

Hawke

Mckeon

Sniscak &

Kennard LLP

ATTORNEYS AT LAW

ORIGINAL

William T. Hawke
Kevin J. McKeon
Thomas J. Sniscak
Norman James Kennard
Lillian Smith Harris
Scott T. Wyland
Todd S. Stewart

Craig R. Burgraff
Steven D. Snyder
Janet L. Miller
Steven K. Haas
William E. Lehman
Rikardo J. Hull
Katherine E. Lovette

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmsk-law.com

October 28, 2005

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

DOCUMENT
FOLDER

RECEIVED
2005 OCT 28 PM 2:44
PA PUC
SECRETARY'S BUREAU

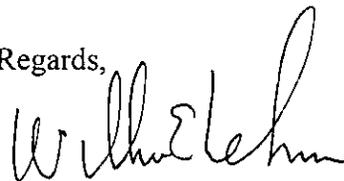
RE: Raymond A. Sabatino, Jr. v. Verizon Pennsylvania Inc.; Docket No. C-20055394;
ANSWER

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s ("Verizon PA") 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.

Regards,



William E. Lehman
Counsel for Verizon Pennsylvania Inc.

WEL/kmg
Enclosures

cc: Raymond A. Sabatino, Jr.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

RAYMOND A. SABATINO, JR.,
:
Complainant
:
v.
:
VERIZON PENNSYLVANIA INC.,
:
Respondent
:

Docket No. C-20055394

PA PUC
SECRETARY'S BUREAU

2005 OCT 28 P11 2:44

RECEIVED

DOCUMENT
FOLDER

ANSWER OF
VERIZON PENNSYLVANIA INC.
TO THE COMPLAINT OF RAYMOND A. SABATINO, JR.

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 Raymond A. Sabatino, Jr. ("Complainant" or "Mr. Sabatino"). In support thereof, Verizon PA avers and represents as follows:

1. ADMITTED upon information and belief.
2. DENIED.
3. ADMITTED. The correct corporate name of the Respondent in this matter is "Verizon Pennsylvania Inc."

DOCKETED
NOV 1 2005

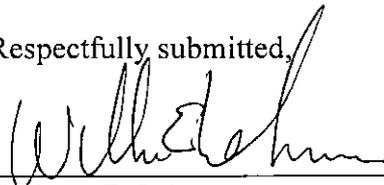
4. Verizon PA DENIES there is a reliability, safety, or quality problem with the Complainant's utility service. Verizon PA DENIES the Complainant's description of its facilities that serve the Complainant. To the extent that the Complainant is complaining about telephone service to his neighbors, Verizon PA avers that he has no legal right, status or standing to pursue complaint allegations about other customers' service.¹ Verizon PA DENIES the Complainant suffers frequent outages, poor quality service or a potentially dangerous situation. Verizon PA ADMITS that when a trouble report is filed, it responds with a service technician. Verizon PA DENIES that the Complainant experiences daily service difficulties or that any alleged problem has been going on for years. Verizon PA ADMITS that the Complainant has contacted it four times since August 11, 2005, but DENIES that Verizon PA's service technicians admit the condition of the main trunk line is unstable. By way of further answer, Verizon PA avers that in each instance, the trouble was repaired by Verizon PA.

5. The statement set forth in Paragraph 5 is a request for relief to which no response is required. To the extent that answer is deemed necessary, Verizon PA DENIES that its trunk line is "dangerously corroded."

¹ *George v. Pennsylvania Public Utility Commission*, 735 A.2d 1282 (Pa. Cmwlth. 1999) (legislator did not have standing or capacity to represent other ratepayers or anyone other than himself).

WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint of Raymond A. Sabatino, Jr. be denied preliminarily.

Respectfully submitted,



William E. Lehman
Hawke McKeon Sniscak & Kennard LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
(717) 236-1300

DATED: October 28, 2005

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

RECEIVED

2005 OCT 28 PM 2:44

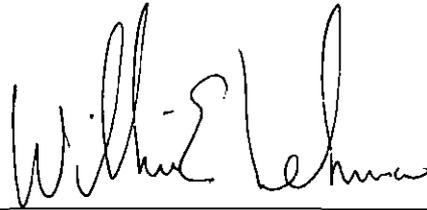
PA PUC
SECRETARY'S BUREAU

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 by first class mail:

Raymond A. Sabatino, Jr.
7 Red Cloud Circle
Royersford, PA 19468



William E. Lehman

DATED: October 28, 2005

RECEIVED
2005 OCT 28 PM 2:44
PA PUC
SECRETARY'S BUREAU