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March 11, 2016

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

Re: Petition of Communications Workers of America for a Public, On-the-Record  
Commission Investigation of the Safety, Adequacy, and Reasonableness of Service  
Provided by Verizon Pennsylvania LLC - Docket Number P-2015-2509336

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Full Service Network, LP's Prehearing Memorandum with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

SCS/dsc  
Enclosures

cc: Hon. Joel H. Cheskis, w/enc.  
Cert. of Service, w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Full Service Network's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and/or First Class Mail**

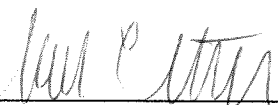
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Sarah C. Stoner, Esq.

Date: March 11, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Communications Workers of :  
America for a Public, On-the-Record : Docket No. P-2015-2509336  
Commission Investigation of the Safety, :  
Adequacy, and Reasonableness of Service :  
Provided by Verizon Pennsylvania LLC :

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**PREHEARING MEMORANDUM OF FULL SERVICE NETWORK, LP**

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Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Prehearing Conference Order dated February 18, 2016, Full Service Network, LP (“FSN”) submits this Prehearing Memorandum.

**I. PRESENTLY IDENTIFIED ISSUES**

FSN is a Pennsylvania certificated competitive local exchange carrier (“CLEC”) and facilities-based interexchange carrier (“IXC”). FSN serves primarily residential customers, largely via resale. FSN purchases services from Verizon Pennsylvania LLC (“Verizon”) as a wholesale customer of Verizon and then resells the services to FSN’s retail customers.

FSN identified numerous issues that affect FSN in its Answer in Support of Petition of Communications Workers of America.<sup>1</sup> The key issue identified is whether Verizon is meeting its statutory obligation to provide “adequate, efficient, safe, and reasonable service and facilities.” FSN is concerned about the implications of Verizon’s neglect of its copper infrastructure, as Verizon’s actions will impact FSN’s ability to continue to provide resale service to FSN’s retail customers. At this time, FSN continues to evaluate its position on these issues and will refine its position based on further study of the proposals, review of discovery

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<sup>1</sup> See FSN’s Answer at ¶¶ 9-15, 17.

and additional input from other parties. FSN reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

**II. SERVICE OF DOCUMENTS**

FSN agrees to electronic service of all documents to the email addresses below with one (1) hard copy mailing of all documents sent to Eckert Seamans as follows:

Deanne O'Dell, Esq.  
Sarah C. Stoner, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
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Sarah Stoner – sstoner@eckertseamans.com

**III. PROPOSED PLAN AND SCHEDULE FOR DISCOVERY**

FSN is amenable to working with the other parties in this matter to adopt a reasonable discovery plan and schedule.

**IV. LITIGATION SCHEDULE**

FSN will continue to cooperate with the parties to develop a reasonable procedural schedule.

**V. WITNESSES**

At this time, FSN is still evaluating whether or not it will present a witness on its behalf in this matter. FSN reserves the right to present testimony as may be necessary depending on the course of the proceeding and will provide the Presiding Officer as well as the other parties in this matter reasonable notice if it determines to do so. FSN also reserves its right to add additional

witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

**VI. POSSIBILITY OF SETTLEMENT**

FSN is willing to participate in settlement discussions with any party to narrow the issues in this matter.

Respectfully submitted,



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(Pa. Attorney ID No. 81064)  
Sarah C. Stoner, Esquire  
(Pa. Attorney ID No. 313793)  
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717 237 6000

Date: March 11, 2016

Counsel for Full Service Network, LP