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June 9, 2014

VIA ELECTRONIC FILING

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

Re: Core Communications, Inc. v. Verizon Pennsylvania, LLC
Docket No. C-2014-2406550

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Conference Memorandum of Core Communications, Inc. in the above referenced matter. Copies of the Memorandum have been served in accordance with the attached Certificate of Service. If you have any questions, please feel free to contact me.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin

Encl.

cc: Honorable Susan Colwell, Administrative Law Judge
Certificate of Service

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A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CORE COMMUNICATIONS, INC.	:	
Complainant	:	
	:	
v.	:	Docket No. C-2014-2406550
	:	
VERIZON PENNSYLVANIA LLC	:	
Respondent	:	
	:	

**PREHEARING CONFERENCE MEMORANDUM OF
CORE COMMUNICATIONS, INC.**

Pursuant to 52 Pa. Code § 5.222, Complainant, Core Communications, Inc. (“Core”), respectfully submits its Prehearing Conference Memorandum in the above-captioned matter.

I. ISSUE FOR RESOLUTION AND CORE’S POSITION

Whether Verizon Pennsylvania, LLC has violated the Interconnection Agreement (ICA) in place between the parties by refusing to pay Core for the use of transport and related facilities to support delivery of interconnection traffic from the Point of Interconnection to the Interconnection Point (“IP”) on Core’s network.

Core’s Position: Core provides and has provided Verizon with transport and related facilities pursuant to the ICA, Verizon ordered and utilized the facilities Core provides and provided to complete the delivery of interconnection traffic to Core’s IP in each LATA pursuant to the ICA, Core has duly billed Verizon for these facilities pursuant to the ICA, yet Verizon refuses to compensate Core in any amount for these facilities.

II. PROPOSED WITNESSES

Core expects to call the following witnesses:

Bret L. Mingo, President, Core— Mr. Mingo is expected to provide testimony, *inter alia*, regarding the respective location of the Points of Interconnection and the Interconnection Points,

the physical architecture of Core's network, the facilities and services used by Verizon, the manner in which Verizon ordered the facilities and services, Core's billings to Verizon for the services and facilities, Verizon's refusal to pay Core for the services and facilities, and the communications between the parties related to the dispute.

Core reserves the right to identify and present the testimony of additional witnesses, as necessary, in direct, rebuttal, and surrebuttal phases of these proceedings, in accordance with the schedule adopted in this proceeding.

III. PROPOSED DISCOVERY, HEARING, AND BRIEFING SCHEDULE

Core proposes the following schedule, which envisions pre-served written testimony followed by an evidentiary hearing for cross-examination of witnesses:

June 12, 2014	Prehearing Conference
July 11, 2014	Core Direct Testimony
August 28, 2014	Verizon Rebuttal Testimony
September 25, 2014	Core Surrebuttal Testimony
October 15, 2014	Verizon Rejoinder Testimony
At hearing	Core Oral Sur-Rejoinder

The parties have conferred and believe the evidentiary hearings will require two days. The parties are available on the following days for hearings: October 21, 22, 23, 28, 29 and 30, 2014. The parties are amenable to holding hearings on any two consecutive days of the Presiding Officer's choosing. The parties agree that Main Briefs would be filed approximately thirty days after the receipt of the hearing transcript, and Reply Briefs would be filed approximately thirty days after the filing of Main Briefs.

IV. DISCOVERY MODIFICATIONS

Core is agreeable to modifying the Commission's regulations regarding discovery at 52 Pa. Code § 5.342(d) for the purposes of this proceeding to provide that objections to discovery are in lieu of answers, and not in addition to answers.


V. STIPULATIONS

Core is agreeable to stipulating to admitting the Interconnection Agreement between the parties into the record by reference to the publicly filed versions of the Interconnection Agreement, to avoid the need to submit copies of the voluminous Agreement itself.

VII. SETTLEMENT

Settlement negotiations have not been initiated by the parties. However, Core remains open to the amicable resolution of this matter. Furthermore, if full settlement cannot be achieved, Core intends to work with Verizon to reach agreement on as many factual and legal issues as possible, to limit the number of issues in dispute and to streamline this proceeding to the greatest extent possible.

Respectfully submitted,



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Counsel for Core Communications, Inc.

DATED: June 9, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

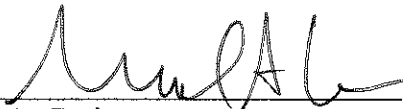
CORE COMMUNICATIONS, INC. Complainant	:	
	:	
v.	:	Docket No. C-2014-2406550
	:	
VERIZON PENNSYLVANIA LLC Respondent	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Pre-Hearing Conference Memorandum upon the parties listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL AND US MAIL

Suzan D. Paiva, Esq.
Verizon Pennsylvania, Inc.
1717 Arch Street, 3 East
Philadelphia PA 19103



Michael A. Gruin

DATED: June 9, 2014