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October 23, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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 please find Verizon's Answer to AT&T's Petition to Intervene, being filed by Verizon Pennsylvania LLC and Verizon North LLC (together, "Verizon") in the above referenced dockets.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva".

Suzan D. Paiva

SDP/slb
Enc.

Via E-Mail and Hand Delivery
cc: The Honorable Joel H. Cheskis

Via E-Mail and First Class U.S. Mail
cc: Attached Certificate of Service

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon's Answer to AT&T's Petition to Intervene, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 23rd day of October, 2014.

VIA E-MAIL AND FIRST CLASS U.S. MAIL

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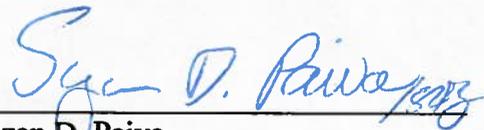
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Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

VERIZON'S ANSWER TO AT&T'S PETITION TO INTERVENE

Verizon Pennsylvania LLC and Verizon North LLC ("Verizon"), pursuant to 52 Pa. Code § 5.66, answer the petition to intervene filed by AT&T Corp and Teleport Communications America, LLC ("AT&T"). Verizon does not object to AT&T's participation in this case relating to the issues that are before the Commission (namely, whether Verizon has met the standard for competitive reclassification under 66 Pa.C.S. § 3016(a) and whether the regulations at issue should be waived). However, Verizon objects to AT&T's attempt to insert originating switched access rates to complicate this statutorily expedited proceeding. AT&T should be precluded from raising the issue of originating access rates for the following reasons:

1. Verizon did not propose in this petition to reclassify switched access services as competitive; thus, such services and their rates are not at issue here. If the Commission grants Verizon's petition, the regulatory status of Verizon's intrastate originating switched access service will not change.
2. AT&T has asked the Commission to address originating access charges. The Commission has declined, noting that "given that the FCC has indicated that it will embark on originating access reform in the near future, there is no compelling reason for

the Commission to ‘rush into the originating access reform breach’ at this time.”¹ In response to an October 3, 2013 Secretarial Letter requesting comment on the future of Docket No. C-20027195 in light of the FCC’s actions, AT&T on October 23, 2013 asked the Commission to keep the docket open and reduce Verizon’s originating rates. AT&T’s request remains open before the Commission, and AT&T may continue to pursue it. But that request has nothing to do with this petition, and the issues associated with it have no place here.

3. Insertion into this case of AT&T’s unrelated request for switched access rate reductions might require the recusal of the presiding officer, given that ALJ Cheskis appeared for many years as counsel to the Office of Consumer Advocate in the ongoing Verizon access charge investigation in which AT&T has also requested originating access reductions, *AT&T Communications of Pennsylvania, Inc. v. Verizon North, Inc. and Verizon Pennsylvania Inc.*, Docket No. C-20027195.

4. AT&T appears to be demanding originating access rate reductions as a condition of granting Verizon competitive classification for the services at issue. However, 66 Pa. C.S. § 3016(a) does not permit the imposition of conditions on competitive classification. It simply allows the Commission to “grant[]” or [deny[]” the request based on whether the petitioner has demonstrated “availability of like or substitute services or other business activities provided or offered by alternative service providers.” The introduction of evidence relating to originating switched access rates will needlessly complicate this case and burden the Commission’s resources in an expedited docket.

¹ *Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund*, Docket No. I-00040105 (Opinion and Order entered July 19, 2012) at 59.

WHEREFORE, Verizon respectfully requests that AT&T's participation be limited to the issues before the Commission in Verizon's petition and that AT&T not be permitted to raise the issue of originating access rates in this case. This limitation will not deprive AT&T of the opportunity to continue to advocate for originating access charge reductions in Docket No. C-20027195.

Respectfully submitted,



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Dated: October 23, 2014