

COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

**DOCKET**

JUL 14 2005

-----  
Jean Reese,  
v.  
Verizon North, Inc.  
  
In Person Hearing  
-----

Docket No.: C-20043520

Pages: 1 - 130

Scranton State Office Building  
100 Lackawanna Avenue  
Room 318  
Scranton, PA 18503

Tuesday, May 17, 2005  
Commencing at 10:00 a.m.

BEFORE:

EMBER S. JANDEBEUR, Administrative Law Judge

APPEARANCES:

JEAN REESE, Pro Se  
6938 Lentz Road  
New Tripoli, PA 18066  
For the Complainant

JANET MILLER, Esquire  
Hawke, McKeon, Sniscak & Kennard, LLP  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
For Verizon North

MICHAEL L. SWINDLER, Esquire  
Thomas, Thomas, Armstrong & Niesen  
212 Locust Street  
Suite 500  
Harrisburg, PA 17101  
For the Inton

REPORTER: RHONDA L. LINGLE

Any reproduction of this transcript  
is prohibited without authorization  
by the certifying agency.

*[Handwritten initials]*

**RECEIVED**

JUN 01 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**DOCUMENT  
FOLDER**

INDEX TO WITNESSES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RE</u>
Reese	10	17	23	
George	35	39	55	
Ryan	59	63	120	

**RECEIVED**

JUN 01 2009

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

JUN 01 2005

INDEX TO EXHIBITS

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

1 NUMBER FOR IDENTIFICATION IN EVIDENCE

2 For the Complainant:

3 No. 1 (Petition) 6 7

4 NUMBER FOR IDENTIFICATION IN EVIDENCE

5 For Verizon North:

6 No. 1 (Testimony of 58 127

7 Regina Ryan  
8 Nonproprietary/Proprietary)

9 NUMBER FOR IDENTIFICATION IN EVIDENCE

10 For Ironton:

11 No. 1 (Testimony of 17 57

12 William George, II and  
13 New Tripoli Calling Area)

14 No. 2 (Ironton Calling 35 57

15 Area)

16 No. 3 (Local Exchanges) 35 57

17 NUMBER FOR IDENTIFICATION IN EVIDENCE

18 For Ironton Cross:

19 No. 1 (MapQuest) 73 127

20 No. 2 (MapQuest) 73 127

1 P R O C E E D I N G S

2 -----  
3 JUDGE EMBER S. JANDEBEUR:

4 This is the time and place for the in  
5 person hearing regarding Jean Reese versus Verizon  
6 North. The Docket is C-20043520. I have Ms. Reese in  
7 the Courtroom. I have Mike Swindler for Ironton. I  
8 have Janet Miller for Verizon North. Yes, Mr.  
9 Swindler?

10 ATTORNEY SWINDLER:

11 I apologize, Your Honor, but I believe it  
12 would be preferable to have our witness on the line  
13 since you're going on the record.

14 JUDGE JANDEBEUR:

15 You did remind me that.

16 ATTORNEY SWINDLER:

17 I apologize.

18 JUDGE JANDEBEUR:

19 You need to remind me even more. Now, do  
20 I have telephone number in front of me or are you  
21 going to give it to me? Is it on something here?

22 ATTORNEY SWINDLER:

23 It was on the e-mail that I sent  
24 yesterday, Your Honor.

25 JUDGE JANDEBEUR:

1 I can go through that.

2 ATTORNEY SWINDLER:

3 (610) 799-0211.

4 CFF RECORD DISCUSSION

5 JUDGE JANDEBEUR:

6 Good morning, Mr. George?

7 MR. GEORGE:

8 Yes, ma'am.

9 JUDGE JANDEBEUR:

10 This is Judge Jandebaur with the PUC in  
11 Scranton. We are in the courtroom, and everybody is  
12 going to be listening to you telephonically.

13 MR. GEORGE:

14 Okay.

15 JUDGE JANDEBEUR:

16 Now, if, when we start, you have trouble  
17 hearing anybody, pipe up and let me know, and we'll  
18 and try and get folks to speak louder. It's going to  
19 be hard to tell just now, because I'm sitting next to  
20 the phone. But obviously there's other people that  
21 are not. So just let me know if you have trouble  
22 hearing.

23 MR. GEORGE:

24 Okay, ma'am.

25 JUDGE JANDEBEUR:

1           We are on the record. Let's see, I have  
2 exhibits from Ironton. Ms. Reese, you have the one  
3 thing that you would like to submit. Ms. Miller, do I  
4 have any exhibits from you?

5           ATTORNEY MILLER:

6           They're attached to Ms. Ryan's testimony,  
7 one exhibit.

8           JUDGE JANDEBEUR:

9           Just the telephone numbers?

10          ATTORNEY MILLER:

11          Yes.

12          JUDGE JANDEBEUR:

13          We have a request by Jean Reese to put in  
14 a petition of neighbors that are in support. I have  
15 explained to her, without the individuals here to  
16 testify, that it's pretty much useless. However, she  
17 would like to put it into the record, nonetheless.  
18 Mr. Swindler, for Ironton would like it put into the  
19 record. Ms. Miller has an objection based on the fact  
20 that the folks are not here, and therefore she has no  
21 idea if they are real people attached to these  
22 signatures. Is that fair enough?

23                   (Reese Exhibit Number One marked for  
24 identification.)

25          ATTORNEY MILLER:

1                   That and whether or not they're actually  
2 New Tripoli exchange customers.

3                   JUDGE JANDEBEUR:

4                   And whether or not they are New Tripoli  
5 exchange customers. I've explained to Ms. Reese that  
6 I will go ahead and allow it into the record with the  
7 qualification that without the individuals here to  
8 testify, I do not believe it will be useful at all in  
9 rendering a decision. But if you want to submit that,  
10 Ms. Reese?

11                   MS. REESE:

12                   Do you get one copy?

13                   JUDGE JANDEBEUR:

14                   I get one, she gets three.

15                   MS. REESE:

16                   She gets three?

17                   JUDGE JANDEBEUR:

18                   Three if you have three, if you don't

19 ---.

20                   MS. REESE:

21                   I have two for sure.

22                   JUDGE JANDEBEUR:

23                   For you, Mr. George, this petition says,  
24 we the residents of the New Tripoli area, customers of  
25 Verizon North, Inc., in the 298 exchange do hereby

1 petition Verizon North, Inc. to extend the local  
2 calling area to include Schnecksville; is that  
3 correct?

4 MS. REESE:

5 Yes.

6 MR. GEORGE:

7 That's correct.

8 JUDGE JANDEBEUR:

9 Schnecksville exchange is 769 and 797,  
10 Ironton Telephone Company.

11 MR. GEORGE:

12 Correction, 799.

13 JUDGE JANDEBEUR:

14 I'm sorry. Each page is individually  
15 numbered, so I can't tell you, but there are a lot.  
16 Do you know how many are on here?

17 MS. REESE:

18 204.

19 JUDGE JANDEBEUR:

20 204 signatures with addresses on here.  
21 So again, I am admitting it into the record with the  
22 qualification that, in my opinion, I will not use it  
23 in rendering a decision, because none of the  
24 individuals are here to testify. That is Ms. Miller's  
25 complaint as well. Nonetheless, it will go ahead and

1 go in the record. If the Commissioners disagree with  
2 me, then it will become an issue once again.

3 ATTORNEY MILLER:

4 Your Honor, I would also note that the  
5 petition has no telephone numbers on it.

6 JUDGE JANDEBEUR:

7 Ms. Miller wants us to note on the record  
8 that the petition does not have telephone numbers on  
9 it. That is correct. It has name, signature and  
10 address. All right. Have you been to one of our  
11 hearings before, Ms. Reese?

12 MS. REESE:

13 I have not.

14 JUDGE JANDEBEUR:

15 Has anyone explained to you the process?

16 MS. REESE:

17 Not really, no.

18 JUDGE JANDEBEUR:

19 Let's go off the record for a minute so  
20 Rhonda doesn't have to transcribe all this.

21 OFF RECORD DISCUSSION

22 JUDGE JANDEBEUR:

23 Ms. Reese, I'm going to call you to the  
24 stand, please. If you need to bring your materials  
25 with you, feel free to. I'll ask you to raise your

1 right hand.

2 -----

3 JEAN REESE, HAVING FIRST BEEN DULY SWORN, TESTIFIED AS  
4 FOLLOWS:

5 -----

6 JUDGE JANDEBEUR:

7 Thank you. You may be seated. Go ahead.

8 MS. REESE:

9 I want everybody to know that this  
10 complaint began as a simple inquiry. It did not make  
11 sense to me that areas further away from the New  
12 Tripoli 298 exchange were local calls, while the  
13 Schnecksville area, 799 and 769 exchanges were toll  
14 calls. I began by making two phone calls to Verizon  
15 to find out why. The people that I talked to did not  
16 have an answer.

17 It was suggested that I call the PUC,  
18 which I did. The PUC employee who took the  
19 information informed me of my complaint number. I  
20 explained again, that I was calling to ask a question.  
21 So began the complaint aspect of my inquiry.

22 About three weeks later, I did receive a  
23 phone call from someone from Verizon regarding my  
24 complaint. She expressed confusion as to the nature  
25 of my complaint since she had accessed my phone bill,

1 and found that it was not high enough because of toll  
2 charges to warrant the complaint.

3           Again, I explained that my initial  
4 contact was an inquiry. She explained how local  
5 service area extensions worked. My understanding was  
6 that the phone company in years past reviewed local  
7 calling areas periodically to see if an extension of  
8 local service was warranted. Now, as it was explained  
9 to me, the phone companies no longer do this unless  
10 someone complains. Though it wasn't a very satisfying  
11 answer, it was an answer.

12           I assumed that that was the end of this  
13 matter. I did not make notes concerning these phone  
14 calls, for which I apologize, since at the time I had  
15 no idea how complicated this matter would become. I  
16 find it quite interesting that the burden of proof to  
17 warrant extension of phone service is placed on the  
18 customer or Complainant, who most likely does not have  
19 the resources available to access the facts, figures  
20 required to present an informative case.

21           I also find it quite interesting that all  
22 parties here today are being paid, excluding me. It's  
23 also noteworthy that the paid participants of today's  
24 hearings are being paid at least in part by me through  
25 phone bills or tax dollars.

1                   In wading through the mountains of legal  
 2 paper my complaint has generated, I have realized that  
 3 the FCC and Verizon expect me to address the following  
 4 matters --- while I'm not very well versed in the  
 5 workings of a phone company, I will do my best.

6                   Concerning the traffic between the  
 7 involved calling exchanges, according to the  
 8 testimony, written testimony, of Regina Ryan on behalf  
 9 of Verizon North, Incorporated, traffic volume is not  
 10 sufficient to warrant the EAS and I have no facts to  
 11 dispute it; however, as stated in Ms. Ryan's  
 12 testimony, the calculations reflect only Verizon's  
 13 access lines. I have presented a petition with 400  
 14 names signed indicating that there is an interest in  
 15 the 298 area for the EAS. While I admit that this  
 16 number is not large, I will also say that the  
 17 community involved, New Tripoli, was not saturated  
 18 with this petition.

19                   Concerning the cost to Verizon to  
 20 implement service and cost increase to customers,  
 21 again, according to Ms. Ryan's testimony, Verizon  
 22 would recover their costs by increasing customers cost  
 23 26 cents a month the first year, and 9 cents a month  
 24 ongoing. Customer bills would increase 35 cents the  
 25 first year, and 9 cents thereafter, according to this

1 testimony. My toll calls, again, per testimony to the  
2 subject exchange is average 67 cents a month. Ms.  
3 Ryan concludes that the other 298 customers have a  
4 similar calling pattern. It would seem that most  
5 customers would not be adverse to the lower cost.

6           Again, regarding costs, I would like to  
7 add that my current phone bill in the New Tripoli  
8 exchange shows a charge of \$8.10 for unlimited local  
9 calling. My local area covers four areas not  
10 including New Tripoli. I have costs from two other  
11 Verizon customers. First from Allentown, a charge of  
12 \$6.85 for unlimited local calling to 18 areas.  
13 Second, from Slatington a charge of \$6.85 for  
14 unlimited local calling to eight areas. It seems  
15 again to make no sense that my bill is higher through  
16 the ability to access fewer areas.

17           I'm a little confused about what seems to  
18 be two different positions by Verizon. On one hand,  
19 they seem to be implying that the traffic between the  
20 subject areas is not sufficient to warrant the EAS;  
21 however, the loss of toll revenue generated by the  
22 same traffic or lack of traffic is sufficient for them  
23 to be concerned about it's recovery. I also have to  
24 wonder how Verizon is recovering all the costs for all  
25 the legal time associated with this matter. It seems

1 the paper alone would have paid for the EAS.

2           Concerning the demography and the  
3 proximity of the exchanges, the Schnecksville area is  
4 approximately ten miles from the New Tripoli area.  
5 Ms. Ryan disagrees with Mr. George's testimony of the  
6 Ironton Phone Company, as to whether the Schnecksville  
7 area is a retail hub for the New Tripoli customers. I  
8 have to agree with Mr. George, CEO of Ironton Phone  
9 Company. Services and businesses located in the  
10 Schnecksville area include two national chain  
11 pharmacies, a national chain grocery store and the  
12 area's community college, which has an enrollment of  
13 over 6,300 students based on the 2003-2004 figures.

14           I feel that the map presented by Mr.  
15 George of the Ironton Phone Company and his testimony  
16 clearly shows that it makes good sense to include  
17 Schnecksville in the local calling area of New  
18 Tripoli. Much of the Schnecksville area is surrounded  
19 by the New Tripoli calling area. While Ms. Ryan's  
20 list of services and businesses in the New Tripoli  
21 calling area is extensive, most of those places are at  
22 least ten miles farther than the Schnecksville area.

