

COMMONWEALTH OF PENNSYLVANIA



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June 4, 2015

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
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 No. P-2014-2446303; P-2014-2446304

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Comments Regarding Data  
Collection and Reporting Obligations, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Barrett C. Sheridan".

Barrett C. Sheridan  
Assistant Consumer Advocate  
PA Attorney I.D. # 61138

Enclosures

cc: Honorable Joel H. Cheskis  
Derek Vogelson, (TUS)  
Lenora Best, (BCS)  
Certificate of Service

193756

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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COMMENTS OF THE  
OFFICE OF CONSUMER ADVOCATE  
REGARDING DATA COLLECTION AND  
REPORTING OBLIGATIONS

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The Office of Consumer Advocate (OCA) submits these Comments in response to the Public Utility Commission's (PUC's or Commission's) March 4, 2015 Reclassification Order and May 20, 2015 Secretarial Letter regarding the appropriate scope and content of Verizon Pennsylvania LLC's and Verizon North LLC's (collectively Verizon) two year data reporting obligation. Through the Reclassification Order, the Commission granted 153 Verizon wire centers competitive classification for pricing, subject to data collection and reporting requirements. The Commission also conditionally waived all or part of certain regulations including but not limited to these related to quality of service, billing, suspension, terminations, and reporting requirements.

The Commission's grant of competitive classification and grant of waivers are both conditioned upon each Verizon Company's obligation to "collect and report annually, for a period of two years, data under two categories: (1) Affordability of Basic Service; and (2) Quality of Service as further directed by the Commission." Reclassification Order at 126,

Ordering ¶ 15. The Commission imposed these data collection and reporting conditions based in part upon consideration of the Commonwealth’s declared policy “[t]o maintain universal service at affordable rates.” *Id.* at 56. The Commission specifically committed to monitor “the potential impact of a competitive determination of basic local exchange service on the price of this service... on a going forward basis.” *Id.* The Commission continued, stating that “[f]or this reason, we intend to commence a collection of data *to aid in our assessment of the market conditions present in the aftermath of the competitive reclassification* that we permit to occur herein, including the impact of our decision, if any, on the affordability of basic local exchange service.” *Id.* (emphasis added). The Commission reiterated later in the Reclassification Order “On data collection, we will seek two years of data to help us and interested parties *assess the market conditions present in the 153 wire centers* determined to be competitive.” *Id.* at 104 (emphasis added). The final identification of the “specific data to be provided, form requirements, and schedule for the reporting of this data” is to be made by the Commission’s Technical Utilities Service, after input by interested parties. *Id.* at 127, Ordering ¶ 16. Similarly, the Commission granted a partial waiver of the Section 64.201 annual customer account information reporting requirement, but gave notice that Verizon may be requested to provide additional data to assist the Commission and interested parties in assessing the affordability of Verizon’s basic service in those competitively classified wire centers. *Id.* at 102; 52 Pa. Code § 64.201.

On May 20, 2015, the Commission issued a Secretarial Letter and links to an Excel Workbook template outlining the proposed data and information to be collected from Verizon during the two year window. Consistent with the Commission’s Reclassification Order, the May 20 Secretarial Letter invites parties to the Petition proceeding to comment “on the

specific data, form, and reporting schedules that we have compiled for inclusion in the Microsoft Excel workbook.” May 20 Secretarial Letter at 3.

On June 1, 2015, the Commission issued a Tentative Implementation Opinion and Order that sets forth a revision to Verizon’s Section 64.201 reporting obligations, in part narrowing the grant of waiver from the Reclassification Order and streamlining the information that Verizon must report pursuant to Section 64.201. These Commission revisions are directed at assuring that the Commission continues to receive relevant information from Verizon pertinent to the Commission’s regulatory responsibilities, pending the future rulemaking. However, the June 1 Tentative Order makes clear that “[t]he issue whether each Verizon Company must file a separate Section 64.201 or Section 64.201-like report, broken down by competitive versus noncompetitive wire centers, will be addressed by the Commission in an action implementing the data collection directive in Ordering Paragraph No. 15 and Ordering Paragraph No. 16 of the *Reclassification Order*.” June 1 Tentative Order at 9.

