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October 20, 2014

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

Re: Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC for Competitive Classification of All Retail Services in Certain Geographic Areas, and For a Waiver of Regulations For Competitive Services, Docket Nos. P-2014-2446303 and P-2014-2446304

Dear Secretary Chiavetta:

Please find enclosed the Petition to Intervene of AT&T for filing in the above-referenced matter.

Please contact me if you have any questions or concerns regarding this matter.

Very truly yours,



Michelle Painter

Enclosure

cc: Certificate of Service  
The Honorable Joel H. Cheskis, ALJ  
Mary E. Burgess, AT&T

**SERVICE LIST**

I hereby certify that I have this day caused a true copy of AT&T's Petition to Intervene to be served upon the parties of record in Docket Nos. P-2014-2446303 and P-2014-2446304 in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55 in the manner and upon the parties listed below.

Dated in Chantilly, VA on October 20, 2014

**VIA FIRST CLASS MAIL**

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Michelle Painter

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Verizon Pennsylvania LLC and :  
Verizon North LLC for Competitive Classification : P-2014-2446303  
Of All Retail Services In Certain Geographic Areas, : P-2014-2446304  
And For A Waiver Of Regulations For Competitive :  
Services :

**PETITION TO INTERVENE OF AT&T**

AT&T Corp. (“AT&T”) and Teleport Communications America, LLC (“Teleport”) (collectively “AT&T”) hereby move to intervene in the above-captioned proceedings pursuant to 52 Pa. Code § 5.71 et seq.

On October 6, 2014, Verizon Pennsylvania LLC and Verizon North LLC filed petitions pursuant to 66 Pa. C.S. § 3016(a) requesting that the Commission declare as competitive all protected or noncompetitive retail services offered by the Verizon companies within their Philadelphia, Erie, Scranton-Wilkes Barre, Harrisburg, Pittsburgh, Allentown, and York service area regions. The petitions also request waivers of Commission regulations for competitive services.

AT&T and Teleport are competitive local exchange carriers (“CLECs”) and interexchange carriers (“IXCs”) and provide retail telecommunications services in the Commonwealth of Pennsylvania. As a competitor of Verizon for the provision of intrastate retail telecommunications services, AT&T has a direct interest in any action the Pennsylvania Public Utility Commission (“PUC”) takes to foster a competitive telecommunications market in the Commonwealth, and is directly impacted by the relief sought by Verizon in these dockets. While the reclassification of certain services requested by Verizon represents one step toward creating a

more competitive telecommunications market, more action is necessary to remove subsidies and level the playing field throughout the telecommunications market. In order to foster competition, the Commission should take this opportunity to implement intrastate originating access charge reform. This reform is a critical component of the consideration of Verizon's reclassification petition.

AT&T and its customers would be negatively impacted if the Commission were to grant Verizon's petitions without implementing intrastate originating access charge reform to eliminate subsidies. The interests of AT&T and its customers will not be adequately represented without AT&T's intervention in this matter.

AT&T has reviewed the testimony submitted in support of Verizon's petition, and while AT&T agrees with much of the evidence addressed in the testimony, the testimony also contains certain errors and omissions of fact and/or Pennsylvania law that should be addressed in order for the Commission to have a complete record on which to base a decision.

For all of the reasons stated herein and in AT&T's Prehearing Memorandum, AT&T has a direct and substantial interest in the subject matter of Verizon's Competitive Classification Petition, and AT&T should therefore be permitted to intervene as an active party.

AT&T's counsel in this case is as follows:

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WHEREFORE, AT&T respectfully requests that the Commission grant AT&T's Petition to Intervene in this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michelle Painter". The signature is written in black ink and is positioned above a horizontal line.

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Counsel for AT&T

Date: October 20, 2014