a utility dedicate its resources to ending state utility deregulation was excludable); *Pepsico, Inc.* (March 7, 1991) (permitting exclusion of

proposal calling for an evaluation of the impact on the company of various federal healthcare proposals); *Dole Food Company* (February 10, 1992) (same); and *GTE Corporation* (February 10, 1992) (same).

In *International Business Machines, supra*, the Staff's letter allowing exclusion of the proposal specifically noted that "the proposal appears directed at involving IBM in the political or legislative process relating to an aspect of IBM's operations." Here, the Proponents clearly want to utilize the resources of Verizon and the platform of its proxy statement to involve Verizon in the ongoing legislative debate about consumer privacy rights and Internet network management practices. The Proposal falsely suggests that Verizon has been complicit in violations of customer privacy, including the tracking and profiling of users' online behavior for profit and the collection and sale of personal information to third parties. On a day-to-day basis Verizon devotes substantial resources to monitoring compliance with laws relating to its handling of customer information, cooperating with lawful requests for information from law enforcement agencies and others and actively participating in ongoing regulatory, legislative and judicial proceedings relating to privacy issues, access to communications content and network management practices. The Proposal inappropriately seeks to intervene in Verizon's routine management of this basic area of its business in order to advance a specific political or legislative objective.

The fact that a proposal may touch upon a matter with public policy implications does not necessarily remove it from the realm of ordinary business matters. Rather, no action precedents demonstrate that the applicability of Rule 14a-8(i)(7) depends largely on whether implementing the proposal would have broad public policy impacts outside the company or would only deal with matters of the company's internal business operations, planning and strategy. For example, in *Microsoft Corporation, supra*, the Staff permitted exclusion of a proposal relating to a significant policy issue (i.e., net neutrality), because it recognized that evaluating the impact of expanded government regulation of the internet was a matter of the company's internal business operations, planning and strategy. As discussed above, implementing the Proposal would clearly involve matters central to Verizon's internal business operations, planning and strategy.

For all of the foregoing reasons, Verizon believes that the Proposal may be omitted from its 2009 proxy materials because it deals with matters relating to Verizon's ordinary business operations.

C. The Proposal May Be Omitted Under Rule 14a-8(i)(3) and 14a-8(i)(6) Because It is Inherently Vague and Indefinite

1. *The Proposal is So Inherently Vague and Misleading that Verizon Would be Unable to Determine What Action Should be Taken.*

Notwithstanding the fact that Verizon believes that Verizon's publicly available materials substantially implement the request of the Proposal under Rule 14a-8(i)(10),

Verizon also believes that the Proposal may be properly excluded under Rule 14a-8(i)(3) and Rule 14a-8(i)(6), because the description of the requested report is so vague and indefinite that “any action ultimately taken by the Company upon implementation of the proposal could be significantly different from the actions envisioned by the shareholders voting on the proposal.” *Fuqua Industries, Inc.* (March 12, 1991).

Rule 14a-8(i)(3) permits a company to omit a shareholder proposal and the related supporting statement from its proxy materials if such “proposal or supporting statement is contrary to any of the Commission’s proxy rules, including Rule 14a-9, which prohibits materially false or misleading statements in proxy soliciting materials.” According to the Staff, a proposal will violate Rule 14a-8(i)(3) when “the resolution contained in the proposal is so inherently vague or indefinite that neither the stockholders voting on the proposal, nor the company in implementing the proposal (if adopted), would be able to determine with any reasonable certainty exactly what actions or measures the proposal requires.” Staff Legal Bulletin No. 14B Section B.4. (September 15, 2004). See, also, *FirstEnergy Corp.* (February 18, 2004) (permitting exclusion of proposal urging Board to change company’s governing documents relating to shareholder approval of shareholder proposals, because requested vote requirement was vague and misleading); *Global Entertainment Holdings/Equities, Inc.* (July 10, 2003) (permitting omission of a proposal that Board adopt an “action plan” which “accounts” for past sale of a business and resulting licensing arrangements, because it was vague and indefinite); *Pfizer Inc.* (February 18, 2003) (permitting omission of a proposal requesting board make all stock options at no less than the “highest stock price” and that the stock options contain a buyback provision, because action requested was vague and indefinite); *Johnson & Johnson* (February 7, 2003) (permitting omission of a shareholder proposal that called for a report on the company’s “progress with the Glass Ceiling Report”, but did not explain the substance of the report); *H.J. Heinz Co.* (May 25, 2001) (permitting omission of a shareholder proposal under Rule 14a-8(i)(3) where the proposal requested the company to implement the SA8000 Social Accountability Standards, but did not clearly set forth what SA8000 required of the company); *Kohl’s Corp.* (March 13, 2001) (same); and *Philadelphia Electric Co.* (July 30, 1992) (permitting omission of a shareholder proposal under predecessor Rule 14a-8(c)(3) where a proposal resolved that a committee of small stockholders would refer a “plan or plans” to the board, but did not describe the substance of those plans). In addition, a company may exclude a shareholder proposal under Rule 14a-8(i)(6) if it is beyond the company’s power to implement it. A company lacks the power or authority to implement a proposal under Rule 14a-8(i)(6) when the proposal in question “is so vague and indefinite that [the company] would be unable to determine what action should be taken.” *International Business Machines Corporation* (January 14, 1992).

Like the proposals described above, the Proposal may be properly excluded from Verizon’s 2009 proxy materials because the scope and focus of the requested report is so vague and indefinite that it is open to myriad interpretations. By generically referring to the “public’s expectations of privacy and freedom of speech on the Internet” without providing parameters defining those expectations, the Proposal

fails to provide any point of reference for the report. For example, an individual who joins a social networking site, shares music and videos online or participates in a blog is likely to have very different expectations as to privacy and freedom of speech on the Internet than another individual who solely uses the internet to engage in online shopping or banking transactions or a third individual who wants to view illicit adult material or a fourth individual who is concerned about her child being able to access that material. The possible scenarios for what constitutes the “public’s expectations” are countless. As a result, it would be impossible for either the shareholders or the Verizon Board to ascertain precisely what implementation of the Proposal would entail. Verizon is being asked to dedicate valuable analytical resources to a hypothetical, ill-defined study, not to a corporate report to shareholders.

In numerous instances, the Staff has permitted the exclusion of a proposal requesting a report where the proposal contains only general or uninformative references to the complex or multifaceted set of issues implicated by the proposal. See, for example, *The Ryland Group, Inc.* (January 19, 2005); *Kroger, Co.* (March 19, 2004); *Albertsons, Inc.* (March 5, 2004); and *Terex Corp.* (March 1, 2004), where, in each case, the Staff permitted exclusion of a proposal requesting a report based on the Global Reporting Initiative’s sustainability guidelines. Like these proposals, the Proposal should be excludable because action requested is so vague and indefinite that it would be impossible for either the shareholders or the Verizon Board to ascertain precisely what implementation of the Proposal would entail.

2. The Entire Supporting Statement and Portions of the Preamble are False and Misleading in Violation of Rule 14a-9

There is a materially false and misleading implication in the Proposal and supporting statement that Verizon engages in network management practices that it actually prohibits. For example, the supporting statement suggests that the requested report could examine the “social and political effects of collecting and selling personal information to third-parties, including information companies such as First Advantage and Equifax”, but does not explain that Verizon has a publicly-disclosed policy *against* collecting and selling personal information. In addition, the statement in the preamble that “Class action lawsuits in several states are challenging the propriety of ISPs’ network management practices” creates the false and misleading impression that the propriety of Verizon’s network management practices has been challenged in class actions lawsuits, when this is not the case. If the Proposal is not omitted in its entirety, Verizon believes that the entire supporting statement and the portion of the preamble discussed above may be omitted because they are materially false and misleading in violation of Rule 14a-9.

D. The Trillium Proposal May be Excluded from the 2009 Proxy Materials Pursuant to Rule 14a-8(f) Because Trillium Failed to Supply Documentary Support Evidencing Satisfaction of the Eligibility Requirements of Rule 14a-8(b)

Rule 14a-8(b)(1) provides that, in order to be eligible to submit a proposal, a shareholder must have continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal for at least one year prior to the date the proposal is submitted and must continue to hold those securities through the date of the meeting. If the proponent is not a registered holder, he or she must provide proof of beneficial ownership of the securities and also include a written statement that he or she intends to continue to hold the securities through the date of the meeting of shareholders. Under Rule 14a-8(f)(1), a company may exclude a shareholder proposal if the proponent fails to provide evidence that it meets the eligibility requirements of Rule 14a-8(b), provided that the company timely notifies the proponent of the deficiency and the proponent fails to correct the deficiency within the required time.

Verizon received the Trillium Proposal by Federal Express on November 17, 2008. The submission did not include documentation establishing that the Proponent had met the eligibility requirements of Rule 14a-8(b)(1). Instead, Trillium stated in a letter dated November 14, 2008, which accompanied the Proposal, that "Trillium submits this proposal on behalf of our clients, who are the beneficial owners, per Rule 14a-8, of more than \$2,000 worth of Verizon Communications Inc. common stock acquired more than one year prior to this date." No such clients were identified by name or otherwise, and no information was provided as to the number of Verizon shares owned by such clients individually or in the aggregate. Referring to the unidentified clients, the letter also states "They have stated their intention to hold this position throughout the date of the next annual stockholder meeting in 2009." After determining that Trillium was not a shareholder of record, in accordance with Rule 14a-8(f)(1) on November 21, 2008, Verizon sent a letter to the Proponent via Federal Express (the "Notification Letter") requesting the names of the proponents whom Trillium was representing, together with a written statement from each proponent authorizing Trillium to act on such proponent's behalf with respect to the submission of the proposal. The Notification Letter also requested a written statement from the record owner of each proponent's shares verifying that the proponent beneficially owned the requisite number of shares of Verizon stock continuously for at least one year prior to the date of submission of the Trillium Proposal. The Notification Letter advised the Trillium that such documentation had to be submitted to Verizon within 14 days of the Trillium's receipt of such letter. As suggested in Section G.3 of Division of Corporation Finance: Staff Legal Bulletin No. 14 (July 13, 2001) ("SLB No. 14") relating to eligibility and procedural issues, the Notification Letter included a copy of Rule 14a-8. Verizon received confirmation from Federal Express that the Notification Letter was delivered to Trillium on November 24, 2008. A copy of the Notification Letter is attached as Exhibit E to this letter.

