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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 Safety, Adequacy and
Reasonableness of Service Provided by Verizon Pennsylvania LLC
Docket No. P-2015-2509336

Dear Secretary Chiavetta:

Enclosed please find Verizon's Prehearing Memorandum, being filed on behalf of Verizon Pennsylvania LLC in the above captioned matter.

If you have any questions, please feel free to contact me.

Very truly yours,


Suzan D. Paiva

SDP/slb

Via E-Mail and Federal Express
cc: The Honorable Joel H. Cheskis

Via E-Mail and First Class U.S. Mail
cc: Attached Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of Verizon's Prehearing Memorandum, upon the parties listed below, in accordance with the requirements of §1.54 (relating to service by a party) and §1.55 (related to service upon attorneys).

Sated at Philadelphia, Pennsylvania, this 11th day of March, 2016.

Via E-Mail and First Class Mail


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Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

VERIZON’S PREHEARING MEMORANDUM

Verizon Pennsylvania LLC (“Verizon”), pursuant to 52 Pa. Code § 5.222 and the February 18, 2016 prehearing order, respectfully submits this prehearing memorandum for purposes of the prehearing conference scheduled for March 18, 2016.

I. HISTORY AND SCOPE OF PROCEEDING

The Communications Workers of America (“CWA”) filed a prehearing memorandum on March 8, 2016, misconstruing the scope of this proceeding. On October 21, 2015, CWA petitioned the Commission to “initiate a public, on-the-record investigation into the safety, adequacy, and reasonableness” of Verizon’s facilities and services. Verizon answered, showing that information already of record with the Commission disproves CWA’s exaggerated and baseless claims and that the petition was part of CWA’s announced strategy to “build political and regulatory pressure on the company” during labor negotiations.¹ Verizon demonstrated that:

- Financial reporting to this Commission disproves CWA’s unsupported claims and shows substantial investment in copper facilities.
- The Commission’s service quality monitoring establishes that Verizon has consistently met or exceeded the Commission’s customer trouble report standard.
- Customer complaints are at an all-time low, underscoring that Verizon provides good service and meets its customer expectations.
- These data, along with new reports that Verizon will provide under the reclassification order, are more than sufficient for the Commission to continue to monitor Verizon’s service, particularly when existing data shows no cause for concern or reason for an investigation.

¹ <http://standuptoverizon.com/> (attached to Verizon’s Answer).

The Commission did not consider at a public meeting whether to open an investigation; it assigned the matter to the Office of Administrative Law Judge (“OALJ”) for “a recommendation to the PUC as to whether to initiate an investigation.”² Yet the ink was not dry on the prehearing notice before CWA seized upon it for another news bite to use in its labor negotiations, falsely proclaiming that the Commission had opened an investigation and would hold hearings on CWA’s claims.³ CWA’s misstatement prompted the PUC’s spokesperson to reiterate that assigning the case to the administrative law judge “does not initiate a hearing on the actual allegations.”⁴ But CWA still continued its misinformation campaign, launching an onerous and intrusive set of interrogatories on March 4, 2016.⁵ CWA’s campaign continued this week, with CWA’s prehearing conference memo noting that it was based “on the assumption that the hearings in this matter will be the investigation CWA requested,” and including a fully proposed schedule for pre-filed testimony, evidentiary hearings and briefs.

But CWA’s assumptions and public proclamations do not define the Commission’s role here. The discrete – and currently only – task before the administrative law judge is to determine whether to recommend that the Commission launch CWA’s requested investigation into Verizon’s service quality. Based on the facts and law here, it should not.

² Statement of Commission press spokesman at http://articles.philly.com/2016-02-24/business/70877742_1_copper-fios-puc

³ “PA Public Utility Commission announces hearings into Verizon’s systemic neglect,” posted 2-23-16 at <http://www.speedmatters.org/blog/archive/pa-public-utility-commission-announces-hearings-into-verizons-systemic-negl/> (claiming the Commission decided “to hold hearings into the unsafe conditions at Verizon locations throughout the state” and “announced” that the OALJ “will preside over hearings examining Verizon’s maintenance practices and quality of service.”)

⁴ Statement of Commission press spokesman at TR StateNews Wire, February 23, 2016, <http://www.trdailyonline.com/tr-insight>

⁵ CWA’s Interrogatories are attached to this prehearing memorandum as *Exhibit A*.

