

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: 04/03/06
8. DOCKET NO: C-20066082	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: MR STUMP INC

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: CHESTER UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES REPEATED ERRORS WITH PHONE AND YELLOW PAGE LISTINGS. HE WOULD LIKE THE PUC TO HAVE THESE PROBLEMS CORRECTED.

**CHRISTOPHER PAUL DERBY**  
Attorney at Law

**ORIGINAL**



May 31, 2006

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building - 2nd Floor  
400 North Street  
Harrisburg, PA 17120

**RE: Mr. Stump, Inc. v. Verizon Pennsylvania Inc.; Docket No. C-20066082  
PRELIMINARY MOTION FOR A MORE SPECIFIC PLEADING  
AND REPLY TO NEW MATTER AND AFFIRMATIVE DEFENSES**

Dear Mr. McNulty;

Enclosed for the Commission are the original and three (3) copies of Mr. Stump, Inc.'s Preliminary Motion For A More Specific Pleading as well as Mr. Stump, Inc.'s Reply To New Matter and Affirmative Defenses. A copy of each of these documents have been served upon Respondent in accordance with the attached Certificate of Service.

If you have any questions with regard to these filings please direct them to me. Thank you very much for your attention to this matter.

**DOCUMENT  
FOLDER**

Sincerely,

A handwritten signature in black ink that reads "Christopher Paul Derby".

Christopher Paul Derby  
Counsel for and Owner of Mr. Stump, Inc.

Enclosures  
cc: Verizon Pennsylvania, Inc.

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2006 JUN -2 AM 9:26  
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**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MR. STUMP, INC.,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

Docket No. C-20066082

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FOLDER**

**DOCKETED**  
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**PRELIMINARY MOTION FOR A  
MORE SPECIFIC PLEADING**

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Mr. Stump, Inc. motions the Public Utility Commission pursuant to 52 Pa. Code Section 5.101(a)(4) to direct Verizon to provide a more specific pleading as an Answer to the Complaint # C-20066082 filed March 31, 2006.

Verizon has evaded answering in good faith the majority of the enumerated facts of the Complaint. Mr. Stump, Inc. filed with the Commission a Complaint against Verizon. The subject matter of the Complaint is the Verizon local telephone directories. The Commission served the Complaint on Verizon Pennsylvania, Inc.. The directory is published by Verizon Information Services - Pennsylvania, Inc. ("VIS") the issuing public utility (Exhibit #M1 attached). 52 Pa. Code Section 63.21(c)(1) requires that "A directory shall contain the name of the issuing public utility". The issuing public utility is Verizon Information Services - Pennsylvania, Inc." (Exhibit #M1). Nowhere does the directory contain the name "Verizon Pennsylvania, Inc.". Yet despite their agency and affiliation,

Verizon Pennsylvania, Inc. claims to have no knowledge of Verizon Information Services Pennsylvania, Inc. the issuing public utility, and claims to have no knowledge of the VIS Pennsylvania directory policies, procedures, actions, and personnel. Thereby Verizon's Answer dated May 11, 2006 is of little value to these Commission proceedings as Verizon evades answering with specificity more than half of the enumerated facts. Verizon evades answering the majority of the enumerated facts with specificity and in good faith both by limiting the fact pattern to the local Verizon Business Office stating "Verizon PA denies" (meaning VIS is to blame for that fact), and by providing dozens of cut and paste answers to the effect "we have no knowledge of VIS". Verizon can and must answer the complaint fully and with specificity in good faith on behalf of VIS the issuing public utility based on ownership, agency, and affiliation.

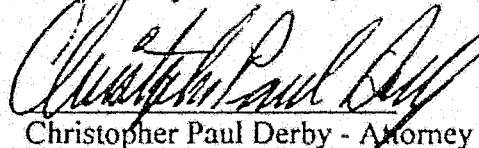
The Commission has subject matter jurisdiction over the Pennsylvania Verizon directories. Both Verizon and VIS the issuing public utility are named in the Complaint as both are responsible for the ongoing directory listings disasters. VIS controls the directory and Verizon controls VIS. VIS controls both the basic white page and "free" yellow page listings as well as any advertising. VIS is the issuing public utility, the publisher, the provider of this public service. Both Verizon PA and VIS take directory listing change and correction orders. The Complaint names VIS, the local Business Office, and Verizon Complaints and Appeals departments as all have been responsible for misfiling, misspelling, and entirely omitting Mr Stump's basic white page and "free" yellow page listings since the year 2003 as detailed in the Complaint. Verizon can and must answer the complaint fully and with specificity in good faith on behalf of its VIS company based on ownership, agency, and affiliation.

