

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
Uniform Cover and Calendar Sheet**

1. <u>REPORT DATE:</u> March 19, 2002	2. <u>BUREAU AGENDA NO.:</u> MAR-2002-FUS-0438*
3. <u>BUREAU:</u> Fixed Utility Services	
4. <u>SECTION(S):</u> Telecommunications	5. <u>PUBLIC MEETING DATE:</u>
6. <u>APPROVED BY:</u> Director: Rosenthal <i>[Signature]</i> 3-5242 Supervisor: Wagner <i>[Signature]</i> 3-6175 Legal Review by: Arnold <i>[Signature]</i> 7-8032	March 28, 2002 DOCKETED APR 8 2002
7. <u>PERSONS IN CHARGE:</u> <i>[Signature]</i> Blawie/House 3-6174	
8. <u>DOCKET NO.:</u> See Below	

9. (a) **CAPTION** (abbreviate if more than 4 lines)
 (b) **Short summary of history & facts, documents & briefs**
 (c) **Recommendation**

DOCUMENT FOLDER

(a) Applications of Adelphia Business Solutions Operations for approval to offer, render, furnish, or supply telecommunication services as a:

- A-310923 – Reseller of Interexchange (IXC) Toll Services
- A-310923, F0002 – Competitive Local Exchange Carrier (CLEC)
- A-310923, F0003 – Competitive Access Provider (CAP)
- A-310923, F0004 – Facilities-Based IXC Toll Carrier

(b) On February 3, 2000, the subject Applications were filed. On March 12, 2002, amended Applications were filed. No protests were filed and no hearings were held.

(c) The Bureau of Fixed Utility Services recommends that the Commission adopt the proposed draft Order approving the Applications.

10. MOTION BY: Commissioner Chm. Thomas

SECONDED: Commissioner Bloom

- Commissioner Pizzingrilli - Yes
- Commissioner Wilson - Yes
- Commissioner Fitzpatrick - Yes

CONTENTS OF MOTION: Staff recommendation adopted.



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

IN REPLY PLEASE
REFER TO OUR FILE

APRIL 1, 2002

A-310923; A-310923 F0002
A-310923 F0003; A-310923 F0004

DANA FRIX ESQUIRE
MICHAEL P DONAHUE ESQUIRE
SWIDLER BERLIN
SHEREFF & FRIEDMAN
3000 K STREET NW STE 300
WASHINGTON DC 20007

DOCUMENT
FOLDER

RECEIVED
APR 11 2002

Application of Adelpia Business Solutions Operations for approval of the right to begin to offer, render, furnish, or supply telecommunication services as a Reseller of Interexchange Toll Services, to the Public, in the Commonwealth of Pennsylvania.

Application of Adelpia Business Solutions Operations for approval of the right to begin to offer, render, furnish, or supply telecommunications services as a Reseller and Facilities-Based Competitive Local Exchange Carrier, to the Public, within the service territories of Verizon Pennsylvania, Inc., Verizon North, Inc., and Sprint/United Telephone Companies, in the Commonwealth of Pennsylvania.

Application of Adelpia Business Solutions Operations for approval of the right to begin to offer, render, furnish, or supply telecommunication services as a Competitive Access Provider, to the Public, in the Commonwealth of Pennsylvania.

Application of Adelpia Business Solutions Operation for approval of the right to begin to offer, render, furnish, or supply telecommunication services, as a Facilities-Based Interexchange Toll Services provider, to the Public, in the Commonwealth of Pennsylvania.

To Whom It May Concern:

This is to advise you that the Commission in Public Meeting on March 28, 2002 has adopted an Order in the above entitled proceeding.

An Order has been enclosed for your records.

Very truly yours,

James J. McNulty
Secretary

fg
encls
cert. mail
JANET S LIVENGOOD ESQUIRE
DDI PLAZA TWO
500 THOMAS STREET
SUITE 400
BRIDGEVILLE PA 15017

NORMAN J KENNARD ESQUIRE
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PO BOX 1778
HARRISBURG PA 17105-1778

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA. 17105-3265**

Public Meeting held March 28, 2002

Commissioners Present:

Glen R. Thomas, Chairman
Robert K. Bloom, Vice Chairman
Kim Pizzingrilli
Aaron Wilson, Jr.
Terrance J. Fitzpatrick

**DOCUMENT
FOLDER**

Application of Adelphia Business Solutions
Operations for approval to offer, render, furnish or
supply telecommunication services as a Reseller of
Interexchange Toll Services to the Public in the
Commonwealth of Pennsylvania.