II. THE COMMISSION SHOULD NOT LAUNCH AN INVESTIGATION

CWA's attempt to use the Commission as a pawn in its labor negotiation to "investigate" Verizon would violate the law. An investigation is a unique prosecutorial authority vested in the Commission. The Public Utility Code does not allow a private party such as CWA to use this Commission to initiate and prosecute its own private investigation. Only *the Commission itself* can open an on-the-record investigation, after it first makes a decision "on its own motion" that it is "necessary in the performance of its duties" for the Commission to "investigate and examine" a public utility. 66 Pa. C.S. § 331(a).

And even within the Commission, there are strict guidelines delineating how prosecutorial investigations are launched. To safeguard due process under the Pennsylvania Supreme Court's guidance in *Lyness v. State Board of Medicine*, 529 Pa. 535, 605 A.2d 1204 (1992), and as required by 66 Pa. C.S. § 308.2(b), the Commission strictly separates its "prosecutory" function of its investigatory power (deciding whether an investigation should be opened) and its "decision-making" function (deciding if a violation has occurred and fines or other consequences are warranted).⁶ Under that strict separation, the bureau with delegated authority to conduct the prosecutory function (in this case the Bureau of Investigation and Enforcement ("BIE"))⁷ may "gather data" informally and do one of only three things:

⁶ *Delegation of Prosecutory Authority to Bureaus with Enforcement Responsibilities*, Docket No. M-00940593, 1994 Pa. PUC LEXIS 148 (Opinion and Order entered September 2, 1994); *Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Opinion and Order entered August 11, 2011).

⁷ *Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. HIKO Energy, LLC*, Docket No. C-2014-2431410, 2015 Pa. PUC LEXIS 364 (Initial Decision of ALJs Barnes and Cheskis, August 21, 2015) ("The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Bureau of Investigation and Enforcement (I&E) and other bureaus with enforcement responsibilities."); *Rulemaking Re: Marketing and Sales Practices for the Retail Residential Energy Market*, Docket No. L-2010-2208332, 2012 Pa. PUC LEXIS 1877; 300 P.U.R.4th 353 (Rulemaking Order Entered October 24, 2012) ("The Commission's independent prosecutory arm, the Bureau of Investigation and Enforcement (I&E), can initiate informal or formal investigations as needed and can seek penalties for non-compliance, including the suspension and revocation of supplier licenses.")

- If BIE “determines that no violation or potential violation of the act has occurred,” it must terminate its informal investigation “by letter.” 52 Pa. Code § 3.1139b(1).
- If BIE “determines that a violation or potential violation of the act has occurred” and “formal action is deemed to be warranted,” then BIE will carry out its prosecutorial function by filing a formal complaint to initiate an “on-the-record proceeding to resolve the issues.” The Commission as decision-maker will make the ultimate decision of whether a violation has occurred, because the prosecutor and decision-maker cannot be one and the same. 52 Pa. Code § 3.1139b(2).
- If BIE and the utility reach a settlement at the informal stage, it must be submitted for the Commission’s approval with an opportunity for interested parties to comment. 52 Pa. Code § 3.1139b(3).

Nothing in the guiding law or the Commission’s regulations and procedures permits CWA to turn itself into a private prosecutor and conduct its own investigation by filing a petition with the Commission. This would contravene the Legislature’s intent that the Commission, not private parties, should determine the necessity for any investigation. CWA would turn the official investigatory process on its head and force Verizon to bear the burden, cost, and reputational damage of litigating the investigation sought by CWA as a labor negotiation strategy before the Commission even determines that an investigation is warranted. CWA’s procedural schedule asks the Commission to violate *Lyness* by asking the presiding officer to both determine whether an investigation is warranted and conduct and decide the substance of the investigation before the Commission has decided the investigation is warranted.