As set forth below, the OCA commends Commission staff for developing baseline information to be provided by Verizon as part of the two year reporting obligation. Critically, the OCA understands that Verizon’s two-year data collection and reporting obligation may overlap but is not constrained by those data collection and reporting requirements imposed by Commission regulations. The Commission’s conditional grant of competitive designation and conditional waiver or modification of certain regulatory obligations will undoubtedly impact Verizon consumers who purchase basic local service, whether on a stand-alone basis or as part of a bundle of services. While Verizon may price basic local service in the competitive exchanges at its discretion, the Public Utility Code, Verizon’s Chapter 30 Plan, and the Reclassification Order make clear that the affordability of service and preservation of universal service as well as

Verizon's obligation to provide reasonable and adequate quality of service to all consumers are unchanged. The OCA recommends that the Commission modify and broaden the scope of Verizon's two-year data collection and reporting requirements so that both the Commission and interested parties, including the OCA, have information available to fully assess the affordability and quality of service in each of the competitively classified wire centers, as well as how the market in those wire centers is developing.

## I. COMMENTS

### A. Introduction

Pursuant to the Reclassification Order, Commission Staff prepared templates in an Excel Workbook outlining the specific data and baseline information which Verizon Pennsylvania and Verizon North may be required to collect and report annually for a two-year period. The OCA supports these detailed data collection and reporting elements as the minimum to be covered by Verizon's two-year data collection and reporting obligation.

As discussed below, however, the OCA submits that the collection and reporting of data by wire center is necessary and consistent with the Commission's stated purposes for imposing this two-year data collection and reporting obligation upon Verizon, as conditions related to both the Commission's grant of competitive classification and waiver of certain regulations for five years, pending completion of a future rulemaking. "The Commission's analysis on availability of competing services was conducted on a per-wire center basis and required widespread availability of both cable telephony and wireless voice service in each wire center determined to be competitive." *Id.* at 62. Even in those wire centers classified as competitive, the Commission has recognized the need to monitor affordability, consistent with

the Commonwealth's declared policy to "[m]aintain universal telecommunications service at affordable rates." *Id.* at 56. Among the 153 wire centers, there are geographic and demographic differences. There are also differences in Verizon's own network to the home, whether copper or fiber, and differences in Verizon's maintenance and trouble report history. *Id.* at 43-48. Despite Verizon's position that service quality should be a function of the market and consumer expectations (*Id.* at 43), the Commission has emphasized that its authority under Section 1501 of the Public Utility Code to require Verizon to furnish and maintain "adequate, efficient, safe and reasonable service and facilities..." includes Verizon's competitively classified wire centers. *Id.* at 48; 66 Pa.C.S. § 1501. The OCA proposes that Verizon collect and report data related to the affordability, quality of service, and market for Verizon's basic service at the wire center level as necessary and consistent with the Reclassification Order.

B. Access Line Count Worksheets

1. Justification For The Baseline Information Proposed

The first worksheets require Verizon to report on a monthly basis "Access Line Count" related to the provision of "Basic Service" broken out between competitive and non-competitive wire centers and residential and business customer classes. The OCA supports this data collection obligation, as integral to assessing the affordability of service and development of the market in the competitive wire centers. The OCA submits that data for the residential and business rate classes and for both non-competitive and competitive wire exchanges is necessary to complement the other data and information which is proposed as part of Verizon's data collection and reporting obligation.

2. Additional Information And Detailed Data Collection Needed

The OCA submits that Verizon's collection and reporting of the monthly access line count data for basic service should be done on a more granular level by wire center, rather than only split between competitive and non-competitive categories. The Commission classified 153 Verizon wire centers as competitive based upon the Commission's acknowledged "need to be as granular as reasonably possible when determining a cable telephony coverage standard...." Reclassification Order at 38. The Commission granted competitive classification for wire centers where "ninety-seven percent or more of the households in a wire center have access to" cable telephony service. *Id.* The OCA submits that collecting and reporting data for competitive wire centers only in the aggregate is inconsistent with the Commission's recognition that the level and availability of competitive alternatives varies within individual wire centers classified as competitive was critical to its determination.

The OCA submits that Access Line Data also needs to be collected and reported separating out residential stand-alone basic service counts and residential bundled service counts. The Commission's grant of competitive classification provides Verizon with pricing flexibility over the previously non-competitive, protected basic local service. Verizon already had discretion to fix the price for a bundle of services that included basic local calling service. Yet the Commission's grant of regulatory waivers will impact both residential stand-alone basic service and bundled service customers. This detailed break-out is necessary so the Commission and interested parties can assess the separate and combined impact of competitive classification and regulatory waivers on Verizon residential stand-alone basic service consumers and residential bundled service consumers, with regard to affordability, quality of service and market conditions. See, e.g. Reclassification Order at 56, 104.

