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October 20, 2014

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC for Competitive Classification Of all Retail Services In Certain Geographic Areas, And For A Waiver Of Regulations For Competitive Services – Docket Nos. P-2014-2446303 and P-2014-2446304

Dear Rosemary Chiavetta:

Enclosed for electronic filing please find Full Service Network's Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Certificate of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Full Service Network's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

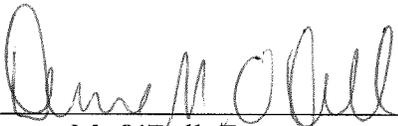
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Date: Oct. 20, 2014



Deanne M. O'Dell, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Verizon Pennsylvania LLC :
and Verizon North LLC for Competitive :
Classification Of all Retail Services In Certain : Docket No. P-2014-2446303
Geographic Areas, And For A Waiver Of : P-2014-2446304
Regulations For Competitive Services :
:

PETITION TO INTERVENE OF FULL SERVICE NETWORK LP

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the public notice published in the Pennsylvania Bulletin on October 11, 2014 (44 Pa.B. 6643), Full Service Network LP (“FSN”) petitions to intervene in this proceeding involving the Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC (collectively “Verzion”) for Competitive Classification Of all Retail Services In Certain Geographic Areas, And For A Waiver Of Regulations For Competitive Services filed on October 6, 2014. In support of its intervention, FSN states as follows:

1. On October 6, 2014, Verizon filed a petition pursuant to 66 Pa. C.S. § 3016(a). As permitted by this section, Verizon is seeking a Commission determination that its retail services in the metropolitan areas of Philadelphia, Pittsburgh, Erie, Harrisburg/York and Scranton/Wilkes-Bare should be reclassified from noncompetitive (or protected) to competitive. Verizon is also seeking a waiver of certain regulations contained in Chapter 63 and 64 of the Pennsylvania Code as applied to competitive services in those areas.

2. Notice of the Petition was published in the *Pennsylvania Bulletin* on October 11, 2014. That notice required that formal protests, petitions to intervene and answers to the Petition be filed by October 21, 2014.

3. FSN is a Pennsylvania certificated competitive local exchange carrier (“CLEC”) and facilities-based interexchange carrier (“IXC”). FSN was created in Pittsburgh, Pennsylvania in 1989 as a long distance reseller serving only business accounts following the divestiture of AT&T. In 1999, FSN entered the local telecommunications market. Over time, FSN installed its own network facilities and expanded its corporate structure and today provides a complete range of services including long distance, toll-free service, internet and local telephone services. FSN is also a wholesale customer of Verizon that purchases services from Verizon at a wholesale discount and then resells them to FSN’s retail customers

4. FSN’s attorneys in this matter are:

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5. The Commission’s regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A “person” includes a corporation and an association. 52 Pa. Code § 1.8.

6. FSN meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). FSN is a jurisdictional telecommunications provider and a wholesale customer of Verizon. Thus, FSN has interests that will be directly affected by this proceeding. To the extent Verizon is

granted waivers of Commission regulations which are also applicable to FSN but for which FSN is not also granted a waiver can create a competitive disadvantage. Further, the ability of FSN to continue to resell Verizon's services at the wholesale discount could be specifically and substantially affected by the outcome of this proceeding.

7. FSN's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including other individual telecommunications carriers or other organizations interested in telecommunications in Pennsylvania in general and in Verizon's service territory in particular.

8. FSN will be bound by the action of the Commission in this proceeding to the extent it impacts FSN's ability to resell services or results in other competitive disadvantages as a result of granting waivers of Commission regulations only for Verizon and not other similarly situated regulated telecommunications carriers.

9. FSN's intervention is in the public interest. FSN's participation will enable it to contribute the unique perspectives and insights of a Pennsylvania based telecommunications carrier that has been participating in the Pennsylvania market since 1988. It should also be noted that FSN has been an active participant in many telecommunications proceedings over the years.

10. Due to the early stage of this proceeding, FSN reserves the right to raise and address issues identified through its continued review and analysis of Verizon's Petition (and related information), or other issues raised by other parties.

WHEREFORE, FSN respectfully requests that the Commission grant its Petition to Intervene.

Respectfully submitted,



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Date: October 20, 2014

Attorneys for Full Service Network LP