On November 26, 2008, Verizon received by facsimile transmission a letter dated November 26, 2008 (the "Response Letter") from Charles Schwab & Company ("Schwab"), referencing Richard Ames and a specified Schwab account number (redacted for purposes of this letter). The Schwab letter verified that Schwab holds as custodian for Mr. Ames's account more the \$2,000 worth of common stock in Verizon Communication s Inc. and that these shares have been held continuously for at least one year prior to and through November 17, 2008. A copy of the Response Letter is attached as Exhibit F to this letter. Verizon received no further correspondence from Trillium, Mr. Ames or Schwab.

Although the Response Letter was timely sent to Verizon, it did not satisfy the requirements of Rule 14a-8(b). Pursuant to such Rule, the proponent was required to submit a written statement from the record holder of his shares, verifying his continuous ownership of *at least \$2,000* of Verizon shares from November 17, 2007 through November 17, 2008. While the Response Letter verifies that Mr. Ames held Verizon stock for the requisite period, it fails to establish that he held the requisite amount of Verizon stock to satisfy the \$2,000 threshold. In Section C.1.a. of SLB No. 14, the Staff explains how to calculate the market value of securities for purposes of Rule 14a-8(b) :

a. How do you calculate the market value of the shareholder's securities?

Due to market fluctuations, the value of a shareholder's investment in the company may vary throughout the year before he or she submits the proposal. In order to determine whether the shareholder satisfies the \$2,000 threshold, we look at whether, on any date within the 60 calendar days before the date the shareholder submits the proposal, the shareholder's investment is valued at \$2,000 or greater, based on the average of the bid and ask prices. Depending on where the company is listed, bid and ask prices may not always be available. For example, bid and ask prices are not provided for companies listed on the New York Stock Exchange. Under these circumstances, companies and shareholders should determine the market value by multiplying the number of securities the shareholder held for the one-year period by the highest *selling* price during the 60 calendar days before the shareholder submitted the proposal. For purposes of this calculation, it is important to note that a security's highest selling price is not necessarily the same as its highest closing price.

The Response Letter merely confirms that, as of November 26, 2008, the stock in Mr. Ames account is worth more than \$2,000. However, because the Response Letter does not specify the number of shares in Mr. Ames account, Verizon cannot confirm that these shares satisfied the \$2,000 threshold on any date within the 60 calendar days before November 17, 2008.

Trillium also failed to provide a written statement from Mr. Ames authorizing Trillium to act on his behalf with respect to the Proposal. Absent such an authorization,

Verizon has no way to confirm that Trillium is indeed authorized to submit the proposal on his behalf or to represent that Mr. Ames will continue to hold the requisite amount of Verizon stock through the date of the annual meeting.

The Staff has consistently taken the position that if a proponent does not provide on a timely basis documentary support sufficiently evidencing that it has satisfied the requirements of Rule 14a-8(b), the proposal may be excluded under Rule 14a-8(f). See, e.g., *General Motors Corporation* (April 5, 2007) (account summary insufficient verification of continuous ownership); *Yahoo! Inc.* (March 29, 2007) (broker's letter did not specifically verify continuous ownership); *The Home Depot, Inc.* (February 5, 2007) (broker's letter verifying ownership "for the past year" was insufficient to provide proof of ownership for requisite period); *General Electric Company* (January 16, 2007) (brokerage statement insufficient); and *International Business Machines Corporation* (November 16, 2006) (broker's letter dated before date of submission did not verify continuous ownership for requisite period).

While Rule 14a-8(f) requires a company receiving a proposal to notify the proponent of any procedural or eligibility deficiencies, it does not require a second notification if the response to the first notification was deficient. Any further verification Trillium or Mr. Ames might now submit would be untimely under Rule 14a-8(f). Therefore, Verizon believes that the Trillium Proposal is excludable pursuant to Rule 14a-8(f) because Trillium failed to remedy the eligibility deficiency on a timely basis after notification by Verizon.

E. The Trillium Proposal May be Excluded From Verizon's 2009 proxy Materials Pursuant to Rule 14a-8(i)(11) Because It Substantially Duplicates the Haible Proposal

Under Rule 14a-8(i)(11), a proposal may be omitted "[i]f the proposal substantially duplicates another proposal previously submitted to the company by another proponent that will be included in the company's proxy materials for the same meeting." The Trillium Proposal is identical to the Haible Proposal, which was received by Verizon five days prior to the Trillium Proposal. Accordingly, if the Staff concludes that the Haible Proposal cannot be excluded from Verizon's 2009 proxy materials under any of the bases set forth in this request and Verizon includes it in its 2009 proxy materials, then Verizon believes that the Trillium Proposal may be excluded as substantially duplicative of the Haible Proposal.

III. Conclusion.

Verizon believes that both the Haible Proposal and the Trillium Proposal may be omitted from its 2009 proxy materials (1) under Rule 14a-8(i)(10) because Verizon has already substantially implemented the request of the Proposal; (2) under Rule 14a-8(i)(7) because the Proposal deals with matters relating to Verizon's ordinary business operations and (3) under Rules 14a-8(i)(3) and 14a-8(i)(6) because the Proposal is

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inherently vague and indefinite. Accordingly, Verizon respectfully requests the concurrence of the Staff that it will not recommend enforcement action against Verizon if Verizon omits both the Haible Proposal and the Trillium Proposal, each in its entirety, from Verizon's 2009 proxy materials.

In addition, Verizon believes that the Trillium Proposal may be omitted from its 2009 proxy materials (1) under Rule 14a-8(f) because Trillium failed to provide documentary support evidencing compliance with Rule 14a-8(b) and, (2) if the Haible Proposal is included in the 2009 proxy materials, under Rule 14a-8(i)(11) because the Trillium Proposal substantially duplicates a prior received proposal. Accordingly, Verizon respectfully requests the concurrence of the Staff that it will not recommend enforcement action against Verizon if Verizon omits the Trillium Proposal in its entirety from its 2009 proxy materials.

If you have any questions with respect to this matter, please telephone me at (908) 559-5636.

Very truly yours,



Mary Louise Weber
Assistant General Counsel

Enclosures

cc: Mr. Paul Haible
Mr. Jonas Kron, Trillium Asset Management Corporation

Paul Haible

FISMA & OMB Memorandum M-07-16

November 12, 2008

Mr. Ivan G. Seidenberg

Chairman and CEO

Verizon Communications Inc.
140 West Street
New York, NY 10007

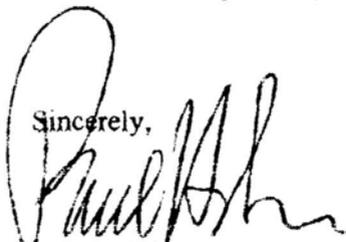
Re: Shareholder Resolution

Dear Mr. Seidenberg:

I have serious concerns regarding the practice of Internet filtering and the impact it can have on participation, expression, competition and innovation on the Internet. I fully understand that there are legitimate uses of Internet filtering but there can also be illegitimate uses of the practice. As you well know, in recent months the practice of Internet filtering has generated considerable attention among federal and state regulators and legislators as well as consumer groups, the general public and the media

Therefore, I am submitting the enclosed shareholder proposal for inclusion in the 2008 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. I am the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of at least 200 shares of Verizon stock. I have held my shares continuously for more than one year and will be providing verification of my ownership. I will continue to hold all the shares through the next stockholders' meeting. My representative or I will attend the shareholders' meeting to move the resolution as required by the SEC rules. Thank you.

Sincerely,



Paul Haible

Encl.

Report on Network Management Practices,
Public Expectations of Privacy and Freedom of Expression on the Internet

The Internet is becoming the defining infrastructure of our economy and society in the 21st century. Its potential to open markets for commerce, venues for cultural expression and modalities of civic engagement is without historic parallel.

Internet Service Providers (ISPs) are gatekeepers to this infrastructure: providing access, managing traffic, insuring communication, and forging rules that shape, enable and limit the public's Internet use.

As such, ISPs have a weighty responsibility in devising network management practices. ISPs must give far-ranging thought to how these practices serve to promote--or inhibit--the public's participation in the economy and in civil society.

Of fundamental concern is the effect ISPs' network management practices have on public expectations of privacy and freedom of expression on the Internet.

Whereas:

- More than 211 million Americans--70% of the population--use the Internet;
- The Internet serves as an engine of opportunity for social, cultural and civic participation in society;
- 46% of Americans have used the internet, e-mail or text messaging to participate in the 2008 political process;
- The Internet yields significant economic benefits to society, with online U.S. retailing revenues – only one gauge of e-commerce - exceeding \$200 billion in 2008;
- The Internet plays a critical role in addressing societal challenges such as provision of health care, with over 8 million Americans looking for health information online daily;
- 72% of Americans are concerned that their online behaviors are being tracked and profiled by companies;
- 53% of Americans are uncomfortable with companies using their email content or browsing history to send relevant ads;
- 54% of Americans are uncomfortable with third parties collecting information about their online behavior;
- Our Company provides Internet access to a very large number of subscribers and is considered a leading ISP;

- Our Company's network management practices have come under public scrutiny by consumer and civil liberties groups, regulatory authorities and shareholders.
- Class action lawsuits in several states are challenging the propriety of ISPs' network management practices;
- Internet network management is a significant public policy issue; failure to fully and publicly address this issue poses potential competitive, legal and reputational harm to our Company;
- Any perceived compromise by ISPs of public expectations of privacy and freedom of expression on the Internet could have a chilling effect on the use of the Internet and detrimental effects on society.

Therefore, be it resolved, that shareholders request the board issue a report by October 2009, excluding proprietary and confidential information, examining the effects of the company's Internet network management practices in the context of the significant public policy concerns regarding the public's expectations of privacy and freedom of expression on the Internet.