CWA’s petition should be dismissed, as there is no provision in the law for a private party to prosecute an investigation. If BIE, the only bureau to which the prosecutorial function has been delegated, were to conduct an informal investigation, the Commission’s regulations do not provide for CWA participation at that stage. Only if BIE determines to initiate a formal on-the-record proceeding by filing a complaint or filing a settlement at a later stage may other parties such as CWA participate. And to encourage full candor by utilities and witnesses, the Pennsylvania Right-to-Know law treats as confidential the informal investigatory process and BIE’s decision whether or

not to investigate or prosecute. *See* 65 P.S. § 67.708(b)(17).⁸ This Commission recently emphasized to the Pennsylvania Supreme Court the crucial importance of allowing BIE to conduct its investigations and decision-making without interference by parties with their own parochial interests such as CWA:

If individuals are less likely to cooperate in the inspections/investigations process, then the inspections/investigations will no longer be an effective means of monitoring the utilities compliance with statutory and regulatory requirements. In addition, if I&E's internal documents are available, I&E will have to operate in a "fishbowl" environment regarding its internal decision-making. This would have a chilling effect on I&E's activities, and harm the public policy of allowing for free deliberations for prosecutors. . . .⁹

III. ISSUES

The only issues to be addressed at this time are as follows:

1. Whether CWA's petition should be dismissed because the Public Utility Code does not empower a private party such as the CWA to "investigate" Verizon through discovery and hearings. The CWA cannot usurp the prosecutorial function that the Commission has delegated to BIE to determine "whether a violation or potential violation" of the Public Utility Code has occurred and whether "formal action is deemed to be warranted," and if so to initiate "a docketed on-the-record proceeding to resolve the issues." 52 Pa. Code § 3.113(b)(2). (*suggested answer "yes"*).
2. Alternatively, whether the OALJ should recommend that the Commission decline to open an investigation because the Commission has sufficient rules and programs already in place to monitor the adequacy of Verizon's service and the data collected shows no reason for concern? (*suggested answer "yes"*).

⁸ *See, e.g., Pa. Public Utility Commission v. Gilbert and The Wall Street Journal*, 40 A.3d 755, 761 (Pa. Cmwlth. 2012) (public release of investigatory notes, statements and other materials could lead to parties "being less likely to cooperate and provide relevant information out of fear of retaliation or public embarrassment," following which "the inspections/investigations will no longer be an effective means of monitoring the utilities compliance with statutory and regulatory requirements."); *Pa. Public Utility Commission v Seder and The Times Leader*, 106 A.3d 193, 199 (Pa. Cmwlth. 2014) (disclosing investigatory documents "could lead to public utilities and employees being less likely to cooperate and provide relevant information out of fear of retaliation or public embarrassment, frustrating the purpose of PUC's investigations and lessening the effectiveness of the PUC in monitoring the utilities' compliance with statutory and regulatory requirements.")

⁹ Brief of the Pennsylvania Public Utility Commission, *PUC v. Seder*, 2015 PA S. Ct. Briefs LEXIS 525948 (Pa. Sept. 2, 2015).

IV. SERVICE LIST

Pursuant to 52 Pa. Code § 1.55, Verizon's representative for the service list in this proceeding is as follows:

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Verizon
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V. DISCOVERY

Because the Commission has not determined to open an investigation, CWA does not have the right to take discovery from Verizon. Pursuant to 52 Pa. Code § 5.321, the right to discovery only applies to a proceeding in which:

- (1) A complaint, protest or other adverse pleading has been filed.
- (2) The Commission institutes an investigation.
- (3) The Commission institutes an on-the-record proceeding.

This docket does not fall under any of these categories. The Commission has not opened an investigation or directed an on-the-record proceeding and CWA has not filed a complaint or other adverse pleading. Neither the CWA nor any other private party is thus entitled to take discovery.

The only party that might ask for information under the Commission's rules is BIE, which pursuant to 52 Pa. Code § 3.113(a) may "gather data" as part of an informal investigation if it believes it is "appropriate" to do so. But BIE does not need to engage in discovery in a docketed proceeding to do so. And any information it gathers in an informal investigation cannot be shared with CWA or any other private party, as it must be kept confidential by law. *See* 65 P.S. § 67.708(b)(17).

VI. PROCEDURAL SCHEDULE

Given the limited scope and purpose for which this petition was referred to the administrative law judge, establishing a schedule for discovery, pre-filed testimony, and/or hearings would be inappropriate. The presiding officer should dismiss CWA's petition without prejudice to BIE determining whether to investigate informally under the procedures in the Commission's regulations. If the presiding officer believes that it would be helpful to have more briefing on these issues from the parties before making a decision, Verizon will discuss an agreeable briefing schedule with the parties at the prehearing conference.

VII. WITNESSES

Because the law does not permit litigation of the substance of CWA's demanded investigation at this stage of the proceeding, Verizon does not propose to present any witnesses.