23           In these times of soaring gas prices and  
24 people being extremely busy, I would think that most  
25 people would want to deal with places that are closer

1 to home. I also believe that it is presumptuous of a  
2 phone company to decide where it's convenient for a  
3 group of people to shop or bank.

4                   At this moment, if a New Tripoli customer  
5 had an elderly or sick relative living in Allentown,  
6 which is 20 miles away, or approximately 30 minutes by  
7 car, he could call that person toll free. If that  
8 person decided to move closer to the New Tripoli area  
9 and ended up in Schnecksville, which is ten miles  
10 away, or 15 minutes by car, it would now be a toll  
11 call.

12                   Concerning the availability of  
13 alternatives, I'm sure there are many, as noted in Ms.  
14 Ryan's testimony. I wonder how the PUC or Verizon  
15 deems a service to be either reasonable or decent if  
16 an alternative or an addition is routinely required.

17                   Concerning the economic effect on the  
18 community if service is not extended, I honestly  
19 suspect that will be none. Most people are pretty  
20 resilient. Most of the people in the New Tripoli area  
21 are hard-working, middleclass individuals. We all  
22 know it's a toll call to the Schnecksville area. I  
23 suspect that most people would make the call if they  
24 have to, or keep it very short. To go to any of the  
25 places listed by Ms. Ryan in the Allentown area, one

1 can pass through the Schnecksville area. I guess it  
2 would be just as easy to stop as to call.  
3 My personal volume of calls or my toll  
4 charges were never the issue in this matter. The lack  
5 of any sense in the exclusion of the Schnecksville  
6 area as a local 298 call is what prompted this  
7 complaint. While there may be no economic effect if  
8 service is not extended, the best interest of the New  
9 Tripoli community will certainly not be served. In my  
10 opinion, the Ironton Phone Company seems to be  
11 operating in the best interest of the community, while  
12 Verizon seems to be concerned only with providing the  
13 absolute minimum service required by the PUC.

14 I contacted the Consumer Advocacy for  
15 help in pursuing this matter and was advised by them  
16 that because there is such a large volume of these  
17 complaints, they could not support me at this time. I  
18 would think the PUC would consider the large volume of  
19 these complaints to be a red flag concerning the  
20 service provided by phone companies.

21 I'm not sure that my testimony has  
22 presented any hard evidence to prove the need for  
23 extension of local calling in the 298 exchange;  
24 however, I feel common sense associated with the  
25 inclusion of Schnecksville in the local calling area

1 should prevail. I do realize that this issue is  
2 relatively unimportant in the realm of events  
3 happening in the world, this country and this  
4 community; however, I feel that the American public as  
5 consumers and taxpayers continue to be asked to accept  
6 less and less in quality and accountability. At some  
7 point that decline must end. We, as a society, have  
8 also allowed common sense to be relegated to a very  
9 diminutive position when, in fact, sometimes common  
10 sense is all that is needed.

11 Thank you.

12 JUDGE JANDEBEUR:

13 Thank you. Questions, Ms. Miller? No,  
14 not yet.

15 ATTORNEY MILLER:

16 Yes, Your Honor, thank you.

17 EXAMINATION

18 BY ATTORNEY MILLER:

19 Q. Ms. Reese, do you have Ironton Exhibit Number One  
20 with you?

21 (Ironton Exhibit Number One marked for  
22 identification.)

23 A. Yes, I do.

24 Q. Would you look at it, please?

25 A. I don't have it here, but I have looked at it.

1 Q. Because I'm not familiar with the area, I believe  
2 your testimony was you had to pass through  
3 Schnecksville to get to Allentown?

4 A. Yes, you do.

5 Q. Can you tell me where on the map Schnecksville is?

6 A. Schnecksville is pretty much in the pink area that  
7 is listed as Ironton. Ironton Phone Company, if  
8 you're looking at the same one as I am. If you travel  
9 south on 309, you would pass right through  
10 Schnecksville.

11 Q. To get to Allentown?

12 A. Allentown is further south on 309.

13 Q. So Allentown proper, like the city center?

14 A. Most of Allentown, you would get to going south on  
15 309, so Schnecksville is technically between New  
16 Tripoli and Allentown as you would travel.

17 Q. Do you know how local calling areas and local  
18 calling rates are determined?

19 A. No, I do not.

20 Q. So your testimony regarding the \$6.85 local  
21 calling charge for Allentown customers to be able to  
22 call approximately 18 exchanges, is just numbers.

23 A. Those are numbers that I have gotten from Verizon  
24 customers. It's what they are paying as opposed to  
25 what I am paying.

1 Q. Right. You also stated during your testimony that  
2 you think that most customers are not adverse to lower  
3 costs; explain what you meant.

4 A. Well, in figuring out the numbers presented by Ms.  
5 Ryan, it would actually end up less. Because she is  
6 saying that the average call from New Tripoli customer  
7 would cost --- and this is off of testimony that was  
8 in her written testimony. What it says in her  
9 testimony is that she feels that the average costs  
10 that New Tripoli customers are now using is 67 cents a  
11 month, where Verizon's amount that they're recovering  
12 would only come to 35 cents at the most, so it would  
13 be cheaper than she is testifying that is an average  
14 cost now.

15 Q. If you look at that testimony, am I not correct,  
16 that that's what she averaged your bills to be?

17 A. She also stated in that testimony, that she  
18 thought it was pretty much of a basic cost for most  
19 New Tripoli customers.

20 Q. Do you attend the Community College?

21 A. I do not.

22 Q. Do you have children that attend the Community  
23 College?

24 A. I do not.

25 Q. Where did you get this 6,300 number?

- 1 A. By getting in touch with the Community College.
- 2 Q. In the past six months, how many times have you  
3 had to call a pharmacy?
- 4 A. I have not called a pharmacy from home.
- 5 Q. Is the pharmacy that you use in Ironton Telephone  
6 Company's territory?
- 7 A. Yes.
- 8 Q. Is the grocery store you use in that same  
9 territory?
- 10 A. Yes, it is. It's actually the only major grocery  
11 store in that area.
- 12 Q. Other than that grocery store, where is the next?
- 13 A. In Allentown.
- 14 Q. I believe your testimony was that's a 30 minute  
15 drive?
- 16 A. Yes, it is.
- 17 Q. As opposed to a 20 minute drive?
- 18 A. Fifteen (15), Schnecksville really isn't that hard  
19 to get to. Schnecksville has grown up quite a bit in  
20 the last couple of years.
- 21 Q. You also made a statement during your testimony  
22 that Verizon is presenting only the minimum amount of  
23 service necessary. On what do you base that  
24 statement?
- 25 A. I base that statement on the fact that this issue

1 has become such a big deal. It really doesn't seem to  
2 be that big of a deal. This map that Mr. George  
3 presented in his testimony, frankly, is one of the few  
4 things that has made sense in all of this going on.  
5 Ironton is smack dab in the middle of New Tripoli's  
6 calling area, but it's not included. I don't really  
7 understand why Verizon would spend this much time and  
8 effort to oppose this. It seems to make sense.

9 I realize that my petition does not carry  
10 a large amount of names. I realize that you do not  
11 want to allow that into this testimony, but I've  
12 talked to many residents in New Tripoli. The biggest  
13 question everyone has is, it doesn't make any sense.  
14 If this area was 20 miles past Allentown, I don't  
15 think anybody would be making this request. But it's  
16 not. It's smack dab in the middle of our calling  
17 area. Again, it doesn't make any sense. Anyway, it  
18 doesn't to most people that aren't involved with  
19 Verizon phone company, I would assume.

20 Q. What is your estimation as to what the company is  
21 spending in order to deny your request ---.

22 A. I really don't know.

23 Q. So that's just your opinion?

24 A. My opinion is that I don't know why anybody would  
25 spend all this time and energy to oppose something

1 that seems to make sense.

2 Q. If you look at Ironton Exhibit Number One, can you  
3 describe for me where in the New Tripoli exchange you  
4 reside? Just a ball park, about the middle, left-  
5 right, bottom-top.

6 A. Probably in the middle.

7 Q. Would you expect customers who live to the left of  
8 you on the map to have the same calling patterns as  
9 you do? Closer to the Kempton area.

10 A. Chances are, no, they would have different calling  
11 needs than what I do. Chances are they probably do  
12 most of their things up towards the Kutztown area, not  
13 south. They would probably be going in a different  
14 direction. So I don't know that they would need it  
15 all, but I don't know that they wouldn't. I don't  
16 really know. The petition, I did not closely look at  
17 the peoples' addresses, which are listed on there,  
18 which would give you a better idea of what parts of  
19 New Tripoli all those names come from.

20 Q. Would you agree that the same statement could be  
21 made for customers of New Tripoli who live towards the  
22 New Smithville or farther north towards the Slatington  
23 exchanges? That their calling areas would not be the  
24 same as yours?

25 A. Their calling areas, I would think that the people

1 closer to the Slatington area, their calling patterns  
2 would probably be the same.

3 Q. When the Office of Consumer Advocate told you that  
4 there was a lot, that there were large volume of  
5 extended area service complaints, did they specify  
6 that they were for this exchange, or was that a  
7 general statement?

8 A. It was a general statement, just that they had so  
9 many.

10 ATTORNEY MILLER:

11 Your Honor, I don't have any further  
12 questions. Thank you.

13 JUDGE JANDEBEUR:

14 Mr. Swindler?

15 ATTORNEY SWINDLER:

16 Thank you, Your Honor. I have just a few  
17 clarifying questions.

18 EXAMINATION

19 BY ATTORNEY SWINDLER:

20 Q. Ms. Reese, good morning.

21 A. Good morning.

22 Q. With regard to the petition that you submitted  
23 into the record with over 200 names, was it your hope  
24 to show that this EAS request that you're making is  
25 much more than just a mere personal preference?

1 A. Yes.

2 ATTORNEY MILLER:

3 Your Honor, I don't consider that a  
4 clarifying question. That's a question that puts into  
5 the record support for the petition. I believe it  
6 speaks for itself.

7 JUDGE JANDEBEUR:

8 I agree with that. That last statement,  
9 it speaks for itself. Overruled. Continue, Mr.  
10 Swindler.

11 BY ATTORNEY SWINDLER:

12 Q. With regard to your testimony about the retail  
13 hub, the term used in Mr. George's testimony, just to  
14 clarify, regarding the national chain pharmacies or  
15 chain food stores that you've mentioned, is it your  
16 testimony that while they are located in  
17 Schnecksville, which is in the Ironton exchange, that  
18 such national chain pharmacies and food stores do not  
19 exist within the New Tripoli exchange, itself?

20 A. Correct. There are no pharmacies or large chains  
21 in the New Tripoli area.

22 Q. Lastly, could you clarify for me what you meant  
23 by, quote, Schnecksville has really grown up in the  
24 past few years, end quote.

25 A. I think the fact that the New Tripoli exchange did

2  
1 not include Schnecksville, maybe 15 years ago, might  
2 have made sense. There wasn't that much there, but  
3 there is now. Again, it cuts people traveling time  
4 from the New Tripoli area to those businesses, grocery  
5 stores, pharmacies, in half. So I would think people  
6 would be using those places more often than driving to  
7 Allertown, if they can.

8 JUDGE JANDEBEUR:

9 Stop for just one second.

10 SHORT BREAK TAKEN

11 JUDGE JANDEBEUR:

12 Sorry about that. Anything else, Mr.  
13 Swindler?

14 ATTORNEY MILLER:

15 No, that's all I have, Your Honor. Thank  
16 you, Ms. Reese.

17 JUDGE JANDEBEUR:

18 Ms. Reese, I want to walk you through a  
19 just a few things. You still live on Lentz Road in  
20 New Tripoli?

21 A. Yes, I do.

22 JUDGE JANDEBEUR:

23 Where do you work?

24 A. I work in Schnecksville.

25 JUDGE JANDEBEUR:

1                   What do you do?

2 A.    I'm a secretary.

3                   JUDGE JANDEBEUR:

4                   So it's pretty much 9:00 to 5:00, Monday  
5 through Friday?

6 A.    Actually, it's part time. I generally work from  
7 10:00 to 1:30, Monday through Thursday.

8                   JUDGE JANDEBEUR:

9                   I'm going to walk you through your  
10 response to the criteria, which I think you're aware  
11 of through Ms. Ryan's testimony and also Mr. George's.  
12 Both of them walked through the criteria that we  
13 consider quite thoroughly. So I'm going to walk you  
14 through your personal response to some of that  
15 criteria; if you don't mind?

16 A.    Okay.

17                   JUDGE JANDEBEUR:

18                   You've read both of their opinions on the  
19 amount of toll traffic between the exchanges. How do  
20 you come out on that? What are your thoughts with  
21 regard to the toll traffic between these exchanges?

22 A.    I can honestly say that I really don't have any  
23 proof. I certainly can't argue with anybody about  
24 that. It would be silly of me to do that, but I do  
25 believe that a lot of people just simply have gotten

1 used to not calling that area. Again, you can travel  
2 through there, if you need to stop, so be it, you do.

3 ATTORNEY SWINDLER:

4 Your Honor?

5 JUDGE JANDEBEUR:

6 Yes.

7 ATTORNEY SWINDLER:

8 But just to clarify, maybe for myself,  
9 Verizon provided testimony in both a proprietary and a  
10 nonproprietary fashion. It's not clear to me whether  
11 Ms. Reese actually had access to the proprietary  
12 information, so some of the detailed numbers, she  
13 might not have.

14 A. I did not.

15 JUDGE JANDEBEUR:

16 You did not get the proprietary copy? Is  
17 that correct, Ms. Miller?

18 ATTORNEY MILLER:

19 That's correct, Your Honor, she did not  
20 sign a proprietary agreement.

21 JUDGE JANDEBEUR:

22 That's true.

23 ATTORNEY MILLER:

24 So she received only the nonproprietary  
25 copy of the testimony.

1                   Okay. I'm all right with her not having  
2 the actual numbers.

3                   ATTORNEY SWINDLER:

4                   That's fine, Your Honor. You are asking  
5 about the numbers, I just wanted to make it clear on  
6 the record that Ms. Reese ---.