C. Quality of Service Worksheets

1. Justification For The Baseline Information Proposed

The second set of worksheets address “Quality of Service” measures, to be reported by Verizon broken out between competitive and non-competitive wire centers. The categories of data include trouble reports, trouble report rate per 100 access lines, number of out-of-service reports, number of out-of-service reports > 24 hours, number of out-of-service reports < 24 hours, and average installation completion interval (days). The Commission granted Verizon a waiver of some regulations, including certain Chapter 63 service quality regulations, “for a period not to exceed five years, *pending data collection* and a rulemaking ....” Reclassification Order at 76 (emphasis added). The Commission declined to waive Sections 63.55 (Surveillance levels); Section 63.56(f) and (g) (Measurements); and Section 63.57 (Trouble reports) as Verizon’s compliance with these regulations is “necessary to assist the Commission in ensuring Verizon’s continued compliance with Section 1501 of the Code and to manage reasonable consumer expectations regarding service outages even in a competitive environment.” *Id.* at 87.

The data to be collected and reported in the proposed “Quality of Service” worksheets is directly related to Verizon’s ongoing obligation to provide consumers with service which is reasonably continuous and if interrupted or out-of-service then Verizon will take timely action to restore service. Section 63.57(f) provides that:

It shall be substandard performance for a public utility to receive more than 5.5 customer trouble reports per 100 lines per month. A public utility receiving greater than 5.5 customer trouble reports per 100 lines per month is subject to the reporting requirements set forth in § 63.55(a) (relating to surveillance levels).

52 Pa. Code § 63.57(f). Section 63.55(a), (b), and (c) in turn require Verizon to report to the Commission if its quality of service has been substandard for 3 consecutive months, to provide a

report detailing the cause, related facts, and Verizon's remediation plan, and an obligation to monitor for one month and provide a follow-up report to the Commission.

The OCA supports requiring Verizon to collect and report monthly data regarding trouble reports, out-of-service incidents, and average installation intervals at the level of detail set forth the Quality of Service worksheets, broken out between competitive and non-competitive wire centers. As mapped out by these Quality of Service worksheets, Verizon will be required to not only collect, but also report, monthly data regarding service outages, restoration efforts, and installation of service intervals. The OCA acknowledges and supports requiring Verizon to report this data for all wire centers and each month, regardless of whether the Section 63.55 trigger to require surveillance reporting is met.

The OCA agrees with the Commission that consumers continue to expect that Verizon should minimize service outages, take reasonable action to restore service, and promptly install service. Whether the competitive wire center consumer has access to alternative service from a cable or wireless provider as premised in Verizon's Petition or falls in the 3% or less of consumers without such access in many of the 153 wire centers, the OCA submits that a service outage impacts both the Verizon customer and family, friends, and others who cannot call that consumer during the Verizon outage. The OCA submits that these data collection and reporting requirements mapped out in the Quality of Service worksheets reflect the minimum level of quality of service data, broken out between competitive and non-competitive wire centers, which Verizon should be required to report for two years.

2. Additional Information And Detailed Data Collection Needed

For the reasons discussed above, the OCA submits Verizon's two-year reporting obligation should include the collection and reporting of Quality of Service data at the wire

center level. The OCA also submits that Repeat Trouble Report and Repair Time data should be added as a data collection and reporting line items.

D. Residential Account Data Worksheets

1. Justification For The Baseline Information Proposed

The third collection of worksheets addresses “Residential Account Data” and maps out the collection and reporting of data regarding basic local service, suspensions, terminations, and disputes, data that Verizon has historically collected pursuant to portions of Section 64.201. See, e.g. 52 Pa. Code § 64.201(b)(1), (2)(i), (3), (4)(i), (6), (7), and (11). The worksheets appear to request the reporting of “Disputes Handled” which is broader in scope than Section 64.201(b)(11) which is limited to report of “The total number of Chapter 64 disputes handled.” The OCA supports this baseline collection of information, which the Commission has acknowledged does not have to exactly mirror Verizon’s annual Section 64.201 reporting requirements, as modified by the Commission through grant of a conditional waiver.

