

**Bell Atlantic Network Services, Inc.**  
1320 North Court House Road  
8th Floor  
Arlington, Virginia 22201  
703 974-8450 - Telephone No.  
703-974-0783 - Facsimile

**Sarah B. Deutsch**  
Vice President and Chief Intellectual Property Counsel

May 5, 2000

**VIA CERTIFIED MAIL -  
RETURN RECEIPT REQUEST  
AND EMAIL**

EMAIL ADDRESS: emmanuel@2600.com

Mr. Emmanuel Goldstein  
2600 Enterprises  
P.O. Box 848  
Middle Island, NY 11953

RE: Unauthorized Use of the Verizon Name and Mark in the Domain Names  
VERIZONREALLYSUCKS.COM

Dear Mr. Goldstein:

I represent Bell Atlantic Corporation (hereinafter "Bell Atlantic") and its subsidiaries, which own the rights to use the BELL and BELL ATLANTIC trademarks. Bell Atlantic owns the "VERIZON" trade mark and service mark. It has recently come to my attention that you have registered the domain name VERIZONREALLYSUCKS.COM incorporating the "VERIZON" mark referenced above. This letter is to inform you that your registration and/or use of these domain names infringes Bell Atlantic's valuable trademark rights in the "Verizon" mark and violates the new Anticybersquatting Consumer Protection Act (the "Anticybersquatting Act").

Accordingly, unless you immediately agree to take the steps set forth below, including ceasing any use of the "Verizon" and "Bell Atlantic" marks and transferring the domain name VERIZONREALLYSUCKS.COM to Bell Atlantic, Bell Atlantic intends to proceed under the federal Trademark Act, including the Anticybersquatting Act, by filing suit to protect its rights in federal court.

Bell Atlantic is the exclusive owner of the "VERIZON" mark and name and has licensed the "VERIZON" mark and name to a wireless telecommunications company named "Verizon Wireless" that combines the U.S. wireless properties of Bell Atlantic and Vodafone AirTouch. "Verizon Wireless" –the country's largest wireless communications provider commenced business earlier this month, and has been the subject of an intensive media campaign including television, radio and print advertising. Bell Atlantic has also announced, on the Web site [www.verizon.com](http://www.verizon.com) that, pending FCC approval, "Verizon" will become the name of the new company formed by its merger with GTE Corporation. Our client is investing substantial sums of money in promoting the "Verizon" brand and company. On behalf of Bell Atlantic, its agents have registered hundreds of domain names incorporating "Verizon" and variations thereof. Through these efforts, "Verizon" is rapidly becoming famous nationwide, and the public is already associating this name and mark exclusively with our client and the telecommunications services that it offers. In short, such use and/or registration by your company constitutes acts of trademark infringement, unfair competition and dilution in violation of Sections 32(a), 43(a) and 43(c) of the federal Trademark Act, 15 U.S.C. §§1114, 1125(a) and (c).

Moreover, your registration and/or use of the domain name VERIZONREALLY SUCKS.COM also violates the new Anticybersquatting Consumer Protection Act, enacted into law on November 29, 1999, and codified in Section 43 (d) of the federal Trademark Act, 15 U.S.C. § 1125 (d). This new legislation makes explicit what has been implicit in the federal Trademark Act: it expressly prohibits the registration of a domain name confusingly similar to or dilutive of a mark. Specifically, this new law makes illegal the bad faith misappropriation of trademarks as domain names. Relief available under this law may include forfeiture of an infringer's domain name, transfer of that name to the rightful trademark owner, and awards of actual damages, statutory damages of up to \$100,000 per domain name, costs and attorneys fees.

Bell Atlantic would like to resolve this matter amicably, without resort to litigation, but only if you immediately comply with Bell Atlantic's demands. By no later than **May 22, 2000**, please (1) complete and return to my attention, by overnight mail, the enclosed form, fully completed, signed and notarized, transferring the domain name VERIZONREALLYSUCKS.COM to Bell Atlantic; and (2) verify in writing that you will permanently cease, and refrain from all future use of, the mark "Verizon" or any mark or name confusingly similar thereto, whether as a domain name, company name, trademark or otherwise. If we do not hear from you by that date, Bell Atlantic will take all necessary actions to protect its valuable trademark rights.

Mr. Emmanuel Goldstein

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May 5, 2000

Nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by Bell Atlantic. Bell Atlantic expressly reserves all rights and remedies under all applicable federal and state laws.

Sincerely,

Sarah B. Deutsch  
Vice President and Chief  
Intellectual Property Counsel

Enclosures

bcc: TAC members