Docket Number
A-310923

Application of Adelphia Business Solutions
Operations for approval to offer, render, furnish or
supply telecommunication services as a Reseller and
Facilities-Based Competitive Local Exchange Carrier
to the Public in the Service Territories of Verizon PA,
Verizon North, Inc. and Sprint/United Telephone
Companies in the Commonwealth of Pennsylvania.

Docket Number
A-310923 F0002

DOCKETED
APR 11 2002

Application of Adelphia Business Solutions
Operations for approval to offer, render, furnish or
supply telecommunication services as a Competitive
Access Provider to the Public in the Commonwealth of
Pennsylvania.

Docket Number
A-310923 F0003

Application of Adelphia Business Solutions
Operations for approval to offer, render, furnish or
supply telecommunication services as a Facilities-
Based Interexchange Toll Services carrier to the Public
in the Commonwealth of Pennsylvania

Docket Number
A-310923 F0004

ORDER

BY THE COMMISSION:

On February 3, 2000, Adelphia Business Solutions Operations (“ABSO” or “Applicant”) filed Applications seeking Certificates of Public Convenience pursuant to the Telecommunications Act of 1996, 47 U.S.C. §§201, *et seq.*, (TA-96)¹ and to Chapter 11 and 30 of the Public Utility Code (Code) (66 Pa. C.S. §1101, *et seq.*, and §§3001, *et seq.*) evidencing authority to provide the following telecommunication services to residential and business customers:

- (1) As a Reseller of intra and interLATA Interexchange Toll Services (IXC) throughout the Commonwealth,
- (2) As a Reseller and Facilities-Based Competitive Local Exchange Carrier (CLEC) in the service territories of Verizon PA, Verizon North, Inc., and Sprint/United Telephone Companies within the State of Pennsylvania,
- (3) As a Competitive Access Provider (CAP) throughout the Commonwealth, and
- (4) As a Facilities-Based intra and interLATA IXC Toll Services throughout the Commonwealth.

On March 12, 2002, ABSO filed amended Applications supplying updated information.

The Applicant complied with Section 5.14 of our regulations, 52 Pa Code §5.14, relating to Applications requiring notice. No protests were filed. No hearings were held.

¹ Market entry requirements, in light of the policy objectives of the TA-96, for telecommunication service providers are set out in *In Re: Implementation of the Telecommunications Act of 1996*, Docket No. M-00960799 (*Implementation Order*: June 3, 1996; and *Implementation Reconsideration Order*: September 9, 1996).

The Applicant asserts that it will not be a rural telephone company. ABSO served a copy of the Application upon Verizon PA, Verizon North, Inc., and Sprint/United.

The Applicant is a Delaware Corporation with its principal place of business at One North Main Street, Coudersport, PA 16915, Telephone (814) 274-9830, fax (814) 274-8243. Correspondence to resolve complaints may be directed to Ms. Terry Romine, Esq. Director, Legal/Regulatory Affairs (814) 260-3143, or Ms. Jennifer Anderson, Esq., Mgr. Legal/Regulatory Affairs (814) 260-3236, at company headquarters. The Applicant complied with 15 Pa. C.S. §4124, relating to a Foreign Business Corporation. The Applicant's registered office provider is Corporation Service Company, Dauphin County. *The Applicant will not be using a fictitious name.*

ABSO has three (3) Affiliates doing business in Pennsylvania. They are: Susquehanna Adelpia Business Solutions at Docket Nos. A-310547, A-310547F0002, A-310547F0003 and A-310547F0004; Adelpia Business Solutions of Pennsylvania, Inc. at Docket Nos. A-310470, A-310470F0002, A-310470F0003 and A-310740F0004; and PECO Adelpia Communications at Docket Nos. A-310378, A-310378F0002 and A-310378F0003.