The OCA also supports the plan to require Verizon to collect and report these key measures broken out between competitive and non-competitive wire centers. As discussed below, the OCA submits that this data should be collected and reported on a more granular level, by wire center, rather than just competitive and non-competitive. The OCA submits that the ability to review and compare these measures, singly and collectively, as broken out between competitive and non-competitive wire centers will facilitate a review by the Commission and interested parties of the impact of the Commission’s grant of regulatory waivers and competitive classification of 153 wire centers on the affordability of basic service in those wire centers and preservation of universal service. See Reclassification Order at 56. For example, the OCA submits that the number of terminations in the competitive wire centers

may indicate that those consumers still wanted to retain Verizon's basic service but could not afford to do so. Such data may shed light on both the affordability of Verizon's basic service and/or whether consumers perceive that they have viable alternatives for basic service rather than proceed through an involuntary termination of Verizon service.

The OCA supports these two-year data collection and reporting requirements, based in part on Section 64.201 and split to report data between competitive and non-competitive wire centers as the minimum of what the Commission should require Verizon to collect and report.

2. Additional Information And Detailed Data Collection Needed

For the reasons discussed in these Comments, the OCA submits that Verizon's two-year reporting obligation should include the collection and reporting of Residential Customer Account data at the wire center level. As set forth below, the OCA submits that the data collected and reported by Verizon should be broadened to include more information related to: 1) Verizon's pricing for services including stand-alone basic service, as well as installation and restoration of service charges; 2) the residential Total Bill; 3) data related to Verizon's handling of suspension and terminations; 4) Verizon Pennsylvania's distribution of UTAP assistance; and 5) the nature and Verizon's resolution of consumer disputes not otherwise covered by the Warm Transfer reporting. Given the geographic and demographic diversity of Verizon's competitively classified wire centers, the OCA submits that this additional information should also be collected and reported on a wire center basis.

The Excel worksheets would require Verizon to report "Avg. Residential Customer Bill for Basic Service." The Commission has taken notice of a commitment by

Verizon to uniform pricing in competitive wire centers. Reclassification Order at 57, citing Verizon Reply Brief at 10. In its Reply Brief, Verizon stated:

If CWA-IBEW is suggesting that Verizon or other providers would charge higher prices to the small number of “unserved” households within these wire centers, that argument is a red herring. Verizon currently prices its service uniformly throughout its rate centers (individual wire centers or groups of wire centers) and will commit that it will do so even in exchanges classified as competitive.

Verizon R.B. at 10. The OCA acknowledges that Verizon has made some commitment to uniform pricing, however the OCA understands that Verizon’s commitment is price basic service uniformly within a rate center, even if one or several wire centers within the rate center are classified as competitive. Since rate centers and wire centers are not always the same, the OCA understands the Staff’s request for the Average Residential Bill. The OCA submits, however, that the use of averages in this instance may mask the impact on affordability. Additionally, it is unclear to the OCA whether the data to be collected includes all components of the total bill paid by the customer.

In addition or in place of this line item “Avg. Residential Customer Bill for Residential Service,” the OCA submits that Verizon should collect and report, the specific residential stand-alone basic service rate for each wire center for each month in the two-year period. The Commission has directed Verizon to maintain Price Lists with the Commission, setting forth prices for competitive services. Reclassification Order at 56. The OCA submits that this price information should be included in Verizon’s reports, to allow the Commission and interested parties to observe the month to month changes, if any, in Verizon’s charges for stand-alone basic service in each wire center. Verizon should similarly report the stand-alone basic rate for residential service in the non-competitive wire centers, as set pursuant to Verizon’s Chapter 30 Plan.

In addition, Verizon should collect data and report, for each wire center, the “Total Bill for Residential Basic Service.” The OCA submits that the Total Bill should be comprised of the elements adopted by the Federal Communications Commission to establish its \$30 benchmark, a benchmark for testing affordability which the Commission adopted in August 2012. See, Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, Docket Nos. I-00040105, et al., Opinion and Order on Reconsideration at 67-68, Ordering ¶ 5 (Aug. 9, 2012)[subsequent history omitted]. The Total Bill calculated by Verizon for basic service in each wire center should include the basic local service rate, the subscriber line charge, Verizon’s Access Recovery Charge, and 911 and TRS surcharges. See e.g. 47 C.F.R. § 51.915(b)(11).<sup>1</sup>

