

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :
 2. BUREAU: ALJ :
 3. SECTION(S): :
 5. APPROVED BY: : 4. PUBLIC MEETING DATE:
 DIRECTOR: : 00/00/00
 SUPERVISOR: :
 6. PERSON IN CHARGE: : 7. DATE FILED: 10/30/06
 8. DOCKET NO: C-20067044 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: ZIMMERMAN, CHARLES

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES THERE IS A RELIABILITY, SAFETY OR QUALITY PROBLEM WITH THEIR UTILITY SERVICE. HE WOULD LIKE TO HAVE RELIABLE PHONE SERVICE AND WHEN THERE IS AN OUTAGE TO HAVE IT CORRECTED WITHIN A REASONABLE TIME FRAME.

DOCUMENT
FOLDER

DOCKETED
NOV 03 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Formal Complaint Form

Please print or type.

C-2006 7044

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name Charles Zimmerman

Street/P.O. Box 3683 Calumet St Apt # _____

City Philadelphia State PA Zip 19129

County Philadelphia

Area Code/HOME Phone (215) 438-3681

Area Code/WORK Phone (215) 686-4531

Utility Account Number 215 438-3681 693 82Y
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name N/A

Street/P.O. Box N/A

City _____ State _____ Zip _____

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Verizon

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER
(taxi, moving company, limousine)

TELEPHONE
(local, long distance)

PROCEEDING
2006 OCT 30 AM 10:23
SECRETARY'S BUREAU

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other.
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

I've had a chronic problem with reliable phone service. Also when my phone service goes out often it takes too long to have it repaired. I've complained to the P.U.C. twice before about this. This is why I'm now filing a formal complaint. Attached is a history of my problems with my phone service. It only goes back to 8/15/2000 before that I did not document the problems, but I had many problems before 2000.

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

I would like to have reliable phone service, and when there is an outage I would like to have it corrected within a reasonable time frame.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: I Charles Zimmerman, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Charles Zimmerman
(Signature) 10/26/6
(Date)

9. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

PHONE OUTAGES from 08\15\00 to 10\23\06

10\20\06 10\23\06 No dial tone

Verizon 1 800 275-2355 ex1 10\23\06 7:55AM Jim
Exec Office 1 800 483-7988 Debbie A. 10:15AM

Verizon 1 800 275-2355 ex1

10\20\06 12:00AM spoke with Sandy she hung up before I was through explaining
Called back, spoke to Mary she tried to charge \$9.00 for 3 minute local collect call to 267 259-4079 (a local call) isn't that price gouging?

Called again @ 12:37AM 10\20\06 Talked to Jesse he could not help me.

12:00AM Pay phone @ A-Plus Ridge & Midvale Aves. took money 50 cents did not work

Pay Phone own by: Tri County Inc.
1011 Eric Ave
Phila PA 19124
877-211-9633
local calls 50 cents

Verizon select service Inc.
???? N. MacArther Blvd.
Irving TX 75039
1 800 708-1361

Long Distance 25 cents per minute 1 800 873-8438

Called P.U.C. 1 800 782-1110 -4-2 Spoke to Eva

07\01\05 5:55PM Phone line hung too low truck tore line down 1 (800)640-4155

05\13\05-05\15\05 (3 days no dial tone) [whether was nice]

08:50PM 1 (800) 276-2355 -1 Deloris scheduled service for Monday 05\16\05
09:10PM Mike scheduled service for Sunday 05\15\05

02\03\04-02\04\04 (2 days no dial tone) vines grew up telephone pole into electrical box

P.U.C. Case # 1582859 John Patrick_1(800) 782-1110-4-2
Verizon Repairs
1 (800) 276-2355-1
1(888)847-2929
1(800)621-9900 Richard Fox
1(800)483-7988-3 Exec. Office
Relocated phone line

01\28\04 (No dial tone) vines grew up telephone pole into electrical box

08\04\03-08\04\03 (1 day no dial tone) vines grew up telephone pole into electrical box

Verizon Repairs 1 (800) 275-2355-00
Verizon 1 (800)640-4155 (5-4-2)

08\15\00-08\28\00 (19 days no dial tone) vines grew up telephone pole into electrical box

P.U.C. claim # 0829343 Jack Smith 1(800) 782-1110
Verizon 1 (800)640-4155 (5-4-2)
AT & T 1 (800) 222 -0300

filed complaint to.
Dale Irwin
P.O. Box 716
Lansdowne PA 19050



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: NOVEMBER 6, 2006

C-20067044

LEIGH A. HYER
VERIZON PENNSYLVANIA INC
FLOOR 10W
1717 ARCH ST
PHILADELPHIA PA 19103

DOCUMENT
FOLDER

Dear Ms. Hyer:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by CHARLES ZIMMERMAN. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either, personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

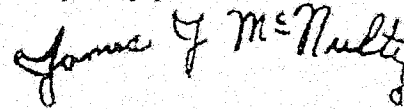
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

NOVEMBER 6, 2006

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,

A handwritten signature in cursive script that reads "James J. McNulty". The signature is written in dark ink and is positioned above the printed name and title.