The Applicant has the following Affiliates rendering public utility service in jurisdictions outside of Pennsylvania as follows:

Adelpia Business Solutions Atlantic, Inc.
Adelpia Business Solutions of Florida, Inc.
Adelpia Business Solutions of Kentucky, Inc.
Adelpia Business Solutions of Vermont, Inc.
Adelpia Business Solutions International, LLC

Adelphia Business Solutions of Nashville, LP
Adelphia Business Solutions of South Carolina, Inc.
Adelphia Business Solutions of Virginia, LLC
Adelphia Business Solutions of Louisiana, Inc.
Adelphia Business Solutions of Louisiana, LLC
Adelphia Business Solutions Investment, LLC
Adelphia Business Solutions of Jacksonville, Inc.
Adelphia Business Solutions Investment East, LLC

The Applicant has no affiliates providing service to or receiving services from the Applicant. The Applicant has no predecessors, and the Applicant is not presently doing business as a public utility in Pennsylvania.

ABSO initially plans to offer a full range of telecommunications services, including resold and Facilities-Based Local Exchange Services, Exchange Access Services and Interexchange Services. The Applicant initially plans to provide services on a resold basis. ABSO plans to construct its own network and at such time, will install fiber optic rings with Lucent 5ESS or equivalent switched and related electronics.

Issues affecting CLECs have been addressed and are being addressed in a number of Commission proceedings.² A CLEC Applicant is expected to adhere to the requirements relative to universal service and lifeline programs, as initially set forth or as subsequently enlarged or modified.³ Also, per federal rules CLECs are required to ensure the efficient usage of their numbering resources and are

² See, e.g., *MFS, Intelenet, et al.*, Docket Nos. A-310203, F0002, *et al.*, (October 4, 1995; July 31, 1996; and August 7, 1997); *Pa. PUC v. Bell*, Docket No. R-00963578; *Pa. PUC v. GTE*, Docket No. R-0093666, *Global Order*, Docket Nos. P-00991648 and P-00991649, as well as other CLEC proceedings.

³ *Universal Service Invest.*, Docket No. I-00940035 (January 28, 1997).

required to semi-annually report their utilization and forecast data to the North American Numbering Plan Administrator. See 47 C.F.R. § 52.5 et seq. Any CLEC failing to comply with state and/or Commission orders related to numbering may be subject to the reclamation of their numbering resources as well as fines pursuant to the Public Utility Code, 66 Pa.C.S. § 3301. See *Implementation of Numbering Conservation Measures Granted to Pennsylvania by the Federal Communications Commission in its Order released March 31, 2000 – NXX Code Reclamation*, Docket No. M-00001373 (Order entered August 22, 2000), 30 Pa. B. 4701 (September 2, 2000)(Commission established process for reclaiming NXX codes from carriers who have failed to activate them within 6 months of their availability for assignment to customers.) Further, Section 253(b) of the TA-96 permits a state Commission to impose, on a competitively neutral basis and consistent with the Universal Service Section, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunication services, and safeguard the rights of consumers. In response, we articulated explicit concerns relative to an Applicant's financial fitness, tariff compliance, and rates.⁴

The Applicant has provided financial information to support its Applications. We, therefore, conclude that the Applicant has demonstrated that it is financially capable of providing telecommunication services as a CLEC, and as an IXC reseller, a CAP, and a facilities-based IXC carrier.

We conclude that the Applicant has met the requirements for certification as an IXC Reseller, a CLEC, a CAP⁵, and as a Facilities-Based IXC, consistent

⁴ *Blue Ribbon*, Docket No. A-310442 (April 25 and August 4, 1997).

⁵ CAP authority may not be used to access the Public Switched Network or toll calling. If a utility with CAP authority wishes to provide access to the Public Switched

with this Order. Premised upon our review of the Applications and the proposed tariffs, and consistent with our Orders, the Code, our Regulations and the TA-96, we conclude that the Applicant's proposed services do not raise concerns at this time regarding safety, adequacy, reliability, or privacy as contemplated by Section 3009(b)(4) of the Code. We note, however deficiencies in the proposed tariffs. See Appendix A.

We shall direct the Applicant to revise the proposed tariff(s) in accordance with the changes noted in Appendix A of this Order.⁶ The Applicant shall thereafter file its Initial Tariffs reflecting the requested changes on or before sixty (60) days from the date of entry of this Order. Copies of the Initial Tariffs shall also be served upon the same entities receiving service of the original Application(s), including the ILECs. If the time required for such resolution and filing exceeds sixty (60) days, the Applicant may request an extension of an additional sixty (60) days with the Commission's Secretary. Thus, if the Initial Tariffs are not filed within 60 days (120 days including the extension) of the entry of this Order, the Applications will be dismissed and the authority granted herein will be revoked without further Commission Order. To the extent that the proposed tariffs contain rates, the Initial Tariffs may become effective on one (1) day's notice from the date upon which they are filed and served.