While the monthly charge for residential stand-alone basic service is an important element in any assessment of the affordability of service and market conditions in a particular wire center, the OCA submits that Installation and Restoration of Service charges are also important. The OCA understands that the Commission’s grant of competitive classification will permit Verizon to price these non-recurring charges at its discretion. While Verizon will report the prices for residential Installation and Restoration of Service in its Price Lists filed with the Commission, the OCA submits that the data should be reported as part of Verizon’s two-year reporting obligation. Verizon should similarly report the residential Installation and Restoration of Service charges in the non-competitive wire centers, as set pursuant to Verizon’s Chapter 30 Plan.

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<sup>1</sup> The FCC’s regulations define: “(11) *Rate Ceiling Component Charges*. The *Rate Ceiling Component Charges* consists of the federal end user common line charge and the Access Recovery Charge; the flat rate for residential local service (sometimes know as the “1FR” or “R1” rate), mandatory extended area service charges, and state subscriber line charges; per-line state high cost and/or state access replacement universal service contributions, state E911 charges, and state TRS charges.”

The Commission has waived portions of Verizon's Section 64.201 reporting requirements, while preserving Verizon's obligation to collect and periodically report under Section 64.201(b)(5) "[t]he average number of residential basic service suspension notices sent per month." The Excel worksheets do not request Verizon to report this information as part of its two-year reporting obligation. The OCA submits, however, that the addition of this Section 64.201(b)(5) type information, broken out by wire centers, will be useful in assessing the quality of service provided by Verizon and in the future Chapters 63 and 64 rulemaking. See Reclassification Order at 103. The Commission denied Verizon's request for waiver of certain Chapter 64 regulations that pertain to Verizon's suspension and termination practices. *Id.* at 99. "As part of providing reasonable service, we believe that Verizon should continue to comply with ... the written notice requirement prior to suspending service under Section 64.71."<sup>2</sup>

The OCA further requests that Verizon report on a wire center basis the total number of customers whose basic local calling service is suspended each month, the total number of customers terminated each month, and the total number of customers whose basic local service is restored each month. The OCA submits that this data, collected and reported for two-years will be useful in assessing Verizon's quality of service, preservation of universal service and considerations in the future rulemaking.

Additionally, Verizon should collect and report Terminations data showing the percent of terminations where basic service was purchased on a stand-alone basis and the

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<sup>2</sup> See, 52 Pa. Code § 64.71. "General notice provisions. The LEC shall mail or deliver written notice to the customer at least 7 days before the date of proposed suspension regardless of the grounds upon which suspension is sought, with the exception of the following: Failure to comply with the material terms of a payment agreement for toll or nonbasic service, or both. In these cases, the LEC shall comply with § 64.81 (relating to limited notice upon noncompliance with report or order)."

percentage of terminations where the customer's basic service was purchased as part of a bundle, and then subject to the suspension and termination procedures for basic service pursuant to Section 64.24. The Commission declined to waive Section 64.24, which addresses the preservation of basic local exchange service upon termination of a bundled package, since Section 64.24 "contains an important consumer protection that remains relevant in a competitive market ...." Reclassification Order at 96. Further, as the Commission has acknowledged, Verizon has been allowed to classify wire centers as competitive even if 100% of the consumers do not have access to cable telephony as a competitive alternative. The affordability of Verizon's basic local service and the reasonableness of Verizon's termination procedures are matters which the Commission has committed to monitor and assess.

The OCA notes that Verizon Pennsylvania offers eligible low income consumers assistance to retain telephone service through its Universal Telephone Assistance Program (UTAP), pursuant to Verizon Pennsylvania's Chapter 30 Plan. The OCA submits the Verizon Pennsylvania should collect and report data identifying the number of applications for UTAP as well as the number and average amount of UTAP grants awarded, on a monthly basis and by wire center. The OCA submits that presentation of this information regarding the need and implementation of Verizon Pennsylvania's existing universal service assistance program bears upon both the affordability of Verizon Pennsylvania's service in competitive wire centers and the state of the market.

