

July 10, 2011

Via Electronic Filing

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

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

LIDIA SHAN – COMPLAINANT V VERIZON PENNSYLVANIA, INC - RESPONDENT
Docket No. C-2011-2243183 .

HEARING REQUEST

Dear Ms. Chiavetta,

The Preliminary Objections provided by Verizon's counsel in response to my complaint do not elaborate on any issues raised in Docket No. C-2011-2243183, do not have any valuable solution to resolve Verizon's practices to eliminate consumer's complaints, nor do they respond to any previously raised questions. The Preliminary Objections are irrelevant, legally defective and invalid to the complaint.

In my opinion Verizon failed to respond to my complaint and it is the Commission's responsibility not to accept and consider Preliminary Objections as a valid document for the response to my complaint. I believe that it is the responsibility of the Commission to order Verizon to restructure their procedures and tariffs that are in existence and widely used.

I object to the response from Verizon and therefore, I request that all Preliminary Objections presented by Verizon's counsel to my complaint must be dismissed and not permitted in the court hearing as they are a maneuvering strategy of the counsel, "**kill the messenger**", nothing else. The purpose of such demurrer is to make the Commission to understand that they have an obligation in the public interests to move all the parties concerned to resolve Verizon's unfair practices. It is obvious that the Verizon's counsel by stating that my 2011 complaint is "the same" as the one of 2009 makes me to believe that the counsel is trying to compare oranges to apples and convince the Commission that they are growing on the same tree and they are the same fruits.

I request that a hearing be scheduled for Case Docket No. C-2011-2243183 as my complaint is not "the same" as stated in the Preliminary Objections because this complaint raises many different issues to the one that were heard in the court in September 2010. Even though the case concerns the same company, Verizon, and me, the dispute I have now with Verizon is of issues that were not discussed in the hearings of 2010. The argument I make is that Verizon continues the same instance of conduct and provides the same defective product line-services.

If Verizon would do a sufficient job and not betray their subscribers, maybe Verizon would not need any counsel to defend what should not be defended as the issue is of poor business practices, honesty and trust between the company that provides the services and the public that buys the services then the time Verizon's counsel is concerned about would not be wasted not only by the counsel and Commission but mostly by the customers of Verizon.

If it is such a concern of the counsel that time will be lost due to a court hearing, it should be noted that I was advised by the office of the Honorable Judge to file a new formal complaint because my additional allegations to the previous complaint were not permissible.

It is a prudent use of time and resources of the parties to finally resolve Verizon's manipulative practices and stop the company from extortion of unreasonable fees to consumers so that the consumers will have no need to complain in the future about dissatisfaction they receive from the services Verizon provides.

It is remarkable to realize that after spending several hours in court and many pages (over 50) of transcript notes as the counsel states, the counsel of Verizon does not understand diddly squat what the 2010 court was about and is manipulating the Commission to dismiss my complaint Docket No. C-2011-2243183 from a hearing. What part of the complaint counsel doesn't understand is incredulous for me unless she has a mission to cover up and not reveal any information and is purposely misleading the Commission as she represents unfair, manipulative practices of the company and because she is paid by Verizon to do whatever it takes to mislead and manipulate the court system.

Let's review and refresh the memory of the parties involved in order to clarify the subject of Verizon.

In my 2009 complaint Docket No. C-2009-2150021 I was questioning the real costs Verizon have and they must prove that by disconnecting a telephone line or putting telephone line on suspension by turning off the switch on their circuit in their Central Office or in their distribution facility there are any additional costs involved. Verizon has to prove that there is a difference in standard operational procedures between these two similar operations. In the 2010 court hearings Verizon failed to prove otherwise. Up till now I have not seen their response to my questions raised in court nor have I seen the price list they have to derive the rates. Verizon's response to my complaint of 2011 doesn't shed any light regarding issues raised nor are they willing to respond to the requests of 2010 to provide the actual operational costs for the discussed issues.