Supporting Statement

One example of an issue to be examined could be the social and political effects of collecting and selling personal information to third-parties, including information companies such as First Advantage and Equifax.



Trillium Asset Management Corporation
www.trilliuminvest.com

November 14, 2008

Marianne Drost
Senior Vice President
Deputy General Counsel and Corporate Secretary
Verizon Communications, Inc.
1 Verizon Way
Basking Ridge, NJ 07920

Overnight Mail

Dear Ms. Drost:

Trillium Asset Management Corporation ("Trillium") is an investment firm based in Boston specializing in socially responsible asset management.

I am authorized to notify you of our intention to file the enclosed shareholder resolution. Trillium submits this resolution for inclusion in the 2009 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. Trillium submits this proposal on behalf of our clients, who are the beneficial owners, per Rule 14a-8, of more than \$2,000 worth of Verizon Communications, Inc. common stock acquired more than one year prior to this date. Trillium is authorized to file this proposal and to represent our client's in this matter. They have stated their intention to hold this position throughout the date of the next annual stockholder meeting in 2009. We will provide verification of ownership from our custodian separately upon request. We will send a representative to the stockholders' meeting to move the resolution as required by the SEC rules.

I can be reached at (971) 222-3366 and look forward to your response.

Sincerely,

Jonas Kron, J.D., M.S.E.L.
Senior Social Research Analyst

cc: Ivan G. Seidenberg, Chairman and Chief Executive Officer
Ron Lataille, Senior Vice President, Investor Relations

BOSTON	DURHAM	SAN FRANCISCO	BOISE
111 Atlantic Avenue Boston, Massachusetts 02111-2809 T: 617-423-6655 F: 617-482-6179 800-548-5684	353 West Main Street, Second Floor Durham, North Carolina 27701-3215 T: 919-688-1265 F: 919-688-1451 800-853-1311	369 Pine Street, Suite 711 San Francisco, California 94104-3310 T: 415-392-4806 F: 415-392-4515 800-933-4806	950 W. Rannock Street, Suite 530 Boise, Idaho 83702-6118 T: 208-337-0777 F: 208-487-0278 800-567-0538

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Privacy and Customer Security Policies

Letter from the Chief Executive Officer

Technology is changing the way all companies do business -- and changing the way they collect and use information about customers. Used responsibly, that information can help companies serve customers better. But, advances in communications technology bring growing concerns -- by customers and policymakers -- about maintaining the privacy of individual customer information.

We take privacy concerns very seriously. GTE and Bell Atlantic were built on more than a century of customer service and trust, and we work hard to continue that tradition. Our Companies have been guided by strong codes governing the privacy of customer communications and information. We have worked hard to establish Privacy Principles for Verizon that are the best in the industry.

These Privacy Principles embody our commitment and define our policy on safeguarding customer privacy. These principles strike a reasonable balance of customer concerns about privacy with their interest in receiving quality service and useful new products. This is especially important at a time when emerging telecommunications services present us with new business opportunities and new challenges to protecting customer privacy.

We recognize that our customers may have varying concerns regarding the information we obtain about them. Our Privacy Principles give our customers choice and flexibility regarding how we use that information. And these Principles guide our employees in handling customer information so that private information remains private.

At Verizon, we're committed to safeguarding customer privacy. We require our employees, partners and suppliers to protect the privacy of information about our customers. We're putting customers first -- and that's the key to Verizon's success in this dynamic marketplace.

Ivan Seidenberg, CEO

Updated January 2003

Other Privacy & Policy Links

- [Internet Privacy Policy](#)
- [Letter from the CEO](#)
- [General Privacy Principles](#)
- [Telephone Company Customer Privacy](#)
- [FiOS TV Subscriber Privacy Notice](#)
- [Do Not Call Policy](#)
- [Browser Policy Statement](#)
- [Linking Policy Statement](#)
- [Terms and Conditions](#)
- [Your California Privacy Rights](#)
- [Ohio Telephone Customer Rights and Responsibilities](#)

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Privacy and Customer Security Policies

Other Privacy & Policy Links

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[Browser Policy Statement](#)
[Linking Policy Statement](#)
[Terms and Conditions](#)
[Your California Privacy Rights](#)
[Ohio Telephone Customer Rights and Responsibilities](#)

General Privacy Principles

This tells you about the general privacy principles that guide all Verizon companies. Read more information about our [Internet Privacy Policy](#) and [Telephone Company Customer Privacy Policy](#).

1. Verizon obtains and uses individual customer information for business purposes only.
2. Verizon informs customers how information Verizon obtains about them is used, as well as their options regarding its use.
3. Verizon gives customers opportunities to control how and if Verizon uses individual information about them to sell them products and services.
4. Verizon enables customers to control how and if Verizon discloses individual information about them to other persons or entities, except as required by law or to protect the safety of customers, employees or property.
5. Verizon strives to ensure that the information we obtain and use about customers is accurate.
6. Verizon considers privacy implications as new services are planned and introduced and informs customers of the privacy implications of these services.
7. All Verizon employees are responsible for safeguarding individual customer communications and information.
8. Verizon participates in and supports consumer, government and industry efforts to identify and resolve privacy issues.
9. Verizon complies with all applicable privacy laws and regulations wherever Verizon does business.
10. Each Verizon company is responsible for implementing these Principles and informing customers about its privacy practices. Verizon encourages companies related to, but not wholly owned by, Verizon to adopt these Principles.

Explaining the Guidelines

These ten Principles express Verizon's commitment to assuring strong and meaningful customer privacy protection in an era of rapidly changing communications technology and applications. The Principles are guidelines to help us work with our customers to properly use individual information acquired through a variety of lines of businesses. The goal is simple: balance our customers' concerns about privacy with their interest in receiving quality service and useful new products.

The Principles are based on the concepts of notice, choice and control. Verizon is committed to informing customers, and giving customers choices, about how we use information about them. Above all, the Principles are designed to ensure that Verizon will respect a customer's desire for privacy.

These Principles apply to our use of "individual customer information," that is, information about specific customers. Information that does not reveal a customer's identity is not individual customer information. For example, "aggregated information," such as the number of customers who have purchased Call Waiting in a particular state, or the number of users to access a Web site in a particular day, does not raise privacy concerns and is not covered by these Principles.

Under each Principle, we provide an explanation and list examples to give our employees and customers a sense of how these Principles are applied. The examples are intended to be illustrative, not all inclusive. Additional information about our privacy policy is available at our [Verizon Web sites](#).

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Information Collection and Use

Principle 1:

Verizon obtains and uses individual customer information for business purposes only.

We obtain information about our customers that helps to provide them with Verizon services. This information may also be used to protect customers, employees and property against fraud, theft or abuse; to conduct industry or consumer surveys; and to maintain good customer relations.

We may ask customers questions to better serve their special needs and interests. For example, our telephone company may ask whether customers work at home, whether any members of the household have special needs, or whether teenagers reside in the household, in order to determine whether customers may be interested in additional lines, ISDN or other services.

Access to databases containing customer information is limited to employees who need it to perform their jobs -- and they follow strict rules when handling that information.

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Principle 2:

Verizon informs customers how information Verizon obtains about them is used, as well as their options regarding its use.

Verizon discloses to customers the types of information a Verizon business unit obtains about customers, how and when it is used, when it might be disclosed, the stringent measures we employ to protect it, and ways the customer can restrict the use or disclosure of that information.

For customers of our online services, we will disclose how individual customer information is obtained (whether through customer registration or through automatic means), what kind of information is obtained, and the purpose for which we use the information obtained on line.

Customers may obtain information regarding Verizon's privacy policy by accessing our World Wide Web site at <http://www.verizon.com>, or by requesting information from a Verizon service representative.

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Principle 3:

Verizon gives customers opportunities to control how and if Verizon uses individual information about them to sell them products and services.

Customers have many opportunities to control how we use their individual information to introduce them to new products and services. For example, Verizon will not call customers who have expressed to us a preference not to be called for marketing purposes. Customers can also have their names removed from direct mail lists that we use. The same will be true for email; if any Verizon business unit decides to use email to send new product information to its customers.

However, we do use individual customer information internally for our own general marketing and planning purposes -- so that we can, for example, develop, test and market new products and services that meet the needs of our customers. Ordinarily, such information is combined into aggregations that do not include individual customer identities. Under certain circumstances, we are required by law to disclose the aggregated information to other companies, but in such cases customer identities are not included.

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Disclosure of Individual Customer Information

Principle 4:

Verizon enables customers to control how and if Verizon discloses individual information about them to other persons or entities, except as required by law or to protect the safety of customers, employees or property.

Subject to legal and safety exceptions, Verizon will share individual customer information only with persons or entities outside the company when the customer has consented, or when we have advised the customer of the opportunity to "opt-out" (to choose not to have the information disclosed).

If Verizon enters into a merger, acquisition, or sale of all or a portion of its assets, a customer's personally

identifiable information will, in most instances, be transferred as a part of the transaction.

We may, where permitted by law, provide information to credit bureaus, or provide information and/or sell receivables to collection agencies, to obtain payment for Verizon billed products and services.

An example of when Verizon would disclose individual customer information to an outside entity is when Verizon is served with valid legal process for customer information. In such cases, we are required to release the information. We are also required by law to provide billing name and address information to a customer's long distance carrier and other telephone companies to allow them to bill for telecommunications services. (By law, customers with non-published or unlisted service have the right not to have their billing name and address disclosed when they make a calling card call or accept a collect or third party call. However, if they do restrict disclosure, they will be unable to make calling card calls or accept collect and third party calls.)

Similarly, we are required to provide directory publishers with listings information -- name, address and phone number -- for purposes of publishing and delivering directories. In addition, under certain circumstances, our telephone company shares customer information with other carriers and with law enforcement to prevent and investigate fraud and other unlawful use of communications services.

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Accuracy of Individual Customer Information

Principle 5:

Verizon strives to ensure that the information we obtain and use about customers is accurate.

