

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00	:	
2. BUREAU: ALM	:	
3. SECTION(S):	:	
5. APPROVED BY:	:	4. PUBLIC MEETING DATE:
DIRECTOR:	:	00/00/00
SUPERVISOR:	:	
6. PERSON IN CHARGE:	:	7. DATE FILED: 03/22/06
8. DOCKET NO: C-20066019	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: CZECH, ELISABETH A. COLBATH

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES FOR THE PAST 5 YEARS, SHE HAS HAD REPEATED PROBLEMS WITH 4 DIFFERENT TELEPHONE LINES. SHE WANTS THE BOX REPLACED SO THAT HER PHONES DO NOT GO DOWN ANYMORE.

DOCUMENT
FOLDER

DOCKETED

MAR 23 2006

Formal Complaint Form

310200

Please print or type.

C-20066019

RECEIVED
2006 MAR 22 AM 9:34
PA P.U.C.
SECRETARY'S BUREAU

1. CUSTOMER NAME (COMPLAINANT)

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

Name Elisabeth A. Colbath-Czech

Street/P. O. Box 825 Fitzwater Street Apt #

City Philadelphia State PA Zip 19147

County Philadelphia

Area Code/HOME Phone 215-829-0487

Area Code/WORK Phone 215-627-4201

Utility Account Number 215-829-0487 (from your bill)

ORIGINAL

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

Name

Street/P. O. Box

City State Zip

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: VERIZON

3. TYPE OF UTILITY (check one)

- ELECTRIC
- GAS
- WATER
- TELEPHONE (local, long distance)
- STEAM HEAT
- WASTE WATER
- MOTOR CARRIER (taxi, moving company, limousine)

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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.

For the last five (5) years we have had REPEATED problems with 4 different telephone lines. Every time a verizon repair rep comes to the house they then go to the box on the street and report to us that the problem is exactly the same every time. The BOX on the street is bad and there are no good pairs to connect to. They tell me that Verizon WILL NOT expend the money to replace the box as they are going to be running lines under the street. IT HAS BEEN 5 YEARS NOW. The phone lines go down at least a couple of times a year. Usually every time we have serious rain. Every time I have to spend my time to contact the telephone line provider, then I need to take time off from work to be home for the repairs. I am tired of losing pay and losing phone service.

5. RELIEF

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

I want the box replaced so that my phones do not go down anymore. I would like to be compensated for all of my lost time due to Verizon's inability to handle this issue.

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

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Page Break

about a billing problem, an indication 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: Elizabeth A. Robb-Grech 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).

Elizabeth A. Robb-Grech 3/20/06
(Signature) (Date)

9. LEGAL REPRESENTATION (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 Paul Czech
Street 2 Penn Center suite 950
City Phila State PA Zip 19102
Area Code/Phone Number 215 627 4201

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.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 23, 2006

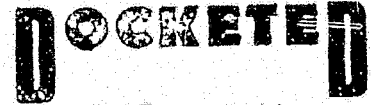
ELISABETH A. COLBATH-CZECH
Complainant

v.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No: C-20066019

DOCUMENT
FOLDER



MAR 23 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



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

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: March 23, 2006

C-20066019

WILLIAM B PETERSEN
VERIZON PENNSYLVANIA INC
FLOOR 32SW
1717 ARCH ST
PHILADELPHIA PA 19103

DOCUMENT
FOLDER

Dear Mr. Petersen:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by ELISABETH A. COLBATH-CZECH. 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.

March 23, 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,

James J. McNulty
Secretary

ane

Hawke
 McKeon
 Sniscak &
 Kennard LLP
ATTORNEYS AT LAW

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

April 11, 2006

ORIGINAL

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Second Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Elisabeth A. Colbath-Czech v. Verizon Pennsylvania Inc.; Docket No. C-20066019; ANSWER

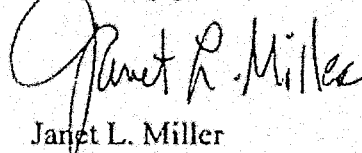
Dear Mr. McNulty:

Enclosed are the original and three (3) copies of the Answer of Verizon Pennsylvania Inc. to the above-captioned Formal Complaint. A copy of this document has been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions concerning this filing, please feel free to call.

**DOCUMENT
FOLDER**

Very truly yours,



Janet L. Miller
Counsel for Verizon Pennsylvania Inc.

JLM/kmg
Enclosures
cc: Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

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2006 APR 11 11:44:13
SECRETARY PUBLIC UTILITIES

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

SECRETARY'S BUREAU
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ELISABETH A. COLBATH-CZECH,

Complainant

v.

Docket No. C-20066019

VERIZON PENNSYLVANIA INC.,

Respondent

**ANSWER OF VERIZON PENNSYLVANIA INC.
TO THE FORMAL COMPLAINT FILED BY
ELISABETH A. COLBATH-CZECH**

Verizon Pennsylvania Inc. ("Verizon PA" or "Company"), by its attorneys in this proceeding, Hawke McKeon Sniscak & Kennard LLP, hereby submits its Answer to the Formal Complaint filed by Elisabeth A. Colbath-Czech ("Complainant"). In support thereof, Verizon PA responds and avers as follows:

DOCKETED
APR 13 2006

1. ADMITTED.

2. DENIED. The correct corporate name of the Respondent in this matter is

"Verizon Pennsylvania Inc."

