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December 7, 2010

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

In re: AT&T Communications of Pennsylvania, Inc. v. Verizon North, Inc. and
Verizon Pennsylvania inc.; Docket No. C-20027195

Dear Secretary McNulty:

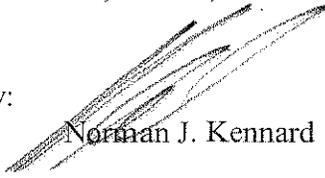
Enclosed please find the Prehearing Conference Memorandum of the Pennsylvania Telephone Association, as electronically filed today. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By:


Norman J. Kennard

Enclosures

cc: Honorable Cynthia Fordham
Certificate of Service

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Administrative Law Judge
Cynthia Williams Fordham, Presiding

AT&T Communications of Pennsylvania, Inc. :
: :
v. : Docket No. C-20027195
: :
Verizon North Inc., Verizon Pennsylvania, Inc. :

**PREHEARING MEMORANDUM
OF
THE PENNSYLVANIA TELEPHONE ASSOCIATION**

In accordance with Prehearing Order No. 5 on Remand of Administrative Law Judge Cynthia Williams Fordham dated December 3, 2010, the Pennsylvania Telephone Association¹ submits this Prehearing Memorandum. The PTA companies have previously participated in the

¹ For purposes of this proceeding, the following rural incumbent local exchange carriers (“RLECs”) are represented by and under the name of the Pennsylvania Telephone Association: Armstrong Telephone Company - Pennsylvania, Armstrong Telephone Company - North, Bentleyville Telephone Company, Buffalo Valley Telephone Company, Citizens Telecommunications Company - New York,* Citizens Telephone Company of Kecksburg, Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, Frontier Communications of Lakewood, LLC, Frontier Communications of Oswayo River, LLC, Frontier Communications of Pennsylvania, LLC, Conestoga Telephone & Telegraph Company, Denver and Ephrata Telephone and Telegraph Company, Hickory Telephone Company, Ironton Telephone Company; Lackawaxen Telecommunications Services, Laurel Highland Telephone Company, TDS Telcom/Mahanoy & Mahantango Telephone Company, Marianna and Scenery Hill Telephone Company, The North-Eastern Pennsylvania Telephone Company, North Penn Telephone Company, Consolidated Communications of Pennsylvania Company, Palmerton Telephone Company, Pennsylvania Telephone Company, Pymatuning Independent Telephone Company, South Canaan Telephone Company, TDS Telcom/Sugar Valley Telephone Company, Venus Telephone Corporation, Windstream Pennsylvania, LLC, and Yukon-Waltz Telephone Company. The group does not include Hancock Telephone Company, TDS Telecom/Deposit Telephone Company, or West Side Telephone Company, since these companies do not have a Pennsylvania access tariff; do not have a Chapter 30 Plan; do not currently receive distributions from the existing PaUSF. While Citizens Telecommunications Company - New York likewise does not have a Pennsylvania access tariff or a Chapter 30 Plan, it does receive support from the PA USF and has participated in Commission investigations related to the Pennsylvania Universal Service Fund.

prior phases of the Verizon Access proceeding under the umbrella of the Rural Telephone Company Coalition ("RTCC"). A PTA Motion to Substitute a Representative Association has since been granted in the matter involving the RLECs' access restructuring proceeding at Docket No. I-00040105, and the PTA has succeeded the interests of the RTCC in all related matters. PTA also filed collectively with The United Telephone Company of Pennsylvania d/b/a Embarq Pennsylvania (now CenturyLink) an Answer to Verizon's Motion to Extend, which was denied by the Commission's May 11, 2010 Order and led to the present proceeding. PTA requests that similar substitution be recognized herein, and if required, will file a similar Motion at this Docket.

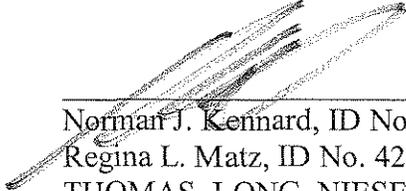
The PTA intends to participate in this proceeding but, as the RTCC has done in the past, primarily will be monitoring the positions of other parties. Please serve all documents upon counsel for PTA as follows:

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At this time, the PTA does not intend to present testimony or raise any issues outside those identified already on the record and as addressed by the Commission in its May 11, 2010 Order, but is reserving the right to do so. Should the PTA seek to provide testimony, it will advise the parties

At this time, the PTA takes no position on the procedural schedule or proposed modifications of the rules of discovery. The PTA is and remains open to settlement discussions.

Respectfully submitted,



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Attorneys for
The Pennsylvania Telephone Association

DATE: December 7, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, 2010, I did serve a true and correct copy of the foregoing document upon the persons below via electronic mail and first class mail as follows:

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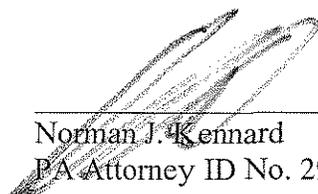
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