

Suzan DeBusk Paiva
Assistant General Counsel



1717 Arch Street, 3 East
Philadelphia, PA 19103

Tel: (215) 466-4755
Fax: (215) 563-2658
Suzan.D.Paiva@Verizon.com

June 15, 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 Reply Comments Regarding Data Collection, 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 black ink, appearing to read "Suzan D. Paiva".

Suzan D. Paiva

SDP/slb
Enc.

Via E-Mail and First Class Mail

cc: Lenora Best, Bureau of Consumer Services
Derek Vogelsong, Bureau of Technical Utility Services
Attached Certificate of Service

Via E-Mail

cc: RA-PC-VzReclass@pa.gov

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon's Reply Comments Regarding Data Collection, 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 15th day of June, 2015.

VIA E-MAIL AND FIRST CLASS MAIL

Barrett Sheridan, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

Michelle Painter
Painter Law Firm, LLC
26022 Glasgow Drive
Chantilly, VA 20152
Counsel for AT&T

Scott J. Rubin, Esquire
Counsel for CWA and IBEW
333 Oak Lane
Bloomsburg, PA 17815

Charles Thomas, III, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 600
Harrisburg, PA 17101
Counsel for PA Telephone Assoc

Steven C. Gray, Esquire
Office of Small Business Advocate
Suite 202, Commerce Building
300 North Second Street
Harrisburg, PA 17102

Harry S. Geller, Esquire
Elizabeth Marx, Esquire
c/o PA Legal Aid Network
118 Locust Street
Harrisburg, PA 17101
Counsel for CAUSE-PA

Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market St, 8th Floor
P.O. Box 1248
Harrisburg, PA 17101
Counsel for Full Service Network



Suzan D. Paiva
Pennsylvania Bar ID No. 53853
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103
(215) 466-4755

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 REPLY COMMENTS REGARDING DATA COLLECTION

The Office of Consumer Advocate (“OCA”) asks the Commission to shackle services classified as competitive with more onerous and detailed reporting requirements than those applicable to noncompetitive services. That would undermine Chapter 30’s policy goal to reduce “regulatory obligations imposed upon the incumbent local exchange telecommunications companies . . . to levels more consistent with those imposed upon competing alternative service providers.” 66 Pa. C.S. § 3011(13). The Commission should reject OCA’s call for more reporting; instead it should adopt the modifications to the proposed reporting set forth in Verizon’s initial comments.

Wire center level data: OCA presses the Commission to impose the burdensome requirement of collecting all data on a wire center level of detail, instead of the competitive/non-competitive area reporting proposed by the staff. OCA’s proposal would increase the reporting burden with no added value, and no “benefits” that would “substantially outweigh the attendant expense and the administrative time and effort required” to provide wire center level reporting. 66 Pa. C.S. § 3015(f). The wire center is simply a technical configuration of Verizon’s wireline network, comprising the geographic area served by a single end office switch. Wire center areas mean nothing to customers or in the market. Verizon does not price its services by wire center (and the Commission will be able to verify that Verizon continues not to price in this manner

because it will receive updates to the price list any time a competitive rate is changed). Competitors do not guide their behavior or marketing plans based on Verizon's wire centers. Verizon does not dispatch different repair crews to individual wire centers. The Commission will have ample information to evaluate market performance with the data reporting at the competitive/noncompetitive area level and should reject OCA's demand to increase Verizon's reporting burdens by requiring wire center level reporting.

Line counts: OCA's proposal to add "residential bundled service" line counts to the stand-alone residential basic line counts in the staff's proposal is misguided. (OCA Comments at 6). It makes sense for the Commission to monitor stand-alone basic service line counts, since that is the service that was newly classified competitive and is the only service classified differently in competitive versus noncompetitive areas. That logic, however, does not apply to bundled services that have been competitive for many years without the Commission requiring any reporting of line counts. OCA offers no valid reason why such reporting should be started now.

Additional service quality metrics: Verizon explained in its initial comments why the Commission should reject the staff's proposal to institute regulatory service quality reporting beyond anything required by this Commission's regulations. Verizon explained that neither the Chapter 30 statute nor the Commission intended that competitively classified areas would require more onerous reporting following competitive classification than existed when the areas were classified noncompetitive, and that outdated service metrics are unlikely to be a meaningful barometer of service quality for real world customers in today's market. (Verizon Comments at 2-5).

OCA would go in the other direction, proposing to add more old-style regulatory metrics, including “Repeat Trouble Report” and “Repair Time” metrics. (OCA Comments at 9). OCA does not explain why it believes this additional reporting would provide any useful information, much less “benefits” that “substantially outweigh the attendant expense and the administrative time and effort required” to provide this additional reporting. 66 Pa. C.S. § 3015(f). As Verizon explained in its comments, the Commission should limit the reporting to data that is more relevant to customer expectations, such as the percent of installation orders completed on the due date. (Verizon Comments at 4-5). The Commission should reject OCA’s unsupported demand for more service quality reporting.

Additional payment and collection data. In addition to the Section 64.201 report, OCA demands reporting of various other irrelevant information regarding payment and collections. (OCA Comments at 10). For example, OCA wants Verizon to calculate different permutations of the pricing for a typical stand-alone basic service bill, but even OCA recognizes that Verizon will already report in its price list the prices needed to perform OCA’s demanded calculations. And for noncompetitive services that OCA also wishes to include in its calculations, the prices are available in tariffs. OCA can perform these calculations from publicly available data if it wishes to do so.

OCA’s request for data relating to “UTAP” is also unnecessary. Verizon already submits an annual report to the Commission that includes UTAP and Lifeline information. And the applicability of UTAP is very narrow; eligibility for UTAP is limited only to Verizon Pennsylvania LLC Lifeline 100 customers. OCA’s suggestion to broaden the scope of reporting would not help measure the competitiveness landscape in Pennsylvania. OCA also wants information reported under Section 64.201 to be broken down into further categories; those

categories are unnecessary and not required by the Commission's rules. (OCA Comments at 14). Verizon intends to submit the Section 64.201 report annually (as modified by the June 1, 2015 Order) and to update its filed price list with any rate changes. Additional reporting by Verizon is not necessary for the Commission to monitor the affordability of service. As stated in Verizon's comments, the Commission should rely on the Section 64.201 annual reports for the years 2015 and 2016, which Verizon will submit in compliance with the June 1, 2015 Order, and should not use this data collection initiative to increase the reporting burdens in this area.

CONCLUSION

For the foregoing reasons, Verizon respectfully submits that the Commission should reject the additional data reporting proposed by the OCA and should modify its proposed data reporting requirements as set forth in Verizon's comments.

Respectfully submitted,


Suzan D. Paiva (Atty ID No. 53853)
Verizon
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103
Telephone: 215-466-4755
Facsimile: 215-563-2658
Suzan.D.Paiva@verizon.com

Counsel for Verizon

Dated: June 15, 2015