

September 30, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street — Filing Room (2nd Floor)
P.O. Box 3265
Harrisburg, PA 17105-3265

CERTIFICATE OF SERVICE

RE: Lidia Shan
v
Verizon Pennsylvania;

Docket No. C-2013-2371560;

**MOTION TO STRIKE VERIZON'S MOTION TO STRIKE
OF SEPTEMBER 24, 2013**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is my Motion to Strike Verizon's Motion to Strike of September 24, 2013. I Motion to Strike Verizon's Motion to Strike because Verizon's actions are inappropriate based on intentional concealing documentation from ALJ and me requested for the hearing for over 4 years. Verizon caused the hearing of September 27, 2013 to be cancelled due to their secrets knowingly hidden from the consumers.

A copy of this document will be served to your office and the respondent at the same time as required by the Commission's Regulations by the date above.

This is to verify that I E-filed Motion to Strike in the docket #2013-2371560 and Certificate of Service to your attention and to the respondent.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

Lidia Shan
215-758-0280

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

September 26, 2013

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street — Filing Room (2nd Floor)
P.O. Box 3265
Harrisburg, PA 17105-3265

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

LIDIA SHAN,
Complainant

Docket No. C-2013-2371560

v

VERIZON PENNSYLVANIA LLC,
Respondent.

**MOTION TO STRIKE VERIZON'S MOTION TO STRIKE
OF SEPTEMBER 24, 2013**

I Motion to Strike Verizon's Motion to Strike because Verizon continue to disregard the requested documents for the hearing of September 27, 2013 intentionally concealing them from ALJ and me causing the hearing to be cancelled; Verizon is hiding the truth regarding their poor records keeping. Verizon's "Motion to Strike" my "Motion to Dismiss" Verizon's Answer of September 24, 2013 is unwarranted as Verizon in "Motion to Strike" have not fully disclosed what was requested from them. Verizon's statement in their attachment to September 17, 2013 correspondence is incorrect. I requested this information not once as they state but several times. The attached information to their "Motion to Strike" of September 24, 2013 finally provided by Verizon but was edited by Verizon to suit their intentions. Verizon knowingly failed to attach a very important fact and that is the confirmation number issued to me on November 21, 2011 where there would be a note of the entire conversation and the fact about issued fee of \$6.0/monthly from December 5, 2011 to September 1, 2012. What was edited later not at the time of the conversation without my consent is irrelevant as I was not there to correct or agree. Verizon finally admitted that on November 21, 2011 there was a conversation between Verizon and me and it states that it was issued a fee of \$6.0 a month for 9 months. Now Verizon states that on November 21, 2011 the fee of \$6.0 a month for nine months was issued in error. Until Verizon provides me with the confirmation number issued on that day with the attached note or written records Verizon's statement is incorrect and cannot be accepted as a valid statement. It was not issued in error because representative did not tell me that the confirmation number is issued in error at the time of the conversation. It is like in a circus: now you see it, now you don't. A magician (Verizon) shows things and then the things immediately disappear turning into something else.

As far as I experienced dealing with other companies when ethically run business made an error they honor their error without turning their error into unlawful

demands as Verizon did by claiming my delinquency. Verizon with its Counsel are in chaotic, disorganized hysteria sending every day another Motion that doesn't prove anything, doesn't resolve anything, their answers never ever would relate to my questions, doesn't go anywhere and then galore of irrelevant Motions. Counsel in his correspondences is not capable to concentrate on the issues knowingly or unknowingly; he is always omitting the important issues. It makes me to believe that I am dealing with a victim of "No child left behind" that is an educational catastrophe of America.

If PPUC would provide an impartial ALJ then ALJ in no time could turn everything around and judge impartially by asking Verizon to withhold their useless hysteric "Motions" and "Answers" and respond with accuracies and provide all the requested documentations.

Does a consumer have to bring their own judges that are not paid by utilities that will be definitely impartial to resolve questionable practices of utilities?