Network or to provide local or IXC (intraLATA or interLATA) calling services to its customers, the utility must also have been granted CLEC and/or IXC authority by this Commission.

⁶ Grace House, (717) 783-6174, is the FUS contact. Regardless of the review process, any tariff provision(s) inconsistent with the provisions of the Code, the TA-96, or our Regulations or Orders will be deemed inoperative and superseded. (52 Pa. Code §64.213).

Conclusion

Accordingly, we shall grant the Applications. The Applicant has had provisional authority under our *Implementation Order* (p. 7, para. B.1.c.4) and our *Implementation Reconsideration Order* (p. 5) to provide the proposed IXC reseller, CLEC, CAP and Facilities-Based IXC Services pursuant to its proposed tariffs during the pendency of the Application process. Upon the establishment of filed rates and the approval of the Initial Tariffs, a Certificate of Public Convenience shall be issued evidencing the Applicant's authority to provide services as an IXC and as a CAP in the Commonwealth, and as a CLEC in the service territories of (ILECs), consistent with this Order and our decisions in the *MFS* and such other proceedings; **THEREFORE,**

IT IS ORDERED:

1. That the Application of Adelphia Business solutions Operations at Docket No. A-310923, for authority to operate as a Reseller of Interexchange Toll Services throughout the Commonwealth is granted, consistent with this Order.
2. That the Application of Adelphia Business Solutions Operations at Docket No. A-310923F0002, for authority to operate as a Competitive Local Exchange Carrier within the service territories of Verizon PA, Verizon North, Inc., and Sprint/United telephone companies is granted, consistent with this Order.
3. That the Application of Adelphia Business Solutions Operations at Docket No. A-310923F0003, for authority to operate as a Competitive Access Provider throughout the Commonwealth is granted, consistent with this Order.

4. That the Application of Adelphia Business Solutions Operations at Docket No. A-310923F0004 for authority to operate as a Facilities-Based Interexchange Toll Services Carrier throughout the Commonwealth is granted, consistent with this Order.

5. That the Applicant is directed to revise its proposed tariffs to reflect the changes noted in Appendix A of this Order.

6. That the Applicant shall file its Initial Tariffs consistent with the requisite changes noted in Appendix A of this Order, within sixty (60) days after the date of entry of this Order. The Applicant shall serve copies of its Initial Tariff(s) on each entity receiving a copy of the original Applications. To the extent the Proposed Tariffs contains rates, the Initial Tariffs may become effective on or after one (1) days' notice from the date upon which they are filed and served. If the Proposed Tariffs did not contain rates, the Initial Tariffs may not become effective prior to sixty (60) days' notice. The Initial Interexchange Tariff shall be labeled "Interexchange Reseller Toll Tariff." The Initial Competitive Local Exchange Carrier Tariff shall be labeled "Reseller and Facilities-Based Competitive Local Exchange Carrier Tariff." The Initial Competitive Access Provider Tariff shall reflect on its face that it is a "Competitive Access Provider Tariff." The Initial Facilities-Based Interexchange Tariff shall reflect on its face that it is a "Facilities-Based Interexchange Tariff."

7. That the Applicant shall comply with all the provisions of the Public Utility Code, as now exist or as may be hereafter amended, and with all pertinent rules, regulations, and Orders of the Pennsylvania Public Utility Commission, now in effect or as may be prescribed by the Pennsylvania Public Utility Commission, including but not limited to: the *MFS Intelenet, et al.*, Docket Nos. A-310203F0002, *et al.*; the *Universal Service Investigation*, Docket No.

I-00940035; the *Global Order*, Docket No. P-00991648, *et al.*, and the *NXX Code Reclamation*, Docket No. M-00001373.

8. That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the Applicant, shall not be construed as conferring more than one operating right to the Applicant.

9. That the Applicant maintain separate accounting systems for its Interexchange Toll Operations, Competitive Local Exchange Carrier Operations and Competitive Access Operations.

10. That the Applicant shall file such Affiliated Interest Agreements as may be necessary relative to any transactions with affiliates.

