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October 21, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. 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 Secretary Chiavetta:

Enclosed for filing on behalf of the Pennsylvania Telephone Association is its Petition to Intervene in the above-referenced proceeding. Copies of the Petition are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Encl.

cc: Certificate of Service (w/encl.)
Steve Samara (w/encl.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Verizon Pennsylvania LLC	:	
and Verizon North LLC for Competitive	:	Docket Nos. P-2014-2446303
Classification of All Retail Services in	:	P-2014-2446304
Certain Geographic Areas, and for a Waiver	:	
of Regulations for Competitive Services	:	

**PETITION TO INTERVENE
OF THE
PENNSYLVANIA TELEPHONE ASSOCIATION**

AND NOW, comes the Pennsylvania Telephone Association (“PTA” or “Petitioner”), on behalf of its member companies,¹ by its attorneys, and pursuant to 52 Pa. Code § 5.71 *et seq.*, petitions the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding. In support of its intervention, the PTA states as follows:

I. INTRODUCTION

1. The name, business address, and telephone number of Petitioner are:

Pennsylvania Telephone Association
30 N. Third Street, Suite 300
Harrisburg, PA 17101
Tel: 717.238.8311

¹ The Pennsylvania Telephone Association is the representative of the following member companies for purposes of this proceeding: Armstrong Telephone Company – Pennsylvania; Armstrong Telephone Company – North; Citizens Telephone Company of Kecksburg; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Consolidated Communications of Pennsylvania Company; FairPoint Communications/Bentleyville Telephone Company; FairPoint Communications/Marianna and Scenery Hill Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Oswayo River, LLC; Frontier Communications of Pennsylvania, LLC; Hancock Telephone Company; Hickory Telephone Company; Ironton Telephone Company; Lackawaxen Telecommunications Services; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; North Penn Telephone Company; Palmerton Telephone Company; Pennsylvania Telephone Company; Pymatuning Independent Telephone Company; South Canaan Telephone Company; TDS Telecom/Deposit Telephone Company; TDS Telecom/Mahanoy & Mahantango Telephone Company; TDS Telecom/Sugar Valley Telephone Company; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Venus Telephone Corporation; West Side Telephone Company; Windstream Buffalo Valley, Inc.; Windstream Conestoga, Inc.; Windstream D&E, Inc.; Windstream Pennsylvania, LLC; and Yukon-Waltz Telephone Company.

2. The PTA is the state's oldest trade organization for the local exchange carrier industry. The PTA represents more than 30 telecommunications companies that provide a full array of services over wire line networks. The PTA member companies are identified in footnote 1, *supra*.

3. The name, address, and contact information of Petitioner's counsel are:

Charles E. Thomas III, Esq.
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All pleadings, documents, correspondence, orders, notices, discovery, and other items filed, served, or issued in this proceeding should be served on the above counsel in both electric and paper form.

4. On October 6, 2014, Verizon Pennsylvania LLC and Verizon North LLC (collectively, "Verizon") filed a Joint Petition pursuant to Section 3016 of the Public Utility Code, 66 Pa. C.S. § 3016, seeking a determination from the Commission that Verizon's retail services not currently classified as competitive should be reclassified to reflect competitive status in select metropolitan areas, *viz.* Philadelphia, Pittsburgh, Erie, Harrisburg/York, and Scranton/Wilkes-Barre. Verizon's Joint Petition also seeks a waiver certain Commission regulations found at 52 Pa. Code Chapters 63 and 64 as applied to competitive services in these geographic areas, specifically including Chapter 63, Subchapters B (Services and Facilities), C (Accounts and Records), E (Telephone Quality Service Standards), F (Extended Area Service),

G (Public Coin Telephone Service), and all of Chapter 64 (relating to the standards and billing practices for residential telephone service).