Verizon's funds are wasted on the Counsel that is doing such a poor job in convincing me that they do not have any documents then they do find them but then they forge them for their own intentions. How can ALJ and I trust Verizon statements or accept them as valid documents if they constantly inappropriately misinform us and avoid the responsibility to face the facts and respond to them in accordance with ethical business practices? Verizon still conceals the records of November 2, 2010 regarding the conversation between Verizon and me. It is imperative to have both of these documents to make comparison analyses to prove that in 2011 the issued \$6.0 fee was not issued in error. In 2011 when I was on the phone with Verizon's representative I purposely asked whether the conversation was being recorded and I was told that it was. Why did Verizon made statement that they do not have records? Verizon does have documents regarding my conversation of November 21, 2011 but for several months they were stating that they do not have any such documents. Finally they discovered the records that were unknown for Verizon until September 18, 2013 but what should have been preserved for a period of seven years as the industry requires and the documents should be identified correlating with cross references as confirmation numbers without hesitation. Instead Verizon decided to fool everybody and hide the facts.

This is the reason that all previously written correspondences to the docket # 2013-2371560 must be dismissed by ALJ due to inaccuracies in Verizon's statements and due to continuous misinformation regarding my requests. Verizon in their statements have a tendency not to concentrate on the arguments I presented but they pick and choose something of unimportance for their intentions and spin what should be prohibited by ALJ. This was one of the reasons why I petitioned to assign an impartial ALJ. ALJ instead of issuing an Order to disclose all the requested documentation from Verizon, decided to close the hearing. This action proves that ALJ was not willing to use his power as an impartial ALJ but as a prejudice judge. I will Motion endlessly because I identified long ago what Verizon doesn't want consumers to know. An assigned ALJ must stop this game of the "Motions" and must Order and compel Verizon to provide all requested documents I specified in many of my correspondences.

In my "Motion to Dismiss" of September 19, 2013, I requested assigned ALJ to subpoena the following documents:

1. Operational procedure to disconnect the dial tone line.

2. Operational procedure to suspend the dial tone line.
3. Operational procedure to issue a confirmation number.
4. Records, notes of conversation between Verizon representative and me on November 21, 2011.
5. Records, notes of conversation between Verizon representative and me on November 2, 2010.
6. Confirmation number PA 00128314172 of 21/11/2011 and what it is concerns.
7. Confirmation number PA 00077679813 of 2/11/2010 and what it is concerns.
8. Where these confirmation numbers are being logged and stored?
9. What is the value of the confirmation number?
10. What is the validity of confirmation number?
11. How long the confirmation numbers must be kept for references?
12. Is there an established tracking system to reference the confirmation numbers?
13. Who reads and has access to oversee the issuance of confirmation numbers?
14. How these confirmation numbers are being coordinated with billing department and correlated with consumer's account?

Since these documents were not subpoena by ALJ, Verizon cannot apply a "Motion to Strike" of September 24, 2013. Verizon continues to conceal the aforementioned documents. Is there anyone at PPUC to stop this non-sense if ALJ is not capable to do it?

Verizon is intentionally blocking fair justice to take place. Without the aforementioned documents being provided ALJ cannot have a hearing.

Verizon is liable for intentionally discrediting my financial integrity by falsifying evidence of my delinquency by filing with several collection agencies. At Verizon there is no system in place that any department can trace a confirmation number and the action to reference the confirmation number to an actual order they issued. If consumer has data concerning particular action with a confirmation number and Verizon has no system to verify this therefore Verizon has no rights to demand from the consumer any unpaid balance because they cannot identify the specificity of their demand.

Verizon exposed their dysfunctional system when I began an investigation into the existed tariffs for suspended lines. The description of the operational procedure of suspending telephone line has nothing to do with operational procedure for dial tone connection line.

Therefore I Motion to Strike Verizon's Motion to Strike of September 24, 2013 and request that an impartial ALJ be appointed and issue an Order for Verizon to provide all the aforementioned necessary documentation. I request this documentation be presented immediately and a new time for a hearing be scheduled.

Lidia Shan
215-758-0280