

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17105-3265

**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:
Final Implementation Order**

**Public Meeting August 20, 2015
2446304-OSA
Docket Nos. P-2014-2446303
P-2014-2446304**

STATEMENT OF CHAIRMAN GLADYS M. BROWN

As an initial matter, the Office of Special Assistants is to be commended for the quality and depth of their recommendation notwithstanding today's decision.

Today's decision allows Verizon to file changes to their Product Guide "on or before" the day the changes go into effect for all changes except price. The Product Guide is an important document to educate consumers, the Commission, and the public about changes in the service provided in Verizon's reclassified exchanges. It would have been better to adopt the 10 day advance filing period originally proposed or, perhaps, a 5 day period. Advance filing facilitates informal disposition of issues sure to arise. That is not the same thing as mandatory approval by the Commission.

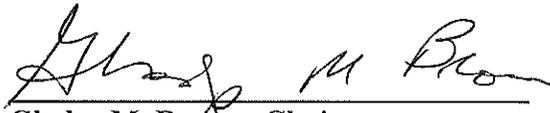
Today's decision also limits who can get information. The concern with harm arising from disclosure to third parties, particularly the OCA even though they are a statutory advocate, and competitors in the market is better addressed by Confidentiality Agreements. Verizon and competitors already use those at the Federal Communications Commission. They warrant consideration here.

Today's decision confines the categories reported in the 64.201 Annual Report to competitive and noncompetitive. They are not broken down by wire center, a better approach given the *Reclassification Order's* substantial impact on wire-center consumers not reporting categories.

But, today's decision reverses an earlier decision to extend our waivers to wire centers that were not even in the record. The Commission wisely avoids legal error by limiting the decision to the record.

Other considerations also warrant support despite my concerns. The filing period for Product Guide changes can always be modified, particularly if the consumer education impact changes. The parties can work out voluntary Confidentiality Agreements. The category approach can be adjusted if things change. And, importantly, the Annual Report decision is confined only to record wire centers.

August 20, 2015
Date


Gladys M. Brown, Chairman