11. That the Applicant contact each county or municipal authority where it intends to provide CLEC telecommunications service, and make the necessary arrangements for the provisioning of Emergency 911 service.

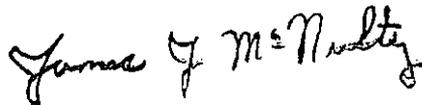
12. That the Applicant shall make 711 abbreviated dialing available to access Telecommunications Relay Service and to arrange its switching equipment to translate these calls to the assigned toll-free number, (888) 895-1197, in order to route calls to the Telecommunications Relay Service Provider, in accordance with Commission's Order entered on February 4, 2000 at Docket No. M-00900239.

13. That in the event that the Applicant has not, on or before sixty (60) days (120 days including an approved extension) from the date of entry of this Order, complied with the requirements set forth herein, the Applications at Docket Nos. A-310923, A-310923F0002, A-310923F0003, and A-310923F0004

may be dismissed and the authority granted herein revoked without further Commission Order.

14. That upon the establishment of filed rates and the approval of the Initial Tariffs, a Certificate of Public Convenience shall be issued authorizing the Applicant to furnish services as a Reseller of Interexchange Toll Services, to furnish services as a Competitive Access Provider, and to furnish services as a Facilities-Based Interexchange Carrier throughout the Commonwealth of Pennsylvania, and to furnish services as a Reseller and Facilities-Based Competitive Local Exchange Services within the service territories of Verizon Pennsylvania, Inc., Verizon North, Inc. and Sprint/United Telephone Company of Pennsylvania consistent with this Order.

BY THE COMMISSION,



James J. McNulty
Secretary

(SEAL)

ORDER ADOPTED: March 28, 2002

ORDER ENTERED: **APR 01 2002**

ADELPHIA BUSINESS SOLUTIONS OPERATIONS, INC.
Docket Nos. A-310923, A-310923F0002, A-310923F0003 & A-310923F0004
Proposed tariffs for Facilities-Based and Reseller of Competitive Local
Exchange Carrier Services, Switched Access Services,
IXC Reseller Services, Competitive Access Services, &
Facilities-Based Interexchange Carrier Services

Adelphia Business Solutions Operations, Inc. ("ABSO") is seeking a Certificate of Public Convenience to provide telecommunication services as a Facilities-based and Reseller of Competitive Local Exchange Carrier Services ("CLEC"), as a Facilities-Based Interexchange Carrier ("IXC"), as an IXC Reseller, and as a Competitive Access Provider ("CAP:") in the state of Pennsylvania. ABSO has filed proposed initial tariffs with its Applications for CLEC, IXC and CAP Services. The proposed tariffs contain certain deficiencies that are discussed here. These deficiencies should be addressed by ABSO before the tariffs can be approved.

Tariff deficiencies noted - Reseller IXC. (A-310923)

1. Although the Application states that the IXC Reseller authority is included in at Docket No. A-310923, there is no tariff provided for this authority, Provide the IXC Reseller tariff, and designate it as Tariff Telephone-Pa. P.U.C. No. 1

Tariff deficiencies noted – CLEC (A-310923F0002)

1. After the IXC Reseller tariff is filed, this will be Tariff No. 2
2. Every page in the tariff should be formatted to show :
"Tariff Telephone -Pa. P.U.C. No. 2" in the upper right corner, with the page number directly under that heading,
3. Title Page should read:

ADELPHIA BUSINESS SOLUTIONS OPERATIONS, INC.

REGULATIONS AND SCHEDULE OF CHARGES
GOVERNING THE FURNISHING OF COMPETITIVE LOCAL
EXCHANGE TELECOMMUNICATIONS SERVICES

IN
The Service Territories of Verizon PA, Verizon North, Inc., and Sprint/United
Telecommunications Companies
As shown in Section 10 of this Tariff

In addition, please correct the address for Mr. Glicksman in the lower margin of this and every page.