7                   JUDGE JANDEBEUR:

8                   She doesn't have specific numbers. The  
9 second criteria is the cost to the company to  
10 implement an extended area of service. Of course,  
11 Verizon believes that there is significant cost to  
12 them. You've read Mr. George's comments on that and  
13 what Ironton did. Again, my question to you is what  
14 is your opinion, your thoughts on the cost to Verizon  
15 to implement an extended area of service?

16 A. The only thing that I really have to go by is the  
17 information that was in Ms. Ryan's testimony. She  
18 quoted some numbers as to how much it's going to cost  
19 them to recover, implementing it and then loss of the  
20 toll charges. Again, with the testimony that I read,  
21 it would actually --- if my average phone call costs  
22 are correct, and I don't dispute it, she has access to  
23 a lot more things than I do. It would actually be  
24 cheaper for me. It would probably actually be cheaper  
25 for most New Tripoli customers, because we're talking

1 about an average of 35 cents extra on our phone bills  
2 for Verizon to recover, which is cheaper than she's  
3 saying the 67 cents, which is an average toll call  
4 from New Tripoli per month. So it would certainly be  
5 cheaper for the New Tripoli residents. It doesn't  
6 seem to me to be a great cost.

7 JUDGE JANDEBEUR:

8 So you would not be adverse to there  
9 being a basic charge added to your phone bill? In  
10 other words, if it's going to be 35 cents a month, and  
11 one time you call at 67, you're in favor of that 35?

12 A. Correct. Would that not make sense?

13 JUDGE JANDEBEUR:

14 I'm not sure it's quite that simple, but  
15 I understand your position. I think that does make  
16 sense. If it's going to be 35 versus 67, we'd go with  
17 the 35.

18 A. And with that 35, I would also be able to make  
19 unlimited calls. I mean, the 67 cents comes to, I  
20 don't know how many minutes, but with the 35, it would  
21 be included in my local calling area.

22 JUDGE JANDEBEUR:

23 Okay. I'm going to skip number three,  
24 the criterion that talks about an increase in the  
25 local service charge versus the current costs, because

1 I think you've answered that. But also I'm not going  
2 to talk about number four, about demographics and the  
3 proximity of the exchange, because I think you've  
4 testified to that very clearly. Now, you've read Ms.  
5 Ryan's testimony regarding alternatives where she  
6 talks about prepaid phone cards, e-mail and talked  
7 about cell phones. What's your thoughts on the  
8 alternatives that are available to you?

9 A. Pretty much as I've testified. I'm not really  
10 sure I think much of a phone company that is requiring  
11 me to have alternatives to make some very basic calls,  
12 I really don't think they're doing their job then. I  
13 mean to have a cell phone to call a relative that's  
14 out of state because it would end up cheaper, I can  
15 see alternatives in certain situations. Oftentimes  
16 people have extreme situations that they need to go to  
17 an alternative. But as far as I'm concerned,  
18 including the Schnecksville area is just a very basic  
19 phone service. I don't understand why it would  
20 require an alternative.

21 JUDGE JANDEBEUR:

22 I'm not going to ask you about number  
23 six, unless you feel you want to comment on it.  
24 Number six is basically what do you think the economic  
25 effect would be of the extended area service on the

1 community.

2 A. Again, I don't really know that there would be  
3 any; however, I realize this is just hearsay, but I'll  
4 throw it in here, I have spoken to a garage in New  
5 Tripoli area that deals with parts that they could get  
6 from a Schnecksville garage, but they don't do it  
7 because it's a toll call.

8 JUDGE JANDEBEUR:

9 Okay. Did that drum up any additional  
10 questions for you, Ms. Miller?

11 ATTORNEY MILLER:

12 Not in response to your questions, Your  
13 Honor, but I do have some Cross in response to Mr.  
14 Swindler's question.

15 JUDGE JANDEBEUR:

16 Okay.

17 EXAMINATION

18 BY ATTORNEY MILLER:

19 Q. Mr. Swindler asked you a question about the  
20 national chain pharmacy and the national chain  
21 grocery. He asked you if those chains were not  
22 available in the New Tripoli exchange, and your answer  
23 was, that's correct.

24 A. I thought he asked if they were available in the  
25 New Tripoli area. They are not. In the exchange,

1 yes, they would be in Allentown.

2 Q. So they are available in the local calling area,  
3 but not in the exchange itself?

4 A. Not in the --- yes.

5 Q. One question in response to Judge Jandebaur's  
6 questions. You said you work 10:00 to 1:30, Monday  
7 through Thursday. You work in Schnecksville; correct?

8 A. Yes, I do.

9 Q. Is it more convenient for you to do your grocery  
10 shopping and your errands while you're in  
11 Schnecksville working?

12 A. Well, after work, it certainly is.

13 Q. Is that one of the reasons why you do your  
14 business in Schnecksville, because it's more  
15 convenient?

16 A. No, I did not. I've only worked, actually, my  
17 office has only been in Schnecksville the last two  
18 years, actually, when it started, which is why it  
19 occurred to me that it seemed very silly.

20 Q. Where did work before that?

21 A. Northfield (phonetic), which was further south,  
22 closer to Allentown.

23 ATTORNEY MILLER:

24 Thank you, Your Honor. I have nothing  
25 further.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

JUDGE JANDEBEUR:

Mr. Swindler? Your turn?

ATTORNEY SWINDLER:

I've nothing else, Your Honor.

JUDGE JANDEBEUR:

Thank you, Ms. Reese.

MS. REESE:

Thank you.

JUDGE JANDEBEUR:

Mr. Swindler?

ATTORNEY SWINDLER:

Your Honor, Ironton Telephone Company  
would call its witness, Mr. William George.

JUDGE JANDEBEUR:

Mr. George?

MR. GEORGE:

Yes, I can hardly hear Mr. Swindler.

JUDGE JANDEBEUR:

He's going to come closer.

MR. GEORGE:

Thank you.

-----  
WILLIAM D. GEORGE, II, HAVING FIRST BEEN DULY SWORN,  
TESTIFIED AS FOLLOWS:  
-----

1                   JUDGE JANDEBEUR:

2                   Thank you, sir. Go ahead, Mr. Swindler.

3 DIRECT EXAMINATION

4 ATTORNEY SWINDLER:

5 Q. Mr. George, good morning.

6 A. Good morning.

7 Q. Do you have before you a statement which is marked  
8 in the upper right-hand corner as Ironton Statement  
9 Number One?

10 A. Yes, I do.

11 Q. That is labeled the Direct Testimony of William D.  
12 George, II.

13 A. Correct.

14 Q. We also have Ironton Exhibit Numbers One, Two and  
15 Three; is that correct?

16 A. Yes.

17                   ATTORNEY SWINDLER:

18                   Your Honor, I would ask that the  
19 statement and exhibits be so identified.

20                   JUDGE JANDEBEUR:

21                   They are marked.

22                   (Ironton Exhibit Numbers Two and Three  
23 marked for identification.)

24 BY ATTORNEY SWINDLER:

25 Q. Mr. George, was the statement and exhibits

1 prepared by you or under your supervision and control?

2 A. Yes, they were.

3 Q. Do you have any changes or modifications to make  
4 to the Ironton Statement Number One, which contains 12  
5 pages of written testimony?

6 A. No, I do not.

7 Q. Now, if you were to ask the same questions today  
8 that are contained in Ironton Statement Number One,  
9 would your answers be the same?

10 A. Yes, they would.

11 Q. Is the information contained therein true and  
12 correct to the best of your knowledge, information and  
13 belief?

14 A. Yes.

15 ATTORNEY SWINDLER:

16 Now, Your Honor, before making Mr. George  
17 available for Cross Examination, I do have just a few  
18 additional questions that I would like to ask him on  
19 Direct; if I may, verbally?

20 JUDGE JANDEBEUR:

21 Go ahead.

22 BY ATTORNEY SWINDLER:

23 Q. Mr. George, just to supplement your Ironton  
24 Statement Number One, a few additional questions.

25 A. All right.

1 Q. Can you please clarify for us how long you have  
2 been with Ironton Telephone Company?

3 A. Actually, all my life, but more specific, as soon  
4 as I incorporated the business in 1958 for my paternal  
5 grandfather. That's about 47 years.

6 Q. Do you reside in the area there, the Ironton,  
7 Schnecksville, New Tripoli area?

8 A. Yes.

9 Q. Also, just to clarify, because we talk a lot about  
10 Schnecksville. Schnecksville is a community within  
11 the Ironton exchange; is that correct?

12 A. That is correct.

13 Q. Now, going back to your 47 years with the company,  
14 can you tell me whether you have personal knowledge as  
15 to when the local calling area of the New Tripoli  
16 exchange leapfrogged the Ironton exchange and added  
17 the Allentown exchange to it's local calling area?

18 A. Yes, I do know the date, on January 7th, 1962.

19 Q. Now, in your testimony, in the written testimony,  
20 Ironton Statement Number One, specifically at page 11,  
21 line 3, you refer to the term retail hub. You  
22 indicate there that Schnecksville is a retail hub of  
23 the area, including New Tripoli; correct?

24 A. Correct.

25 Q. Can you be a little more specific as to what you

1 mean by retail hub as far as what retail  
2 establishments are now present in Schnecksville?

3 A. Over the last 40 years, Schnecksville has grown by  
4 leaps and bounds to where we now have a Weis.

5 Q. Is that W-E-I-S?

6 A. W-E-I-S-S (sic), a Weis grocery store in a small  
7 shopping center that was built about 10 or 12 years  
8 ago. It includes not only the large grocery store,  
9 but also a State Store or Wine & Spirits. It includes  
10 several fast food locations, including a McDonald's.  
11 It includes a tire store. In that same area, we have  
12 three banks, including the large --- I think the  
13 largest bank in the area is called Wachovia. I can't  
14 spell it. We have two pharmacies, CVS, which is a  
15 large chain, moved into the Schnecksville area about  
16 three or four years ago. A second pharmacy in the  
17 Weis shopping center. We have a car dealer,  
18 specifically a Dodge dealership, which dates back,  
19 really, before my time.

20 Q. Let me just ask you then with regard to those  
21 retail establishments, is it safe to say then that the  
22 retail hub that you refer to now existing in  
23 Schnecksville was not in existence back in the early  
24 1960s or late 1950s when the New Tripoli exchange  
25 elected to jump over the Ironton exchange and not

1 include it in it's local calling area?

2 A. That's a fair assumption. Some of the  
3 establishments were there, but a preponderance of  
4 establishments have been more in the last 20 years  
5 than 40 years ago.

6 Q. Would it be safe to say that the community of  
7 interest of New Tripoli customers has sufficiently  
8 changed such that the community of interest now does  
9 include Schnecksville?

10 A. I would believe that, yes.

11 ATTORNEY SWINDLER:

12 May I have one moment, Your Honor?

13 SHORT BREAK TAKEN

14 ATTORNEY SWINDLER:

15 Your Honor, that would conclude Mr.

16 George's Direct Testimony. Mr. George is now  
17 available for Cross Examination.

18 JUDGE JANDEBEUR:

19 Ms. Miller?

20 ATTORNEY MILLER:

21 Thank you, Your Honor.

22 CROSS EXAMINATION

23 BY ATTORNEY MILLER:

24 Q. Good morning, Mr. George. My name is Janet  
25 Miller. I represent Verizon North.

1 A. Good morning.

2 Q. I want to start with your oral testimony, and then  
3 we'll move to your written testimony. Mr. Swindler  
4 asked you some questions about when the Allentown  
5 exchange was added to the local calling area of the  
6 New Tripoli exchange. Do you remember those  
7 questions?

8 A. Yes.

9 Q. He used a phrase leapfrog. Based on your  
10 experience, what do you consider leapfrog to be as it  
11 has to do with telephone exchanges?

12 A. We have two exchanges that have EAS to one  
13 another. Ironton is in the middle, more or less. So  
14 New Tripoli service leapfrogged Ironton to get to the  
15 majority of Allentown.

16 Q. When you say EAS service, are you referring to  
17 local calling area?

18 A. Yes, ma'am.

19 Q. The retail hub that you were discussing with Mr.  
20 Swindler, is that the small shopping center that you  
21 referred to?

22 A. I wouldn't consider it small. For a rural area,  
23 it's large.

24 Q. It has approximately 11 or 12 stores in it?

25 A. Yes, that could be correct.

1 Q. When you talk about the retail hub, is it that  
2 shopping center that you're discussing?

3 A. Not necessarily. It's the entire village of  
4 Schnecksville.

5 Q. How big is the village of Schnecksville?

6 A. Population, I do not have that number since it's a  
7 village, and not a defined community.

8 Q. Can you approximate how much of the Ironton  
9 exchange is comprised of the Schnecksville village?

10 A. As far as customers are concerned, over 50  
11 percent.

12 Q. How about in terms of size? Would you say the  
13 village is 50 percent of the Ironton exchange, also?

14 A. No. No, it couldn't. I have no numbers, but  
15 maybe 10 percent.

16 Q. Do you live in the New Tripoli exchange?

17 A. No, I do not.

18 Q. So you don't receive service in the New Tripoli  
19 exchange?

20 A. No, ma'am.

21 Q. On what do you base your opinion then that the  
22 community of interest of the customers of the New  
23 Tripoli exchange has changed over the last 20 years?

24 A. Well, based on two previous formal complaints from  
25 customers of the New Tripoli area that want EAS to

1 Ironton, and just the general growth of the Ironton  
2 area and New Tripoli over the past 40 years, that  
3 leads me believe that the community of interest has  
4 grown tremendously. Especially since all these retail  
5 establishments that in the Schnecksville area  
6 specifically were not there 40 years ago.

7 Q. When you say all the retail establishments that  
8 weren't there, we're talking about the 11 or 12 stores  
9 in the shopping center; correct?

