

Richard Simpson
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October 21, 2014

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
RE:
P-2014-2446303
P-2014-2446304

Dear Secretary Chiavetta:

After a review of Verizon's petition for competitive classification, the PBFAA has some fundamental concerns on the request of declassification. We are in agreement with Verizon's forward looking position however to ensure the Pennsylvania consumer is protected, our suggestion is to review the entire process and developing a model communication plan agreeable to all parties.

There are some technical concerns Verizon neglected to address related to VOIP and Managed Network services in the filing. Our members companies are active in the development of building and fire life safety codes both residential and commercial. VOIP services do not meet the minimum requirements of the National Fire Alarm Code (NFPA 72) for either residential or commercial establishments. The current offerings for FIOS will not meet the 24 hour requirement for backup power. This requirement will be mandatory effective 2016. The Pennsylvania commercial will be held accountable by the insurer yet there is no communication provider with a satisfactory solution to meet this minimum requirement.

We urge the commission to review the petition with a focus on a complete revision and not allowing a short term correction.

Sincerely,

[Your Name]
[Title]

Enclosure

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