4. Pages 3 through 17. The 5th and 6th columns are misaligned. Correct these pages so that the Page number indicated corresponds to the Revision number. Also, when making corrections to the proposed tariff, update the Check Sheet.
5. Table of Contents. Update when corrections are made.
6. Page 28 – Change definition of “C” to read: To signify any change in text or regulation.
7. Page 37 – 1.1.1 Service Territory , change “within the Comm. Of PA.” to read : within the service territories of Verizon PA, Verizon North, Inc. and Sprint/United Telephone companies. Also state that ABSO will not be a rural telephone company.
 - 1.1.2 This states that the Tariff applies to On-net services. Your Application indicates that this tariff is for both Facilities-Based and Reseller Services
8. Page 51 – 2.3.2 Add the cite from Pa. Code 52 to the last sentence in the second paragraph “Pa. Code 52 §64.31 – 64.36.”
9. Page 53. 2.3.3 In the third sentence, and a statement specifying that the bills are due at least 20 days from the date of mailing the bill.

There are two references to the “applicable statute of limitations”, one in the first paragraph, 6th line, and on in the last line of the second paragraph. Replace that phrase with the statement of a time period

In the first paragraph, the first word on the 13th line is “cification”. Please correct.
10. Page 54. 2.3.5 a. Add “at least 20 days from the date of mailing” to the first sentence. The allowable rate for the late payment charge is 1.25%. Please change.
 - e. What is R.103-623? What is the applicable statute of limitations?

11. Page 55. First paragraph, last sentence – The rate of interest shall be the Company’s applicable Late Payment Charge – remove the phrase “greater of the customer deposit interest rate”. (64.19) Also remove the phrase “adjusted for any changes in the deposit rate or late payment rate” from the first sentence, 2nd paragraph.
12. Page 56 – 2.6.2 Remove this section from this page, and incorporate it into the description on page 175, (which also needs updated)
13. Page 57 – 2.8.1 – Replace the first sentence with: “ The Company may suspend or terminate service to a residential customer due to the following reasons: 1) failure to make satisfactory arrangements to pay arrearages, 2) failure to post a deposit, 3) failure to meet the requirements of a payment agreement, 4) failure to give adequate assurances that an unauthorized use or practice will cease.” §64.121
14. Page 58 d. 2nd para, first sentence, insert the words “as outlined in section 2.8.1” between “terminated” and “for”.
15. Page 60 – a. 1st para, insert the words “in accordance with Pa. Code 52 §64.71, after the word “writing”.
16. Page 63 – Replace the last sentence with “A customer who wishes to have service discontinued shall give at least 5 days oral or written notice tot the Company.” §64.53
17. Page 64 - 2.9.1 b. sixth word is “cified” – Please correct.
18. Page 65- 2.9.3 Add a statement explaining that interest will be accrued on deposits in accordance with 52 Pa. Code §64.41
2.9.4 Add “as outlined in section 2.8.1” to last sentence.
19. Page 68 – Remove these conditions, in accordance with 52 PA Code §64.31.
20. Page 71 – 2.10.6 – Replace a. and b. with “Prior to termination of service, the Company should mail or deliver written notice to the customer at least 10 days prior to the date of the proposed termination. Termination of service by a carrier to a residential customer should follow a two step process, whereby the carrier shall mail or deliver written notice to the customer at least 7 days before the date of proposed suspension regardless upon which suspension is sought.”

21. Page 72 – 2.10.7 – Remove this section – replace with regulations from §64.17, regarding partial payment.
22. Page 73 – 2.10.8 – Put in the amount of a return check charge. Section 2.10.10 – add “in accordance with §64.102 – 64.109” to first sentence. Remove “up to an amount specified by the Commission” from the 4th sentence.
23. Page 81 – 2.12.1 d. This paragraph refers to Provision 1 – Please provide an explanation, or a location of Provision 1.
24. Page 83 – First paragraph, third line (c) states “a charge from one c of service...”. Please explain what is meant by “c” of service.
25. Page 84 - 3.1.2 b. Same as 24, refers to a “c” of residence service.
26. Page 85 - Last sentence Please correct or define the word “recification”.
27. Page 90 - 4.1.1 Third line, define or correct the word “ces”.
28. Page 95 -Last sentence. There is no 5.4 Section in the tariff – please correct reference.
29. Page 97 - d. 2nd line – correct the word “form” to be “from”.
30. Page 100 – Same as #28, correct the reference to 5.4
31. Page 101 – Same as #27, line 3, 8th word – “ces”.
32. Page 108 – Section 4.4, Promotional Offerings, the duration of the offering should be mentioned in the description (less than six months). Also, for your information, promotional offerings are to be filed with the Commission on at least one day’s notice prior to the actual offering to customers.
33. Page 112 – 4.7.1 – Mention that residential customer receive 2 FREE Directory Assistance calls per month.
34. Page 119 – In accordance with the requirements of Title 66 §2906 and Commission Order at Docket No. R-00943025, Caller ID Blocking Services, both per line and per call must be offered in the tariff.
35. Page 124 – 4.13.2 k. 1st line uses the word “cified” either define or correct.