10 A. That's only part of the list. The list is much  
11 more extensive than the 10, 11 or 12 stores in this  
12 one specific shopping center area. There are many  
13 businesses in Schnecksville, which we have not  
14 enumerated.

15 Q. Is it your testimony that those same types of  
16 businesses are not available to New Tripoli customers  
17 within their own local calling area?

18 A. If you include Allentown and Slatington as part of  
19 their local calling area, these types of  
20 establishments are available, but at a much further  
21 distance geographically than Schnecksville, as can be  
22 seen on Exhibit One.

23 Q. So it's simply your testimony that it's not as  
24 convenient?

25 A. That's correct, it would be not as convenient.

1 Q. Do you have your written testimony in front of  
2 you?

3 A. Yes, I do.

4 Q. Would you look at page four, please?

5 A. Okay.

6 Q. At lines four, five and six, you make a statement  
7 about the Ironton exchange, which is close to New  
8 Tripoli but is a toll call, versus portions of the  
9 neighboring Slatington and Allentown exchanges, which  
10 are farther away but are local calls. Do you see that  
11 testimony?

12 A. I see that.

13 Q. Can you explain how the distance between two  
14 exchanges is measured?

15 A. Officially it's measured by V&H coordinates.

16 Q. That's not a physical distance; is it?

17 A. No, it's not physical.

18 Q. Do you know what the toll rate center mileage  
19 between the New Tripoli exchange and the Ironton  
20 Exchange is?

21 A. No, we did not attempt to calculate that using the  
22 V&H system.

23 Q. Can I assume that you didn't calculate it for  
24 either Allentown or Slatington?

25 A. That is correct. We did not.

1 Q. Explain what you mean by portions of the  
2 neighboring exchanges? Is it your testimony that  
3 there are parts of the Slatington and Allentown  
4 exchanges that are also close to New Tripoli?

5 A. Looking at Exhibit One, that would be correct.

6 Q. If you would look at your testimony at lines 10  
7 and 11, how many other communities are in the Ironton  
8 exchange, other than Schnecksville?

9 A. I would like to know how you define the word  
10 community?

11 Q. Your testimony is each exchange is unique in that  
12 it consists of an exclusive geographic area usually  
13 containing a central community and its immediate  
14 surroundings. What is the central community that  
15 you're referring to in this case?

16 ATTORNEY SWINDLER:

17 I'm sorry, where is that testimony  
18 referenced?

19 ATTORNEY MILLER:

20 It's on page four, and it's lines nine  
21 and ten.

22 ATTORNEY SWINDLER:

23 Thank you.

24 A. Right. I got that. Schnecksville would be the  
25 largest community in the Ironton exchange, but there

1 are several other, as I'll call them, crossroad  
2 communities, such as Ironton, itself, is a village,  
3 but not as large as Schnecksville. There are five or  
4 six other communities within the Ironton exchange.

5 BY ATTORNEY MILLER:

6 Q. Is the village of Ironton between the New Tripoli  
7 exchange and the Schnecksville village?

8 A. No, it is not. Schnecksville is the closest  
9 community in the Ironton exchange to New Tripoli.

10 Q. If you would look at your testimony on page five,  
11 please? The answer that begins on line five, you  
12 opine that the customers of the New Tripoli exchange  
13 have a real interest in having extended area service  
14 to Ironton. On what do you base that statement?

15 A. That's based on Ms. Reese's complaint and the  
16 previous complaints that I referred to a few minutes  
17 ago.

18 Q. Would you agree with me that the Castrine  
19 (phonetic) complaint was withdrawn before it went to  
20 hearing?

21 A. That's what the testimony that I have in my  
22 possession says, yes.

23 Q. So would you agree that there is no testimony from  
24 that case as to the support for EAS?

25 A. No, there was no testimony put on the record as

1 far as I understand it.

2 Q. So you're basing your statement that there's a  
3 real need for EAS from New Tripoli to Ironton on the  
4 fact that there's been three formal complaints filed  
5 in ten years; would that be an accurate statement?

6 A. No, it's my personal opinion that there is a need  
7 based the complaints that I have received personally  
8 over the last 30 to 40 years.

9 Q. These complaints are coming from Ironton Telephone  
10 customers or from Verizon North customers?

11 A. Up until 18 months ago, they were coming from  
12 customers on both sides. Ironton customers,  
13 specifically and New Tripoli customers also.

14 Q. In what situation were you receiving complaints  
15 from Verizon customers?

16 A. Could you repeat the question?

17 Q. Yes. Under what circumstances were you receiving  
18 complaints about the calling area from Verizon  
19 customers?

20 A. Well, I can recollect on one occasion where I was  
21 invited by a group of farmers in the New Tripoli area  
22 to come and visit with them one evening and explain  
23 the situation of extended area calling and why they  
24 had to pay a toll charge to call Ironton and not  
25 Allentown. That was a personal observation.

1 Q. So you were invited to a meeting?

2 A. Correct.

3 Q. I assume Verizon customers are not calling Ironton  
4 to complain about the calling area, would that be  
5 accurate?

6 A. Yes, I presume they're not calling Ironton. That  
7 is correct. They would be calling Verizon or in the  
8 past Bell of Pennsylvania.

9 Q. So your opinion is just based on your casual  
10 conversations and the one meeting that you've had with  
11 the farmers?

12 A. Well, I've had more than one meeting and  
13 discussions with New Tripoli customers over the past  
14 30 to 40 years.

15 Q. You also state in your testimony there in the  
16 answer that starts on line five, on page five, that  
17 the New Tripoli customers having a need to call the  
18 three educational institutions that you identify.

19 A. Yes.

20 Q. Do you have any documentation to show the number  
21 of calls that New Tripoli customers are making to  
22 those establishments?

23 A. I have no knowledge of that information since that  
24 would be Verizon's information to present.

25 Q. Is it accurate then to say that your testimony

1 that those customers need to call the three  
2 institutions identified is based on your opinion?

3 A. It's an opinion, and since these institutions  
4 service the Northwestern Lehigh School District, which  
5 is in New Tripoli, it should be obvious to anybody  
6 that there would be a fair amount of calling to the  
7 community college, to the Vo-tech school and even the  
8 intermediate unit.

9 Q. Why would it be obvious?

10 A. Because there are many students from the  
11 Northwestern School District, and I do not have an  
12 actual count, but we could sure get it from the  
13 college, that attend the college.

14 Q. Do you know whether the customers of New Tripoli  
15 can call the Northwestern Lehigh School District  
16 without incurring a toll charge?

17 A. Since the Northwestern Lehigh School District is  
18 within the New Tripoli exchange, there would be no  
19 toll charge. It's a local call.

20 Q. I'm not familiar with the area, so I apologize.

21 A. Okay.

22 Q. On page seven of your written testimony at line  
23 six, you referenced a petition that was entered into  
24 the record in the Fern Keller v. GTE case. Do you see  
25 that testimony?

1 A. Yes.

2 Q. Did you personally review that petition?

3 A. Personally, I've never seen that petition.

4 Q. So you don't know the wording of the petition or  
5 how many people actually signed it, whether they were  
6 actually customers, that type of information?

7 A. No, I'm not privy to that information.

8 Q. Would you look at your testimony on page eight,  
9 please? The testimony that starts on line two,  
10 nevertheless.

11 A. Right.

12 Q. On the next line, you say, nevertheless, in  
13 determining whether the exchanges in question are  
14 within a community of interest, the desires of this  
15 customer is a valid consideration that should cause  
16 the Commission to review other criteria. Is it your  
17 testimony that extended area service should be  
18 implemented at the request of a single customer?

19 A. Not necessarily. Had this hearing been held in  
20 the New Tripoli exchange area, I am sure there would  
21 have been many more customers in attendance.

22 Q. That's your personal assumption; correct?

23 A. Correct, that's my personal assumption.

24 Q. Would I also be correct that the statement at line  
25 nine on page eight, that the extended area of service

1 is also desired by many others in the New Tripoli  
2 exchange, is also based upon your personal opinion.

3 A. Correct.

4 Q. In the answer that begins at line 12 on page 8,  
5 you talk about the toll traffic study and the fact  
6 that local exchange carriers are no longer required to  
7 file biennial studies; correct?

8 A. Correct.

9 Q. Isn't it true that the 1996 Commission Order that  
10 you talk about in your testimony allows an  
11 Administrative Law Judge to require an updated toll  
12 study?

13 A. I'll have to take your word for that.

14 Q. What is the source of your statement that the  
15 Commission now appears to be shifting the evidentiary  
16 weight to other criteria, which is on lines 20 and 21  
17 of page eight?

18 A. In discussions with our attorney, we arrived at  
19 that conclusion.

20 Q. So is it your testimony that the Commission is no  
21 longer looking at toll traffic information as one of  
22 the criteria for extended area service consideration?

23 ATTORNEY SWINDLER:

24 Your Honor, that is not Mr. George's  
25 testimony. It clearly says shifting the weight, not

1 looking at the toll traffic information at all.

2 ATTORNEY MILLER:

3 Well. Your Honor, the testimony reads,  
4 with the elimination of the biennial toll traffic  
5 study requirement.

6 JUDGE JANDEBEUR:

7 Your question was?

8 ATTORNEY MILLER:

9 Is it his opinion that the Commission is  
10 not taking the toll traffic study into consideration?

11 JUDGE JANDEBEUR:

12 Overruled, continue. Go ahead and answer  
13 that Mr. George?

14 A. I further state in that sentence that the  
15 Commission now appears to be shifting the evidentiary  
16 weight to other criteria.

17 BY ATTORNEY MILLER:

18 Q. So you have no specific cases that you could cite  
19 to support that statement; would that be accurate?

20 A. I personally do not have any specific cases.

21 Q. If you would look at page nine of your testimony?

22 A. Yes.

23 Q. You discussed, starting on the bottom of page  
24 nine, the answer that begins at line 17 and then  
25 continuing on page ten. The route that traffic takes

1 from the Ironton exchange to Verizon North's New  
2 Tripoli exchange?

3 A. Yes.

4 Q. Do you know that traffic travels on the same route  
5 in reverse from New Tripoli to Ironton?

6 A. Physically, it should, but I do not know that,  
7 because of the toll charges, not EAS.

8 Q. Is it your testimony that if the traffic is  
9 carried on the same facilities, that Verizon North  
10 should be required to implement extended area service?

11 A. Not necessarily.

12 Q. If you will look at your testimony, please, on  
13 page 11?

14 A. Yes.

15 Q. The question and answer that begin on line nine  
16 about the alternatives to EAS. You describe them as  
17 partial or second-rate alternatives. What  
18 alternatives are you talking about?

19 A. Cell phones, internet, VOIP.

20 Q. Why do you consider those alternatives to be  
21 second-rate or partial?

22 A. I guess, we consider the old fashion PCP service  
23 to be superior to these other alternatives. That's an  
24 opinion. We use cell phones as many other people do,  
25 personally we have cell phones.

1 Q. Do you know the number of cell phone carriers that  
2 are this area that would serve New Tripoli customers?

3 A. No, I do not know how many cell phone providers  
4 are in the New Tripoli area.

5 Q. Is it an accurate statement that there is adequate  
6 cell phone service available?

7 A. I would have no way of knowing that.

8 Q. Do you have signal on your cell phone when you  
9 turn it on?

10 A. Yes. In the Ironton area, I do.

11 Q. If you'd look at your testimony on page 12,  
12 please?

13 A. Yes.

14 Q. In the answer to the first question, you state  
15 that Ironton has a presence in the community. Are you  
16 talking about Ironton or are you talking about New  
17 Tripoli?

18 A. What line?

19 Q. I'm sorry. Line four. As I have already stated,  
20 as a presence in the community, we believe ---.

21 A. Your question, again, please.

22 Q. What community are you referring to, Ironton or  
23 New Tripoli?

24 A. I would say both.

25 Q. If you would look at the answer that begins on

2 lines 20, 21 and 22? You state that most of the  
3 customers in the New Tripoli exchange truly have a  
4 reason or need to call the Ironton exchange. Based on  
5 your previous testimony, can I assume that that is  
6 your opinion?

7 A. Yes.

8 ATTORNEY MILLER:

9 One moment, Your Honor?

10 SHORT BREAK TAKEN

11 ATTORNEY MILLER:

12 Thank you.

13 BY ATTORNEY MILLER:

14 Q. Mr. George?

15 A. Yes.

16 Q. Is it your testimony that Verizon North should be  
17 required to implement EAS from New Tripoli to Ironton  
18 simply because Ironton agreed to do it in the reverse?

19 A. Not necessarily, but it would be good public  
20 relations, I believe, on Verizon North's part if they  
21 implemented EAS into the Ironton exchange.

22 Q. That's your opinion; correct?

23 A. That would be my expert opinion.

24 ATTORNEY MILLER:

25 Thank you, Your Honor. Nothing further.

1                   JUDGE JANDEBEUR:

2                   Mr. Swindler?

3                   ATTORNEY SWINDLER:

4                   Thank you, Your Honor.

5 FEDIRECT EXAMINATION

6 BY ATTORNEY SWINDLER:

7 Q.    Mr. George?

8 A.    Yes.

9 Q.    This is Mr. Swindler.

10 A.    Hi.

11 Q.    I just have a few additional questions on Redirect  
12 based on what Ms. Miller just asked you.

13 A.    All right.

14 Q.    Mr. George, how old are you?

15 A.    Seventy (70) years old, born in 1934.

16 Q.    Have you lived in the Schnecksville area all your  
17 life?

18 A.    Yes, I have.

19 Q.    You've been involved with the Ironton Telephone  
20 Company all of your life?

21 A.    That is correct.

22 Q.    Given that, do you think you have a pretty good  
23 sense of what the community of interest is in that  
24 area?