VIII. SETTLEMENT

Verizon is open to discussions regarding the possibility of a reasonable settlement of this matter.

Respectfully submitted,



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Dated: March 11, 2016

Counsel for Verizon Pennsylvania LLC

EXHIBIT A

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF COMMUNICATIONS WORKERS OF AMERICA, SET 1

Pursuant to 52 Pa. Code § 5.341, Communications Workers of America ("CWA") hereby serve these Interrogatories and Requests for Production of Documents, Set 1, on Verizon Pennsylvania LLC ("Verizon" or "Company").



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Bloomsburg, PA 17815
scott.j.rubin@gmail.com
(570) 387-1893

Counsel for CWA

Date: March 4, 2016

Instructions and Definitions

- a. These interrogatories and requests for production of documents shall be deemed to be continuing. Company is obligated to change, supplement, and correct all answers to conform to available information, including such information as first becomes available after the answers are filed.
- b. The answers should first restate the question asked and also identify the person or persons supplying the information. Each answer should begin on a separate page.
- c. All information is to be divulged that is within the knowledge, possession, control, or custody of Verizon or any and all of its subsidiaries, Affiliates, attorneys, agents, employees, or other representatives.
- d. "Affiliate" or "Affiliated Interest" means an affiliated interest as the term is defined in 66 Pa. C.S. § 2101(a).
- e. "Commission" refers to the Pennsylvania Public Utility Commission.
- f. "Company" or "Verizon" refers to Verizon Pennsylvania LLC, as well as its Affiliates, attorneys, agents, employees, or other representatives.
- g. The word "document" includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, electronic mail, voice mail, notations of any sort concerning conversations, telephone calls, meetings, or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments, and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or optical or magnetic media.
- h. The word "identify" when referring to a person refers to the person's name, job title, and business address.
- i. The word "identify" when referring to correspondence or electronic mail refers to the item's date, subject, sender, author, and recipients.
- j. The word "identify" when referring to a document other than correspondence and electronic mail refers to the title, date, and author of the document.
- k. All information where the original document is kept in electronic form should be provided in both its original electronic form and in hard copy. Electronically available documents should be provided by electronic mail, electronic download, or on one of the following types of media, usable on a Windows-compatible computer: USB drive, CD-ROM, or DVD-ROM, and in one of the following formats that most closely matches the original form of the document: ASCII text, Adobe Acrobat portable document format (.pdf), Microsoft Word, WordPerfect, Microsoft Excel, Microsoft Access, Lotus 1-2-3, dBase, SPSS, SAS, comma delimited text.

Any questions about the intent or meaning of a question, or about the specific information requested, should be resolved by contacting counsel for CWA by telephone or electronic mail as quickly as possible.

- CWA-1. Please describe the ways in which Verizon (or an entity on behalf of Verizon) assesses the condition of its network, including the frequency of such assessments.
- CWA-2. Please provide complete copies of Verizon's continuing property records in electronic format.
- CWA-3. Please identify by name and title the top five management individuals responsible and with the authority for ensuring that Verizon's network is adequately maintained. Describe their roles in full.
- CWA-4. Please provide any and all internal documents, manuals, and directives that guide Verizon's decision-making regarding capital investment, repair, and preventive maintenance within Pennsylvania.
- CWA-5. Please describe the role, if any, of return on investment or other business case analyses (e.g., net present value analyses) that affect capital budgeting, repair and maintenance decisions. Include any criteria, guidelines, procedures and policies that apply.
- CWA-6. Please provide details about the three most recent proposed capital expenditures that were authorized as a result of Verizon's capital budgeting procedures and the three most recent capital expenditures that were not approved as a result of Verizon's capital budgeting procedures
- CWA-7. What steps does Verizon take for preventive maintenance for cable for moisture, wear and tear, and high winds? Please provide copies of any proactive cable maintenance plans used by Verizon.
- CWA-8. Please describe the way in which Verizon catalogs the location, age, and condition of its poles.
- CWA-9. Concerning all poles to which Verizon attaches its intrastate facilities:
- a. How many poles does Verizon own?
 - b. How many poles does Verizon attach to but not own?
 - c. How many poles does Verizon jointly own with another public utility that is regulated by the Commission?
 - d. How many poles does Verizon jointly own with another entity that is not a public utility that is regulated by the Commission?
 - e. Please provide copies of all agreements between Verizon and another public utility that is regulated by the Commission governing the rights, responsibilities, use, maintenance, repair, and/or replacement of poles.