James J. McNulty
Secretary

jin

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: NOVEMBER 6, 2006

CHARLES ZIMMERMAN
Complainant

v.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No C-20067044

DOCUMENT
FOLDER
DOCKETED
NOV 03 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: VERIZON PENNSYLVANIA, INC.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

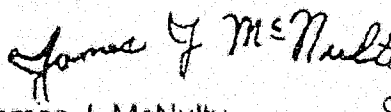
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.


James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

Hawke
 Mckeon
 Sniscak &
 Kennard LLP
ATTORNEYS AT LAW

William T. Hawke
Kevin J. McKeon
Thomas J. Sniscak
Norman James Kenaard
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. Hall
Katherine E. Lovette
Amy A. Whitney

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

November 27, 2006

VIA HAND DELIVERY

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

ORIGINAL

SECRETARY'S OFFICE

NOV 27 11:57

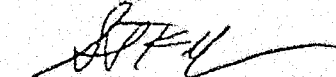
RE. Charles Zimmerman v. Verizon Pennsylvania Inc.; Docket No. C-20067044;
ANSWER OF VERIZON PENNSYLVANIA INC.

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.

Sincerely,



Steven K. Haas
Counsel for Verizon Pennsylvania Inc

SKH/kml
Enclosures
cc: Charles Zimmerman

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CHARLES ZIMMERMAN,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent.

Docket No. C-20067044

2006/07/27 3:33:57
SECURITY BUREAU

ANSWER OF VERIZON PENNSYLVANIA INC.
TO THE COMPLAINT OF CHARLES ZIMMERMAN

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 Charles Zimmerman ("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 is Verizon Pennsylvania Inc.
3. ADMITTED.
4. A. Verizon PA ADMITS that the Complaint involves allegations of reliability, safety or service quality issues.
4. B. Verizon PA DENIES that the Complainant has had a chronic problem with his telephone service, or that it has taken the Company excessive periods of time to repair problems that have been found. By way of further response, Verizon PA AVERS as follows: Verizon PA ADMITS that it has received several contacts from the Complainant over the past several years

DOCUMENT
FOLDER

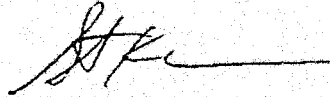
concerning his telephone service. In each instance, Verizon PA has either made necessary repairs to the facilities that serve the Complainant, or it has investigated and found that these facilities were working properly. In two instances, (June 14, 2004 and October 21, 2006) telephone wires that serve the Complainant were accidentally damaged by personnel from other companies working in the area. By way of example, on June 14, 2004, a truck working in the area struck the telephone service telephone wire that serves the Complainant's residence. By way of further example, on October 21, 2006, the telephone cable that serves the Complainant was accidentally cut by personnel from another company doing work in the area. This caused the Complainant and several other customers in the area to lose telephone service. The service problems experienced by the Complainant during these two instances were not caused by deficiencies with Verizon PA's facilities.

Verizon PA notes that, pursuant to 66 Pa. C.S.A. § 33.14(a), customers may not complain about alleged problems that occurred more than three (3) years ago. Accordingly, the allegations about problems from the year 2000 may not be included in this Complaint.

5. Paragraph 5 of the Complaint contains requests from relief to which no responses are required.

WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint filed by Charles Zimmerman, at Docket No. C-20067044, be dismissed or denied in its entirety.

Respectfully submitted,



Steven K. Haas
Hawke McKeon Sniscak & Kennard LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
(717) 236-1300
Email: skhaas@hmsk-law.com

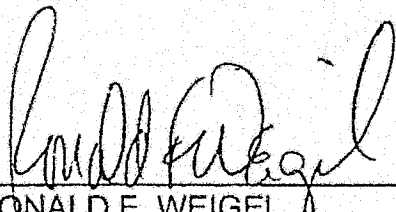
DATED: November 27, 2006

Counsel for
Verizon Pennsylvania Inc.

2006-10-27 PM 3:57
SECRETARY'S OFFICE

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.



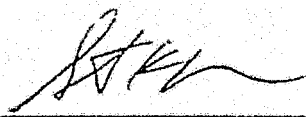
RONALD F. WEIGEL
Director – Government Relations

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service via first class mail:

Charles Zimmerman
3683 Calumet Street
Philadelphia, PA 19129



Steven K. Haas

Dated this 27th day of November, 2006.

NOV 27 11 57 AM '06
SECRETARY'S OFFICE