25 A.    I sure do.

1 Q. Now, when Ms. Miller asked you about your  
2 testimony on page 12, line 4, she asked you which  
3 community were you talking about, when you mentioned a  
4 presence in the community ---

5 A. Yes.

6 Q. --- wouldn't it be correct to say that for someone  
7 who knows the area, when you talk about Schnecksville  
8 and New Tripoli, you look at it as one community? Do  
9 you agree?

10 A. Yes.

11 ATTORNEY SWINDLER:

12 I have nothing else. Thank you.

13 JUDGE JANDEBEUR:

14 Mr. George, this is Judge Jandebaur, have  
15 you ever quantified the cost to your company to  
16 implement the EAS that you implemented?

17 A. I do not have those figures available.

18 JUDGE JANDEBEUR:

19 I understand that you may not have them  
20 available, but did the company ever attempt to  
21 quantify it?

22 A. Yes, I'm sure we did.

23 JUDGE JANDEBEUR:

24 Who is your cell phone provided by, what  
25 company?

4 providers in the area other than Verizon?

5 A. Cingular, Sprint, Nextel.

6 JUDGE JANDEBEUR:

7 They're all there?

8 A. There all in the Ironton area, and they are all  
9 customers of Ironton, as we provide the data circuits  
10 to get to the cell towers.

11 JUDGE JANDEBEUR:

12 Ms. Miller, did that drum up anything?

13 ATTORNEY MILLER:

14 Nothing further, thank you.

15 JUDGE JANDEBEUR:

16 Thank you, Mr. George.

17 A. You're welcome.

18 ATTORNEY SWINDLER:

19 Your Honor, if this would be the  
20 appropriate time, I would ask that Ironton Statement  
21 Number One, and Exhibits One, Two and Three be entered  
22 into the record.

23 JUDGE JANDEBEUR:

24 Did I hear any testimony on two and  
25 three?

1                    ATTORNEY SWINDLER:  
2                    It's in the written statement, Your  
3 Honor.

4                    JUDGE JANDEBEUR:  
5                    Okay. Any objections?

6                    ATTORNEY MILLER:  
7                    No, Your Honor.

8                    JUDGE JANDEBEUR:  
9                    They are so admitted.

10                   ATTORNEY SWINDLER:  
11                   Thank you.

12                   JUDGE JANDEBEUR:  
13                   You're welcome. Ms. Miller?

14                   ATTORNEY MILLER:  
15                   Thank you, at this time, I would call  
16 Regina Ryan.

17                   JUDGE JANDEBEUR:  
18                   I'll ask you to raise your right hand,  
19 Ms. Ryan.

20 -----  
21 REGINA RYAN, HAVING FIRST BEEN DULY SWORN, TESTIFIED  
22 AS FOLLOWS:  
23 -----

24                   JUDGE JANDEBEUR:  
25                   Thank you, be seated.

1 DIRECT EXAMINATION

2 BY ATTORNEY MILLER:

3 Q. Ms. Ryan, do you have before you a document that  
4 is entitled Verizon North Statement Number One?

5 (Verizon North's Exhibit Number One  
6 marked for identification.)

7 A. Yes.

8 Q. Is that the Direct Testimony you're presenting in  
9 this proceeding?

10 A. Yes.

11 Q. Was this document prepared by you or under your  
12 direction?

13 A. Yes, it was.

14 Q. Do you have any modifications, changes or  
15 additions to your testimony?

16 A. Just on page ten, line 21, it's annual toll,  
17 there's no access revenues included in that.

18 Q. Does that statement appear on any other page in  
19 your testimony?

20 A. No.

21 Q. Would you look at the question that begins on line  
22 16 on page 11? You can make the same change in the  
23 last line of the answer to that question?

24 A. Oh, yes. I'm scrry. On line 22, we got access.

25 Q. Is there an exhibit attached to your testimony?

1 A. Yes, I didn't bring it up with me.

2 Q. What is depicted on Verizon North Exhibit Number  
3 One?

4 A. It's telephone numbers for businesses that would  
5 be considered local calls for the New Tripoli  
6 customers.

7 Q. Does that exhibit exclude any areas of the local  
8 calling area?

9 A. No.

10 ATTORNEY MILLER:

11 If I may approach, Your Honor?

12 JUDGE JANDEBEUR:

13 Yes.

14 A. I'm sorry, on Exhibit Number One, it does exclude  
15 the Allentown area.

16 BY ATTORNEY MILLER:

17 Q. Was that exhibit prepared by you or under your  
18 direction?

19 A. Yes, it was.

20 Q. To the best of your information, knowledge and  
21 belief, are the answers set forth in your testimony  
22 true and correct?

23 A. Yes.

24 Q. If I asked you the same questions today under  
25 oath, would your answers be the same?

1 A. Yes.

2 ATTORNEY MILLER:

3 Your Honor, I have two questions that I'd  
4 like to ask orally based on this morning's testimony?

5 JUDGE JANDEBEUR:

6 Go ahead.

7 BY ATTORNEY MILLER:

8 Q. Ms. Ryan, Ms. Reese, during her testimony,  
9 discussed the surcharge that Verizon North would  
10 request be implemented if the EAS is granted in this  
11 case. I believe in your testimony, that it appears on  
12 page 11.

13 A. Yes.

14 Q. Can you describe the surcharge, please?

15 A. The surcharge would be as indicated in my  
16 testimony, to recover the costs. This is the lay out  
17 under Verizon North's Chapter 30 plan. Actually the  
18 surcharge would be for the first year, it would be 26  
19 cents per month. Then after that, ongoing, would be 9  
20 cents. The 9 cents would recover the toll loss.

21 Q. Also Mr. Swindler and Mr. George and I had a  
22 discussion about when the Allentown exchange was added  
23 to the New Tripoli calling area. Do you remember that  
24 testimony?

25 A. Yes.

1 Q. Looking at Ironton Exhibit Number One, do you  
2 agree with the opinion expressed by Mr. Swindler and  
3 Mr. George that the Ironton exchange was leapfrogged  
4 when the Allentown exchange was added to the local  
5 calling area?

6 A. No.

7 Q. Explain why not.

8 A. When I look at New Tripoli, Slatington and the  
9 Allentown area are right next to it. And Ironton is  
10 after it. It's to the right of it. It didn't jump  
11 over an exchange to get to Allentown.

12 ATTORNEY MILLER:

13 Thank you. I have nothing further. Ms.  
14 Ryan is available for Cross Examination.

15 JUDGE JANDEBEUR:

16 Mr. Swindler?

17 ATTORNEY SWINDLER:

18 Your Honor, could we ask the Complainant  
19 whether she wanted to go first?

20 JUDGE JANDEBEUR:

21 Yes, I'm sorry. Ms. Reese?

22 MS. REESE:

23 If I could, I'd like to ask one question.

24 JUDGE JANDEBEUR:

25 Sure.

2 BY MS. REESE:

3 Q. Ms. Ryan, do you live anywhere near the New  
4 Tripoli-Slatington area?

5 A. No, I don't.

6 Q. So then all of the businesses that you have listed  
7 in this Exhibit Number One, you actually have no idea  
8 how far they are from the New Tripoli area?

9 A. No.

10 JUDGE JANDEBEJR:

11 Mr. Swindler?

12 ATTORNEY SWINDLER:

13 Thank you, Your Honor.

14 CROSS EXAMINATION

15 BY ATTORNEY SWINDLER:

16 Q. Good morning, Ms. Ryan.

17 A. Good morning.

18 Q. You start off by indicating that you are employed  
19 by Verizon Pennsylvania, Inc.; that's correct?

20 A. Yes.

21 Q. The company involved in this matter is Verizon  
22 North, Inc.; correct?

23 A. Yes.

24 Q. Have you ever been affiliated during your employ  
25 --- have you ever been employed by Verizon North?

9 A. No, I haven't.  
10 Q. Are you an engineer?  
11 A. No, I'm not.  
12 Q. We've got the basics out of the way. Given that,  
13 would it be correct for me to assume that any  
14 discussions held in the past between Ironton and  
15 Verizon North or GTE or Contel representatives with  
16 regard to potentially implementing EAS, you were not a  
17 part of those discussions?  
18 A. No, I wasn't.

19 ATTORNEY MILLER:  
20 Your Honor, could I ask for clarification  
21 as to where this is going? Past history has nothing  
22 to do with this case, or whether or not Ms. Ryan was  
23 involved in those discussions.

24 ATTORNEY SWINDLER:  
25 I'm moving on, Your Honor, I have nothing

1 for that.

2 JUDGE JANDEBEUR:

3 Okay. Does that satisfy you, Ms. Miller?

4 ATTORNEY MILLER:

5 Yes, I'm curious if he has some objection  
6 to her providing testimony today?

7 JUDGE JANDEBEUR:

8 Go ahead, Mr. Swindler.

9 BY ATTORNEY SWINDLER:

10 Q. Now, on page two of your testimony, specifically  
11 line 13.

12 ATTORNEY SWINDLER:

13 I'm going to see if I can actually stand  
14 up, Your Honor, if you don't mind, just in case that  
15 helps Mr. George hear me.

16 JUDGE JANDEBEUR:

17 Go ahead.

18 BY ATTORNEY SWINDLER:

19 Q. You refer to some of Mr. George's testimony. You  
20 state in your answer at line 13, that an exchange  
21 usually contains many communities, not a central  
22 community, so on and so forth; is that right?

23 A. That's correct.

24 Q. Do you have any idea what those communities are  
25 within the New Tripoli exchange?

1 A. No, I do not.

2 Q. Now, you said you weren't an engineer, are you  
3 familiar at all with what facilities, what Verizon  
4 North facilities serve the New Tripoli exchange?

5 A. I'm not sure what you're asking.

6 Q. Facilities as to the cable, what kind of cable,  
7 whether it's a remote switch at the central office,  
8 where the cables go?

9 A. No.

10 Q. So you wouldn't know whether the facilities that  
11 are in place now would be able to provide service from  
12 the New Tripoli exchange to the Ironton exchange; or  
13 would you?

14 A. Well, I do check with our engineers. There are  
15 enough facilities to carry the traffic.

16 Q. I'm sorry.

17 A. There are enough facilities to carry the traffic.

18 Q. With regard to Mr. George's testimony that the  
19 local calling area of the New Tripoli exchange added  
20 the Allentown exchange in the early 1960s or late  
21 1950s, do you have any reason to not believe that?

22 A. No.

23 Q. On page three at the top, line three, you  
24 mentioned that you testified that Verizon North  
25 currently has three rate bands. Could you identify

1 those rate bands for me?

2 A. I didn't bring that information with me. But the  
3 rate bands are depending on the number of access lines  
4 that a customer can call in an exchange. We call them  
5 rate bands, A, D and F. A being the smallest number,  
6 and F being the largest. I do know that the New  
7 Tripoli exchange is in rate band F, which I believe  
8 --- I don't have the information here with me. I'd  
9 have to pull the tariffs.

10 Q. What tariff would that be?

11 A. It would be in --- I think it's the 180, no, no,  
12 this is Verizon North, the number one tariff of  
13 Contel, former GTE.

14 ATTORNEY MILLER:

15 Your Honor, we can provide that tariff  
16 ---.

17 ATTORNEY SWINDLER:

18 Maybe I can provide that tariff.

19 BY ATTORNEY MILLER:

20 Q. Is it by any chance Verizon North tariff telephone  
21 number three?

22 A. Three, that can't be Contel.

23 ATTORNEY MILLER:

24 May I, Your Honor?

25 JUDGE JANDEBEUR:

1 Yes.

2 BY ATTORNEY SWINDLER:

3 Q. First of all, do I have the right --- did I  
4 provide you with the right tariff?

5 A. This is the rate bands, A, D and F, but I don't  
6 know if this is the right one that has ---.

7 Q. Let me see if I can find a page, quickly --- on  
8 this page, this is Telephone PA PUC Number 3 of  
9 Version North, Inc., Section 2, 13th Revised, Sheet 8,  
10 does that mention or show New Tripoli as one of the  
11 exchanges?

12 A. Yes.

13 Q. So this would be the correct tariff?

14 A. Yes.

15 Q. What is the reference here, usage rate group, dial  
16 tone line?

17 A. Usage rate group is F. That indicates there is  
18 over 83,000 access lines that can be called. Four is  
19 the dial tone line cell, F-4. We have cells one, two,  
20 three and four. That should be in here also.

21 Q. Okay, that's good enough. I might come back to  
22 this in a few moments. Now, given that the New  
23 Tripoli Exchange is in the largest of the three rate  
24 bands, does that have something to do with why there  
25 would be an increase in the local charge to New

1 Tripoli customers if EAS were implemented?

2 A. That's right. There would be no monthly increase.

3 I'm not talking about the surcharge, now. I'm just  
4 talking about the regular monthly local rate would  
5 stay the same.

6 Q. The local monthly rate?

7 A. That's right.

8 Q. On page three, line 10, you seem to agree with Mr.  
9 George's testimony with regard to what a local calling  
10 area is, but you state ---.

11 JUDGE JANDEBEUR:

12 Mr. George?

13 MR. GEORGE:

14 Yes.

15 JUDGE JANDEBEUR:

16 Are you doing work at your desk, by  
17 chance?

18 MR. GEORGE:

19 No.

20 JUDGE JANDEBEUR:

21 Can you put your telephone on mute,  
22 because when you shuffle papers, the telephone picks  
23 it up.

24 MR. GEORGE:

25 Oh, sorry.

1                   JUDGE JANDEBEUR:

2                   That's all right. But it's disruptive,  
3 so if you put yours on mute, if you need us, you just  
4 have to remember to flip it back off.

5                   MR. GEORGE:

6                   All right.

7                   JUDGE JANDEBEUR:

8                   If I put mine on mute, you won't hear  
9 what's going on. Okay?

10                  MR. GEORGE:

11                  Okay.

12                  JUDGE JANDEBEUR:

13                  Thank you. Go ahead.

14 BY ATTORNEY SWINDLER:

15 Q. Ms. Ryan, at page three, line ten, you say, quote,  
16 I would point out that the most important criterion --  
17 - et cetera. You mention that --- is it your  
18 testimony that it's important to understand that we're  
19 looking to meet the day-to-day needs of the majority  
20 of the folks in the exchange. You have the word  
21 majority capitalized.