- f. Please provide copies of all agreements between Verizon and another entity that is not a public utility that is regulated by the Commission governing the rights, responsibilities, use, maintenance, repair, and/or replacement of poles.
- CWA-10. How many double poles does Verizon have?
- CWA-11. Please describe fully the procedures and policies that Verizon uses to:
- a. Determine the presence of double poles; and
 - b. Determine when and where to remove double poles.
- CWA-12. Separately for each of the years 2011 through 2015, please provide a table showing the following information:
- a. Number of double poles at January 1
 - b. Number of double poles removed during the year
 - c. Number of double poles added during the year
 - d. Number of double poles at December 31
- CWA-13. Has Verizon (or another entity on behalf of Verizon), within the last five years, surveyed Verizon's poles with reference to the age and/or condition of the poles and/or the presence of double poles? If so, please provide copies of any surveys, reports, memoranda or other documents prepared.
- CWA-14. For most recent year for which data are available provide the number of sheath kilometers (or miles) of copper and the number of sheath kilometers (or miles) of fiber.
- CWA-15. Has Verizon identified any cable as needing to be replaced? If so, how many feet (or miles) of cable has Verizon identified as needing to be replaced?
- CWA-16. Please describe fully the criteria that Verizon uses to determine whether cable needs to be repaired or replaced.
- CWA-17. How much did Verizon spend in each of the past five years for repairing defective cable?
- CWA-18. How much did Verizon spend in each of the past five years for replacing defective cable?
- CWA-19. What budget, if any, has Verizon allocated for repairing defective cable in each of the years 2016, 2017, and 2018?
- CWA-20. What budget, if any, has Verizon allocated for replacing defective cable in each of the years 2016, 2017, and 2018?

- CWA-21. Separately for each of the years 2011 through 2015, please provide a table showing the following information:
- a. Number of open work orders to repair or replace defective cable at January 1
 - b. Number of defective-cable work orders closed during the year
 - c. Number of defective-cable work orders opened during the year
 - d. Number of open defective-cable work orders at December 31
- CWA-22. Please confirm that transducers are used to monitor air pressure and air flow in various environments, and to generate alarms when transducer readings drop beyond set parameters. If this is not correct, please provide an accurate description of how transducers are used.
- CWA-23. Separately for 2013, 2014, and 2015, how many transducers did Verizon have and how many of them went into alarm mode? Of those that went into alarm mode, how many had previously gone into alarm mode?
- CWA-24. Please describe Verizon's procedures when transducers go into alarm mode.
- CWA-25. How many remote terminals does Verizon have?
- CWA-26. What are the ages of each of the batteries in these remote terminals?
- CWA-27. Separately for each of the past five years, how many batteries in remote terminals did Verizon replace?
- CWA-28. Does Verizon have a formal battery replacement schedule for remote terminals? If so, please provide. If not, how does Verizon determine where and when to replace batteries at remote terminals? Please provide any guidelines, time tables, policies, and/or procedures used for determining when and where to replace batteries in remote terminals.
- CWA-29. Please provide Verizon's dispatch priority guidelines, plans, policies, and/or procedures.
- CWA-30. How many dispatch centers does Verizon operate? Include the locations of all dispatch centers and separately by dispatch center indicate the number of lines served by the dispatch center and the square mileage of the area covered by the dispatch center.
- CWA-31. Please describe fully the flow process for repairs, including explanations of any and all disposition codes used.