Verizon is committed to ensuring that the information we obtain and use about customers is accurate. To that end, we strive to verify that our customer records are correct. Customers who find an error in their Verizon bills are encouraged to notify Verizon. Verizon's service representatives are trained to answer customer questions about, and to give customers reasonable access to, the information we have about them. Our service representatives will also provide explanations of how such information is used and how to correct any inaccuracies if they occur.

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Privacy and Verizon Services

Principle 6:

Verizon considers privacy implications as new services are planned and introduced and informs customers of the privacy implications of these services.

Verizon offers several privacy-enhancing services, including Non-Published numbers, Caller ID, Caller ID With Name, Per Call Blocking, and Anonymous Call Rejection. We also work to develop other services that help customers to control access to information about them. We seek customer input in developing new products and conduct comprehensive customer outreach and education before and after introducing privacy-sensitive products. We take these steps in accordance with these Privacy Principles as well as our Universal Design Principles, which govern the accessibility of our services to the broadest possible range of diverse users.

At Verizon, we are committed to expanding the world of communications and multimedia for customers -- a world of wireline and wire-free solutions...voice, video and data services...information and entertainment. We will investigate the privacy implications these new services may have and build safeguards into services before they are introduced. We will inform and educate customers about the effect on privacy the new services may have.

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Information Management and Security

Principle 7:

All Verizon employees are responsible for safeguarding individual customer communications and information.

Verizon's Employee Code of Business Conduct, which is distributed to all employees, requires Verizon personnel to be aware of and protect the privacy of all forms of customer communications -- whether they are voice, data or image transmissions -- as well as individual customer records. The Code makes clear

that employees who fail to follow the Privacy Principles will face disciplinary action, which can include dismissal. All employees are trained regarding their responsibilities to safeguard customer privacy.

We strive to ensure that information we have about our customers is accurate, secure and confidential, and to ensure that our employees comply with our privacy policy. We never tamper with, intrude upon or disclose the existence or contents of any communication or transmission, except as required by law or the proper management of our network. Access to databases containing customer information is limited to employees who need it to perform their jobs -- and they follow strict guidelines when handling that information. We use safeguards to increase data accuracy and to identify and authenticate the sources of customer information. We use locks and physical security measures, sign-on and password control procedures, and internal auditing techniques to protect against unauthorized use of terminals and entry into our data systems.

Verizon requires that records be safeguarded from loss, theft, unauthorized disclosure, and accidental destruction. In addition, sensitive, confidential, or proprietary records must be protected and maintained in a secure environment. It is our policy to destroy records containing sensitive, confidential, or proprietary information in a secure manner. Hard copy confidential, proprietary, or sensitive documents must be made unreadable before disposition or recycling, and electronic media must be destroyed using methods that prevent access to information stored in that type of media. Just as employees would report stolen property, missing records and suspicious incidents involving records are referred to Verizon Security.

We encourage our employees to be proactive in implementing and enforcing the Verizon's privacy policies. If employees become aware of practices that raise privacy concerns, they are encouraged to report them to their supervisors or to contact Verizon's Ethics or Security office.

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Compliance With Laws and Public Policy Participation

Principle 8:

Verizon participates in and supports consumer, government and industry efforts to identify and resolve privacy issues.

We participate in legislative and regulatory proceedings, industry association efforts, consumer group efforts, and general business group activities relating to telecommunications privacy issues. Our External Affairs department is responsible for coordination of Verizon's public policy participation.

We believe that developing international privacy protection and information-use standards is necessary to protect the needs of our customers. Verizon supports the development of international standards to protect individual customer information and its proper use on a worldwide basis.

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Principle 9:

Verizon complies with all applicable privacy laws and regulations wherever Verizon does business.

Customer and policymaker perceptions of privacy have changed over time and will continue to do so. Changes in technology can also alter what is appropriate in protecting privacy. Laws may change accordingly. We will regularly examine -- and update, if necessary -- the Verizon Privacy Principles.

Not only will Verizon comply with all applicable privacy laws, but we'll carefully monitor customer needs and expectations. And Verizon will work with policymakers and consumers to ensure that we continue to safeguard privacy, giving customers choices, flexibility and control.

Verizon considers privacy laws and regulations to be the minimum standards we will adhere to in protecting privacy. In addition to complying with the law, Verizon will also adhere to these Privacy Principles wherever we do business.

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Implementation

Principle 10:

Each Verizon company is responsible for implementing these Principles and informing customers about its privacy practices. Verizon encourages companies related to, but not wholly owned by, Verizon to adopt these Principles.

Every Verizon business unit is responsible for:

- Evaluating its particular needs and determining how to implement the Principles;
- Developing its own privacy policies and procedures based on the Principles, and developing additional privacy policies and procedures if needed;
- Informing its employees of the policies and training them in the proper procedures; and
- Informing customers how personal customer information is used and how they can control its use and disclosure.

Verizon's Corporate Compliance Officer is responsible for ensuring that all Verizon business units and their employees comply with privacy laws and regulations.

Verizon requires any vendors and consultants we hire, as well as suppliers and contractors, to observe these privacy rules with respect to any of our customers' individual customer information. They must abide by the Principles when conducting work for us, and they will be held accountable for their actions.

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Updated November 2005

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Privacy and Customer Security Policies

Internet Privacy Policy

As always, the privacy and security of your personal information is our #1 priority, and we want you to be aware of how we collect and handle information on our site.

When you visit verizon.com, we may collect the following information about your visit:

- Anonymous statistics collected as you browse the site
- Personal information you knowingly give us

For details about our general and Internet privacy policies, you may select from the topics to the left or search our privacy FAQs below:



Other Privacy & Policy Links

[Internet Privacy Policy](#)
[Letter from the CEO](#)
[General Privacy Principles](#)
[Telephone Company Customer Privacy](#)
[FiOS TV Subscriber Privacy Notice](#)
[Do Not Call Policy](#)
[Browser Policy Statement](#)
[Linking Policy Statement](#)
[Terms and Conditions](#)
[Your California Privacy Rights](#)
[Ohio Telephone Customer Rights and Responsibilities](#)

Please select a question

What does it mean to me for Verizon to be a licensee of the TRUSTe Privacy Program?

Go

What does it mean to me for Verizon to be a licensee of the TRUSTe Privacy Program?

The TRUSTe seal confirms that Verizon is a licensee of the TRUSTe Privacy Program. Verizon wants you to feel confident about your privacy when using verizon.com, so we have TRUSTe review this site for compliance with their guidelines. TRUSTe is an independent, non-profit organization whose mission is to build users' trust and confidence in the Internet by promoting the use of fair information practices. Contact us if you have questions or concerns regarding this statement. If your inquiry has not been satisfactorily addressed, you should then contact TRUSTe who will serve as a liaison to resolve your concerns.

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Information Verizon Collects

What information does this Web site gather?

Verizon collects personal information such as name, address, and email address, when you knowingly provide it to us. In addition, Verizon may collect other information provided by you, such as your credit card number, billing address, Social Security Number (SSN) and date of birth, when you set up an online account or order service online. Our Web servers automatically collect statistical information about your visit such as pages visited and which browsers are used to visit our site. None of this information is associated with you as an individual (see information about cookies). We use these statistics to monitor our site's performance and to make it easier for you to use.

If you choose to use an available referral service to tell a friend about our site or a specific product or service, we will ask for your friend's name and email address. We will then send your friend a one-time email regarding our site or the featured product or service. Verizon uses this information for purposes of sending this one-time email and tracking the success of the referral service.

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What happens when I provide personal information on this Web site?

When you supply information for a specific purpose, such as online ordering of a Verizon service, we use the information for that purpose.

When you use our Web site to order services, we may use this individually identifiable information as we would if obtained in a non-electronic manner. Such information may include:

- Publishing your name, address, and phone number in our directories (unless you have requested a non-published or non-listed number)
- Evaluating your service needs and contacting you regarding additional services you may find useful

If the way we use personally identifiable information changes, Verizon will contact you via email notifying you of this change and giving you the opportunity to opt out of such use.

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What happens when I provide information on registration forms?

When you choose to register with verizon.com or any other Verizon site, we request accurate contact information and preferences that help us better serve you. You will always retain the option to choose if your contact information is used to send you company and product information, special offers, and in some cases, newsletters.

If you're a local Verizon phone service customer, you may be given the option to register a profile with us (limited to specific areas). We would then store your name, purchase history, and billing information to make it easier for you to shop and purchase from us in the future. Customers have access to their account information on their monthly bills or by establishing an account online.

At anytime you may:

- Elect not to receive (opt out) marketing email messages. The primary purpose of these messages is the commercial advertisement or promotion of a Verizon product or service. At any time after the initial registration, you can opt out by selecting the opt-out cancel option in your profile within the application itself.
- Update your contact and personal information anytime by updating your account and/or your profile (where available) within the application.

In order to improve your experience with us, we may decide to improve our site's ability to obtain information about users. We will update this privacy statement continually to ensure that you are aware of developments in this area.

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Does Verizon sell or give my information to non-Verizon companies?

No. We do not sell or disclose individually identifiable information obtained online about our visitors to anyone outside of Verizon. The only exceptions to this rule are the following:

- If you specifically authorize Verizon to share your information with another company
- It is required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site
- Disclosure is necessary to protect the safety of customers, employees, or property
- Publishing your name, address, and phone number in our directories if you initiate your telephone service with us online (unless you have requested a non-published or non-listed number)
- Sharing data with our authorized vendors, contractors and agents, only to the extent necessary for them to perform their work, in order that Verizon can carry out certain functions in marketing and delivering services to you.

If you provide individually identifiable information at an event Verizon sponsors with another company, or if you register on a co-sponsored Web site, or if you have elected to participate in an affinity program (such as airline miles), you may be providing the individually identifiable information to the co-sponsor as well as Verizon. Review the privacy statement at the event or on the co-branded site or the affinity site to learn how the partner uses this information. Be assured that Verizon uses this information in accordance with this privacy policy.

On occasion, Verizon shares non-personally identifiable information with non-Verizon companies in order to assess the results of a promotion or event. This information is used in aggregate only, and does not contain any information that would personally identify you.

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Does Verizon accommodate links to other sites?

