

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: 03/22/06
8. DOCKET NO: C-20066020	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: MCCUNE, WILLIAM J. JR.

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: BEAVER

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES THERE IS A RELIABILITY AND QUALITY PROBLEM WITH HIS UTILITY SERVICE. HE WOULD LIKE THE PUC TO GET THE COMPANY TO UPGRADE THE PHONE LINES SO THAT HE CAN HAVE A DEPENDABLE, STATIC FREE LINE.

DOCUMENT
FOLDER

DOCKETED

MAR 23 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

310200

Please print or type.

C-20066020

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2006 MAR 22 AM 9:46

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 William J McCune Jr

Street/P O. Box 306 CRYSTAL DR Apt # _____

City GEORGETOWN State PA Zip 15043

County BEAVER

Area Code/HOME Phone 724-573-9163

Area Code/WORK Phone _____

Utility Account Number 724-573-9163-474-37-y
(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) *Bad phone lines when damp (rain snow ice) I get a lot of static can hardly hear caller, reported to Verizon over last 10 to 20 years but problem was never really fixed, last time problem late Oct. of 2005.*

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.

TALKED TO VERIZON TECH. WHEN HE CAME OUT IN LATE OCT 2005 HE SAID HE WAS QUITE SURE THE PROBLEM WAS IN LINE ON LEEPER RD SAID IT NEEDED TO BE REPLACED SAID HE WOULD TALK TO SUPERVISOR, THAT WAS THE LAST THAT I HEARD FROM VERIZON, SINCE THEN I HAD STATIC ONCE IN FEB 2006

5. RELIEF

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

I would like you to get Verizon to upgrade our phone lines so that we can have dependable static free lines like most other people and possibly get some of the newer services that would be available with newer lines

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 William J McCune Jr, 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).

William J McCune Jr
(Signature)

MARCH 17, 2006
(Date)

MY

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 23, 2006

DOCUMENT
FOLDER

WILLIAM J. MCCUNE, JR.
Complainant

v.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No: C-20066020

DOCKETED

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-20066020

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 WILLIAM J. MCCUNE, JR.. 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

ORIGINAL

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 12, 2006

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street - Filing Room (2 North)
P.O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT
FOLDER

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2006 APR 12 PM 1:36
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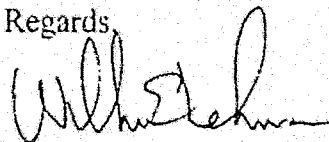
RE: William J. McCune v. Verizon Pennsylvania Inc.; Docket No. 20066020;
ANSWER

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s ("Verizon PA") 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.

Regards,



William E. Lehman
Counsel for Verizon Pennsylvania Inc.

WEI/kmg
Enclosures

cc: William J. McCune

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

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

WILLIAM J. McCUNE,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

Docket No. C-20066020

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APR 12 2006

**DOCUMENT
FOLDER**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**ANSWER OF
VERIZON PENNSYLVANIA INC.
TO THE COMPLAINT OF WILLIAM J. McCUNE**

Verizon Pennsylvania Inc. ("Verizon PA"), by and through its counsel in this proceeding, Hawke McKeon Sniscak & Kennard LLP, hereby submits its Answer to the Complaint filed by William J. McCune ("Complainant" or "Mr. McCune"). In support thereof, Verizon PA avers and represents as follows:

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APR 17 2006

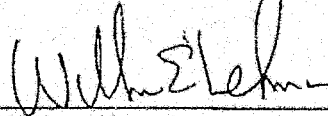
1. ADMITTED upon information and belief.
2. DENIED. The correct corporate name of the Respondent in this matter is "Verizon Pennsylvania Inc."
3. ADMITTED upon information and belief.
4. Verizon PA DENIES there is a reliability, safety, or quality problem with the Complainant's utility service. Verizon PA DENIES that the Complainant has "bad phone lines

when damp." Verizon PA DENIES the Complainant's description of the quality of his telephone service. Verizon PA ADMITS that the Complainant has filed repair reports, but is without sufficient information or knowledge to respond to the Complainant's allegation that he has filed repair reports for the past 10-20 years; therefore, this allegation is DENIED. By way of further answer, Verizon PA AVERS that, per Commission regulation, it keeps copies of repair reports for four years. According to Verizon PA's records, the Complainant has filed eight (8) repair reports over the past four (4) years. On three (3) occasions, Verizon identified and repaired a problem with the Complainant's facilities. On the remaining five (5) occasions, Verizon PA found no trouble with the Complainant's facilities. Verizon PA DENIES that the Complainant's "problem was never really fixed." Verizon PA DENIES the Complainant's allegations regarding the content of conversations he had with a Verizon PA technician. Verizon PA DENIES that the Complainant had static on his line in February 2006. By way of further answer, Verizon PA AVERS that it received no reports of trouble from the Complainant in February 2006.

5. The statements set forth in Paragraph 5 are requests for relief to which no response is required.

WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint of William J. McCune be denied in its entirety.

Respectfully submitted,



William E. Lehman
Hawke McKeon Sniscak & Kennard LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
(717) 236-1300

DATED: April 12, 2006

Counsel for
Verizon Pennsylvania Inc.

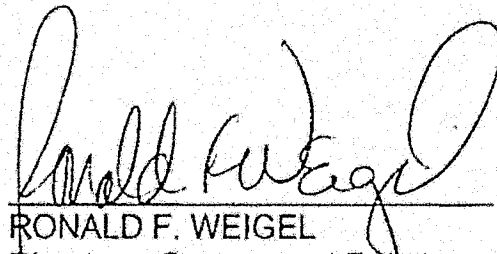
AFFIDAVIT

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.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



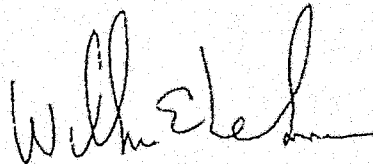
RONALD F. WEIGEL
Director – Government Relations

CERTIFICATE OF SERVICE

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

Service by first class mail:

William J. McCune
306 Crystal Drive
Georgetown, PA 15043



William E. Lehman

DATED: April 12, 2006

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2006 APR 12 PM 1:37
PA PUC
SECRETARY'S BUREAU