- CWA-32. Please list all disposition codes that are subsumed within (a) the out-of-service component of the trouble report rate and (b) the service affecting component of the trouble report rate.
- CWA-33. Based on troubles reported in 2015, what percentage of troubles are service affecting versus out of service?
- CWA-34. What percentage of out-of-service troubles require the customer to be home in order for trouble to be fixed? Please describe fully the circumstances that would require a customer to be home in order for the line to be fixed.
- CWA-35. Please confirm that inside wire problems are not included in the trouble report rate.
- CWA-36. Please confirm that in the vast majority of instances the network interface device is located outside a customer's home.
- CWA-37. For the portion of Verizon's footprint that is *not* served by FiOS please provide the total feet (or miles) of cable and then disaggregate the length by age, e.g., pre-1960; 1960-1964; 1965-1969; etc.
- CWA-38. Please provide a map at the municipality level showing FiOS deployment in Verizon's service area.
- CWA-39. Please provide a list of municipalities served by Verizon, showing for each municipality (a) the percentage and number of households to which FiOS is available as of December 31, 2015, (b) the percentage and number of business premises to which FiOS is available as of December 31, 2015; (c) the numbers of households and businesses served as of December 31, 2015.
- CWA-40. Please identify the 20 central offices that experienced the highest residential trouble report *rate* in 2015. If data concerning the residential trouble report rate is unavailable, please respond based on the total trouble report rate and indicate such.
- CWA-41. Please identify the 20 central offices that experienced the highest *absolute quantity* of residential trouble reports in 2015. If data concerning residential troubles is unavailable, please respond based on the total troubles reported and indicate such.
- CWA-42. Please identify the 20 central offices that experienced the highest *repeat* residential trouble report rate in 2015. If data concerning the repeat residential trouble report rate is unavailable, please respond based on the total trouble report rate and indicate such.
- CWA-43. Please identify the 20 central offices that experienced the highest absolute quantity of *repeat* residential trouble reports in 2015. If data concerning repeat

residential troubles is unavailable, please respond based on the total troubles reported and indicate such.

- CWA-44. Please provide the following on a statewide basis:
- a. Annual capital expenditures for 2013, 2014, and 2015;
 - b. Total lines served in 2013, 2014, and 2015;
 - c. Verizon's projected capital investment for 2016, 2017 and 2018;
 - d. Annual operating and maintenance expenditures for each of the past three years;
 - e. Verizon's projected operating and maintenance expenditures for 2016, 2017 and 2018;
 - f. Total plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
 - g. Additions to plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
 - h. Depreciation for each of the past three years;
 - i. Depreciation reserve.
- CWA-45. Please provide the following for the part of Verizon's territory where it has deployed FiOS:
- a. Annual capital expenditures for 2013, 2014, and 2015;
 - b. Total lines served in 2013, 2014, and 2015;
 - c. Verizon's projected capital investment for 2016, 2017 and 2018;
 - d. Annual operating and maintenance expenditures for each of the past three years;
 - e. Total plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
 - f. Additions to plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
 - g. Depreciation for each of the past three years;
 - h. Depreciation reserve.

CWA-46. Please provide the following for the part of Verizon's territory where it has *not* deployed FiOS:

- a. Annual capital expenditures for 2013, 2014, and 2015;
- b. Total lines served in 2013, 2014, and 2015;
- c. Verizon's projected capital investment for 2016, 2017 and 2018;
- d. Annual operating and maintenance expenditures for each of the past three years;
- e. Total plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
- f. Additions to plant in service for each of the past three years, separately by category including, but not limited to central office and outside plant;
- g. Depreciation for each of the past three years;
- h. Depreciation reserve.

CWA-47. Provide statewide totals for Verizon's territory:

- a. Number of households in area whether served by Verizon or not;
- b. Number of households served by Verizon;
- c. Total revenues (intrastate and interstate);
- d. Total intrastate revenues;
- e. Number of retail lines (residence and business) served; and
- f. Number of wholesale lines served (include Wholesale Advantage, unbundled network element loops, resale).

CWA-48. For the area within which Verizon has deployed FiOS, provide:

- a. Number of households in area whether served by Verizon or not;
- b. Number of households served by Verizon;
- c. Total revenues (intrastate and interstate);
- d. Total intrastate revenues;
- e. Number of retail lines (residence and business) served; and

- f. Number of wholesale lines served (include Wholesale Advantage, unbundled network element loops, resale).

CWA-49. For the area within which Verizon has *not* deployed FiOS, provide:

- a. Number of households in area whether served by Verizon or not;
- b. Number of households served by Verizon;
- c. Total revenues (intrastate and interstate);
- d. Total intrastate revenues;
- e. Number of retail lines (residence and business) served; and
- f. Number of wholesale lines served (include Wholesale Advantage, unbundled network element loops, resale).

CWA-50. Please confirm that in March 2010 Verizon determined that it would not roll out FiOS to any new areas. If this is not true, please explain fully including any plans for future roll-outs of FiOS.

CWA-51. Since January 1, 2013, has Verizon or any entity on behalf of Verizon conducted any internal analyses, studies, and/or surveys of the quality of its service including but not limited to such measures as customer satisfaction, timeliness of the installation of basic local service, the timeliness of the repair of out-of-service dial tones, the timeliness of the repair of service-affecting troubles on dial tone lines, the trouble report rate). If so, please provide.

