



One Verizon Way  
Mailcode: VC34E251  
Basking Ridge, NJ 07920

**Cliff Feldman**  
Executive Director  
Benefits

November 30, 2009

Office of Health Plan Standards and Compliance Assistance  
Employee Benefits Security Administration, Room N-5653  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington, D.C. 2010

Attention: Regulatory Information Number 1210-AB27

Verizon Communications appreciates the opportunity to comment on the Request for Information on Title I of the Genetic Information Nondiscrimination Act of 2008 (GINA). This letter expresses our concerns about the adverse impact of the interim final rules on employer-sponsored wellness and disease management programs and requests that you rescind the regulations.

As a large employer with a covered population of more than 900,000 employees, retirees and dependents, we believe that allowing family medical history to be provided on a voluntary basis is critical in helping to identify potential health risks for them. Knowing and making individuals aware of potential health risks allows for proactive measures to be taken via preventive care, health screenings and early detection. These measures can enhance their quality of life and even extend life expectancy.

Verizon has stringent safeguards to protect the privacy of our covered population and does not have access or knowledge of information voluntarily shared on a confidential health assessment. Our health and wellness initiatives, including free electronic personal health records and online health risk assessments, help individuals get additional value from their healthcare coverage through services, tools and resources to foster awareness and allow proactive management of their health. These tools and resources are jeopardized by the proposed interim final rules on employer-sponsored wellness and disease management programs

Verizon's goal is to offer access to affordable health plan options that offer meaningful choices for our employees. We respectfully request that you rescind those provisions that would prevent our covered population from maximizing the value of the benefits available to them.

Sincerely,

CF/tg

CC: The Honorable Timothy Geithner  
Robert Kocher, MD  
The Honorable Kathleen Sebelius  
Ezekiel Emanuel, MD  
The Honorable Hilda Solis  
Stuart J. Ishimaru



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Executive Director - Benefits

November 30, 2009

Mr. Stephen Llewellyn, Executive Director  
Executive Secretariat  
Equal Employment Opportunity Commission  
131 Main Street Northeast, Suite 6NE03F  
Washington, D.C. 20507

Dear Mr. Llewellyn,

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Sincerely,

A handwritten signature in black ink, appearing to read "Cliff Feldman".

CF/tg

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