22 A. That's correct.

23 Q. Do you say it that way because that's not what Mr.  
24 George said?

25 A. I'd have to look at ---.

1 Q. Do you have Mr. George's ---?

2 A. I don't have it up here.

3 JUDGE JANDEBEUR:

4 Here's one.

5 ATTORNEY SWINDLER:

6 Ironton Statement Number One?

7 JUDGE JANDEBEUR:

8 Oh, no, I'm sorry. That's not it. Never  
9 mind.

10 BY ATTORNEY SWINDLER:

11 Q. Go to page 4, line 22. Does Mr. George already  
12 say with regard to local area that it would attempt to  
13 meet the day-to-day needs of the majority of the  
14 people on the exchange?

15 A. Right. Yes.

16 Q. So that's not a disputed point; is it?

17 A. No.

18 Q. On line 13 of page 3, you use the term customer's  
19 unique community of interest. Do you see that?

20 A. Yes.

21 Q. That seems to be a contradiction in terms to me,  
22 customer's unique community of interest. Can you  
23 explain what you mean by that?

24 A. What I mean is an individual community of  
25 interest. Everybody has a different need or want in a

1 community. If one person wants to do this in one  
2 town, that might not be everybody else's preference.

3 Q. I see. Is it Verizon North's position that if  
4 there is already one doctor and one grocery store in  
5 the local calling area, no matter where in the local  
6 calling area that might be, that those needs are  
7 covered?

8 A. I think we found more than one doctor and one  
9 grocery store in the area.

10 Q. Are you referring to the exhibit that's attached  
11 to your testimony?

12 A. Yes.

13 Q. That says it excludes the Allentown numbers. So  
14 if there's one doctor, but there are four doctors and  
15 four grocery stores in the Allentown exchange, even  
16 though that's 20 miles away as opposed to the grocery  
17 store in Schnecksville, which is 10 miles away, that  
18 need is covered; is that Verizon North's position?

19 A. Yes.

20 Q. There was some discussion this morning about how  
21 you can say that Schnecksville is in between New  
22 Tripoli and Allentown. I guess looking at Ironton  
23 Exhibit Number One, it was hard to really visualize  
24 that. I believe there was some testimony by Ms. Reese  
25 describing Route 309. I'm trying to help you

1 visualize how that works ---

2 A. Right.

3 Q. --- because you've never been to New Tripoli.

4 A. No, I haven't.

5 Q. Your Counsel indicates she's also not familiar  
6 with the area. So I just thought I would help you out  
7 just so you could visualize this.

8 ATTORNEY SWINDLER:

9 I'll give a copy --- basically, I have  
10 something here, if we have to submit it, I've labeled  
11 it Ironton Cross Exhibit One and Ironton Cross Exhibit  
12 Two. So I'll give those to your Counsel. Let me just  
13 give you two copies here, or a copy of each. I'll  
14 give Your Honor a copy of each so we can all follow  
15 along.

16 (Ironton Cross Exhibit Numbers One and  
17 Two marked for identification.)

18 BY ATTORNEY SWINDLER:

19 Q. Now, let's look at Ironton Cross Exhibit One. You  
20 see this happens to be something that I just pulled  
21 off the internet at mapquest.com; are you familiar  
22 with MapQuest?

23 A. Yes, I am.

24 Q. So I didn't make this up. There's a star in the  
25 middle. Do you see that that represents

1 Schnecksville?

2 A. Yes.

3 Q. In fact, when you look up at the upper left, there  
4 was an address, that happens to be the community  
5 college address. That's where the star is right at  
6 Schnecksville; okay?

7 A. Okay.

8 Q. We agree that Schnecksville is in the Ironton  
9 exchange at this point; right?

10 A. That's right.

11 Q. Looking at this Cross Exhibit One, where is  
12 Allentown in relation to Schnecksville? Do you see  
13 Allentown on this map?

14 A. No, I don't. Is it on here?

15 Q. Yes. In that grey area, do you see something?

16 A. Oh, there it is. I'm sorry.

17 Q. Where is Allentown in relation to the star that  
18 represents Schnecksville?

19 A. It's to the right of 309.

20 Q. Sort of ---.

21 A. Below and to the right.

22 Q. Maybe east-southeast?

23 A. Yes.

24 Q. Do you see where New Tripoli is on this?

25 Actually, New Tripoli isn't on that.

1 A. Oh, okay.

2 Q. Look at Ironton Cross Exhibit Two. Are you  
3 familiar with how MapQuest works? It's pretty cool,  
4 you can zoom in and out.

5 A. Oh, yes. That's how I got here.

6 Q. Okay. So that is basically using the same map and  
7 the same star, but I zoomed in. This shows New  
8 Tripoli in relationship to Schnecksville; does it not?

9 A. Yes.

10 Q. Again, can you describe for us the relationship  
11 between New Tripoli and Schnecksville, as far as  
12 directionally, looking at Ironton Cross Exhibit Two?

13 A. Yes, New Tripoli looks like it's to the west.  
14 Schnecksville is to the east, and 309 appears to run  
15 through it.

16 Q. So looking at Cross Exhibit Two, you can see how  
17 Route 309 basically goes right through New Tripoli,  
18 right through the center of Schnecksville and  
19 continues on.

20 A. Right.

21 Q. So if you back to Cross Exhibit One, and you look  
22 for 309, you can see how 309 goes down past  
23 Schnecksville into the Allentown area. Now let's see  
24 if we can agree. If you look at the two together ---  
25 as you know, New Tripoli didn't show up on Cross

1 Exhibit One.

2 A. Right.

3 Q. We had to zoom in to get them to show New Tripoli.

4 But if you look and sort of see above New Tripoli in  
5 Cross Exhibit Two how 309 starts to bend up, it almost  
6 looks like there's a fork in the road there, at New  
7 Tripoli, you can go left on 143 or you can go up 309.

8 A. Right.

9 Q. So you go back to Cross Exhibit One, right just to  
10 the left of the 309 symbol?

11 A. Uh-huh (yces).

12 Q. You see that fork, the same fork. So would you  
13 agree with me that when you look at the two maps and  
14 compare them, New Tripoli must be located just to the  
15 left of that 309 symbol on Cross Exhibit One? See the  
16 point of my pen, see if you agree with where I'm  
17 putting my pen.

18 A. Okay.

19 Q. Do you agree with that?

20 A. I assume so.

21 Q. That's what it looks like; right?

22 A. Yes.

23 Q. Let's assume that that's where New Tripoli is  
24 located. So you're looking at Cross Exhibit One.  
25 That's where New Tripoli is. Then you see

1 Schnecksville with the star. Then you see Allentown  
2 way over here to the right.

3 A. Right.

4 Q. So would you agree that if you wanted to go to the  
5 pharmacy or if you wanted to go the grocery store,  
6 Schnecksville is a lot closer than going down here;  
7 isn't it?

8 A. Yes, but I don't know if that's what I would  
9 choose to do.

10 ATTORNEY SWINDLER:

11 Your Honor, I have two more copies of  
12 each Cross Exhibit One and Cross Exhibit Two that I  
13 can give to the Court Reporter to submit into the  
14 record.

15 JUDGE JANDEBEUR:

16 Okay.

17 BY ATTORNEY SWINDLER:

18 Q. One last question, looking at those --- I'm sorry.

19 A. That's okay.

20 Q. I noticed that I had one last question. In your  
21 opinion, if Allentown is within New Tripoli's  
22 community of interest, how could Schnecksville not be?

23 A. I don't know. I don't know anything about  
24 Schnecksville.

25 Q. Let's move on to page four of your testimony.

1                    ATTORNEY SWINDLER:

2                    Now, my goal here is to avoid talking  
3 about any of the proprietary information, just so  
4 Verizon North's Counsel understands that so we don't  
5 have to deal with going on and off the record and all  
6 that stuff.

7                    ATTORNEY MILLER:

8                    I appreciate it.

9                    ATTORNEY SWINDLER:

10                   I'm sure the court reporter probably  
11 appreciates that too.

12 BY ATTORNEY SWINDLER:

13 Q.    But my question now is about the number of access  
14 lines, which on the propriety version is on page 4,  
15 line 11.

16 A.    Right.

17 Q.    There is a total number of access lines in the  
18 local calling area. Then there's the number. Are you  
19 sure that number is right?

20 A.    No, I'm not.

21 Q.    Are you sure that number is wrong?

22 A.    I need to check it.

23 Q.    Did you need to do that now?

24 A.    I can't from here. I don't have that information.

25 Q.    So let me ask you --- you've been doing EAS cases

1 for Verizon PA, Verizon North; Allentown is a Verizon  
2 PA exchange?

3 A. Right.

4 Q. Do you ever do EAS matters for Allentown?

5 A. I can't recall off the top of my head.

6 Q. So looking at that number, it doesn't trigger  
7 whether it's right or wrong?

8 A. It's too low.

9 ATTORNEY MILLER:

10 Your Honor, could we go off the record a  
11 moment, and I can talk with Ms. Ryan.

12 JUDGE JANDEBEUR:

13 Do you have any problem with that?

14 ATTORNEY MILLER:

15 We may be able to clear up the  
16 inconsistency.

17 JUDGE JANDEBEUR:

18 Go ahead and go off the record for just a  
19 minute.

20 OFF RECORD DISCUSSION

21 JUDGE JANDEBEUR:

22 Ms. Ryan, you remain under oath. Mr.  
23 Swindler, do you want to continue?

24 BY ATTORNEY SWINDLER:

25 Q. Ms. Ryan, we're back to the total number of access

1 lines in the New Tripoli local calling area. Can you  
2 tell me whether the number provided on line 11 of the  
3 proprietary version of the testimony is correct?

4 A. No, the number is incorrect, but I did get a  
5 correct number.

6 ATTORNEY SWINDLER:

7 How do I get that correct number without  
8 having the number on the --- can she show me the  
9 number, Your Honor, so I don't have to say any numbers  
10 on the record for proprietary ---.

11 JUDGE JANDEBEUR:

12 On the record?

13 ATTORNEY MILLER:

14 Then we'll revise the pages before we  
15 leave.

16 JUDGE JANDEBEUR:

17 Okay. Does anybody want to show me the  
18 number? Thank you.

19 BRIEF INTERRUPTION

20 JUDGE JANDEBEUR:

21 Mr. George, it would be good if you  
22 wouldn't put us on hold because the radio comes in.

23 MR. GEORGE:

24 Oh, goodness. Sorry about that.

25 JUDGE JANDEBEUR:

1                   That's all right. Now, let me check, Mr.  
2 Swindler, do you still need him? Do you want him to  
3 stay on?

4                   ATTORNEY SWINDLER:

5                   Mr. George, do you want to be on the  
6 phone to listen to my excruciating Cross Examination  
7 of Ms. Ryan, or would you prefer to be let go?

8                   MR. GEORGE:

9                   If you could speak up so we could hear it  
10 better, we'd appreciate it.

11                   JUDGE JANDEBEUR:

12                   Do you want to stay on the line, though,  
13 sir?

14                   MR. GEORGE:

15                   We'll stay on.

16                   JUDGE JANDEBEUR:

17                   Okay, all right. Go ahead.

18 BY ATTORNEY SWINDLER:

19 Q. With regard to that number, are you sure that  
20 that's the correct --- are you sure now that that is  
21 the correct number of access lines in the total local  
22 calling area of the New Tripoli exchange?

23 A. Yes. Yes, that's the numbers that I took from the  
24 traffic studies.

25 Q. From the traffic studies that you used to come up

1 with the traffic study data information in your  
2 testimony?

3 A. In March of 2005.

4 Q. So Ironton Exhibit Number Two that shows the New  
5 --- Ironton Exhibit Number One, which shows the New  
6 Tripoli local calling area, everything that's in  
7 yellow, the number that you just revised.

8 A. Everything that's in yellow, plus what's in blue.

9 Q. Right. This revised number is the number you used  
10 to come up with your traffic information?

11 A. Well, it wouldn't have affected the traffic  
12 information. That's just the number of access lines  
13 that they can call from the New Tripoli exchange. The  
14 traffic information is specifically from New Tripoli  
15 to Ironton.

16 Q. I'm hesitating because I still have a concern as  
17 to the accuracy of that number, so after we're done,  
18 it's not imperative. I'm not going to waste anymore  
19 time here, but if you would just double check that  
20 absolutely, I'd appreciate it.

21 On page four, line 16, you talk about the number  
22 of customers PIC'd, P-I-C- apostrophe -D, to Verizon  
23 North. Can you explain how that's relevant here?

24 A. The traffic that we capture is only our own  
25 traffic on the traffic report. But the number of

1 lines, we need to know how many are PIC'd to Verizon,  
2 because that's the traffic we're carrying.

3 Q. So when a customer is PIC'd to Verizon, it means  
4 that customer has selected Verizon as it's IntraLATA  
5 toll carrier?

6 A. That's correct.

7 Q. IntraLATA toll is what you're looking at for your  
8 traffic study?

9 A. That's correct.

10 Q. To this traffic route, since it's a toll route,  
11 right?

12 A. That's right.

13 Q. So it's your testimony that all the numbers that  
14 you give with regard to the traffic and how many  
15 people make calls, it's only based on the subset of  
16 customers that use Verizon North as their IntraLATA  
17 toll carrier?

18 A. That's correct.

19 Q. Why is that?

20 A. Well, otherwise, the number would actually be a  
21 lot lower if I used all of the access lines in the New  
22 Tripoli exchange.

23 Q. Why would you say that?

24 A. Well, when you do the calculations, you would be  
25 dividing the number of customers that are calling by

1 either the number that are PIC'd, which is a lot lower  
2 than the total number. So if I did the math that way,  
3 it would actually be --- the percentages would be a  
4 lot lower.

