



ORIGINAL

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July 30, 2007

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SECTION OF RECORDS

James J. McNulty, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
P.O. Box 3265
Harrisburg, PA 17120

KJR

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

Petition of Verizon North Inc. for Alternative Form of
Regulation Under Chapter 30 and Act 183
Docket Nos. P-00981449, P-00001854 F1000 and
R-00051227

Dear Secretary McNulty:

In response to Verizon's letter dated July 24, 2007 in the above referenced matter, please be advised that the Office of Consumer Advocate concurs with the procedure proposed by Verizon. Please contact me at the above address or phone number should you have any questions about this matter.

Sincerely yours,

Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. # 81617

DOCUMENT
FOLDER

cc: Suzan D. Paiva/Verizon
Steven C. Gray/OSBA
Robert V. Eckenrod/OTS
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DOCKETED
OCT 05 2007



ORIGINAL

OFFICE OF SMALL BUSINESS ADVOCATE
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Harrisburg, Pennsylvania 17101

William R. Lloyd, Jr.
Small Business Advocate

(717) 783-2525
(717) 783-2831 (FAX)

DOCUMENT
FOLDER

August 1, 2007

HAND DELIVERED

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

DOCKETED
SEP 25 2007

SECRETARY'S BUREAU

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REC'D

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

Petition of Verizon North, Inc. For Alternative Form of Regulation Under Chapter 30 and Act 183, Docket Nos. P-00981449, P-00001854F1000, and R-00051227

Dear Secretary McNulty:

On July 24, 2007, Verizon Pennsylvania Inc. and Verizon North (collectively "Verizon" or the "Companies") submitted the Companies' compliance filings in the dockets set forth above. However, Verizon also included numerous "additional changes" to both Amended Chapter 30 plans for which Verizon is requesting Commission approval.

Verizon proposed a procedural plan in order to handle the combined tasks of reviewing both the compliance filing changes and the additional changes proposed by the Companies. In general, the Office of Small Business Advocate ("OSBA") accepts the procedural plan proposed by Verizon with the following specific changes.

First, Verizon's proposed deadline of October 1, 2007, is simply not enough time for the task. In addition to the "complexity of these documents" submitted by the Companies, Verizon and the OSBA are involved in a Commonwealth Court appeal at these same docket numbers. The briefing schedule for that appeal occurs within the same time frame as the review of Verizon's

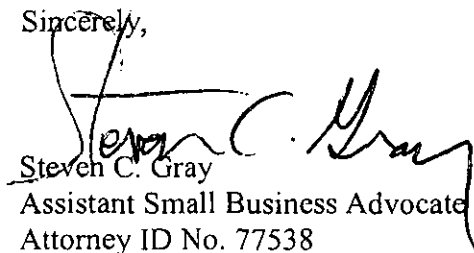
Amended Chapter 30 plans. The OSBA does not wish one task to interfere with the other. Therefore, the OSBA requests the Commission to set the deadline as November 1, 2007.

Second, Verizon proposes that “any party that disagrees with any compliance change” file a complaint with the Commission. Under 52 Pa. Code § 5.592(c), the proper procedure is for a party to file exceptions to a compliance filing, not a complaint. In contrast to Verizon’s proposal, Section 5.592(c) will properly preserve the burden of proof during this phase of the proceeding. Therefore, the OSBA requests that the Commission make it clear that any compliance filing disagreements should be handled through the filing of exceptions.

Third, Verizon expressed its desire to “discuss these matters . . . informally with the Commission Staff.” The OSBA is concerned that such discussions will constitute *ex parte* communications and will violate 66 Pa. C.S. §§ 319 and 334. Therefore, the OSBA requests that the Commission assure that all contacts are in conformance with the *ex parte* rules.

Therefore, the OSBA is willing to support Verizon’s procedural plan with the modifications set forth above.

Sincerely,



Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Cc: Hon. Larry Gesoff
Administrative Law Judge

Parties of Record

Allen G. Buckalew

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Petition of Verizon North, Inc. For :
Alternative Form of Regulation Under : Docket Nos. R-00051227,
Chapter 30 and Act 183 : P-00981449,
: P-00001854F1000

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the foregoing document, on behalf of the Office of Small Business Advocate, by e-mail and first class mail (unless otherwise noted) upon the persons addressed below:

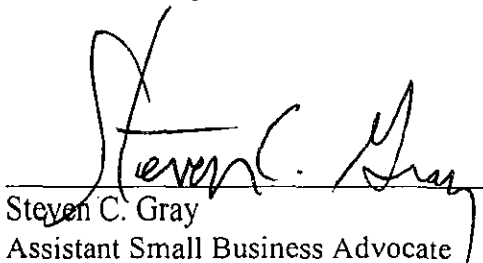
Hon. Larry Gesoff
Administrative Law Judge
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Date: August 1, 2007


Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538