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June 27, 2012

Rosemary Chiavetta
Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265

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PA P.U.C.
SECRETARY'S BUREAU

Re: Lawrence Zurawsky
vs.
Verizon Pennsylvania, Inc.
Docket Number: C-2012-2305085


Dear Secretary Chiavetta:

Enclosed is Complainant's Reply to the Answer submitted by Verizon Pennsylvania in the subject proceedings.

If you have any questions with regard to this filing, please direct them to me.

Thank you for your attention to this matter.

Very truly yours,


Lawrence G. Zurawsky
Complainant

LGZ:ssz

cc: Suzan D. Paiva
Assistant General Counsel
Verizon Pennsylvania, Inc.
1717 Arch Street, Floor 3 SE
Philadelphia, PA 19103

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Lawrence Zurawsky

Complainant,

Docket No. C-2012-2305085

v.

Verizon Pennsylvania Inc.,

Respondent.

**COMPLAINANT'S REPLY TO ANSWER
OF VERIZON PENNSYLVANIA INC.**

Complainant, Lawrence G. Zurawsky, submits the following as his Reply to the Answer to the Complaint filed by Verizon. Complainant respectfully reserves the right to amend this Reply and the Complaint, if this case proceeds to administrative hearing and/or litigation. Complainant replies as follows:

1. Verizon avers that Verizon's random phone check system "... rarely rings through to disturb customers", thereby admitting that the system check tone can ring through to disturb customers, which is happening in Complainant's circumstances.

2. Verizon avers that a manual Prohibit Line Insulation Testing (PLIT) lock was placed on Complainant's line but avers further that Verizon "...determined that the PLIT had been removed from the line ...". That admission by Verizon corroborates the identical information that, on two prior occasions, was reported orally to Complainant by Verizon personnel who were responding to Complainant's telephonic complaints to the Verizon office.

3. In their Answer, on page 2, paragraph 2, Verizon avers that "With PLIT coding still active on Complainant's line it would have been impossible for line testing to

flow through to this residential number.” That statement contradicts the averment made by Verizon in its Answer, page 2, in which Verizon avers that “... the system check rarely rings through to disturb customers.” (Emphasis supplied by Complainant).

4. In its Answer, on page 2, last paragraph, Verizon avers that Complainant was not willing to work any further with Verizon PA to determine the origin of the calls. That disingenuous averment is incredible in consideration of the four year history of Complainant’s reporting repetition of the problem to Verizon. Verizon’s response included sending four separate technicians to respond to the problem. In total, the technicians spent approximately four hours in Complainant’s residence. No Verizon employee ever suggested a trap to intercept the random checking system signal.

Verizon has ignored the fact that, when the problem first occurred three or four years ago, a ten day trap was placed on the same residential telephone number at the request of Complainant. That ten day trap never intercepted the checking signal and the trap was removed. It is not surprising that a ten day trap installation period would not be efficacious. The signal is not sent often enough to assure interception in a ten day trap period. After the trap was removed, the system check code signal has been received on a number of occasions.

5. Verizon’s Answer averments present an additional inconsistency in Answer footnote 1 on page 2, in which Verizon admits that, because the checking signal is a short ½ ring, “... it is not 100% certain that the trap will be able to catch the caller information.”

6. On June 26, 2012, Complainant received a telephone call from Mediator Cynthia Lehman, during which Complainant agreed to cooperate with Verizon for installation of a trap. Complainant did request that the trap be maintained for longer than a ten day period because of the timing between code signals received in the past.

7. The averments of Answer paragraph 9 are denied. Paragraph 9 of the formal Complaint presents Complainant's averment that the facts reported in the Complaint are true and correct and are verified under Pennsylvania law.

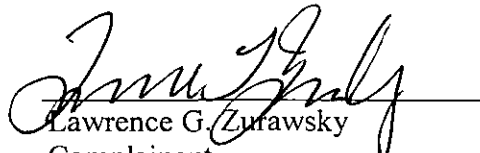
WHEREFORE, for the reasons stated above and reasons stated in the Complaint, and in Complainant's letter of June 12, 2012 to Rosemary Chiavetta, Secretary of the Pennsylvania Public Utility Commission, Complainant respectfully requests that:

(a). Verizon be required to install a trap immediately and maintain that trap for a period of time that can reasonably be anticipated to intercept the line checking signal, and

(b). Mediation be scheduled promptly after the removal of the trap, at a date and time certain for a mediation conference between Complainant and representatives of Verizon.

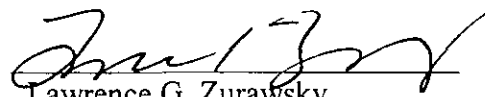
Respectfully submitted,

June 27, 2012


Lawrence G. Zurawsky
Complainant

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2012, a true and correct copy of the accompanying Reply to Verizon's Answer was served by first class mail, postage prepaid, to Suzan DeBusk Paiva, Verizon Pennsylvania Inc., 1717 Arch Street, 3rd Floor, Philadelphia, PA 19103

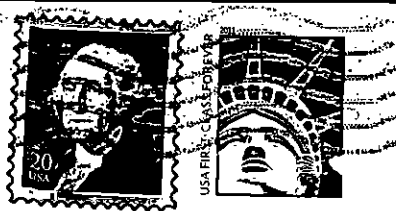

Lawrence G. Zurawsky

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