In the 2010 hearing, most of the discussion concerned technical issues of what it means when the telephone is on suspension or is disconnected and technical standard operational procedures to do so. It was proven in court that my complaint was about unnecessary mysterious charges Verizon applies when the telephone is in temporary suspension mode. It was proven in court that when the telephone is on temporary suspension, the line of this particular telephone number is unplugged from the circuit at the Verizon's location and is technically disconnected for a specified time in accordance with the consumer's request. It was proven that technically and physically there is no difference between the disconnected or temporary suspended telephone lines because in both cases the telephone cannot be used and there are no additional costs involved in both procedures for disconnection, therefore the DIAL TONE LINE should not be part of charges while the telephone is on temporary suspension. When the telephone is disconnected there are no additional charges involved for disconnection, therefore there should not be any charges for suspended telephone line. When the telephone is disconnected or suspended the DIAL TONE LINE or a VOICE service is not in use or is non-operable, therefore there should not be additional charges applied to the consumer's line. These were the discussions in the 2009 complaint I filed. The issues raised in the hearing were of major high importance as thousand of customers of Pennsylvania or millions in the country are being manipulated by Verizon and extra fees are being extorted from them for no factual reasons.

Since PAPUC has not rendered a decision of the 2010 court hearing, it allows Verizon to continue their "same" unfair practices in overcharging the consumers.

In my 2011 complaint Docket No. C-2011-2243183 I have a dispute regarding discrepancies in daily operations of Verizon, contractual obligations of Verizon and inconsistencies in responses to the same question raised regarding fluctuation in price rates when multiple approved tariffs are used for the same service operation. My new complaint Docket No. C-2011-2243183 concerns the multiplicity of tariffs for one telephone line placed on Temporary Suspension or Vacation. This is a different issue and cannot be construed to be the same issue of the 2010 court hearing. In logical terms only one tariff should be approved for every standard operational procedure but not multiple tariffs as are now in existence because the standard operational procedure describes only one step for one activity.

Since there are several tariffs available, does the consumer has a choice to choose which of the tariffs they would like to accept? Does Verizon offer bargains based on the variety of tariffs? Is the average consumer aware of the different tariffs available for the same operational procedure? These and many other inadequacies counsel doesn't understand or is not willing to understand and Verizon doesn't want the

consumer to know. Wouldn't this be ridiculous to see an item being displayed on a shelf in a retail store with five different price tags?

These are the major differences between two complaints. Why is the counsel misleading the Commission? It is just a maneuvering strategy to postpone the time and not reveal any secrets Verizon keeps from the public. Commission must take into consideration this strategy while deciding whether my complaint has merits.

PAPUC has jurisdiction to administer and reform Verizon; however, neither of these steps has been implemented by the Commission. Therefore consumers will continue to complain and keep the courts busy until PAPUC orders Verizon to revise their tariff structure according to the actual costs and not fictitious costs.

Based on my logical assertions I urge the Commission to schedule the hearing after my return to Philadelphia on September 15, 2011.

I do object to the Preliminary Objections referencing of past court hearings concerning other entities and the outcome of them as they do not reflect the same conditions and situation of my complaint of 2011.

All of the items discussed by the counsel in the BACKGROUND statement have nothing to do with my allegations in 2011 complaint. Therefore the Preliminary Objections should be fully dismissed and new hearing must be scheduled.

Concerning assessments of the counsel of my knowledge regarding the derivation of rates I would suggest you dismiss these statements as she has no idea of my background, education or expertise. On the other hand Verizon doesn't use the actual cost in deriving the rates anyway. Besides, there is no prerequisite to subscribe to Verizon's services without particular knowledge of the rates derivation.

I request that the Preliminary Objections presented in response to my formal complaint Docket No. C-2011-2243183 be dismissed and not permitted in the hearing because they do not have any merit to the issues concerned. Please schedule a hearing between September 15 and November 15, 2011.

Respectfully submitted,

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Dated: July 10, 2011

Cc: Janet L. Miller, Hawke, McKeon & Sniscak LLP