CWA-52. Please provide in Excel-format a listing of all Verizon central offices in Pennsylvania and separately by central office, provide for the most recent time period for which data are available (indicate the date that corresponds with the response):

- a. The CLLI code
- b. The “plain English” name
- c. The municipalities served (in whole or in part) by that central office
- d. The total quantity of households within the footprint of that central office (including Verizon-served households as well as those not served by Verizon)
- e. The total quantity of Verizon residential lines with voice service that is not FiOS-based.
- f. The total quantity of residential lines with fiber-based voice service.
- g. The total quantity of residential VoiceLink lines

- h. The quantity of households that are passed by FiOS (where “passed” means that the customer could subscribe to FiOS-based voice service).

CWA-53. Separately for each of the years 2012 through 2015, please provide the following statewide totals:

- a. The total quantity of Verizon residential lines with voice service that is not FiOS-based.
- b. The total quantity of residential lines with FiOS-based voice service.
- c. The total quantity of residential VoiceLink lines.

CWA-54. During the past three years, has Verizon Pennsylvania or Verizon Communications prepared any business plans that have informed, directed, or otherwise influenced Verizon Pennsylvania’s operations? If so, please provide the business plans.

CWA-55. Concerning the deployment of broadband service as defined in Chapter 30 of the Public Utility Code, please provide a Microsoft Excel file showing the following:

- a. Separately by central office indicate whether Verizon has complied with the requirement to make broadband service available to 100% of its customers.
- b. In those instances where 100% availability has not been attained, provide the percentage that has been attained in each central office.
- c. Identify each central office where Verizon relies on the deployment of 4G LTE by an Affiliate as evidence of compliance with the Chapter 30 broadband deployment requirement.
- d. Identify each central office where Verizon relies on the deployment of 4G LTE by an entity other than an Affiliate as evidence of compliance with the Chapter 30 broadband deployment requirement.

CWA-56. Does Verizon offer VoiceLink in Pennsylvania? If not, why not? If so:

- a. Describe fully the circumstances under which Verizon offers VoiceLink, including but not limited to the persons (titles/roles) involved in deciding when and where to deploy VoiceLink.
- b. If a customer called Verizon, could that customer request and obtain VoiceLink? Please explain.
- c. Does Verizon offer VoiceLink to customers who reside in areas where FiOS is offered?

- d. Provide customers scripts used by customer representatives regarding to the sale and use of VoiceLink.
- e. Separately by wire center, and in electronic machine-readable format please provide, as of the most recent date for which data are available, the quantity of:
 - i. Residential customers subscribing to Voice Link.
 - ii. Business customers subscribing to Voice Link
- f. Separately by wire center and in electronic machine-readable format please indicate whether customers have the option to subscribe to VoiceLink.

CWA-57. During periods of extreme weather during 2013, 2014, and 2015 did Verizon's FiOS customers experience any network outages? If so:

- a. Please identify the three largest (by square miles) geographic areas affected.
- b. Please identify the three geographic areas in which the largest quantity of households are located.
- c. Please identify the three FiOS network outages of longest duration, and the time when and the locations where the outages occurred.

CWA-58. During periods of extreme weather during 2013, 2014, and 2015 did Verizon's basic stand-alone customers (that is, non-FiOS customers) experience any network outages? If so:

- a. Please identify the three largest (by square miles) geographic areas affected.
- b. Please identify the three geographic areas in which the largest quantity of households are located.
- c. Please identify the three copper network outages of longest duration, and the times when and the locations where the outages occurred.

CWA-59. Please provide any and all internal documents, studies, surveys, presentations prepared by or on behalf of Verizon within the past three years specific to Pennsylvania or implicitly relevant to Pennsylvania (i.e., relative to nationwide corporate strategies) that discuss Verizon's analysis of its residential customers' preferences for service of a particular quality.