5 Q. That would also be inaccurate information; would  
6 it not?

7 A. Right.

8 Q. Because what you're saying is you would skip all  
9 of the other toll carriers' information as to their  
10 customers and what their traffic data is?

11 A. Right. I couldn't include them because I don't  
12 capture their traffic.

13 Q. So is it your testimony that Verizon North does  
14 not have access to the traffic data for the other  
15 IntraLATA toll carriers that serve the New Tripoli  
16 exchange?

17 A. That's correct.

18 Q. On the bottom of that page 4, line 23, is it your  
19 testimony that the New Tripoli exchange is located  
20 within the Northeast LATA?

21 A. Yes.

22 Q. I'm going to show you a handy map. A telephone  
23 map of Pennsylvania. Are you familiar with this map?

24 A. Yes.

25 Q. Is that a map put out by the Pennsylvania

1 Telephone Association? Have you seen that map before?

2 A. Yes.

3 Q. Can you take a look that map and tell me whether  
4 the New Tripoli exchange, whether you're still  
5 testifying that New Tripoli exchange is located within  
6 the Northeast LATA?

7 A. It's in the Philadelphia LATA.

8 Q. Thank you. Access number is wrong ---.

9 ATTORNEY MILLER:

10 Your Honor, we can do without ---.

11 JUDGE JANDEBEUR:

12 I understand.

13 BY ATTORNEY SWINDLER:

14 Q. Let's turn to page five. When you talk about how  
15 the rate for an IntraLATA toll call is determined,  
16 what is the relevance of that information to Ms.  
17 Reese's EAS request? Is there any relevance in how a  
18 toll call is rated?

19 A. No, it's just that there's different companies you  
20 can go with. You can get different rates. There are  
21 packages out there.

22 Q. Page 5, line 21, your answer, you use the term so  
23 insufficient, then you again say, meet the needs. So  
24 insufficient that it does not meet the needs of the  
25 majority; is that what your testimony says?

1 A. Yes.

2 Q. Can you provide any more specifics as to what you  
3 mean meet the needs?

4 A. Well, in some areas, a lot of the school  
5 districts, the County seat, a lot of people bring that  
6 into consideration when they want to extend their  
7 local calling area. Plus a lot of the times the  
8 traffic is a lot higher in some areas.

9 Q. Your testimony is, quote, the local calling area  
10 of an exchange should be enlarged only if the existing  
11 calling area is so insufficient that it does not meet  
12 the needs of the majority of the customers in the  
13 exchange. Would you agree, yes or no, that those  
14 needs could change over time?

15 A. Yes.

16 Q. In fact, in addition, other than just whether the  
17 local calling area is insufficient, that's the only  
18 time Verizon changes its local calling area. Wouldn't  
19 they also change the local calling area based on the  
20 PUC's EAS regulations?

21 A. Yes.

22 Q. Page six, line three. It is your testimony that  
23 customers of the New Tripoli exchange currently have  
24 access to a large local calling area. Large in what  
25 way? Do you mean geographically?

1 A. Geographically and the number of lines that they  
2 can call. Allentown is a pretty big city.

3 Q. Hypothetically, if the New Tripoli exchange  
4 customers could call Philadelphia toll free, would  
5 that also be considered a large local calling area?

6 A. Yes.

7 Q. But even though it would be a large local calling  
8 area in that hypothetical scenario, would being able  
9 to call Philadelphia toll free from New Tripoli serve  
10 the needs of the community in New Tripoli?

11 A. Probably not.

12 Q. I'm down to line 14. You say, quote, the local  
13 calling area of an exchange is designed so that a  
14 majority of the customers within that exchange can  
15 place calls to meet their day-to-day needs without  
16 incurring toll charges. Again, would you agree that  
17 if a customer's or exchange's needs had changed since  
18 that exchanges local calling area was designed, as you  
19 say, shouldn't that warrant a reassessment of that  
20 local calling area?

21 A. Based on the traffic study, the traffic is not  
22 there.

23 Q. But we already know that there are a lot more  
24 criteria that we're looking at here, other than just  
25 traffic information; right?

1 A. Right.

2 Q. I have a question now on line 20 about the base  
3 rate. Base rate of \$13.78 per month, what is that a  
4 reference to?

5 A. That's the dial tone line and the unlimited  
6 calling to the local area.

7 Q. So now we're back to looking at the tariff again;  
8 right?

9 A. Yes.

10 Q. Now, the tariff that I have, that I've shown you,  
11 my copy, I simply took that off of the Verizon  
12 website. Is it or is not the most recent?

13 A. It is. The rates did go up February 1st, by 80  
14 cents.

15 Q. So let's back up now. We're at line 20, and you  
16 say the base rate is \$13.78 per month. Are you now  
17 saying that's not what the rate is?

18 A. No, it is \$14.58 now.

19 Q. Is that with my math calculation?

20 A. Yes.

21 Q. As you explained earlier, why don't you explain it  
22 again then. You can tell by looking at the tariff,  
23 you add what together?

24 A. The dial tone line at density cell 4, which is  
25 \$6.48 and the usage package, it's rate group F, which

1 is \$8.10, it comes out to \$14.58.

2 Q. So that should be the number on line 20?

3 A. Right.

4 Q. And your answer continues on top of page seven,  
5 with regard to a dial tone line rate, is that number  
6 also incorrect?

7 A. Yes, it's now \$6.48. I apologize, this was  
8 written when we were supposed to have the last  
9 hearing.

10 Q. You said the rates changed February ---?

11 A. February 1st, yes.

12 Q. Now, you start talking about Lifeline Service.

13 What does Lifeline Service have to do with Ms. Reese's  
14 EAS complaint?

15 A. Nothing. We always just include that it is  
16 available.

17 Q. Does the Lifeline Service, if a customer has  
18 Lifeline Service, help pay that customer for a toll  
19 call from New Tripoli to the Ironton exchange?

20 A. No.

21 Q. On page nine, line four, starting at line three,  
22 your answer is, quote, the study showed that only  
23 blank of Verizon North customers in the New Tripoli  
24 exchange were used to make ---. Can you tell me what  
25 that means? It continues, but I don't understand that

1 sentence.

2 A. It should say the access lines. The number of  
3 accessed ---. The study showed that only blank of  
4 Verizon North customers in the New Tripoli --- access  
5 lines of Verizon North customers, it probably should  
6 say, were used to make at least one call to the  
7 Ironton Exchange.

8 Q. So insert access lines before Verizon North on  
9 line four?

10 A. Yes.

11 Q. That makes sense. Now, you talk about the PUC  
12 regulation's criteria at 63.77. Then over on page  
13 ten, you talk about the toll traffic. Just so I'm  
14 clear again, the traffic data, the numbers that you  
15 provide here with regard to the number of calls made,  
16 et cetera, that was based on the revised access line  
17 number that you provided us earlier today and not the  
18 incorrect number that is in your written testimony?

19 A. Well, the access line number has nothing to do  
20 with this specific toll traffic study, because I'm  
21 only using the New Tripoli lines and only the New  
22 Tripoli lines that are PIC'd to Verizon. The number I  
23 had to update was the Allentown numbers.

24 Q. We would agree that the traffic data, that's only  
25 the first of six criteria that the Commission and the

1 Judge will look at?

2 A. Right.

3 Q. With regard to the cost to Verizon North to  
4 implement this requested EAS, again you provide a  
5 number, a dollar number. You say that is for the  
6 expenses to make the required tariff filing and  
7 customer notification. So in other words, to  
8 implement this EAS request, there would be no  
9 facility's cost to Verizon North?

10 A. That's correct.

11 Q. Then you mentioned a dollar number as to lost  
12 annual toll revenue; correct?

13 A. Correct.

14 Q. Now, with regard to either of those dollar  
15 numbers, do you have worksheets with you today that  
16 show how you arrived at those?

17 A. I don't have them with me.

18 Q. Is that something that could be provided?

19 A. Yes, we could provide it.

20 Q. You say you testify in hearings like this for  
21 Verizon North and Verizon PA?

22 A. That's correct.

23 Q. Any other company?

24 A. No.

25 Q. Have you been doing that for a number of years?

1 A. For three years in this particular job.

2 Q. That keeps you pretty busy; doesn't it?

3 A. Yes.

4 Q. Now, in all of those EAS hearings that you go to  
5 all over the place in Pennsylvania, you're often  
6 likely giving numbers of the costs to the utility to  
7 provide the requested EAS; would that be correct?

8 A. That's correct.

9 Q. In your experience, based on all of those  
10 hearings, as you look at the numbers that we're  
11 talking about here, the dollars to Verizon North to  
12 actually implement this Complainant's request. Is  
13 this a very large amount in comparison?

14 A. No, it's not a large amount.

15 Q. It's a pretty small, miniscule amount compared to  
16 other cases that you've been involved with; isn't it?

17 A. I'd have to look at the other cases.

18 Q. Unfortunately I can't say the numbers, because I  
19 don't want to start getting into proprietary  
20 information, but would you agree that Verizon North is  
21 a multi-million dollar company?

22 A. Yes.

23 Q. Just Verizon North, not even Verizon  
24 Communications, not Verizon Pennsylvania, but Verizon  
25 North.

1 A. Yes.

2 Q. I had something to show you, operational revenues  
3 of \$400,000,000 for 2002, but I won't even bother  
4 showing you that, because I think we agree --- multi-  
5 million dollar company.

6 ATTORNEY MILLER:

7 Your Honor, Ms. Ryan already agreed that  
8 the amount of money involved for notification and  
9 tariff filing in the loss of total revenues is not  
10 that much.

11 JUDGE JANDEBEUR:

12 Okay. Continue.

13 BY ATTORNEY SWINDLER:

14 ATTORNEY SWINDLER:

15 All of which is the cost to implement  
16 this EAS, there are no other costs. That's total  
17 costs to implement and she agrees that's a very small  
18 amount.

19 ATTORNEY MILLER:

20 She testified that there are no facility  
21 costs.

22 ATTORNEY SWINDLER:

23 I'm just clarifying that that very small  
24 amount is very small compared to the operating  
25 revenues of a Verizon North. It might be different

1 when you compare it to the operating revenues of an  
2 Ironton Telephone Company, that's all I was trying to  
3 clarify.

4 ATTORNEY MILLER:

5 Your Honor, there's no question in there.

6 ATTORNEY SWINDLER:

7 You raised it, so I was trying to clarify  
8 that.

9 BY ATTORNEY SWINDLER:

10 Q. On page 11, continuing from page 10, let me ask  
11 you this. In your experience in prior cases similar  
12 to this, are you aware that the Commission, in fact,  
13 prohibits the recovery of lost toll revenue?

14 A. I know for Verizon Pennsylvania it does. But in  
15 Verizon North's Chapter 30 plan, we are allowed to  
16 recover revenue.

17 Q. But as a consideration of whether EAS should be  
18 implemented and looking at the criteria, and oh my  
19 gosh, it's going to cost whatever, here it happens to  
20 be a small amount, but even if it was a large amount  
21 for lost toll revenue, would you agree with me that  
22 that's not something --- the Commission has said, that  
23 that's not something that we'll consider when we try  
24 to decide whether to implement EAS?

25 A. In certain cases, but I do believe we did get it

1 in one case.

2 Q. Then you're Chapter 30 point is, you're saying in  
3 your Chapter 30 plan'---.

4 A. Verizon North's.

5 Q. In Verizon North's Chapter 30 plan, Verizon North  
6 has the ability to recover that as a surcharge to it's  
7 customers?

8 A. That's correct.

9 Q. Are you talking about the cost to implement or are  
10 you specifically talking about that lost toll revenue  
11 part?

12 A. Both.

13 Q. So it really doesn't matter what the cost is,  
14 because Verizon North is going to pass it on to  
15 customers? Verizon North isn't going to be out  
16 anything because they're going to recover it from  
17 their customers; right?

18 A. That's right.

19 Q. That amount is the amount that you talk about on  
20 page 11, which is the 26 cents for the first 12  
21 months? Am I correct, as Ms. Reese was asking or  
22 stating in her testimony, we're going through all of  
23 this because Verizon North doesn't want to implement  
24 something that they're going to charge their customers  
25 \$3.12 more, then 9 cents a month thereafter; is that

1 correct?

2 A. Yes.

3 Q. The third criteria that you mentioned on page 12,  
4 the increase in local service charge, we've already  
5 covered that. Your testimony says that we agree there  
6 is no change in the local service rate. They're at  
7 the higher rate band. Adding the Ironton access lines  
8 won't move it to a higher rate band?

9 A. That's correct.

10 Q. The local rate stays the same, to the amount that  
11 we corrected today.

12 Now, on page 12, beginning at line 14, your  
13 testimony says you've been lead to a certain  
14 conclusion. The calling volumes identified by the  
15 toll traffic study I described earlier in my  
16 testimony, you were saying, leads me to the conclusion  
17 that other customers in the New Tripoli exchange have  
18 similar calling patterns. Is that what your testimony  
19 says?

20 A. That's correct.

21 Q. Now, how many customers' bills did you review?

22 A. I didn't review any of the bills, but just based  
23 on the toll traffic study, the calling pattern of Ms.  
24 Reese, mirrors the traffic study. The call volumes  
25 are low.

1 Q. But it's just a sub-portion of all the customers  
2 in the exchange, because you only looked at the ones  
3 PIC'd to Verizon?

4 A. That's right.

5 Q. Is it your testimony that you really get a true  
6 calling volume when you only look at the Verizon North  
7 customers PIC'd to Verizon North for IntraLATA toll,  
8 and you don't consider use of cell phones, and prepaid  
9 calling cards, and calling your neighbor and asking  
10 him to call you back, and all of the other things that  
11 people have to do to make a call so they don't have to  
12 pay a toll charge, do you really get an accurate  
13 calling pattern?

14 A. I don't have access to that information. The only  
15 information that I have access to is the Verizon  
16 North's traffic study.

