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May 15, 2006

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room (2nd Floor)
P.O. Box 3265
Harrisburg, PA 17105-3265

**DOCUMENT
FOLDER**

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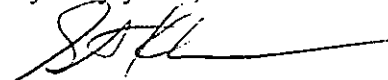
RE: Regina Williams v. Verizon Pennsylvania Inc.; Docket No. C-20066249;
ANSWER OF VERIZON PENNSYLVANIA INC.

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s Answer in the above-captioned proceeding. A copy of this document has been served upon the Complainant in accordance with the attached Certificate of Service.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,



Steven K. Haas
Counsel for Verizon Pennsylvania Inc.

SKH/kml
Enclosures
cc: Regina Williams

SECRETARY'S BUREAU

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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SECRETARY'S BUREAU

REGINA WILLIAMS,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent.

Docket No. C-20066249

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DOCKETED
MAY 18 2006

**ANSWER OF VERIZON PENNSYLVANIA INC.
TO THE COMPLAINT OF REGINA WILLIAMS**

Verizon Pennsylvania Inc. ("Verizon PA"), by its attorneys in this proceeding, Hawke McKeon Sniscak & Kennard LLP, hereby submits its Answer to the Complaint filed by Regina Williams ("Complainant"). In support thereof, Verizon PA avers and represents as follows:

1. ADMITTED, upon information and belief.
2. ADMITTED. The correct corporate name of the Respondent in this proceeding is Verizon Pennsylvania Inc.
3. ADMITTED.
4. A. ADMITTED.
4. B. Verizon PA DENIES that the Complainant's telephone bill was paid in full.

Accordingly, proof of this allegation is demanded at hearing. By way of further response and explanation, Verizon PA AVERS as follows: The Complainant filed a previous Formal Complaint against Verizon PA at Docket No. F-01861653.¹ In November of 2005, the parties to

¹ This Complaint was filed under the name James R. Lucas. Ms. Williams indicated during the proceeding that Mr. Lucas was her uncle and had been deceased since August of 2000. Ms. Williams agreed to assume responsibility for all outstanding charges on the account, and to have the name on the account changed from James Lucas to Regina Williams. By agreement of the parties, Ms. Williams was the actual Complainant in that proceeding.

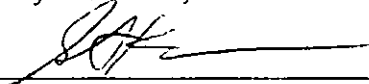
this previous proceeding agreed to settlement terms as a resolution of the proceeding. Under that settlement, Ms. Williams received a credit on the account. Additionally, Ms. Williams agreed to pay her current charges plus an additional \$25.00 each month, until all past due charges on the account were paid in full. Ms. Williams failed to comply with the terms of the settlement.

A suspension notice was mailed to the Complainant on or about February 3, 2006, due to unpaid basic charges on the account. On or about February 1, 2006, the Complainant filed an Informal Complaint with the Commission's Bureau of Consumer Services ("BCS"). This Informal Complaint was docketed at BCS No. 203174. The BCS issued a decision on this complaint on March 1, 2006. In this decision, the Complainant was required to pay her current charges plus an additional \$30.00 each month, beginning with her February 24, 2006 bill, in order to avoid suspension of her telephone service. Verizon PA AVERS that the Complainant failed to comply with the requirements of this BCS decision. Verizon PA AVERS that the Complainant is responsible for all outstanding charges on her account, and that the BCS decision should apply.

5. Paragraph 5 of the Complainant contains a request for relief to which no response is required.

WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint filed by Regina Williams, at Docket No. C-20066249, be dismissed or denied in its entirety.

Respectfully submitted,



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DATED: May 15, 2006

Counsel for
Verizon Pennsylvania Inc.

AFFIDAVIT

I, **RONALD F. WEIGEL**, Director – Government Relations of Verizon Pennsylvania, am authorized to make this affidavit on its behalf, and I verify that the information provided in the foregoing document(s) is true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



RONALD F. WEIGEL
Director – Government Relations

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IN PL...
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the person and in the manner indicated below.

Service via first class mail:

Regina Williams
7644 Massey Way, Apt. A
Elkins Park, PA 19027



Steven K. Haas

DATED: May 15, 2006

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