Respondent's refusal to accept responsibility for the directory and refusal to answer the Complaint with specificity and in good faith is characteristic of the Verizon interdepartmental and intercompany blame-game that is the crux of the Complaint and the cause of the ongoing damages, confusion, and directory failures. Verizon corporate has sliced the directory responsibilities into so many different groups (VIS, Verizon, VIS-PA, Verizon Communications, Verizon PA, Verizon Directories Corp, Verizon Directory Publishing Corp.) that none of them know what the others are doing. And Verizon has endowed all of these groups with the ability to destroy Pennsylvania small business' basic white page and "free" yellow page listings through misfiling, misspelling, and omitting. And, as detailed in the Complaint, VIS the issuing public utility, the local Business Office, Verizon Complaints in Massachusetts, Verizon Appeals in Philadelphia, Verizon Customer Service in Marion, Ohio, Verizon Superpages in New Jersey, and the TCC in Irving, Texas all blame each other for their ongoing directory failures yet all are responsible. Verizon can and must answer the complaint with specificity on behalf of its VIS company based on ownership, agency, and affiliation.

Since the year 2003 Mr Stump's customers have been unable to locate Mr Stump's listings in the Verizon directory. The listings have been misfiled, misspelled, and entirely omitted after a decade of inclusion. With each attempt we make to correct the listings disasters Verizon only makes things worse as the problems compound from year to year and the myriad of Verizon departments and companies just blame each other and incredibly still refuse to fix the problems. Respondent's exhausting pledge of ignorance as to VIS the issuing public utility over which the Commission also has jurisdiction, results in an answer that is of little value and it substantially and severely handicaps these Commission proceedings.

Therefore, Mr. Stump, Inc. motions the Commission to direct Verizon and VIS to answer the Complaint in good faith, fully and with specificity.

Respectfully Submitted,



Christopher Paul Derby - Attorney ID #93368  
271 Phoenixville Pike  
Malvern, PA 19355  
Telephone: (610) 640-9434  
E-mail: [chrispalaw@earthlink.net](mailto:chrispalaw@earthlink.net)

Counsel for and Owner of  
Mr. Stump, Inc.

DATED: May 31, 2006

Chester - Delaware County - Main Line  
White Pages Directory

This directory contains listings for:

Area Codes 610, 484 & 835 - Ardmore, Cynwyd-Narberth, Broomall-Vewtown Square, Bryn Mawr, Chester, Chester Heights, Darby-Ridley Park-Sharon Hill, Havertown-Manoa, Media, Paoli-Malvern-Berwyn, Swarthmore, Upper Darby-Lansdowne-Drexel Hill, Wayne



\*Numbers that are preceded by TTY/TDD are associated with text telephone. Unless you have similar equipment, you may not be able to call these numbers

The rates and information in this Customer Guide apply to Verizon customers residing in Pennsylvania and are current at time of publication. Because rates and services may change, please call our Business Office for current information on local rates and services

Every reasonable precaution is taken to avoid errors or omissions from the Customer Guide. However, Verizon does not guarantee the information in the Customer guide and shall not be liable for any such errors or omissions.

Contents of this Customer Guide cannot be reprinted, in whole or in part without written permission from Verizon.

## LOCAL TELEPHONE COMPANIES

- How to Reach Verizon ..... See Below
- How to Reach Other Local Phone Service Providers ..... 2

## GENERAL INFORMATION

- Your Telephone Rights and Responsibilities ..... 5
- Other Important Information ..... 8
- Privacy Principles—Verizon ..... 8
- Consumer Protection Principles ..... 10
- Protection Tips Against Telephone Abuse and Fraud ..... 10
- Setting Up Telephone Service ..... 11
- Repair ..... 13
- Billing and Payment ..... 14
- Optional Residence Service ..... 15

## CALLING INFORMATION

- Dialing and Calling Information ..... 20
- Local and Verizon Calling Area ..... 22
- Your Verizon Regional Calling Area ..... 32
- Jersey Link ..... 37
- Long-Distance Calling ..... 38
- International Calling Codes ..... 41

## GOVERNMENT NUMBERS

- See Blue Pages

## How to Reach Verizon

Call your Verizon representative for questions about your bill or to place an order. There is no charge for these calls.

