



**Brandon N. Egren
Associate General Counsel &
Assistant Secretary**

December 1, 2021

Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Potential Technical Changes to EDGAR Filer Access and Filer Account Management Processes, Release Nos. 33-10993; 34-93204; 39-2541; IC-34392; SEC File No. S7-12-21

Dear Ms. Countryman:

Verizon Communications Inc. (“Verizon” or “we”) appreciates the opportunity to provide comments to the U.S. Securities and Exchange Commission (the “Commission”) on the proposed technical changes to the Commission’s Electronic Data Gathering, Analysis, and Retrieval system (“EDGAR”) filer access and filer account management processes (the “Potential Access Changes”). While we applaud the Commission’s objectives of enhancing the security of EDGAR, improving the ability of filers to securely maintain access to their EDGAR accounts, facilitating the responsible management of EDGAR credentials, and simplifying procedures for accessing EDGAR, we would like to express some concerns regarding the potential logistical effects of the Potential Access Changes on Verizon and, more specifically, our directors and executive officers, in the context of filings pursuant to Section 16(a) of the Securities Exchange Act of 1934, as amended.

Verizon, like many issuers, prepares and files Section 16 reports on behalf of its directors and executive officers (collectively, “Section 16 D&Os”) pursuant to authority delegated by powers of attorney. We have an onboarding process for new Section 16 D&Os that includes, among other things, a description of the legal requirements applicable to Section 16 D&Os; a request to provide an existing central index key (“CIK”) and CIK confirmation code (“CCC”), if applicable, or alternatively, a solicitation for a request to obtain a new CIK and CCC; and a request for a power of attorney. Once this process is complete, and we have a CIK, CCC, and power of attorney for a Section 16 D&O, under the current framework, we are able to prepare and file Section 16 reports more or less indefinitely, without any further action required by the Section 16 D&O.

This aspect of the current EDGAR system and process is useful, valuable, and practical for our Section 16 D&Os because it creates a clear delineation of responsibility for the preparation and filing of their Section 16 reports with respect to their beneficial ownership of Verizon equity securities; while the legal obligation to file these reports ultimately rests with the Section 16 D&Os, once they have delegated authority to an issuer such as Verizon, they can, and should, have confidence that the issuer is able to fulfill that responsibility fully independently. We are concerned by the prospect of having to go back to our Section 16 D&Os to ask them to take further actions, seek further permissions or re-authorizations, or confirm

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permissions, after we already have their filing credentials and authorization to prepare and file reports on their behalf, particularly to the extent that any challenges arising from the implementation of the Potential Access Changes were to prevent Verizon from making timely filings after a Section 16 D&O has delegated authority to Verizon. We are likewise concerned by the prospect of having to rely on a third-party administrator to grant us access during any transition period, particularly in the case of a Section 16 D&O whose CIK and CCC were not obtained by us, since a number of our Section 16 D&Os file reports at multiple issuers. This would be impractical for us and our Section 16 D&Os and would present significant logistical concerns.

Once again, we appreciate the opportunity to provide comments on the Potential Access Changes. We would be happy to provide you with further information to the extent you would find it useful.

Respectfully submitted,

A handwritten signature in cursive script that reads "Brandon Egren".

Brandon N. Egren