5. Notice of the filing of the Joint Petition was published in the *Pennsylvania Bulletin* on October 11, 2014. *See* 44 Pa.B. 6643. As presented in the published notice, petitions to intervene in the proceeding are to be filed with the Commission on or before October 21, 2014, and an initial prehearing conference has been scheduled for October 23, 2014 in Harrisburg before presiding Administrative Law Judge Joel Cheskis.²

6. The Commission's regulations permit intervention by a party that demonstrates an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitions may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2). Intervention is also allowed where a party's participation is in the public interest. 52 Pa. Code § 5.72(a)(3).

II. PTA'S INTERVENTION

7. The PTA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As the trade organization representing more than 30 incumbent local exchange carriers, the PTA has a direct and substantial interest in this proceeding, particularly with respect to the reclassification of retail protected and non-competitive services and the requested waiver of specific Commission regulations relative to telephone service, standards, and billing practices. Specifically, the PTA has a vested interest in the interplay between the legal ramifications of a potential waiver of the Commission's traditional telephone service rules and regulations and the provisions of Title 66 of the Public Utility Code, including, but not limited to, Section 1501, 66 Pa. C.S. § 1501.

² Contemporaneously with the filing of this Petition to Intervene, the PTA is submitting a Prehearing Conference Memorandum addressing the matters set forth in the Prehearing Conference Order, dated October 9, 2014.

8. The PTA's interests are unique from and will not be adequately represented by other existing parties' involvement. The Commission's disposition of Verizon's Joint Petition potentially establishes legal precedent regarding competitive classification under Section 3016, the Commission's existing regulations, and the scope of Section 1501 of the Public Utility Code. The PTA's intervention, therefore, is necessary because its own member companies' ability to compete within their respective service territories could be materially influenced by the outcome of this proceeding.

9. The PTA's intervention is also in the public interest. The PTA's participation will be helpful in developing a record on the reasonableness of Verizon's requests for competitive reclassification in select geographic areas and waivers of specific Chapter 63 and 64 rules and regulations. The legal issues raised by Verizon's Joint Petition and the potential ramifications of any Commission resolution of those issues could directly and adversely impact other incumbent local exchange carriers in the Commonwealth. Moreover, because the PTA's interests are not adequately represented by existing participants, the PTA and its member companies, without the opportunity to intervene, will be unable to potentially provide input to the Commission and to otherwise participate in this proceeding, but nevertheless could be bound by the actions taken by the Commission. Such actions may have a material impact on the PTA member companies' telecommunications services, operations, and business activities throughout the Commonwealth.

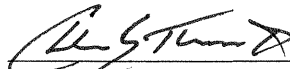
III. PTA'S POSITION REGARDING THE ISSUES

10. Due to the initial stage of this proceeding, it is not possible for the PTA to present its position on the matters presented in Verizon's Joint Petition. The PTA is presently reviewing and analyzing the filing and accompanying testimony and reserves the right to present its position and address any appropriate issues in accordance with the litigation schedule established

at the initial prehearing conference.

WHEREFORE, the Pennsylvania Telephone Association respectfully requests that the Pennsylvania Public Utility Commission grant this Petition and authorize its intervention and participation in the above-captioned proceedings as a full and active party.

Respectfully submitted,



Charles E. Thomas, III, Esq. (PA ID # 201014)

Thomas T. Niesen, Esq. (PA ID # 31379)

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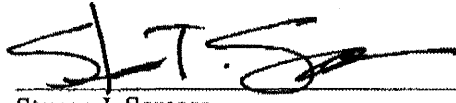
Pennsylvania Telephone Association

DATED: October 21, 2014

VERIFICATION

I, Steven J. Samara, President of the Pennsylvania Telephone Association, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: October 21, 2014



Steven J. Samara

Joint Petition of Verizon Pennsylvania LLC and :
Verizon North LLC for Competitive : Docket Nos. P-2014-2446303
Classification of All Retail Services in Certain : P-2014-2446304
Geographic Areas, and for a Waiver of :
Regulations for Competitive Services :

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of October, 2014, served a true and correct copy of the foregoing Petition to Intervene of the Pennsylvania Telephone Association, upon the persons listed below by e-mail and first class mail, postage prepaid:

Honorable Joel H. Cheskis
Administrative Law Judge
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