### Telephone Services: Residential and Business

- establish new service(s)
- order changes in your present service(s)
- ask about Verizon services, rates and charges, or phone book listings
- report annoying, harassing or obscene calls
- ask general questions about your bill

### Residential Services

Monday - Friday 8:00 a.m. - 6:00 p.m.  
..... **\$1-800-660-2215**

### Centro Hispano de Verizon

Lunes - Viernes 8:00 a.m. - 6:00 p.m.  
..... **\$1-800-479-0305**

### Verizon Center for Customers with Disabilities

Residential Customers  
Monday - Friday 8:00 a.m. - 6:00 p.m.  
Voice & TTY ..... **\$1-800-974-6006**

### Business Services

Monday - Friday 8:30 a.m. - 5:00 p.m.  
..... **\$1-800-479-1919**

### Centro Hispano de Verizon

Lunes - Viernes 8:30 a.m. - 5:00 p.m.  
..... **\$1-800-483-4522**

### Conference Calling From Verizon - Conference Connections®

Reservationless Conference Service  
..... **1-800-779-2972**

Visit us on the Internet at  
[www.verizon.com/conferenceconnections](http://www.verizon.com/conferenceconnections)

### Payment Information: Residential and Business

- Call Verizon to
- hear a list of bill payment locations
- hear last payment credited to your account
- enter details of your last payment
- hear your bill balance
- make payment arrangements
- discuss overdue bills
- request a copy of your telephone bill

### Residential Customers

24 Hours a day account information  
English & Español ..... **\$1-800-801-4008**

### Business Customers

24 Hours a day account information  
English & Español ..... **\$1-800-906-7792**

### Repair Services: Residential and Business

24 Hours a day ..... **\$1-800-275-2355**  
Text Telephone (TTY/TDD) Users (hearing or speech impaired only) ..... **\$1-888-663-0363**

### Other Useful Numbers: Verizon Calling Card

report lost or stolen cards ..... **1-800-745-6989**  
24 Hours a day

### Verizon Public Payphone Service Customers

- Orders/Billing/Coin Collection
- Questions ..... **\$1-800-PUB-TELL**
- Repairs ..... **\$1-800-275-2355**

### Verizon SuperPages: Advertising and Customer Service

..... **1-800-555-4833**  
Or <http://verizon.superpages.com/custsupp>

### Directory Store

Local directories ..... **1-800-888-8448**  
Purchase Out-Of-State, Specialty or International Directories ..... **1-888-BOOKS-65**  
..... **(1-888-266-5765)**

SuperPages.com ..... **1-800-428-8722**

### Internet from Verizon

Residential & Business ..... **1-877-483-9322**  
Contact us on the Internet at [www.verizon.com](http://www.verizon.com)

### Buried Utility Line Information

Before You Dig - avoid cutting underground utility lines: PA One Call System ..... **\$1-800-242-1776**

### Pennsylvania Relay Center

TTY/TDD & Voice ..... **711**  
TTY/TDD only ..... **1-800-654-5984**  
Voice only ..... **1-800-654-5988**

### NOTES:

- Not all services are available in all areas
- Hours are subject to change. Closest Holidays.
- There is no charge to you when calling the numbers on these pages from exchanges within Verizon territory. If you call from a non-Verizon coin phone, a charge may apply. Mobile phone users, air time charges do apply.

### § Observing for Service Quality

You should know that when you speak with us at Verizon a supervisor may listen in on the call. Supervisors listen in only to help train employees and to ensure that we provide you with accurate information and high quality customer service.

Published by:  
Verizon Information Services - Pennsylvania, Inc.  
c/o Verizon Information Services, Inc.  
Verizon Place, 2200 W. Airfield Drive, P.O. Box 619810,  
D/FW Airport, Texas 75261-9810

EXHIBIT # M1

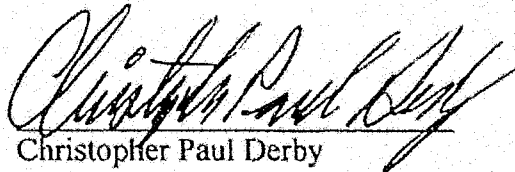
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below in accordance with Section 1.54.

