



June 11, 2015

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 Comments Regarding the June 1, 2015 Tentative
Implementation Opinion and Order, being filed by Verizon Pennsylvania LLC and Verizon North
LLC in the above captioned matter.

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 First Class Mail

cc: Cheryl Walker Davis, Office of Special Assistants
Lenora Best, Bureau of Consumer Services
Derek Vogelsong, Bureau of Technical Utility Services
Attached Certificate of Service

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon's Comments Regarding the June 1, 2015 Tentative Implementation Opinion and Order, 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 11th day of June, 2015.

VIA E-MAIL AND FIRST CLASS MAIL

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**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 COMMENTS TO TENTATIVE
IMPLEMENTATION OPINION AND ORDER**

Verizon¹ agrees with the Commission’s conclusion in the Tentative Implementation Order that applicable statutes and retained regulations continue to be binding in the competitive wire centers. (6/1/15 Order at 6). This is nothing new. Verizon’s product guide has governed most of its services in these wire centers and throughout the state since early 2012.² The product guide is a critical document, as it serves as the binding, legal contract between Verizon and its customers once a service is no longer governed by the terms, conditions and rates of a tariff. But the product guide’s terms do not supersede applicable statutes and regulations; applicable statutes and regulations have always taken precedence. The addition of more competitive services to the existing product guide does not change this structure.

The Tentative Implementation Order, though, would go a step further and impose problematic new tariff-like conditions on the product guide that have not applied for the past three years and that would run afoul of Chapter 30. Chapter 30 states that “the commission may not require tariffs for competitive service offerings to be filed with the commission.” 66 Pa. C.S. § 3016(d)(2). Yet that is what the Commission would do with certain requirements proposed in

¹ Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”).

² See *Pennsylvania Public Utility Commission v. Verizon Pennsylvania Inc.*, Docket No. R-2011-2244373 (Opinion and Order entered November 14, 2011) (approving the detariffing of services classified competitive at that time).

the Tentative Implementation Order. For example, the Commission proposes to require Verizon to file a copy of the product guide with staff and to notify staff “at least ten days in advance” of future changes to the product guide. (6/1/15 Order at 6). Requiring filing advance copies of product guide changes, including changes to any general terms and conditions, with the Commission staff would transform the product guide into a mandatory tariff filing. This type of mandate would thus violate Chapter 30 and deviate from the Commission’s previous competitive classification orders.

The Commission already receives advance notice regarding price changes to competitively classified services. Under Chapter 30, Verizon provides notice of rate changes by updating its filed price list on one day’s notice. *See* 66 Pa. C.S. § 3016(d)(4) (price list changes made on one day’s notice). If the Commission wants to monitor stand-alone basic service affordability during the two year data collection period discussed in the March 4, 2015 reclassification order, Verizon would also agree to provide the staff with at least 10 days’ advance notice of stand-alone basic rate changes during the two year period. And that notification process could be revisited at the end of the two-year time period.

But broad-based advance filing requirements that metamorphose the product guide into a filed tariff would violate Chapter 30. Verizon thus respectfully requests that the Commission limit the filing requirements proposed in the Tentative Implementation Order to stand-alone basic rate changes for a period of two years.

Respectfully submitted,



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Dated: June 11, 2015