36. Page 125 – 4.13.3, 2nd line refers to dial type DDD, please define.
37. Page 126 – Last paragraph – define CCITT and ANSI.
38. Page 136 – Add Caller ID Blocking both per line and per call to the list of features offered to Residentials.
39. Page 156 – 6.2.3 e. (1) 2nd paragraph – need definition for PSU.
40. Page 157 – Same as #39, plus is PBS an error? Should it be PBX?
41. Pages 165 through 167 regarding the Lifeline and Link Up Programs. This language has been replaced by Commission Orders P-009911648, P-00991649, and R-00017044. Call me and I will fax updated regulations.
42. Sections 7.5 & 7.6 – Add the attached 911 Tariff language to this section, in accordance with Commission Order at Docket No. P-00971203 & M-00991217, dated 8/17/2000. Call me and I will fax you a copy of the language if you need it.
43. Page 172 – 7.6.2 a. Correct the reference – there is no section 8.5.2
44. Pages 175 & 176 – Replace this language with the attached prescribed tariff language, and add the 711 language in accordance with Commission Order M-00900239 entered February 4, 2000. Call me and I will fax it to you if you need it.
45. Page 178 – 8.1.2 First sentence the reference to Section 9.1.1 is incorrect.
46. Page 180 – 8.1.3 c. – The references in this paragraph are incorrect.
47. Page 184 9.1.2 c. – Incorrect reference
48. Page 190 – 9.3 The reference to Section 5.7. is incorrect, also on the third line the words “the request” are repeated.
49. Pages 193 to 1058 – This should be Section 10, as the preceding Section is Section 9. Please correct these pages and all Section references throughout the tariff.
50. Page 193 – and throughout this entire section. Since this is a new tariff, there cannot be “Grandfathered” rates. Also, provide a definition for NPA.

51. Page 205, 268, 269, 326, etc. throughout Sections 11 and 12 (which should be Sections 10 & 11)– Change GTE to Verizon North. Eliminate Contel – the company is no longer in existence.
52. Page 216, 225, 333, etc. throughout Sections 11 and 12 (which should be Sections 10 & 11)– GTE s/b Verizon North – eliminate Quaker State – no longer existent.
53. Page 254, 255 etc. throughout Sections 11 and 12 (which should be Sections 10 & 11)– Change GTE to Verizon North
54. Page 258, 259, etc. throughout Sections 11 and 12 (which should be Sections 10 & 11) – Change United to Sprint/United
55. Page 656, 664, etc., indicates service in Alltel’s service territory. You are not permitted to offer service in Alltel’s territory. Remove.
56. Page 987 – Remove AT&T Local Service Area – the application does not apply for authority in AT&T’s Territory.
57. Pages 1061 to 1770 – This should be Section 11, please correct all pages and Section references throughout the tariff.
58. Page 1061 Correct references on this page and throughout the tariffs from Bell Atlantic to Verizon PA.
59. Page 1063, and throughout Section 12 (s/b 11) – 5.1 Non-recurring charges – Provide an explanation for “First” and “Additional” – i.e., if there are non-recurring charges – shouldn’t there be just one charge?
60. Page 1065 – Add Caller ID Blocking – both per line and per call to these features.
61. Page 1067 – 5.7 Add the words “per month” after “per line.”
62. Page 1069 – Caller ID Blocking must be added to this section.
63. Page 1072 – Provide an explanation for the Non-Recurring Service Order Charge of \$75.00.
64. Page 1073 – there is an asterisk after the word “Nonrecurring”, but no reference.