Yes. Our site contains links to other Web sites. We are not responsible for the content or the privacy

practices employed by other sites. However, in some instances where a service is provided through a non-Verizon partner or supplier site, such as Online Bill Pay, you can feel confident that your individually identifiable information will be protected. Verizon requires suppliers not to use the information for any purpose other than the purpose for which it was originally collected, protecting the privacy of your information.

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What does Verizon do with non-personally identifiable information collected automatically?

Verizon uses cookies to collect this type of information in order to enhance your online experience as follows:

- Ensure that you see the correct products and pricing applicable to the state in which you live
- Manage the number of ads that you see to avoid over-delivery of the same message
- Tailor an advertisement to better match your interests and preferences

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What does Verizon do with personally identifiable information?

Personal information you voluntarily supply when obtaining information, purchasing products, or interacting with our advertising on verizon.com **is not shared** for non-Verizon purposes. This information is Verizon proprietary data and is not available for use to any outside company in this personalized form. Should any changes be made in the way we use personally identifiable information, Verizon will contact you via email notifying you of this change and give you the opportunity to choose to opt out of such use.

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Does Verizon use the information provided online to profile its customers?

No. Verizon does not combine offline information about you with the online information that you provide on our Web site.

We have made it a requirement that you will be clearly notified at the time of online data collection for the purpose of consumer profiling. When your online purchase behavior is intended to be combined with offline information, this intent will be clearly stated. You will then have the ability to choose not to have that information combined.

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Email

Does this site send email to site visitors?

Verizon strives to continuously improve our customers' online experience by providing them with the latest information about the benefits of Verizon's products and services and in other circumstances described below. We may provide this information in any number of ways, including emails to our customers, online visitors and others who have provided their email addresses to Verizon. In addition, unless you have chosen to opt out from receiving email messages from Verizon, Verizon may send emails to:

- Inform customers that their telephone bills are available for review online
- Conduct online surveys
- Provide marketing information about Verizon products and services
- Provide information to those who have voluntarily provided their email addresses to third parties in order to receive promotional material

Moreover, in the following situations, Verizon reserves the right to communicate through email with online users, including those who have opted out of receiving solicitation-based emails, to:

- Notify customers about service or product affecting changes
- Respond to an online user's email
- Confirm transactions, orders, payments and registrations placed online
- Send information that a customer or potential customer has requested
- Provide emergency, security and online account maintenance information

Verizon supports and complies with all laws governing its email communications and will update this policy as needed to ensure ongoing compliance.

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Security Issues

How does Verizon protect my personal information?

We are committed to protecting the information you give us, so we implement the appropriate safeguards to do so. Any information that you give us is protected by a password with a minimum of six characters for added security. Within Verizon, your information is stored in password-protected, limited-access servers. Wherever possible, Verizon servers reside behind a corporate firewall that maintains tight controls on any access to the system from both our internal network and the Internet. Verizon uses Secure Socket Layer (SSL) to transmit sensitive information such as credit card numbers and SSN. SSL is a transport level technology for authentication and data encryption between a Web server and a Web browser. SSL sends data over the "socket" which is a secure channel at the connection layer.

Does Verizon's Web site collect information from children?

Verizon believes that protecting the privacy of children on the Internet is very important. The Verizon Web site is not designed to attract children under the age of 13, and we do not intentionally collect personal information from children on our Web sites. Ordering online products and services is limited to adults 18 or over.

Children should exercise caution before providing personal information online and should discuss with an adult or guardian before doing so. Verizon also urges parents and guardians to consider using one of the low-cost software programs designed to protect children while they are online.

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Cookies

What are cookies and why does Verizon use them?

A cookie is a small data string our server writes to your hard drive. This data string contains your unique user ID for our Web site. This technology also allows us to customize your experiences when you visit the Verizon Web site. For example, we're able to deliver content specific to your interests, keep track of your online ordering and alert you to new products or money saving opportunities based on your current services.

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What information is collected by the site or in cookies?

Verizon collects non-personally identifiable information regarding your visit, usually in the form of cookies, log files, or clear .gif files. Cookies contain a session identification number that our systems use to recall previous authentication or order information from our servers. We may also collect your domain name, IP address, the address of the last URL you visited prior to coming to our Web site, and your browser and platform type. We use third party tracking services to help us analyze this information in the aggregate to evaluate the effectiveness of our site. In some cases, the information is collected directly by the third party and in others it is forwarded by Verizon to the third party. The third party is not permitted to use the information for any other purpose.

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How do I disable cookies on my browser?

It's important you know that a cookie cannot be used to access or otherwise compromise the data on your hard drive. Your privacy is always protected. However, at any time you may choose to change your browser settings to disable cookies if you do not want us to establish and maintain a unique verizon.com user ID for you. Please be aware that cookies may be required to complete certain functions on this Web site, such as ordering online. We've made it easy for you 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 instructions.

PC Users

[Microsoft® Internet Explorer 6.x](#)
[Microsoft Internet Explorer 5.x](#)
[Netscape® 7.x](#)
[Netscape 6.x](#)
[Mozilla Firefox™ 1.x](#)

Macintosh® Users

[Netscape 7.x](#)
[Safari 1.x](#)

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Online Advertising

What is Verizon's position regarding online advertising and third-party ad servers?

As an online advertiser, Verizon uses information supplied from third-party companies in several ways. This is aggregated data that does not personally identify any individual online user. This data is used to:

- Evaluate and prioritize site selection when developing online media plans
- Geographically target advertising
- Deliver product and pricing information applicable to the customer's state
- Gauge the effectiveness of our online advertising

Again, personally identifiable information such as name, address, phone number, or email address is not collected unless you voluntarily supply this data to Verizon or to a third party partner in order to get further information about Verizon products and services.

In addition, some Verizon Web sites -- for example, www.SuperPages.com -- may accept advertisements from third-party advertisers. These advertisers are carefully selected to provide information about products and services that we think may benefit you. Please check the privacy policy of these Web sites concerning what information may be collected by third-party advertisers.

Third-party advertising companies may also utilize technology in order to measure the effectiveness of ads. Some Verizon Web pages contain clear .gif files (also known as Web beacons), electronic images that allow the third party to collect anonymous information. This anonymous information about your visits to our site is used to provide advertisements about goods and services of potential interest to you. No personally identifiable information is collected during this process.

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Whom do I contact if I am concerned, or have questions, about my Privacy at Verizon?

Please visit [Contact Us](#).

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Updated January 2006

[About Us](#) | [Contact Us](#) | [Store Locator](#) | [Careers](#) | [Verizon Foundation](#) | [Site Map](#) | [Privacy Policy](#) | [Site Feedback](#) | [Terms and Conditions](#)

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[Español](#)

Guiding Principles for Content on Verizon Networks



Our goal is simple . . . to help you access the content you want and avoid content you don't.

Verizon builds great networks—broadband, mobile and global. These networks allow us to deliver communications, data and entertainment content to our customers in an array of ways that few companies can—through FiOS TV, Verizon Online and Verizon Wireless mobile devices.



As one of the world's leading communications providers, Verizon believes in open networks and that network operators should provide access to all lawful content on the Internet.

We also believe it is important for our customers to have access to the tools they need to choose and manage what content they and their families wish to receive.

We have adopted Content Guidelines based on these core principles. These guidelines will help us make content decisions consistent with our values—respect for customer choice, privacy and safety. By applying them, we can help make our customers' lives richer and their experience with Verizon's services more enjoyable, productive and meaningful.

VERIZON'S GUIDING PRINCIPLES FOR CONTENT

- Where Verizon offers its own content, or other parties' content through one of its platforms such as V CAST or Verizon Surround, it does so based on factors that include content ratings provided by existing rating systems and consistency with acceptable industry practices.

Verizon believes in empowering customers to make informed choices about the content they seek to access by providing customers with available ratings information and parental controls.

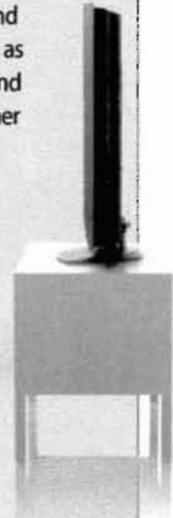
- As a network provider, Verizon provides access to the Internet and, through it, to services and content that Verizon does not own, develop or control.

Verizon is committed to helping its customers make informed decisions about the content they want to access over Verizon's network and will provide content management tools, as well as access to educational materials and other resources to assist parents and other users in identifying content they deem appropriate.

- Verizon respects freedom of expression and our customers' ability to freely access and disseminate lawful content of their choosing in a manner that respects others' use of the network and that complies with the law.

Verizon supports sound industry practices for safeguarding children, intellectual property rights and our customers' privacy and security.

- Verizon exercises broad discretion over its choice of brands and companies that advertise on its platforms. In selecting advertising partners and content, Verizon takes into account its corporate values, as well as the values of our business partners and customers.



Verizon's Content

We hold ourselves to high standards for content that Verizon produces, or others produce on our behalf, such as some programming distributed on V CAST, FiOS One TV and Verizon Surround.

We will not knowingly distribute such content if it:

- contains material that is obscene, is indecent, has strong sexual, explicit or erotic themes, or has links to such content; or
- contains hate speech; or
- contains excessive violence; or
- contains extreme profanity; or
- contains misleading or fraudulent claims; or
- promotes or glamorizes alcohol abuse, illegal drug use or the use of tobacco products.

Third-Party Content That Verizon Distributes

We present different kinds of content on Verizon-branded wireless, Internet and TV platforms. Programming runs the gamut from news, weather, and sports programs to movies, music, and videos available for download.

When we assess what standards should apply to this third-party generated content, Verizon distinguishes between rated and un-rated content.

When content has been rated, the parental controls we provide and content management tools we offer enable customers to limit or restrict access to it. What's more, FiOS TV customers can even block all un-rated content if they wish.

Empowering our customers is why we strongly encourage content providers to have their programming, games, music or other types of content rated by third-party rating organizations.

If content is not rated, we will not offer it on a Verizon-branded platform unless it complies with the same requirements we place on our own content.

