



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

November 28, 2007

P-00930715F1000	P-00001854F1000
P-00930715	P-00001854
R-00051228	R-00051227
R-00051228C0001	R-00051227C0001
R-00051228C0002	R-00051227C0002

SUZAN D PAIVA
ASSISTANT GENERAL COUNSEL
VERIZON PENNSYLVANIA INC
VERIZON NORTH INC
1717 ARCH STREET 10W
PHILADELPHIA PA 19103

DOCUMENT
FOLDER

Re: *Petition of Verizon Pennsylvania Inc. For Alternative Form of Regulation Under Chapter 30 and Act 183, Docket Nos. P-00930715, P-00930715F1000, R-00051228, R-00051228C0001, and R-00051228C0002*

Petition of Verizon North Inc. For Alternative Form of Regulation Under Chapter 30 and Act 183, Docket Nos. P-00001854, P-00001854F1000, R-00051227, R-00051227C0001 and R-00051227C0002

Dear Ms Paiva:

Staff review indicates that the filing, the Redline Compliance Version re-submitted by Verizon on August 16, 2007, to incorporate pertinent information from all supplements to its Chapter 30 plan contains language that goes beyond "the language currently in effect" as directed in Ordering Paragraph 9.

9. That Verizon Pennsylvania Inc. and Verizon North Inc. shall review, integrate, and edit each of their Amended Chapter 30 Plans so that those documents **incorporate the pertinent information from the existing supplements into them** so as to ensure that the Plans contain only the language currently in effect. Within ninety (90) days after the date of entry of a final Opinion and Order in this proceeding, Verizon Pennsylvania Inc. and Verizon North Inc. shall file revised Chapter 30 Plans, along with redlined copies, with the Commission for approval.¹ [emphasis added]

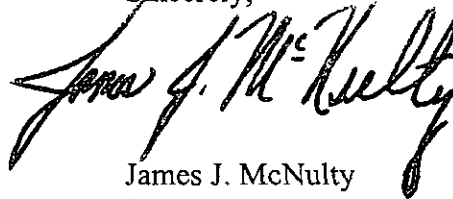
¹ See Ordering Paragraph 9 of our March 22, 2007 Order and page 25 of our Order entered April 25, 2007, in the above referenced dockets.

Staff would like to note that this is a compliance filing only and that any updates and rewording should not have been made in this filing. Updates, rewording and deletion of language that is no longer in effect are to be included in the upcoming proposed filing that Verizon intends to make. Changes are not to be made based on the entire Act 183. The only changes that should be made to the above mentioned Chapter 30 Plan are those that were found in previously Commission-approved supplements.

Any changes that concern Act 183 that were not in the approved supplements must be removed as per the March 22, 2007 Order.² The notice does not encompass the entire act.

Please note Verizon has 10 business days to file replies to the changes as directed in this Secretarial Letter and to contact the Commission to schedule a meeting to review these changes. Questions in this matter may be directed to Christopher Hepburn, Telco Division, Bureau of Fixed Utility Services at (717) 214-9115 or chepburn@state.pa.us.

Sincerely,



James J. McNulty
Secretary

cc: Office of Consumer Advocate
Office of Small Business Advocate
Bohdan Pankiw, Chief Counsel Law Bureau
Carl S. Hisiro, Assistant Counsel
Karen O. Moury, Director of Operations
Robert Wilson, Director of FUS
Elaine McDonald, FUS Tariffs
Jani Tuzinski, FUS Telco
Johnnie Simms, Director of Trial Staff
Kathleen Aunkst, Secretary's Bureau

² See Discussion at section 4(d), paragraph 4 of March 22, 2007 Order.

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Verizon Pennsylvania Inc.
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General Note: All changes reflecting the name change from Bell to Verizon are acceptable and therefore not included in the following changes.

Table of Contents

1. Add the glossary back into the Table of Contents and the relevant section of the Plan.

Executive Summary

2. First paragraph: Replace the word “minimize” with the word “reduce.”
3. Paragraph 1: Change back to original state. Starting with the second sentence, delete all underlined text and add back all crossed out text.
4. Paragraph 2: Remove the words, “consistent with Act 183” and add text “and obligations...privacy.”
5. Paragraph 3 starting with the second sentence: Re-instate all crossed out language.
6. Paragraph 4: Remove “consistent with Act 183.” Restore the last sentence of this paragraph.
7. Paragraph 5: Restore original text starting with the sentence “Part 3 supersedes” to the end of paragraph.

Part 1 – Price Stability Mechanism for Noncompetitive Services

8. Paragraph 2: Restore original language except for the change of 2.93 percent to 0.5 percent.
9. Restore footnote 1.
10. Part 1 (A) 1. Restore rate caps.
11. Part 1 (A) 4: Re-instate original text.
12. Part 1 (A) 7: Restore “on 30 days notice.”
13. Part 1 (B) 2: Remove the text beginning with “which services may be
14. Part 1 (B) 4: Restore all text.