CWA-60. Please provide any and all internal documents, studies, surveys, presentations prepared by or on behalf of Verizon within the past three years specific to Pennsylvania or implicitly relevant to Pennsylvania (i.e., relative to nationwide corporate strategies) that discuss:

- a. Verizon's objectives for basic voice service;
 - b. Verizon's migration to, deployment of, or marketing/sales of VoiceLink.
- CWA-61. Please provide customer scripts for sales representatives answering residential consumer questions about (a) FiOS; (b) stand-alone basic local exchange service; and (c) VoiceLink service.
- CWA-62. Has Verizon, or any entity working on behalf of Verizon, calculated an estimate of households in Pennsylvania composed of persons aged 65 and over ("65+") that rely on Verizon's landline service? If so, please provide the relevant documents.
- CWA-63. Does Verizon establish service quality standards for its internal use? If so, please provide Verizon's internal service quality standards (or objectives, or thresholds) for the following (or if a similar but not identical metric is used, please describe the similar metric and provide Verizon's internal standard for that metric):
- a. Residential Trouble report rate per 100 lines on a statewide basis, sub-state basis (e.g., district, region, territory, or other geographic area that is smaller than the state and larger than a wire center) basis, and on a wire center basis.
 - b. Repeat trouble report rate (please define).
 - c. Percent of residential out of service troubles repaired with 24 hours, 48 hour, 72 hours.
 - d. Installation interval.
- CWA-64. Please describe fully Verizon's methodology for reporting trouble reports, out-of-service troubles, service-affecting troubles, and repeat troubles. Include definitions of terms used in the response.
- CWA-65. Please provide a Microsoft Excel file showing for Verizon's service territory as a whole, and separately for each central office served by Verizon, monthly data for the last 36 months for which data are available (if residential-specific data are unavailable, provide combined residential and business and indicate in the response that combined data are provided):
- a. Residential trouble report rate;
 - b. Repeat residential trouble report rate (please include the definition of repeat trouble report rate as used in the response);
 - c. Residential service affecting troubles per 100;
 - d. Residential out of service ("OOS") per 100;

- e. Percent of residential OOS repaired within 24 hours;
- f. Percent of residential OOS repaired within 48 hours;
- g. Percent of residential OOS repaired with 72 hours; and
- h. Average repair time for residential OOS.
- i. Average installation time for residential FiOS voice service.
- j. Average installation time for residential non-FiOS voice service.

CWA-66. Please provide a Microsoft Excel file showing for Verizon's service territory as a whole, and separately for each central office served by Verizon, monthly data for the last 36 months for which data are available (if business-specific data are unavailable, provide combined residential and business and indicate in the response that combined data are provided):

- a. Business trouble report rate;
- b. Repeat business trouble report rate (please include the definition of repeat trouble report rate as used in the response);
- c. Business service affecting troubles per 100;
- d. Business out of service ("OOS") per 100;
- e. Percent of business OOS repaired within 24 hours;
- f. Percent of business OOS repaired within 48 hours;
- g. Percent of business OOS repaired with 72 hours; and
- h. Average repair time for business OOS.
- i. Average installation time for business FiOS voice service.
- j. Average installation time for business non-FiOS voice service.

CWA-67. Please provide a Microsoft Excel file showing for Verizon's service territory as a whole, and separately for each central office served by Verizon, monthly data for the last 36 months for which data are available *combined for residence and business data*:

- a. Trouble report rate;
- b. Repeat trouble report rate (please include the definition of repeat trouble report rate as used in the response);

- c. Service affecting troubles per 100;
- d. Out of service (“OOS”) per 100;
- e. Percent of OOS repaired within 24 hours;
- f. Percent of OOS repaired within 48 hours;
- g. Percent of OOS repaired with 72 hours; and
- h. Average repair time for OOS.
- i. Average installation time for business FiOS voice service.
- j. Average installation time for business non-FiOS voice service.

- CWA-68. Does Verizon submit service quality reports to the Commission? If so, please provide copies of all service quality reports submitted since January 1, 2012.
- CWA-69. Does Verizon track residential complaints that it receives? If not, why not? If so, please provide tallies of all such complaints by category separately for 2012, 2013, 2014 and 2015.
- CWA-70. Does Verizon track business complaints that it receives? If not, why not? If so, please provide tallies of all such complaints by category separately for 2012, 2013, 2014 and 2015.
- CWA-71. Does Verizon track wholesale complaints that it receives? If not, why not? If so, please provide tallies of all such complaints by category separately for 2012, 2013, 2014 and 2015.
- CWA-72. Does Verizon complete intake forms or in some other way record the nature of and disposition of complaints? If so, please provide all such complaints for January 1, 2015 to the present.