Short Code-Based Messaging Campaigns

The use of short code-based messaging varies widely. Short code campaigns that distribute content such as wallpapers or ringtones, that advertise or market companies, goods or services or provide user-generated content services must comply with our guidelines for such campaigns.

For other uses, including campaigns of political and advocacy groups, Verizon Wireless will provide short code-based messaging services to any group delivering legal content to customers who affirmatively indicate they wish to receive it.

All short code-based messaging campaigns must also comply with applicable industry standards.*

Content to Which Verizon Provides Access

As Internet access providers, Verizon Online and Verizon Wireless enable customers to access content, on web sites and newsgroups, which Verizon does not generate, own or control.

The Internet is a free marketplace of ideas, with content of limitless variety for a very broad range of individual tastes.

At Verizon, we believe you can best choose what content is appropriate for you and your family, so each Verizon network provides access to content management tools such as parental controls — to help you control what is accessible to Internet users in your home.

User-Generated Content

Verizon applies guidelines to services that let users post, transmit or generate their own content — such as chat programs, blogs, social networks, and photo or video portals.

Under these guidelines, applications that appear on a Verizon platform such as Mobile Web or Verizon Surround must not only comply with the law, but also adhere to a set of sound practices with safeguards to protect users against abuse, fraud and other inappropriate conduct or activities. These safeguards should, in particular, protect children and adolescents from predators and inappropriate content.

Third parties hosting these user-generated content services should also adopt their own policies and practices to ensure compliance with the law, including appropriate notice and take-down procedures for unlawful content.

Advertising Content

All advertising which appears on Verizon-branded platforms must not only comply with the law, but also with applicable industry standards* established by groups such as the Mobile Marketing Association's Best Practices, the Child Advertising Review Unit and CTIA's Consumer Code.

Verizon has broad discretion over the advertisements that will run over its services. We may reject advertising for several reasons, including failing to comply with Verizon's standards of decency or good taste; being misleading or inaccurate; or making fraudulent or unfair competitive claims. We may also reject advertising promoting our competitors, or that may harm Verizon's brand or public image.



* For links to information about industry standards, see back panel.





Note to Reader:

This summary is designed to share with our customers, business partners and others how Verizon views and approaches important policy issues involving content. It discusses how ratings, parental controls and other content management tools can help our customers select the content they and their families may access using Verizon's networks and services and how they may choose to restrict access to unwanted content.

This brochure informally describes the principles which guide Verizon's policy and decision-making regarding content available through our networks. It is not a substitute for Verizon's complete policies and practices pertaining to content. It does not attempt to define all requirements applicable to content or to define the legal rights or obligations of our customers, our business partners or Verizon. This brochure is not intended to constitute a contract, and Verizon's content policy may change from time to time to address changes in the marketplace and consumer expectations.

To download full copies of Verizon's Content Policies, visit:
verizon.com/contentpolicy

FOR INFORMATION ABOUT INDUSTRY STANDARDS, VISIT:

CTIA CONSUMER CODE:

www.ctia.org/content/index.cfm/AID/10352

CTIA CONTENT GUIDELINES:

www.ctia.org/advocacy/policy_topics/topic.cfm/TID/36

MOBILE MARKETING ASSOCIATION'S BEST PRACTICES:

www.mmaglobal.com/bestpractices.pdf

CHILDREN'S ADVERTISING REVIEW UNIT
OF THE COUNCIL OF BETTER BUSINESS BUREAUS.

www.caru.org/guidelines

Verizon Communications Inc. (NYSE: VZ), headquartered in New York, is a leader in delivering broadband and other wireline and wireless communication innovations to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving nearly 66 million customers nationwide.

A Dow 30 company, Verizon employs a diverse workforce of nearly 235,000 and in 2007 generated consolidated operating revenues of \$93.5 billion.

For more information about Verizon, please visit:
verizon.com

verizon

Content Policy for Verizon Networks



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Note to Reader:

The guidelines that follow describe Verizon's policies and practices with respect to the various types of content that we make available to our customers through Verizon's wireless, Internet and television services, and the policy issues that relate to such content.

These guidelines offer our customers, business partners and others interested in Verizon's views on content management insight into how we at Verizon view and approach the important policy issues involving content. The guidelines address the use of ratings and other standards, and the use and availability of parental controls and other means we make available to help our customers control the content that they and their families can access and view over Verizon's network.

It is important to note that while these guidelines describe our policies with respect to content that Verizon develops or presents under the Verizon brand, or content that we do not control that is available to our customers through our various services, they are not intended to constitute a contract or to define all operational or commercial requirements applicable to such content. Nor are these guidelines intended to define the legal rights or obligations of our customers or Verizon, as they may change from time to time.

Verizon's Guiding Principles for Content

Verizon distributes, produces and facilitates access to content in a manner consistent with its corporate values. These values include respect for customer choice, respect for customer privacy and security, and dedication to full compliance with the law.

Accordingly, Verizon adheres to the following Guiding Principles with respect to content:

1. Where Verizon offers its own content or other parties' content through one of its platforms, it does so based on factors that include content ratings provided by existing rating systems and consistency with acceptable industry practices. Verizon believes in giving customers the ability to make informed choices about the content it offers by making any ratings and other information readily available to customers and by giving customers access to the tools they can use to monitor and control the content they obtain.
2. As a network provider, Verizon provides access to the Internet and, through it, to services and content, the substance of which, Verizon does not own, develop or control. Verizon is committed to empowering its customers to make informed choices about the services and content they want to access over its network. Verizon is committed to supporting its customers by providing access to personal content management tools, such as parental controls, as well as access to educational materials and other resources about content rating systems to assist parents and other users in identifying appropriate content for themselves and their children.
3. Verizon respects freedom of expression and our customers' ability to freely access and disseminate the lawful content of their choosing in a manner that respects others' use of the network and that complies with the law. Verizon supports sound industry practices for safeguarding children, the intellectual property rights of content owners, and the privacy and security of our customers.
4. Verizon exercises broad discretion over its choice of brands and companies that advertise on its platforms. Verizon's selection of advertising partners and content takes into account our corporate values as well as those of our business partners and customers.

Verizon FiOS TV's General Content Guidelines

1. Content Generated By Or On Behalf of Verizon FiOS TV:

This category covers content/programming that FiOS TV generates or produces, or to content that a third party generates or produces on FiOS TV's behalf. Content in this category is closely identified with the FiOS TV brand and FiOS TV generally has a higher degree of control over it. Examples of content in this category include programming on FiOS TV's FiOS One Channel such as the Push/Pause and Limbo television series.

A. Content standard for this category - FiOS TV will only air content in this category that is lawful and will not knowingly air content that includes material in any of the following excluded content categories:

- Content that contains anything that is obscene or indecent, or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing industry standards, content that does not satisfy the above guidelines may be aired by FiOS TV if it is included in the context of artistic, educational, medical, news, scientific, or sports material.

2. Third-Party Content FiOS TV Distributes On The Verizon FiOS TV-Branded Video Programming Distribution System:

This category covers third-party programming FiOS TV licenses from other entities and distributes over Verizon's FiOS TV video programming distribution system. Examples of content in this category include the ESPN, Discovery Channel, CNN, ABC, CBS and NBC channels, as well as Hollywood movies and other individual programming assets. In contrast to the content in Category 1, above, content in this category is licensed from third parties and is distributed on the FiOS TV-branded platform without editorial control or input from FiOS TV management.

Much of the content in this category is rated by a third-party ratings body, and to the extent feasible, FiOS TV will leverage existing ratings systems and content management tools to empower customers to make their own choices about the types of content they choose to view. Parental controls are available for most, if not all, of this content.

Additionally, FiOS TV may, in its discretion and where it has the ability to do so, elect not to license a particular channel or distribute specific content that is inconsistent with Verizon's Guiding Principles on Content. For those channels that FiOS TV elects to distribute, FiOS TV has no editorial input or control over the specific programming aired by the channel.

The content standards for content in this category are described below:

- A. Content Standard for Rated Content - Third-party groups have rated this content and content management tools, such as parental controls and service blocks, are available to limit or restrict access to content.
- B. Content Standard for Content That Is Not Rated - Content in this category has not been rated. However, FiOS TV offers state-of-the art content management tools, such as parental controls and service blocks that allow customers to block this content in its entirety. However, consistent with industry practice, parental controls may not restrict news, weather, and sports programming.
- C. Mature-Themed Programming Content - Content in this category is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.

In all of the above cases, FiOS TV will only distribute content that is lawful and is consistent with similar types of programming offered by major cable and satellite providers.

3. Content to Which FiOS TV, As A Video Programming Distributor, Is Required To Provide Access:

Content in this category covers content that FiOS TV, in its role as a video programming distributor, is required, by law or regulation, to offer to customers, but which FiOS TV does not purchase, license, develop, generate, promote or exercise editorial control over. The content standards for content in this category are described below:

- A. Content Standard for Leased Access Channels - Content in this category refers to unaffiliated third-party programming contained on FiOS TV's leased access channels that FiOS TV is required to exhibit pursuant to Federal law and the Federal Communications Commission's Leased Access Rules (47 C.F.R. § 76.701). As a general matter, Federal law and regulation does not allow FiOS TV to have editorial control or input over content third parties air on the FiOS TV leased access channels.

However, consistent with Federal Law and the Federal Communications Commission's Leased Access rules (47 C.F.R. § 76.701), content on FiOS TV's Leased Access channels should not include obscenity, indecency, or nudity. Accordingly, FiOS TV has the right to reject any such content, and any third party that desires to air programming on the FiOS TV Leased Access channels must first, among other things, certify that such content is not obscene or indecent.

Content on Verizon's Leased Access channels is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.

- B. Content Standard for Public, Educational and Government (PEG) Channels - Content in this category is unaffiliated third-party programming contained on FiOS TV's PEG channels that FiOS TV is required to exhibit pursuant to state and/or local franchise agreements. As a general matter, FiOS TV does not have editorial control or input over content contained on the PEG channels that are carried on FiOS TV. Pursuant to the Federal Communications Commission's PEG Channel rules (47 C.F.R. § 702), FiOS TV may refuse to transmit any public access program that Verizon reasonably believes contains obscenity. Content on Verizon's PEG channels is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.
- C. Content Standard for Web-based Programming - Content in this category refers to unaffiliated third-party programming available via the Internet, which FiOS TV customers may be able to access using the FiOS TV set-top box and network. Content obtained from the Internet through FiOS TV is covered by, and subject to, Category 3 of the Verizon Online General Content Guidelines.