3. ADMITTED.

4. A. ADMITTED.

B. Verizon PA is without sufficient information or knowledge to respond to

Complainant's statements that she allegedly has had problems with her service on "4 different telephone lines" for the last five (5) years. These statements are therefore DENIED.

**DOCUMENT
FOLDER**

By way of further answer, Verizon PA AVERS the Company has provided service to Complainant's residential line (215-829-0487) only since October 9, 2002. Verizon PA AVERS that, prior to this date, Complainant received service from a Competitive Local Exchange Carrier ("CLEC").

Verizon PA DENIES Complainant's statement that her service goes out "at least a couple of times a year." On the contrary, Verizon PA AVERS Complainant has contacted the Company only four (4) times since October 2002 to report trouble on telephone account number 215-829-0487. Verizon PA AVERS these reports were as follows: October 10, 2002, May 19, 2004, March 20, 2006 and March 21, 2006. Verizon PA AVERS that, in response to these trouble reports, the Company replaced Complainant's outside service loop and repaired the connection of the wires providing Complainant with service at both the Service Access Cabinet ("SAC")¹ and at Complainant's Network Interface Device ("NID"). Verizon PA AVERS testing performed by the Company in response to Complainant's March 21, 2006 trouble report did not locate any trouble with the Company's facilities.

Verizon PA is without sufficient information or knowledge to respond to Complainant's statements that she was required to take off work to be present during the repairs to her telephone facilities. These statements are therefore DENIED. Verizon PA AVERS that, under normal circumstances, no access into the customer's home is required and the customer does not need to be present for repairs to be made to the Company's facilities up to the NID.

Verizon PA is without sufficient information or knowledge to respond to Complainant's statements that she has been told "the problem is exactly the same every time."

¹ The "BOX" that Complainant refers to in her Formal Complaint is known as a Service Access Cabinet. The SAC houses Company facilities that provide telephone service to a large number of customers within a defined service area.

This statement is therefore DENIED. Verizon PA ADMITS the SAC through which Complainant receives service does not qualify for replacement at this time.

Verizon PA AVERS a Company technician was dispatched on March 31, 2006 in response to the Formal Complaint. Verizon PA AVERS the technician performed a 100% inspection of all facilities (both inside and outside) providing Complainant with service and found all equipment to be working properly and within normal parameters. Verizon PA also AVERS that, as a precaution and in an effort to remedy claims made by Complainant that her calls are being "knocked off" by Company technicians working in the SAC, the Local Cable Manager directly connected the wires in the SAC that are used to provide Complainant's service to prevent them from being dislodged.²

Verizon PA ADMITS business service also is provided at 825 Fitzwater Street, Philadelphia, PA under telephone number 215-627-4201, which has three additional lines billed as part of the same account. Verizon PA AVERS service for these business lines has been provided by Cordia Telecommunications ("Cordia") since May 2004 and Complainant would contact Cordia regarding repairs to her service during that time. Verizon PA AVERS that, prior to May 2004, Complainant reported trouble on her line on October 16, 2003, March 15, 2004 and May 14, 2004. Verizon PA AVERS Complainant's outside service loop was changed and the SAC connections were repaired in response to the October 2003 and May 2004 reports. Verizon PA AVERS testing done in response to the March 2004 report showed the trouble was with the Customer Premise Equipment inside Complainant's residence. Verizon PA AVERS repair records prior to October 2003 are being retrieved from the Company's archives; the Company will amend this Answer if those records indicate additional trouble reports.

² Verizon PA AVERS a customer's wires inside a SAC normally are connected by attaching them to the equipment using screws.

The remaining statements set forth in Paragraph 4.B. of the Formal Complaint represent Complainant's opinions or conclusions, to which no response is required. To the extent a response is deemed to be necessary, these statements are DENIED.

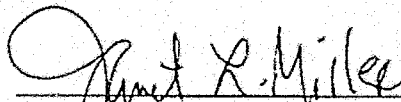
5. The statements set forth in Paragraph 5 of the Formal Complaint are a request for relief, to which no response is required. To the extent a response is deemed to be necessary, these statements are DENIED. By way of further Answer, Verizon PA AVERS the Commission has no power or authority to award damages or compensation to Complainant as a result of this proceeding. This request for relief should, therefore, be DENIED.

6. ADMITTED.

7. No information was provided in this Paragraph of the Formal Complaint; therefore no response is required.

WHEREFORE, for all the reasons set forth above, and in accordance with Commission Regulations, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint filed at Docket No. C-20066019 be dismissed or denied in its entirety.

Respectfully submitted,



Janet L. Miller
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105-1778
(717) 236-1300

DATED: April 11, 2006

Counsel for Verizon Pennsylvania Inc.

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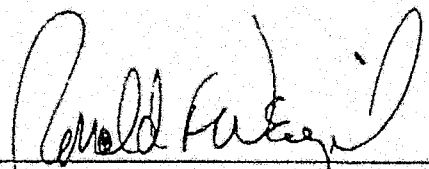
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SECRETARY'S BUREAU

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

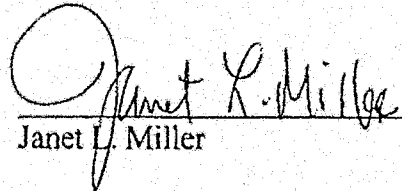
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the persons and in the manner indicated below.

Service by First Class Mail

Paul Czech, Esquire
2 Penn Center
Suite 950
Philadelphia, PA

Elisabeth A. Colbath-Czech
825 Fitzwater Street
Philadelphia, PA 19147


Janet L. Miller

Dated: April 11, 2006

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