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DEC 18 2004

PA PUBLIC UTILITY COMMISSION
ELECTRICITY DIVISION

DOCUMENT
FOLDER

September 7, 2004

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Certificate of Mailing

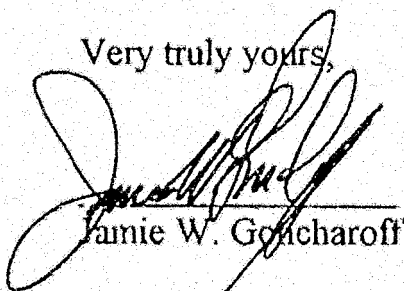
Re: Jamie W. Goncharoff v. Verizon Pennsylvania Inc.
Docket No.: C-20042371

RJP

Dear Sir or Madam:

Enclosed herewith, please find an original and ten copies of Complainant's Exceptions filed in the above-referenced matter. Please date and time-stamp the copies and return one of the copies to me in the enclosed self-addressed, stamped envelope. Please note the enclosed Certificate of Mailing, PS Form 3817 since today is the last day for filing exceptions and yesterday was a holiday. If you have any questions or comments, please do not hesitate to contact me at your convenience. Thank you.

Very truly yours,



Jamie W. Goncharoff

JWG:ddk

Enclosure

cc: William E. Lehman, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JAMIE W. GONCHAROFF :
Complainant :

v. :

Docket No. C-20042371

VERIZON PENNSYLVANIA, INC. :
Respondent :

**Complainant Jamie W. Goncharoff's Exceptions
to Order Granting Judgement on the Pleadings**

Complainant Jamie W. Goncharoff hereby respectfully files the instant exceptions to the Administrative Law Judge's (ALJ) granting of respondent's motion for judgement on the pleadings as follows:

1. Complainant was denied the opportunity to develop the facts in this case despite having served discovery on the respondent, but not having the opportunity to obtain any responses thereto.
2. The answers to the discovery will enable the Complainant to further establish the legal and factual basis for the relief requested.
3. The Complainant was denied due process by not having the opportunity to at least develop a record in this case.

4. The ALJ failed to accept as true all well pled facts by the Complainant which include, but are not limited to, all averments denied by the respondent, such as a denial that respondent is unable to add the words "for 30 cents" to its pre-recorded announcement.

5. The ALJ erred in finding that Complainant was aware of the White Pages description of the amount and application of the charge prior to purchasing a calling plan that included unlimited directory assistance calling.

6. The ALJ erred in finding that there were no material facts in dispute.

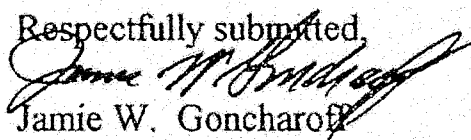
7. A material fact in dispute is when Complainant became aware of the charges.

8. The ALJ erred in preventing Complainant from advocating his claim on his own behalf and not on behalf of the public.

9. Whether or not respondent provided adequate and reasonable service is a factual question, and in addition to denying Complainant the opportunity to develop the facts through discovery that already had been propounded but not answered, the ALJ relied on cases that did not involve the proper development of discovery.

WHEREFORE, Complainant respectfully requests that the Commission give Complainant at least the opportunity to complete discovery and to develop a proper record so as to allow the material facts be presented at a hearing.

Respectfully submitted,


Jamie W. Goncharoff

DEC 13 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

JAMIE W. GONCHAROFF :
Complainant :

v. :

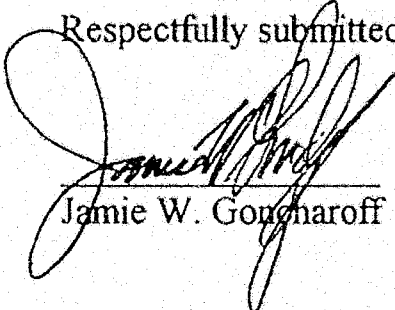
Docket No. C-20042371

VERIZON PENNSYLVANIA, INC. :
Respondent :

CERTIFICATE OF SERVICE

This is to certify that in the above-referenced case, complete copies of all papers contained in Exceptions have been served upon the following person, by the following means and on the date stated:

<u>Name:</u>	<u>Means of Service:</u>	<u>Date of Service:</u>
William E. Lehman, Esquire P.O. Box 1778 Harrisburg, PA 17105	U.S. Postal Service 1 st Class Mail	September 7, 2004

Respectfully submitted,

Jamie W. Goncharoff