

**VIA E-FILING
August 9, 2013**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Lidia Shan

v.

Verizon Pennsylvania, Inc.

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C-2013-2371560

NEW MATTER

I reject in the entirety Verizon's "Answer" to my complaint docket #2013-2371560 as it intentionally omits the subject matter concerning their confirmation number #PA 00128314172 issued to me by Verizon's customer service on 21/11/2011 with a fixed rate of \$6.0/month for the time when the phone was in suspension from December 2011 to September 2012.

I request that "Answer" for the Docket # 2013-2371560 be dismissed or denied in its entirety due to the fact that Verizon knowingly and intentionally omitted in their "Answer" the confirmation number from Verizon's customer service issued to me on 21/11/2011 and the monthly rate of \$6.0/monthly.

I request Verizon to provide the recordings of this date 21/11/2011 to prove that this flat fee was confirmed by Verizon for nine months.

There is no need to go further in this discussion if Verizon cannot substantiate the charges for suspended lines by providing the costs and the fact that the line in reality is being disconnected. If Verizon will not provide the costs for suspended lines the "Answer" must be dismissed as having no validity. Verizon has no proof that the charges they are using are legal and proper because the approved tariffs are intentionally missing the disclosure that the line is being disconnected. I do not owe Verizon a penny therefore the outstanding charge of \$70.20 is unwarranted. Verizon must to withdraw claims from collection agencies they filed as unsubstantiated. I am a customer of Bell Atlantic and later of Verizon since 1985 and I have a perfect credit score as I never missed one payment to Verizon.

It is the full responsibility of a PPUC judge to make sure that Verizon will provide these recordings and actual operational costs for suspended lines. In case Verizon will hide the evidence from the judge and manipulate the outcome of the judge's decision further complaints will be filed. Under the Fifth Amendment of United States Constitution I have full rights of Freedom of Speech and Expressions.

My request to the judge is: you have no rights to make any decision in this case if the evidence of the recording of my conversation with customer service and actual operational costs for suspended lines will not be provided. I must listen to the recording to identify whether it was my recording and not someone else's voice.

Verizon states in the "Answer" that I challenge their Commission's approved tariffs "on the basis that the charges for Verizon 'vacation' services are somehow improper.

The charges have been found proper, reasonable and in full compliance with the Verizon Commission approved tariff." The charges are not only "somehow improper", they are based on non-existing services as the line is being disconnected and therefore there is no signal. The approved tariff for suspended line PAPUC tariff No 1, Section 27, 42 Revision and local General tariff PPUC No 1, Section 1, original Sheet 23HJ doesn't state that the line in reality is being disconnected meaning that Verizon together with PPUC knowingly and intentionally did not disclose to the consumer the truth, making this approved tariff obstruction of justice that is aimed to defraud the consumers.

Let's put facts together. The other states where Verizon operates besides Pennsylvania there are approved PUC flat fees for suspended telephone lines. The PPUC approved tariffs Verizon hides behind are not only illegal or improper; since inception they are based on knowingly omitted facts in that they cannot provide dial tone, touch tone or voice service when there is no signal on the line due to a switched off circuit. This fact is being intentionally not disclosed in approved tariffs and is being hidden from consumers, assuming that an ordinary consumer will not realize how they have been fooled by "friendly Verizon." Therefore approved tariffs are not only unreasonable; they are unjustifiable and must be eliminated.

Let's go back to the time when Verizon initially submitted for filing with PPUC tariffs for approval for suspended telephone lines. Verizon knowingly and intentionally concealed a material fact and that was that the suspended line is in reality a disconnected line when the circuit is off and therefore there cannot be an incoming or outgoing signal. When there is no signal, there is no dial tone, touch tone or voice service, therefore these services are non-existing in objective reality and Verizon cannot substantiate them with the costs; however, these non-existing services are part of the described approved tariffs and show up in the consumers bills. It is in terms not only unreasonable or unjustifiable it constitutes an obstruction of justice and fraud and this fraud has continued for many years in Pennsylvania and is covered up by PPUC (I.D. and Order of Docket # 2009-2150021). These are the reality facts Verizon and PPUC are avoiding to accept and take responsibility for their actions.

These are the grounds and reasons for all of my complaints that did not receive appropriate attention from PPUC, nor Verizon to establish the proper tariffs substantiated by operational procedures they have and the associated costs for suspended lines.

Verizon never substantiated the proof of the tariffs they use with costs they described in their bills, nor did they provide the requested documentation from 2009 in my previous complaint to relief me from complaining.

Apparently, in the lost minds of Verizon and PPUC non-existence may exist as PPUC approved tariffs for non-existent services being existed and they attached a high price tag on it as full tariffs for an operational line. This is in what PPUC and Verizon are trying to convince me and Pennsylvania's consumers that Verizon operates within utility code parameters.

In response to item 4.b of Verizon's "Answer": Yes, indeed, I filed previously complaints against Verizon but none of them received appropriate attention in respect to a matter that the approved tariffs for suspended lines are not in correlation with the operational procedures Verizon has and proof for it was a

testimony of Ms. Ryan, Verizon's representative, when she testified that Verizon does switch off the circuit for suspended lines. This evidence was knowingly and intentionally omitted from discussion in Initial decision and was not disclosed in the approved tariffs for suspended lines. Unfortunately, the matter is continuing because Verizon knowingly omitted the truth about their real operational procedures and associated costs and PPUC covers up.

To clarify the other point Verizon brought up in "Answer" and that is, indeed, I had to disconnect in December of 2012 my phone because the Verizon's customer service representative advised me that Verizon will keep my phone number upon my return. Besides, I will survive without getting aggravated to discuss with Verizon any matter concerning unjustifiable fees for suspended lines they impose on consumers since PPUC did not exercise their "impartial adjudication" but exercised immoral adjudication in closing my complaint instead of establishing and adopting the tariffs for suspended lines as other states already made.

Since Verizon never had intentions to satisfy my complaint of Docket 2009-2150021 while PPUC does cover up for them, Verizon purposely omitted the disclosure of facts and denied the arguments in all correspondences concerning the complaint for their own convenience without any logical or proper reasoning, I have no choice but continue to complain until my complaint will be heard by an independent minded judge and the issues I brought in my formal complaint of December 2009 will be satisfied.

On the other note, I was questioning in my previous correspondences Verizon's flat fee tariffs approved by other states. Please provide me an explanation of the reasons why do I have to complain to PPUC if PUC's of other states, years ago, adopted reasonable flat fee tariffs when their consumers place their phones on vacation (suspension) but PPUC drags their feet without any positive actions to correct this situation. This is why the legal team of Verizon fights with me, wasting funds and not producing any results because Verizon does not want the consumer to know how they defraud them under the protection and authority of the PPUC. By continuation of Verizon's absurdity, Verizon and PPUC don't provide other options for me except to complain.

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