65. Page 1074 - there is an asterisk after the work "Term", with no reference, also provide a definition for CIR
66. Page 1075 forward – If the charges mentioned are not Term charges, remove all the blocks, and put in just the amount in either monthly or yearly amounts. It appears that the service costs \$3.50 for one month or \$3.50 for 7 years.
67. Page 1087 – On pages 1086 and 1088, Business Network Switched Services are preceded with "Section 7", but on this page, it's 12.9 – Please explain or correct.
68. Pages 1090 and 1091 – Same as #67, but page numbering falls after 1089.
69. Page 1099 and in subsequent Centrex sections. 5.7 – Does ABSO allow 2 free directory assistance calls on a Centrex?
70. Pages 1119 & 1122 – Same as #67.
71. Pages 1159, 1192, 1225, 1258, 1291, and 1324 – Pay Telephone Service is no longer regulated by the PUC. Pay Telephone Line Service can be offered, whereby a charge can be imposed for use of the lines.
72. Pages 1283 and 1381 – This page appears to be out of place – Both the previous and subsequent pages are for service in the Harrisburg Area, and this one is for the Erie Area.
73. Page 1313 – The previous and subsequent pages are Section 12 H, and this one is 12 G, so this one appears to be out of sequence.
74. Page 1322 – Section 12I - There is no Contel Service Area – Correct.
75. Page 1355 – Section 12J – There is no Quaker State Service Area – Correct.
76. Pages 1361 and 1375 - This page indicates Section 12 I, and is in with Section 12 J
77. Page 1423 – Lancaster is misspelled.
78. Page 1447 - This page indicates Section 12 H, and is in with Section 12 L
79. Page 1472 – This page is in with the Philadelphia Service Area – Section 12 M.

80. Page 1492 – This is indicates as Section 12 M, and is included in Section 12 N.
81. Page 1632 – This is Section 12 Q, in with Section 12 R.
82. Page 1678, 1701 – This is Section 12 O in with Section 12 T.
83. Page 1710 – Section 12 P in with Section 12 U.
84. Pages 1728 and 1735 – Section 12 P , Service Area Pittsburgh , in with Section 12 U , York Service Area.
85. Page 1739 – Section 12 V – All Other Service Areas – Provide a list of what comprises the Other Service Areas. (If a person wanted to look up rates for a specific area in the section, how would they find it?)
86. Attachment A Service Area Maps. The maps are no longer necessary. Provide a reference (company name, and tariff number) to the maps in each ILEC's tariff from where the service area reference was taken.
87. The sections on Rates and Charges and on the Service Areas appear to be too voluminous. The Rates and Charges Section is too lengthy, with too many NOC blocks. As we discussed some time ago, please try to limit this section to the rates and charges for the services that are currently being provided. Also, please attempt to design a more streamlined Service Area section. This is just a suggestion, but it would make your tariff much mor user friendly, and less cumbersome.
88. Provide the following:
1. a statement in your tariff to ensure that the Billings Standards are in compliance with Chapter 64 of the Pa 52 Code,
 2. a statement that says the Commission's Bureau of Consumer Services has primary jurisdiction over complaints (§64.154)
Include the address as follows: Bureau of Consumer Services
Public Utility Commission
P.O.Box 3265
Harrisburg, PA 17105-3265
(800) 782-1110
 3. a statement regarding an inconsistent tariff – any portions of the tariff which are deemed inconsistent with 52 Pa. Code will be deemed inoperative.

Tariff deficiencies noted – Switched Access Services (A-310923 F0002)

- 1 This tariff will be Tariff Telephone-Pa. P.U.C. No. 3
- 2 Title Page – Provide the correct address for Mr. Glicksman

- 3 Page 1 – Remove the reference to Page 91, as there are only 90 pages in the tariff.

- 4 Page 31 – The Commission approved late payment charge is 1.25%. Please correct.

- 5 Page 34 – Please add Attn: Bureau of Consumer Services and the phone number of (800) 782-1110.

Tariff deficiencies noted – Competitive Access Provider (A-310923 F0003)

1. Title Page – This should be Tariff Telephone-Pa. P.U.C. No. 4. Please correct the address for Mr. Glicksman.

2. Page 30. The Commission approved late payment charge is 1.25%

3. Page 59, and throughout the tariff – Correct Bell Atlantic to Verizon PA.

4. Page 72, and throughout the tariff – Correct GTE to Verizon North, Inc.

Tariff deficiencies noted – Facilities-Based IXC (A-310923 F0004)

1. Title Page – This should be Tariff Telephone-Pa. P.U.C. No. 5
Please correct the address for Mr. Glicksman.

2. Page 18 1.1.1 Service Territory references Hyperion Telecommunications of Pennsylvania – please correct.