Service via first class mail:

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

Dated this 31st day of May, 2006.



Christopher Paul Derby  
Counsel for and Owner of Mr. Stump, Inc.

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MR. STUMP, INC.,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

Docket No. C-20066082

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**REPLY TO NEW MATTER AND  
AFFIRMATIVE DEFENSES RAISED BY  
VERIZON PENNSYLVANIA INC.  
TO THE COMPLAINT OF MR. STUMP, INC.**

**REPLY TO NEW MATTER**

1. Mr. Stump, Inc. DENIES that it is a residential telephone customer of Verizon. Mr Stump, Inc. AVERS that it is and has been a business telephone customer of Verizon since 1995, is charged business customer rates for all Verizon services, that Verizon monthly billing is to Mr Stump, Inc., and that the Verizon residential customer offices will not respond to my inquiries and instead direct me to the business telephone customer office. Mr Stump, Inc. ADMITS that the telephone account number is 610-640-9434 and is provided to 271 Phoenixville Pike; Malvern, PA 19355 the registered business address.

2. Mr Stump, Inc. DENIES that Respondent is unable to respond to the facts.

3. Mr. Stump Inc. ADMITS that the Commission served Verizon PA with the Complaint. Mr Stump, Inc. DENIES that Verizon Information Services provided Mr Stump with paid advertising.

4. Mr Stump, Inc. DENIES that VIS is not regulated by the Commission. Mr Stump further AVERS that VIS is the issuing public utility pursuant to 52 Pa. Code Section 63.21(c)(1). Mr Stump AVERS that VIS is intimately involved in the basic white and yellow page listings - the public service, as both the publisher and the issuing public utility. Mr Stump AVERS that Verizon and VIS are both responsible for the ongoing directory failures, that both take directory listing change and correction orders, and that they blame each other and neither will accept responsibility for the Pennsylvania directory failures. Mr Stump DENIES that VIS has provided paid advertising. Mr Stump DENIES that Verizon and VIS are separate and distinct companies. Mr Stump AVERS that Verizon and VIS share common ownership, agency, and affiliation and must respond to the Complaint.

5. Mr Stump Inc. ADMITS that Mr Stump received no paid advertising either.

#### **REPLY TO AFFIRMATIVE DEFENSES**

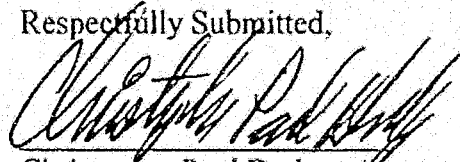
6. Mr. Stump Inc. DENIES that the Commission lacks jurisdiction over all claims involving paid advertising. Mr. Stump AVERS that claims involving paid advertising often are incorporated along with larger claims involving basic white page and "free" yellow page listings and that Verizon's paid advertising departments are endowed with the ability to destroy Pennsylvania small business' basic white and yellow listings.

7. Mr. Stump is without sufficient information or knowledge to respond to what the Commission does with funds sourced through fines and penalties levied against public

utilities who fail to provide basic public service as per the filed tariffs and the Regulations. Mr. Stump further AVERS that the Commission is not without authority in approving future tariff provisions and in advising the state legislature, the attorney general, and the Commonwealth Courts.

WHEREFORE, for the reasons set forth above and in the Complaint, Mr. Stump, Inc. objects to Verizon's request that the Complaint be dismissed, and Mr Stump respectfully requests that these proceedings continue with a hearing subsequent to Verizon and VIS providing a more specific pleading as per the attached Motion.

Respectfully Submitted,



Christopher Paul Derby - Attorney ID #93368  
271 Phoenixville Pike  
Malvern, PA 19355  
Telephone: (610) 640-9434  
E-mail: chrispalaw@earthlink.net

Counsel for and Owner of  
Mr. Stump, Inc.

DATED: May 31, 2006

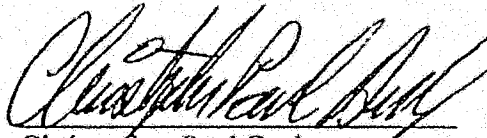
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