Verizon Online's General Content Guidelines

1. Content Generated By Or On Behalf Of Verizon Online:

This category covers content that Verizon Online generates or produces or content that a third party generates or produces on Verizon Online's behalf. Content in this category is closely identified with Verizon or Verizon Online, and Verizon generally has a higher degree of control over it. Examples of content in this category include certain content appearing on Verizon Surround (like V CAST Today) and original content such as FiOS One episodes displayed on a Verizon Online platform.

A. Content standard for this category - Verizon Online will only distribute content that we produce or generate (or others do on our behalf) that is lawful and will not knowingly distribute content that includes material in any of the following excluded content categories:

- Content that contains anything that is obscene or indecent, or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing online industry standards, content that does not satisfy the above guidelines may be distributed by Verizon Online if it is included in the context of artistic, educational, medical, news, scientific, or sports material.

2. Third-Party Content Verizon Online Distributes On A Verizon Online-Branded Distribution Platform:

This category covers content contained on a Verizon Online-branded distribution platform (e.g., Verizon Surround) but which is not created by or on behalf of Verizon Online. Examples include NFL Network, Music by Rhapsody, and other similar content.

The content standards for content in this category are described below:

A. Content Standard for Rated Content - "Rated content" refers to content that third-party groups have rated and for which content management tools, such as parental controls, are available. Verizon Online will typically require its content suppliers to provide their content with a rating that is benchmarked to the appropriate industry standard (e.g., Electronic Software Ratings Board, Recording Industry Association of America, Motion Picture Association of America.).

- B. Content Standard for Content That is Not Rated - Content in this category has not been rated by any third-party ratings group. In making this content available, Verizon Online will generally adhere to the guidelines in Category 1, above, and will not knowingly distribute content that does not adhere to these guidelines.

In each of the above cases, content appearing on Verizon Online-branded distribution platforms must be lawful and consistent with standard industry practices. In addition, Verizon (and others) makes available content management tools, such as parental controls, to help parents and other users limit access to content they may find objectionable.

- C. Internet Search - The use of Internet search tools can lead to content that some users may find unsuitable. Recognizing this, Verizon Online makes available safe search tools for searches conducted on Verizon-branded websites that help its customers determine the level of search filtering they deem appropriate, and that help parents and other users to limit access to content they may find objectionable.

3. Content to Which Verizon Online, As A Network Provider, Provides Access:

General Internet Content: This category covers non-Verizon content that customers access using their Internet connection. Content in this category includes the vast range of information and images generally available via the Internet through websites, search, newsgroups, and other sources. Verizon Online does not generate, own or develop this content, and, therefore, has no control over it.

- A. Content Standard for General Internet Content - The Internet is a free marketplace of ideas. Currently, no industry standards apply to content on the Internet. However, Verizon Online offers content management tools to help customers establish appropriate controls regarding the content that is accessible through their computer, and, in the process, Verizon Online helps parents and other users control the types of content that they and their families can access online. These tools include parental controls offered by Verizon Online and by its portal partners, as well as an Internet Safe Search feature to help control search results initiated from Verizon Online websites.

Verizon Wireless' General Content Guidelines

1. Content Generated By Or On Behalf of Verizon Wireless:

This content category covers content Verizon Wireless generates or produces or that a third party produces or generates on Verizon Wireless' behalf. This content is so closely identified with the Verizon Wireless brand that one could reasonably assume Verizon Wireless has given the content its approval. Examples of content in this category include some of the video clips distributed through V CAST Video (e.g. V CAST Today video clips) and some of the applications distributed through Get It Now (e.g., VZ Navigator, VZW Tones, VZW Pix).

Advertising, user generated and short code-based messaging campaigns used for purposes other than distributing content are not covered by these guidelines. They are addressed below by separate guidelines.

A. Content standard for this category - Verizon Wireless will only distribute content in this category that is lawful and does not otherwise fall into the categories of excluded content described below. Verizon Wireless will not knowingly distribute any content in this category that includes material described below:

- Content that contains anything that is obscene or indecent or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing standards in other content distribution mediums, content in this category that does not satisfy the above guidelines may be distributed by Verizon Wireless if included in the context of artistic, educational, medical, news, scientific or sports material.

Content in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines).

2. Third-Party Content Verizon Wireless Distributes On A Verizon Wireless-Branded Distribution Platform:

This content category covers content distributed through Verizon Wireless-branded distribution platforms such as Get It Now, V CAST Mobile TV, V CAST Music, V CAST Video and short code-based messaging campaigns. Some of this content is rated, while other content is unrated. Content management tools are available to limit or restrict access to this content.

This content must be lawful and comply with applicable industry standards (e.g. Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.). Content distributed through Verizon Wireless-branded distribution platforms cannot disparage Verizon Wireless or its affiliates.

The content standards for content in this category are described below:

- A. Content Standard for Rated Content - Third-party groups have rated this content and content management tools, such as parental controls and service blocks, are available to limit or restrict access to this content. Verizon Wireless will leverage existing ratings systems and make content management tools available in connection with the distribution of this content. Equipped with these tools, customers are empowered to make their own choices about the types of content they choose to access. Verizon Wireless may, in its discretion, elect not to carry certain types of content based on, among other things, ratings and prevailing industry practices.
- B. Content Standard for Content That is Not Rated - Content in this category has not been rated. However, content management tools, such as parental controls and service blocks, are available in connection with the distribution of this content to enable customers to limit or restrict access to the content. Examples of content in this category include unrated wallpaper and ringtones distributed through Verizon Wireless' Get It Now platform.

Verizon Wireless will encourage its content providers to rate content they seek to distribute over a Verizon Wireless-branded distribution platform. If, however, the content is not rated, Verizon Wireless will not distribute any such content unless it complies with the requirements contained in Category 1 above.

3. Content To Which Verizon Wireless, As A Network Provider, Provides Access:

Content in this category covers content that Verizon Wireless, in its role as a network provider, enables customers to access on the Internet, but which Verizon Wireless does not generate, own or control (e.g. content that a user accesses by browsing or searching). This content includes the vast range of content available on the Internet using mobile devices.

Content Standard for General Internet Content - The Internet is a free marketplace of ideas. Currently, there are no industry standards that apply to content on the Internet. However, Verizon Wireless offers content management tools to help customers establish appropriate controls regarding the content that is accessible to them from the Internet via their mobile devices. These tools include parental controls and service blocks.

Verizon Wireless' Short Code Messaging Content Guidelines

Short code-based messaging campaigns vary widely. The following standards apply to the various categories of short code messaging.

- 1) Campaigns used to distribute content (e.g., wallpapers, ringtones, games, videos, jokes, horoscopes, alerts, etc.) to customers of Verizon Wireless must comply with Verizon Wireless' General Content Guidelines.
- 2) Campaigns used to advertise, promote or market companies, goods or services (e.g., coupons, offers, brand awareness, marketing-oriented sweepstakes and contests, etc.) to customers of Verizon Wireless must comply with Verizon's Advertising Content Guidelines.
- 3) Campaigns used to provide services that enable posting or transmission of user-generated content (e.g., chat or flirt programs, communities, bulletin boards, blogs, photo or video portals, social networks, etc.) by customers of Verizon Wireless must comply with Verizon's User Generated Content Guidelines.

All other campaigns, including campaigns of political and advocacy groups, will be governed by the policy set forth in the letter of Lowell C. McAdam, President and Chief Executive Officer of Verizon Wireless, to The Honorable John D. Dingell dated September 28, 2007. Under that policy, Verizon Wireless will provide short code-based messaging services to any group that is delivering legal content to customers who affirmatively indicate that they desire to receive such content.

All short code-based messaging campaigns provided to customers of Verizon Wireless must comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.).

Verizon Business' Content Guidelines

As a network provider, Verizon Business provides business, government and wholesale customers with access to the Internet and, through it, to services and content which Verizon Business does not own, develop or control.

Verizon Business respects freedom of expression and our customers' ability to freely access and disseminate the lawful content of their choosing in a manner that respects others' use of the network and that complies with the law.

All use of Verizon Business' Internet Services and related equipment and facilities must comply with Verizon Business' Acceptable Use Policy, available online at <http://www.verizonbusiness.com/terms>.

Verizon's User Generated Content Guidelines

These guidelines apply to services that enable the posting or transmission of content that users generate (e.g., chat or flirt programs, communities, bulletin boards, blogs, photo or video portals, social networks, etc.); in other words, "User Generated Content Services" or "UGC Services." These guidelines apply to UGC Services hosted by others but offered on a Verizon-branded content platform (Section I), and to UGC Services that are hosted by or on behalf of Verizon (Section II).

1. User Generated Content Services Provided by A Third Party on a Verizon-Branded Content Platform.

A third party User Generated Content Service appearing on a Verizon-branded content platform must comply with the law and have in place a set of sound practices which incorporate safeguards aimed at protecting users of the services from abuse, fraud and other inappropriate conduct or activities. These safeguards should, in particular, protect children and adolescents from predators and inappropriate content.

Sound practices may evolve over time, but third party UGC Service policies under this category should include, at a minimum, the following:¹

- Prominent disclosure of the existence and nature of the safeguards on or through the provider's delivery platform (e.g., websites and other applications);
- Assurances that relevant business practices conform to the disclosures made about the safeguards;
- Processes to accept complaints from users of the services about nudity, pornography, harassment, unwelcome contact, fraud or other inappropriate conduct or activity via hyperlinks prominently placed throughout the provider's delivery platforms or other complaint reporting mechanisms; and
- Processes to immediately (within 24 hours) acknowledge receipt of a complaint about inappropriate conduct or activity and promptly (within three business days) provide an explanation to the complainant of the steps taken to address the complaint.

