

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

September 11, 2013

LIDIA SHAN
V
VERIZON PENNSYLVANIA

Docket No. C-2013-2371560 .

RESPONSE TO VERIZON'S OBJECTIONS

CERTIFICATE OF SERVICE.

Dear Ms. Chiavetta,

Attached for filing in connection with complaint Docket No. C-2013-2371560 is my response to Verizon's objections and their decision not to release the requested documents. Verizon has refused to release these documents since the 2010 hearing.

This response will be served to your office and the opponent at the same time as required by the Commission's Regulations by the date above. This is to verify that I E-filed my letter and Certificate of Service to your attention and to the opponent together with the above mentioned document.

Thank you very much for your attention into the above matter.

Respectfully,

Lidia Shan,
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Philadelphia, PA 19116
215-677-6471
smellsense@aol.com

cc: Steven K. Haas
Counsel for Verizon Pennsylvania Inc.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street,
P.O. Box 1778
Harrisburg, PA 17101

**BEFORE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Lidia Shan

v.

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C-2013-2371560

Verizon Pennsylvania, Inc.

RESPONSE TO VERIZON'S OBJECTIONS

In the hearing in front of the ALJ Cynthia Fordham on September 23, 2010, I requested from Verizon to provide me with the records of operational procedure to suspend the land line in Philadelphia and associated costs with this operational procedure. Besides I requested the same in the response to P.O. in January 2010.

Verizon never provided this information that was requested in order to properly decide my complaint of 2009 docket #2009-2150021,

I repeated my request on many occasions and in e-mail of September 5, 2013 to counsel S.K. Haas to provide recordings or transcripts of the conversations between Verizon's representative and me that took place on November 2, 2010 and November 21, 2011. Both of these conversations resulted in issuing a confirmation number in order to suspend my phone line and a flat fee for non-operational line.

Below, please find a copy of my e-mail of September 5, 2013 to Verizon counsel S.K. Haas:

"Please provide for me the following documentation:

1. Recordings of November 2, 2010 conversation between Verizon representative and me in regard to suspend my telephone.
2. Recordings of November 21, 2011 conversation between Verizon representative and me in regard to suspend my telephone.
3. Operational procedure to suspend the telephone line in Philadelphia and associated costs to suspend these lines.

Thank you for your consideration"

Verizon filed objections regarding these matters on September 9, 2013..

Verizon cannot object to my request to provide the operational procedure and associated costs because Verizon never satisfied my request in 2009 during discovery and in 2010 hearing at PPUC stating that the docket #2009-2150021 is closed and ALJ will not listen in regard to this issue. Verizon cannot separate two complaints because unresolved docket #2009-2150021 cause to file another complaint under the docket #2013-2371560. I already experienced with PPUC the qualification of ALJ and their standpoint on how to make consumer never win the case at PPUC. The tariff itself for suspended line doesn't reveal the operational procedure for this operation, doesn't reveal the objective reality fact and that is that suspended line is a disconnected line and doesn't have a signal and because the docket #2009-2150021 was closed without resolution at PPUC doesn't mean that other judicial jurisdictions will not listen to my

complaint. Therefore, regardless whether Docket #2009-215-0021 was illegally closed you still must provide this information.

Concerning the recordings of the conversations on November 2, 2010 and November 21, 2011 as you stated you do not have recordings even though these conversations have always been recorded as Verizon's message states then you must provide transcripts of these conversations with the confirmation numbers attached to these conversations in order for ALJ Christopher Pell to make a proper decision. Without these documentations Verizon will be liable in postponing the court hearing scheduled for September 27, 2013.

Verizon must provide all the following requested documents:

1. Operational procedure for suspending telephone line in Philadelphia
2. Recordings or transcripts of the conversation between Verizon's Rep and me on November 2, 2010
3. Recordings or transcript of the conversation between Verizon's Rep and me on November 21, 2011.

In case Verizon decides not to provide these documents I will have no choice but subpoena them through other judicial jurisdictions by filing a complaint and have a court hearing where all the evidences intentionally and purposely omitted in the I.D of the hearing of 2010 at PPUC will be on display for the public and open a flood gate of all the irregularities in PPUC and Verizon's practices.

In case if Verizon wants to settle out of court the following are the terms:

1. Verizon must admit that suspended line is a disconnected line as it was stated by Ms. Ryan in the hearing of September 2010;
2. Verizon must introduce and adopt the tariff they are using in other states for suspended lines;
3. Verizon must to reimburse all the consumers of Pennsylvania since the inception of the approved tariff by PPUC when the consumer is requesting to suspend their line charging them for a full operational cost for the disconnected line i.e. New York, N.J., Maryland, Florida etc.

Thank you.

Lidia Shan
215-758-0280