

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Petition of Verizon Pennsylvania LLC and</b>	<b>:</b>	
<b>Verizon North LLC for Competitive Classification</b>	<b>:</b>	<b>P-2014-2446303</b>
<b>Of All Retail Services In Certain Geographic Areas,</b>	<b>:</b>	<b>P-2014-2446304</b>
<b>And For A Waiver Of Regulations For Competitive</b>	<b>:</b>	
<b>Services</b>	<b>:</b>	

---

**OFFICE OF SMALL BUSINESS ADVOCATE  
PREHEARING MEMORANDUM**

---

**I. INTRODUCTION**

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence as follows:

Steven C. Gray, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[sgray@pa.gov](mailto:sgray@pa.gov)

## **II. FILING BACKGROUND**

On October 6, 2014, Verizon Pennsylvania and Verizon North (collectively Verizon or “the Companies”) filed separate Petitions with the Commission seeking to declare as competitive, pursuant to Section 3016(a) of the Public Utility Code, all protected or noncompetitive retail services offered by Verizon within their various service regions.

The Petitions also requested waivers of Commission regulations for competitive services.

## **III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES**

At the time of this writing, the OSBA has not assigned an expert witness to this proceeding. If the OSBA does obtain the services of an expert witness, the OSBA will immediately inform the Administrative Law Judge and the parties.

After a preliminary review of the Petitions, the OSBA will focus on the following issues:

1. Whether there is sufficient evidence of competition in the specific Verizon service territories to grant the Companies’ request that all protected and noncompetitive retail services be declared competitive.
2. Whether the Companies have conformed to the requirements of their respective Chapter 30 Plans, and whether those Chapter 30 Plans will require amendment if the Petitions are approved.
3. Whether Verizon’s small business customers will require special notice and education if the Petitions are approved.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

The OSBA will participate in this case to assure that the interests of small business customers of Verizon are adequately represented and protected.

**IV. SERVICE OF DOCUMENTS**

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail only is not sufficient.

**V. SETTLEMENT**

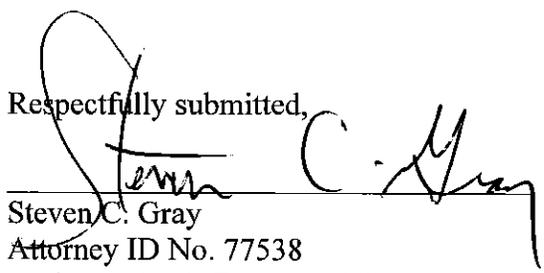
The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

**VI. HEARING AND BRIEFING SCHEDULE**

At the time of this writing, the OSBA believes that the parties can develop a procedural schedule prior to the prehearing conference.

In light of budget constraints, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,

  
Steven C. Gray  
Attorney ID No. 77538  
Assistant Small Business Advocate

For:

John R. Evans  
Small Business Advocate

Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
Dated: October 20, 2014