While the above sound practices represent the minimum basic elements that UGC Service providers should include in their practices, such providers can and should have additional requirements that are customized to the unique characteristics of their individual services.

Additionally, third party hosted UGC Services should adopt policies and practices to ensure compliance with the law, including appropriate notice and take-down procedures for unlawful content.

¹ These requirements are consistent with evolving industry standards, such as those adopted by Facebook. See "Facebook Content Code of Conduct," <http://register.facebook.com/codeofconduct.php>, and "Facebook Terms of Service," <http://www.facebook.com/terms.php>.

User Generated Content Services in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.). These guidelines apply to any User Generated Content Services that will be included on Verizon-branded content platforms as well as to short code-based messaging campaigns that will be used to provide such services.

2. User Generated Content Services Verizon Hosts Or User Generated Content Services Hosted On Verizon's Behalf.

UGC Services offered and hosted by Verizon or that are hosted by a third party on Verizon's behalf must comply with the minimum sound practices referenced in Section 1 above.

Hosted UGC Services in this category generally fall into two groups: those that are "open" (e.g., publicly accessible) and those that are "closed" (e.g., not publicly accessible). Verizon supports the use of proactive controls on "open" UGC Services, where they are commercially available, to help identify and protect against user generated content that is offensive or unlawful, or content that fails to comply with the UGC Service's terms of use or acceptable use policy. For "closed" communities or sites, Verizon generally will not provide (or require others to provide) proactive controls.

Verizon will provide an acceptable use policy for its UGC Services that is consistent with Verizon's Guiding Principles for Content, and all users will be required to comply with the policy as a condition of their continued use of Verizon's UGC Services.

In all cases, UGC Services that Verizon offers will comply with the law, including applicable notice and take-down requirements for unlawful content.

User Generated Content Services in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.).

Verizon's Advertising Content Guidelines

These advertising guidelines apply to third party advertisements, which appear on Verizon-branded websites or platforms and are part of a Verizon-controlled advertising inventory ("Advertisements" or "Advertising"). These guidelines also apply to short-code based messaging campaigns that advertise or promote companies, goods or services (e.g., coupons, offers, brand awareness, marketing-oriented sweepstakes or contests, etc.). These guidelines do not apply to advertising that may appear on a non-Verizon website, or on a Verizon-branded website or platform where Verizon does not control the advertising inventory.

Verizon maintains an advertising review group that examines Advertising for compliance with these guidelines. Wherever practicable, Verizon's advertising review group will review Advertising prior to publication.

Verizon may reject Advertisements which it believes are misleading, inaccurate, or which make fraudulent or unfair competitive claims. Verizon may also reject Advertisements which, in our judgment, make insufficiently supported claims or claims that distort the true meaning or practical application of statements made by the advertiser. Advertisements may not contain material that is patently offensive or which violates the law (e.g., libel, copyright, trademark, right of privacy, etc.). Additionally, Verizon may reject Advertisements which fail to comply with Verizon's standards of decency and good taste.

All Advertisements must comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Standards, etc.). All Advertising should also comply with applicable advertising standards adopted by various associations for specific products and services such as the advertising guidelines adopted by the Distilled Spirits Council of the United States and the Children's Advertising Review Unit of the Council of Better Business Bureaus.

Verizon's Advertising Content Guidelines are based on industry practices and do not purport to include an exhaustive list of all types of Advertising Verizon would find objectionable. As part of Verizon's commitment to provide the highest quality services and experience to its customers, Verizon will not accept certain types of Advertising. For example, in addition to the foregoing, Advertisements may not contain any material that Verizon, in its discretion, deems to fall into the following categories or that links to such material:²

- Anything that is obscene or indecent or that contains strong sexual, explicit or erotic themes; or

² The bulleted restrictions are based on similar restrictions in the publicly available advertising guidelines of Google and The New York Times.

- Products or sites depicting or providing how-to materials about pedophilia or other non-consensual contact; or
- Products or sites that suggest the availability of prostitution services; or
- Products or sites that advocate, glorify or promote rape, torture, cannibalism, suffering or death; or
- Individuals seeking to adopt children or who offer children for adoption; or
- Products that descramble cable or satellite signals in order to get free services; or
- Products that promote software or techniques that bypass copyright protections; or
- Counterfeit, fake or bootleg products or replicas or imitations of designer products; or
- Promotes nudity, nude beaches or naked cruises or resorts; or
- Products or sites that appear to facilitate or promote the evasion of laws (e.g., radar detectors, etc.); or
- Products made from endangered species; or
- Products or sites that offer fake identification or falsified documentation; or
- Promotes the sale of firearms or ammunition by mail order or at gun shows; or
- Products or sites that have online gambling as a central theme; or
- Promotes services, contests or games that predict winners of races or sporting events; or
- Trivializes historic events such as the Holocaust, the Irish Famine or September 11th; or
- Hunting trips that guarantee animals will be available for kill; or
- Multilevel marketing schemes; or
- Organ transplant services; or
- Products or sites that guarantee credit repair or credit cards; or
- Products or sites of questionable legality (e.g., miracle cures, etc.); or
- Escort services or “strip” clubs; or
- Hate speech; or
- Excessive violence; or
- Defamatory, libelous or threatening sites; or
- Extreme profanity; or
- Depicts, promotes or is designed to facilitate alcohol abuse, illegal drug use or use of tobacco products.

Verizon reserves the right to reject Advertisements that promote competitors of Verizon and Advertisements that harm Verizon’s brand or public image.

If Advertisements contain statements or illustrations that are not deemed acceptable and that Verizon thinks should be changed or eliminated, Verizon may, at its election, notify the advertiser. Verizon may attempt to negotiate changes to the Advertisements with the advertiser, but is not obligated to do so.



For information about industry standards, visit:

CTIA CONSUMER CODE:

www.ctia.org/content/index.cfm/AID/10352

CTIA CONTENT GUIDELINES:

www.ctia.org/advocacy/policy_topics/topic.cfm/TID/36

MOBILE MARKETING ASSOCIATION'S BEST PRACTICES:

www.mmaglobal.com/bestpractices.pdf

CHILDREN'S ADVERTISING REVIEW UNIT OF THE COUNCIL OF BETTER BUSINESS BUREAUS:

www.caru.org/guidelines

To download an informal brochure describing Verizon's Content Policies, visit:

verizon.com/contentpolicy

Verizon Communications Inc. (NYSE: VZ), headquartered in New York, is a leader in delivering broadband and other wireline and wireless communication innovations to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving nearly 66 million customers nationwide. Verizon's Wireline operations include Verizon Business, which delivers innovative and seamless business solutions to customers around the world, and Verizon Telecom, which brings customers the benefits of converged communications, information and entertainment services over the nation's most advanced fiber-optic network.

A Dow 30 company, Verizon employs a diverse workforce of nearly 235,000 and last year generated consolidated operating revenues of \$93.5 billion.

For more information about Verizon, please visit:

verizon.com

Mary Louise Weber
Assistant General Counsel



Verizon Communications Inc.
One Verizon Way, Rm VC54S440
Basking Ridge, New Jersey 07920
Phone 908-559-5636
Fax 908-696-2067
mary.l.weber@verizon.com

November 21, 2008

By Federal Express

Jonas Kron
Senior Social Research Analyst
Trillium Asset Management Corporation
711 Atlantic Avenue
Boston, MA 02111-2809

Dear Mr. Kron:

I am writing to acknowledge receipt on November 17, 2008 of the shareholder proposal submitted by Trillium Asset Management Corporation ("Trillium") on behalf of its clients who are beneficial owners of Verizon Communications Inc. common stock (the "Proponents") for inclusion in the proxy statement for the 2009 Verizon Communications Inc. annual meeting of shareholders.

Under the Securities and Exchange Commission's (SEC) proxy rules, in order to be eligible to submit a proposal for the 2009 annual meeting, the proponent must have continuously held at least \$2,000 in market value, or 1%, of Verizon's common stock for at least one year prior to the date that the proponent submits the proposal. In addition, the proponent must continue to hold at least this amount of the stock through the date of the annual meeting. The proposal, including any accompanying supporting statement, may not exceed 500 words. For your reference, I have attached a copy of the SEC's proxy rules relating to shareholder proposals.

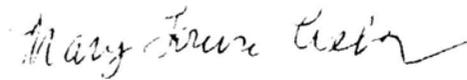
Please provide us with the name(s) of the Proponents whom you represent, together with a written statement from each Proponent authorizing you to act on such Proponent's behalf with respect to the submission of the proposal. In addition, please provide a written statement from the record holder of each Proponent's securities verifying that, at the time the Proponent submitted the proposal, the Proponent had continuously held the requisite number of shares of

Verizon common stock for at least one year. The SEC rules require that this documentation be postmarked or transmitted electronically to us no later than 14 days from the date you receive this letter.

Once we receive this documentation, we will be in a position to determine whether the proposal is eligible for inclusion in the proxy statement for the Verizon 2009 annual meeting.

Please do not hesitate to contact me if you have any questions.

Kind regards,

A handwritten signature in cursive script, appearing to read "Mary Louise Weber".

Mary Louise Weber

Enclosures

cc: Marianne Drost

PO Box 628290 Orlando Florida 32862-8290

November 26, 2008

Mary Louise Weber
Assistant General Counsel
Verizon Communications, Inc.
One Verizon Way, RM VC54S440
Basking Ridge, NJ 07920

Re: Richard Ames/Schwab Account

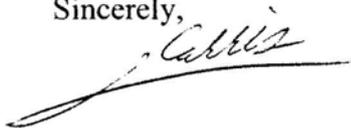
Dear Ms. Weber

This letter is to confirm that Charles Schwab & Company holds as custodian for the above account more than \$2,000 (two thousand dollars) worth of common stock in Verizon Communications, Inc. (VZ) These shares have been held continuously for at least one year prior to and through November 17, 2008.

The shares are held at Depository Trust Company under the Nominee name of Charles Schwab and Company, Inc.

This letter serves as confirmation that the account holder listed above is the beneficial owner of the above referenced stock.

Sincerely,



Jake Carris