The Excel worksheets propose that Verizon collect and report monthly data for "Disputes handled," divided between competitive and non-competitive wire centers. The OCA understands that this reporting category is broader than the Section 64.201(b)(11) requirement that Verizon report "Chapter 64 disputes." See June 1 Tentative Order at 8-9. The OCA

supports broadening the scope of information and requiring more detail in Verizon's reporting of "Disputes handled." As discussed below, Verizon might collect data and report detailed categorization of the nature of consumer queries and disputes passed to Verizon through the "warm transfer" process. The OCA submits that more detailed information is also necessary for Verizon to collect and report regarding the variety of disputes that are not handled through the "warm transfer" process. Verizon should report monthly data, by wire center or at least divided between competitive and non-competitive wire center areas, of direct consumer contacts that present: 1) Chapter 63 disputes; 2) Chapter 64 disputes; and 3) Requests for payment arrangements, as well as corresponding data regarding Verizon's response time for each.

E. Warm Transfer Data Collection

1. Justification For The Baseline Information Proposed

The fourth set of Excel worksheets map out data collection and reporting requirements related to the use by the Commission's Bureau of Consumer Services (BCS) and Verizon of a "warm transfer" process for fielding Verizon consumer complaints. As originally implemented, Verizon customers who contacted BCS were initially given the option to be transferred to a Verizon representative – the warm transfer – in an effort to address the issues raised by the customer prior to BCS's addressing the complaint. Reclassification Order at 46. Pursuant to Ordering Paragraph 13, the Commission directed that "all retail customers located in wire centers determined to be competitive under this Opinion and Order shall have the 'warm transfer' option available to them when contacting [BCS] to make informal complaints." *Id.* at 126. The Commission directed that the warm transfer option "shall be available to such customers with regard to both service and billing-related issues." *Id.*

The need for Verizon to collect and report data categorized by the nature of such warm transfer informal complaints is tied to the Commission's grant in part of Verizon's request for waiver of portions of Chapter 64. Reclassification Order at 90-104. The Commission stated that it still preserved its oversight of Verizon's billing and collections practice in competitive wire centers, that Verizon continues to be bound to comply with Section 1501, and "this includes ensuring that Verizon will continue to provide reasonable billing services." *Id.* at 94; 66 Pa.C.S. § 1501. The Commission granted waiver of some Chapter 64 provisions based on the appearance that Verizon's Product Guides set forth similar information and standards or subject to Verizon's addition to its Product Guide of such standards. See e.g., Reclassification Order at 95, 97.<sup>3</sup>

The fourth set of Excel worksheets propose that Verizon track and tally the nature of informal complaints received by Verizon as part of the warm transfer process among the following categories: Annoyance calls; Billing Disputes; Credit & Deposits; Discontinuance/Transfer; Non-recurring Charges; Rates; Service Delivery; Service Terminations; Toll Services; and Unsatisfactory Service. Further, Verizon would be required to break-out this data between competitive and non-competitive wire centers.

The OCA supports these data collection and reporting requirements as stating the minimum information needed by the Commission and interested parties to assess the affordability and quality of service provided by Verizon to consumers, including those in competitive wire centers, regarding to prices (rates), billing, payments, deposits, transfer of service, and the like. The Commission's grant of certain Chapter 64 waivers is premised on

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<sup>3</sup> "We note, for example, that Verizon's Product Guide, Section 1, Original Sheets 5 and 6, applicable to basic local exchange services in competitive wire centers ... address several of these Subchapter B payment-related issues, including method of payment and late payment charges." Reclassification Order at 95. "Therefore, we shall grant a waiver of this Subchapter [C] conditionally upon the requirement that Verizon provide information in its Product Guide concerning the consequences if an applicant for service is not deemed creditworthy." *Id.* at 97.

Verizon's provision of consumer information and standards in these areas sufficient to protect consumers in the competitive wire centers, pending the future rulemaking or end of the five-year waiver period.

## II. CONCLUSION

The Office of Consumer Advocate supports the initial Excel worksheets which detail important baseline information and data that Verizon Pennsylvania and Verizon North should be required to collect and report to the Commission and parties to this proceeding, consistent with conditions imposed by the Commission in the Reclassification Order. Further, the OCA respectfully requests that the Verizon's data collection and reporting obligation include the collection and reporting of this data on a wire center basis as well as the reporting of the additional information discussed above on a wire center basis.

Respectfully Submitted,



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DATE: June 4, 2015  
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CERTIFICATE OF SERVICE

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 :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Comments Regarding Data Collection and Reporting Obligations, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 4th day of June 2015.

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