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January 6, 2009

E-Filed

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Office of Consumer Advocate, Pennsylvania Utility Law Project,
and AARP Pennsylvania
v. Verizon Pennsylvania Inc. and Verizon North Inc.
Docket Nos. C-20077916, C-20077917**

Dear Secretary McNulty:

Enclosed please find the Petition for Reconsideration and/or Clarification
of Verizon Pennsylvania Inc. and Verizon North Inc., 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.

cc: **Via UPS Delivery**
The Honorable Charles E. Rainey, Jr.
Cheryl Walker Davis, Esquire
Robert Marinko, Esquire
Attached Certificate of Service

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the Petition for Reconsideration and/or Clarification of Verizon Pennsylvania Inc. and Verizon North Inc., 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 6th day of January, 2009.

VIA UPS DELIVERY

Barrett Sheridan, Esquire*
Joel Cheskis, Esquire
Office of Consumer Advocate
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Harrisburg, PA 17101-1923

Harry Geller, Director*
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Pennsylvania Utility Law Project
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Richard Chevretils, State Director
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Suzan D. Paiva (Atty No. 53853)
Verizon.
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Consumer Advocate,	:		
Pennsylvania Utility Law Project, and	:		
AARP Pennsylvania,	:		
Complainants,	:	Docket No.	C-20077916
	:		C-20077917
	:		
v.	:		
	:		
Verizon Pennsylvania Inc. and	:		
Verizon North Inc.,	:		
Respondents.	:		

PETITION FOR RECONSIDERATION AND/OR CLARIFICATION

Verizon Pennsylvania Inc. and Verizon North Inc. (“Verizon”), pursuant to 52 Pa. Code §5.572, respectfully request reconsideration and/or clarification of a portion of the Commission’s December 22, 2008 Order, on the following grounds:

1. The Commission’s December 22, 2008 Order denied Verizon’s exceptions and adopted the Initial Decision (“ID”) of Administrative Law Judge (“ALJ”) Charles E. Rainey, Jr., holding that Verizon must permit Lifeline-qualified customers to purchase three types of bundled service packages at the Lifeline 135 discount.¹

2. Pursuant to ordering paragraphs 5 and 6, the Commission directed Verizon that “within twenty (20) days from the date that this Opinion and Order is entered,” Verizon must “file revised tariffs, to become effective on one day’s notice” modifying the language restricting Lifeline 135 customers from subscribing to packages and permitting them to subscribe to the three packages required by the order.

¹ Specifically, the Lifeline 135 discount must be applied to packages consisting of (1) local service with three vertical services; (2) local service with three vertical services and regional toll; and (3) local service with three vertical services, regional toll and long distance.

3. While the order specifically addresses Verizon's exceptions one through four, which went to the substance of the matter, it neither acknowledges nor discusses Verizon's exception five, which excepted to the ID's requirement that Verizon must make the Lifeline 135 discount available on packages within twenty days of order entry.

4. Verizon had pointed out in this exception five that because the ID's decision was made on cross motions for summary judgment without the development of an evidentiary record, the only issue addressed was whether, as a matter of law, Verizon was required to offer Lifeline on packages; no record was developed on the timing required for compliance. Verizon stated in its exception five that "twenty days is much too short a time for Verizon to make the systems changes required to provide Lifeline on packages," and requested that the matter be returned to the ALJ to determine the timing for compliance because the time needed could vary depending on which packages might be required. (Verizon Exceptions at 20-21).

5. The Commission's order does not mention this exception and does not provide any basis to require compliance in twenty days when Verizon had stated it was unable to comply in twenty days. This petition for reconsideration and/or clarification therefore raises "considerations which appear to have been overlooked or not addressed by the Commission." *Duick v. Pa. Gas & Water Co.*, 56 Pa. PUC 553, 559 (1982).

6. Currently, Verizon's ordering systems have hard-coded programming in place that prevents Verizon's customer service consultants from adding the specified packages to Lifeline 35 accounts. Verizon cannot provide these packages to Lifeline 135 customers until it performs substantial ordering and billing system re-programming. Verizon has already taken the necessary steps to schedule the removal of the hard-coded

ordering blocks along with other necessary programming changes in the earliest possible scheduled information technology (“IT”) release. However, this release will not occur until the weekend of March 21-22, 2009. It is not possible for consultants manually to work around these hard-coded system restrictions in the interim, so it will be impossible for Verizon to provide the Lifeline 135 discount on the specified packages until March 23, 2009. As the Commission is no doubt aware, normally, the IT lead time for a project like this one is much longer – usually about nine months – but Verizon was able to expedite this project for completion within three months.

7. The Commission has recognized that where compliance requires billing system changes, sufficient time must be allowed for the company to accomplish the programming necessary to change its systems. For example, in its 2004 order approving a new slate of unbundled network element rates for Verizon PA, the Commission required the tariff filing to be made within 15 days of order entry, but allowed an additional 60 days following the tariff filing for the systems work to be completed and the rates to take effect. *See Generic Investigation Re Verizon Pennsylvania Inc.'s Unbundled Network Element Rates*, Docket No. R-00016683, 2004 Pa. PUC LEXIS 64 (Opinion and Order entered July 16, 2004) (requiring tariff filings to be made in 15 days, but rate changes to take effect 60 days following the filing of the tariff).

8. Verizon therefore respectfully requests that the December 22, 2008 Order be modified to require compliance within ninety (90) days of order entry, which would be March 23, 2009.

9. Meanwhile, Verizon will make a tariff filing on January 12, 2009 (twenty days after order entry) modifying its tariffs to permit the Lifeline 135 discount to apply to the three specified packages commencing March 23, 2009.

10. Verizon will also instruct its consultants that if any Lifeline 135-eligible customers inquire about purchasing a package, they should be told that they will be able to subscribe to one of the three specified packages as of March 23, 2009 and should call back on or after that date.

WHEREFORE, Verizon respectfully requests that the Commission modify its December 22, 2008 Order to permit compliance as described above whereby Verizon will file modified tariffs within twenty days of order entry to indicate the availability of the Lifeline 135 discount on the specified packages commencing March 23, 2009 (ninety days after order entry).

Respectfully submitted,



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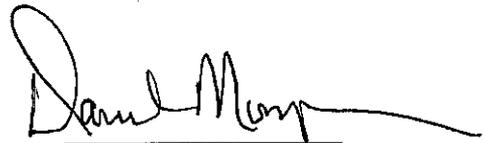
Dated: January 6, 2009

Attorneys for Respondents
Verizon Pennsylvania Inc. and
Verizon North Inc.

VERIFICATION

I, Daniel Monagle, state that I am Director of Public Policy for Verizon, and that as such I am authorized to make this verification on behalf of Verizon Pennsylvania Inc. and Verizon North Inc. ("Verizon"). I have reviewed Verizon's Petition for Reconsideration of the Commission's December 22, 2008 Order, and verify that the facts contained therein are true to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C. S. § 4904, relating to unsworn falsification to authorities.

Date: January 6, 2009

A handwritten signature in black ink, appearing to read "Daniel Monagle", with a long horizontal flourish extending to the right.

Daniel Monagle