Part 1 – Price Stability Mechanism for Noncompetitive Services (cont’d)

15. Part 1 (C) Revenue neutral changes: Restore the language in 1, 2 and 3.

Part 2- Competitive Services Deregulation Plan

16. Section A: Restore the language from “Bell filed informational tariffs” to the end of the paragraph.
17. Section B: Remove the word “direct” from paragraph 4.
18. Section C: Restore entire section.
19. Section C: Remove both references to Act 183 and restore the word “statutory.”

Part 3- Network Modernization Implementation Plan

20. Overview - Paragraph 6: Restore entire sentence “The service capabilities, the services they will support and Verizon’s current view of the most appropriate supporting technologies for each, are as follows.”
21. Section A - Intelligent network Services and Digital Services: Restore all language, including tables, in this section.
22. Section B – Digital Services: Restore entire section, including tables.
23. Section C – Broadband Services: Change this section back to original text.
24. Section C 1: Remove sentence beginning with, “In Act 183, broadband...”
Restore previous table and delete revised table.
Restore to original text starting with “The company’s commitment to universal broadband” to the end of section 1.
Delete footnote 12.
25. Section C 2: Remove Act 183 and replace with chapter 30 in the first sentence.
Remove table – Broadband availability and put the original table back in.
26. Section C 3: Delete this section.
27. Section C 4: change back to original text and table.

Part 3- Network Modernization Implementation Plan (cont'd)

28. Section C 6 – DSL Deployment “Overlay”: We note that although this section isn’t compliant we will accept the section in this filing.
29. Section C 9 – Restore the sentence beginning with, “Although the company has not...”
30. Section C 10: Remove “July 2, 2007.”
31. Change this section to original wording.

Part 4 – Additional Company Commitments

32. Section A: Remove the first paragraph.
Restore text in 1 through 9
33. Section B: Restore 1A. B. C., 2 A through H, 3. 3A and 3B.
34. Section C: Remove this section.

Appendices

35. Explain the deletion of the Upper Black Eddy wire center.
36. Explain the classification of Allentown as both urban and suburban.
37. Provide an explanation as to the difference of Allentown and Allentown-Pitt wire centers.
38. Correct the spelling of Mahaffey.
39. Explain the addition of the Midfield Wire Center.
40. Explain the removal of Appendices 2-7 and 4-1.

PA PUC
Verizon North Inc.
Docket # P-00001854F1000

Executive Summary

1. 1st paragraph: Replace the word “minimize” with the word “reduce.”
Restore original language starting with, “It is designed to entirely...in approving the Verizon parent level merger.”
2. 2nd paragraph: Return entire paragraph back to original wording.
3. 4th paragraph: Restore original text. Delete all changes except those changes associated with NMP.
4. 5th paragraph: Delete “consistent with the provisions of Act 183.”
5. 6th paragraph: Restore “an independent inflation index.”

Part 1. Network modernization Plan

6. 3: Restore the sentence beginning, “This Plan does not supersede...and GTE North, Inc.”
7. 1, 2 and 3: Restore original text in these sections.
8. 3: Remove footnote 3.
9. B 4.3: Replace is deploying with expects and as with to be.
10. B 4.5: Restore original text and delete new text. Change (B) to (b).
11. C 1. Restore original date of March 31, 2003.
Delete “will continue to file biennial reports.”
Restore the second sentence.
12. Explain the deletion of the Technology section found in Supplement 1.

Part 2 – Competitive Services Deregulation Plan

13. 1st paragraph: Delete “The current” and restore “An initial.”
14. A 2: Change “were” to “are” and “determined” to “declared.”

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Part 2 – Competitive Services Deregulation Plan (cont'd)

15. A 2: Change the reference in the first sentence to “66 Pa. C.S. § 3013(c).”
16. A 2: Restore to original text starting with “The following services were declared” to the end of the paragraph.
17. A 4: Change back to original text by deleting the first sentence and “to the extent that authority was preserved under Act 183” and restoring “are not to be regulated on any basis, including rates, rate structures, rate base, rate of return or earnings.”
18. B 3: Remove the word “direct” in both sentences.

Part 3 – Price Stability Plan for Noncompetitive Services

19. A 6: Return “beginning in 2003” to the sentence.
20. B 2: Return entire section to original text.
21. C: Restore footnote 6.
22. D 1-5: Delete new numbers 1 and 2. Restore all other text in these sections.
23. E: Correct number of footnote to 7. See C above.

Part 4 – Additional Company Commitments and Other Terms

24. A 1-7: Remove first two sentences and restore all text in sections one through seven.
25. B 1: Bring back the 2nd sentence beginning with, “In addition...”
Restore (b), (c), (e), (f), (g).
26. C 1: Restore to original text.
27. C 1: Remove new C1 beginning with “No change may be made ...
66 Pa. C.S. § 3013(b).”
28. C 2 (new): Change this section to quote 66 Pa. C.S § 3019(h) verbatim.