17 OFF RECORD DISCUSSION

18 BY ATTORNEY SWINDLER:

19 Q. You then conclude on page 12, it looks like you're  
20 making a conclusory statement there, it starts with  
21 therefore, the costs do not support the implementation  
22 --- costs incurred by these customers, who are these  
23 customers?

24 A. That's based on the information in the traffic  
25 study. Traffic volumes aren't there.

1 Q. Wouldn't you agree, as Ms. Reese stated, if she's  
2 paying 67 cents a month now, I guess, if you're at  
3 Verizon North, and you see 67 cents, that locks pretty  
4 small.

5 ATTORNEY MILLER:

6 Your Honor, could Mr. Swindler not inject  
7 his personal opinions in his questions?

8 ATTORNEY SWINDLER:

9 Your Honor ---.

10 JUDGE JANDEBEUR:

11 Just limit it to the question.

12 BY ATTORNEY SWINDLER:

13 Q. If you look at 67 cents, it doesn't on its face  
14 look like much, but if Verizon and you, on behalf of  
15 Verizon North, are testifying that it would only cost  
16 nine cents, and as Ms. Reese said, then that's local  
17 calling, that's not just to calls that were actually  
18 made, she's got the ability to call Schnecksville  
19 whenever she wants, it's in her local calling area.  
20 Technically, right now, she's paying about 700 percent  
21 more than what she would pay if she was paying that  
22 nine cents, so would you agree that this sort of  
23 depends on how you look at it? Sixty-seven cents  
24 might not sound like a lot, but if you say, I'm going  
25 to make you pay 700 percent more than you have to pay;

1 does that sound like a lot? Does that put a differ  
2 spin on that?

3 A. I guess you could say it puts a different spin  
4 it.

5 Q. Then on page 13, you testified to the demograph  
6 and proximity of the exchanges. I'm just looking at  
7 my notes here, I don't want to have to unnecessarily  
8 duplicate myself, just bear with me. Can you tell  
9 what you mean by a part of your answer at line seven  
10 through nine, beginning as indicated ---? My quest  
11 to you after you read that is how do you make the  
12 correlation that you're making there?

13 A. Because the volumes of traffic are so low going  
14 into the Ironton exchange.

15 Q. The volumes of traffic in your traffic study th  
16 are just a small subset and don't include all the  
17 other ways that people try to make a call?

18 A. That's right.

19 JUDGE JANDEBEUR:

20 Mr. Swindler, limit it to your questio  
21 please. Don't try to characterize what she's alrea  
22 said.

23 ATTORNEY SWINDLER:

24 I'm sorry, Your Honor.

25 BY ATTORNEY SWINDLER:

2 of products and services in the current local calling  
3 area, that includes, I suppose --- is that a reference  
4 to everything that's available in the Allentown  
5 exchange?

6 A. In the exhibits, there's a wide availability of  
7 different businesses for customers to call locally.

8 Q. So a wide variety, are we just talking about the  
9 Exhibit One, or are we talking about Verizon Exhibit  
10 or are we talking about also including the Allentown  
11 exchange?

12 A. The Allentown exchange also.

13 Q. So when you say on line 18, on page 13, in  
14 addition to the businesses and organizations shown on  
15 Verizon North Exhibit Number One, customers of the  
16 Tripoli exchange can make calls to Allentown on a  
17 toll-free basis, am I to understand then from that  
18 you're just trying to again clarify that Verizon North  
19 Exhibit Number One does not include Allentown numbers  
20 which would make it even more?

21 A. That's right.

22 Q. I'd ask you to look at Verizon North Exhibit  
23 Number One. I'll also ask you to look at what has  
24 been admitted into the record as Ironton Exhibit  
25 Number Three. I'll give you a copy of that so that

1 you can take a look at it. That Ironton Exhibit  
2 Number Three, basically shows --- it's a page from the  
3 directory; is it not?

4 A. That's correct.

5 Q. This page shows the local exchanges in  
6 alphabetical order. Would you agree that next to each  
7 named exchange it gives the NXX or prefixes of the  
8 telephone numbers associated with that exchange?

9 A. That's correct.

10 Q. What is the first exchange listed alphabetically  
11 on that?

12 A. Allentown.

13 Q. There are quite a few prefixes there; correct?

14 A. That's correct.

15 Q. It would be your testimony up to this point that  
16 none of those prefixes are located on Verizon North  
17 Exhibit Number One, because that excludes Allentown;  
18 is that right?

19 A. These weren't taken from the Allentown directory.

20 Q. I'm sorry?

21 A. This information wasn't taken from the Allentown  
22 directory. It was taken from the Emmaus directory.

23 Q. Okay. But isn't it your testimony that the  
24 Verizon North Exhibit Number One excludes all the  
25 businesses and services that would be available in

1 Allentown, that you're supposed to add them to what is  
2 shown on Verizon North Exhibit Number One?

3 ATTORNEY MILLER:

4 Rephrase the question if you would, Mr.  
5 Swindler?

6 A. But there are Allentown numbers on this exhibit.  
7 This exhibit was taken from the Emmaus --- this was  
8 prepared using the Emmaus directory, not the Allentown  
9 directory, because there were so many listings in the  
10 Allentown directory. What I did for the Allentown  
11 directory, was just go through and summarized the  
12 number of categories, the yellow page headings.

13 BY ATTORNEY SWINDLER:

14 Q. No matter what directory that the Verizon exhibit  
15 was produced from or made from, doesn't it imply that  
16 all of those things, all of those businesses and  
17 services that are shown on Verizon North Exhibit One,  
18 don't include anything that would be in Allentown? I  
19 mean, it says excluding Allentown in the heading, does  
20 it not?

21 A. Close. We just excluded the Allentown book.

22 Q. So in other words, it doesn't exclude businesses  
23 and services that are in the Allentown exchange?

24 A. That's right.

25 Q. If you actually look closely and go through

1 Verizon North Exhibit Number One, it turns out that  
2 only about 90 of the 250 numbers that you've provided  
3 on Verizon North Exhibit One are not Allentown  
4 numbers. So wouldn't you agree that Verizon North  
5 Exhibit Number One should not be titled in the  
6 heading, excluding Allentown, because it really does  
7 include Allentown?

8 A. We could take that out.

9 ATTORNEY SWINDLER:

10 Now, unfortunately, I did this really  
11 quickly late last night. I didn't have a chance to  
12 make copies, but I'm sure if you go back and you start  
13 looking at the Ironton Exhibit Three and you see all  
14 the Allentown prefixes, if you highlight them,  
15 everything on Verizon North Exhibit One that's really  
16 an Allentown number, you'll find that, in fact, of all  
17 the attorneys listed, only 2 of 13 aren't in  
18 Allentown. And Banks and Credit Unions, three of  
19 eight, and on and on.

20 JUDGE JANDEBEUR:

21 Was there a question in there that you  
22 want her to answer?

23 ATTORNEY SWINDLER:

24 I guess, the question, Your Honor, was,  
25 would you agree that, to clarify, Verizon North

1 Exhibit One doesn't exclude Allentown numbers, it  
2 includes Allentown numbers.

3 A. It includes Allentown, which is part of the local  
4 calling area.

5 BY ATTORNEY SWINDLER:

6 Q. Is it the position of Verizon North that if a New  
7 Tripoli customer has a need to use a bank, for  
8 example, and a bank exists in Allentown, 20 miles  
9 away, and gasoline, as Ms. Reese said in her testimony  
10 is over \$2.00 a gallon now, the New Tripoli customer  
11 does not need to use a bank in Schnecksville, only ten  
12 miles away because they already have access to a bank  
13 in Allentown?

14 A. They have access to call a bank in Allentown.

15 Q. Same with the grocery store and the doctor and the  
16 other businesses and so forth?

17 A. Yes. I don't normally call the grocery store.

18 Q. On page 15, line 5, your testimony is that there  
19 are many interexchange carriers currently providing  
20 service in this exchange. I suppose that's the New  
21 Tripoli exchange? Do you happen to have a list of  
22 those interexchange carriers?

23 A. No, I don't.

24 Q. You continue on, some of which offer bundled  
25 service packages. Do you have examples of those

1 bundled service packages?

2 A. I don't have them with me, but I know many of the  
3 carriers offer packages which include local, toll, and  
4 optional services.

5 Q. When you talk about the competitive local exchange  
6 carriers at the bottom of page 15, you reference the  
7 Commissions Utility Choice website. How many of these  
8 posted CLECs did you verify offer service within the  
9 New Tripoli exchange?

10 A. I didn't call any of them.

11 Q. If you know, I think I'm correct, but even if a  
12 CLEC, a competitive local exchange carrier offered  
13 service in the New Tripoli exchange, don't they mirror  
14 the incumbent LECs anyway?

15 A. They usually mirror the local calling area, yes.

16 Q. So even if a CLEC was there to provide alternative  
17 service, they would likely provide the same local  
18 calling area that Verizon North already provides,  
19 which excludes the Ironton exchange?

20 A. That's right.

21 Q. On page 17 of your testimony, line 4, you testify  
22 that the toll-free calling area available to New  
23 Tripoli exchange customers is consistent with that  
24 offered to other Verizon North Customers in similarly  
25 situated exchanges. Is that what you said?

1 A. Yes.

2 Q. Now, with regard to similarly situated exchanges,  
3 I'll just --- can you provide any example of another  
4 Verizon North exchange that similarly leapfrogs a  
5 closer exchange like Ironton to provide service in  
6 Allentown?

7 A. I don't think that it leapfrogs, because even  
8 though you have the maps that have the roads on them,  
9 on the roads they show these areas right near each  
10 other, by exchanges, nothing has been leapfrogged to  
11 get to Allentown.

12 Q. Do you know how the Verizon North facilities are  
13 placed to provide service from New Tripoli to  
14 Allentown?

15 A. No, I don't.

16 ATTORNEY SWINDLER:

17 Can I have just a moment, Your Honor?

18 JUDGE JANDEBEUR:

19 Yes.

20 ATTORNEY SWINDLER:

21 That's all I have, Your Honor.

22 JUDGE JANDEBEUR:

23 Ms. Miller, I can either allow you to do  
24 your Redirect at this point, or I have some questions.  
25 So if you want to hear those first, that may

1 facilitate whatever Redirect, rather than going  
2 through it all several times.

3 ATTORNEY MILLER:

4 That's fine.

5 JUDGE JANDEBEUR:

6 Do you have Mr. George's testimony in  
7 front of you?

8 A. No, I don't.

9 JUDGE JANDEBEUR:

10 I'll get you one. I thought I had two,  
11 but I don't. Rhonda, do you have one?

12 ATTORNEY SWINDLER:

13 I have an extra copy.

14 JUDGE JANDEBEUR:

15 I got one, never mind. You can go ahead  
16 and sit down. If you look at Mr. George's testimony  
17 on page nine, which I'm going to give to you in just a  
18 second, you'll see down at the bottom of the page, he  
19 says that Ironton was able to implement this EAS route  
20 with existing facilities at no increase in rate to its  
21 taxpayers. Those trunking facilities route the  
22 traffic from Ironton south to Verizon North.

23 ATTORNEY SWINDLER:

24 Did you say ratepayers, Your Honor?

25 JUDGE JANDEBEUR:

1 I'm not sure. I tried to read ---.

2 ATTORNEY SWINDLER:

3 I believe you said taxpayers, I believe  
4 you meant ratepayers.

5 JUDGE JANDEBEUR:

6 Okay. Rates to it's ratepayers, sorry.  
7 Does the ability to go in the other direction exist at  
8 the Verizon North facilities now?

9 A. Yes, it does.

10 JUDGE JANDEBEUR:

11 I think you testified, if I understood,  
12 that was your testimony that there's no further  
13 facilities needed.

14 A. That's correct.

15 JUDGE JANDEBEUR:

16 So the ability is there to do it.

17 A. That's correct.

18 JUDGE JANDEBEUR:

19 Then if you look at your own testimony,  
20 the proprietary version, do you now have a copy ---  
21 you know what it says, obviously.

22 A. Yes.

23 JUDGE JANDEBEUR:

24 If you go to your testimony on page ten,  
25 when we're talking numbers, is it your testimony that

1 that \$3.12 in the first year and nine cents every  
2 thereafter, is that going to cover those costs?

3 A. It will cover the costs that are on page ten.

4 JUDGE JANDEBEUR:

5 Yes.

6 A. Yes.

7 JUDGE JANDEBEUR:

8 So it's over a period of time, do you  
9 know what that period of time is?

10 A. The 26 cents that we talk about, that's for the  
11 first year. That would cover the cost of customer  
12 notification and tariff filings. Then after that it's  
13 just the toll cost recovery, the nine cents.

14 JUDGE JANDEBEUR:

15 In order to implement, if this EAS were  
16 approved, in order to implement this EAS, because of  
17 the language in your Chapter 30, would you need to go  
18 through a rate filing or no? Do you know what I'm  
19 asking you?

20 A. Yes.

21 JUDGE JANDEBEUR:

22 In order to add this additional charge  
23 onto the customer's, would you have to file a rate  
24 case, or because of the language of Chapter 30?

25 A. We would file a tariff.

1                   JUDGE JANDEBEUR:

2                   A tariff change?

3 A.   A tariff change to add the surcharge to the New  
4 Tripoli exchange.

5                   JUDGE JANDEBEUR:

6                   That's all that would be needed?

7 A.   That's all that would be needed.

8                   JUDGE JANDEBEUR:

9                   Until a new rate case comes up?

10 A.   That's correct.

11                   JUDGE JANDEBEUR:

12                   How long is Chapter 30 effective for, the  
13 tariff that's in place now?

14 A.   I ---.

15                   JUDGE JANDEBEUR:

16                   You don't know.   Okay.

17                   ATTORNEY MILLER:

18                   I believe, Your Honor, amended plans are  
19 before the Commission now, based on the new Chapter 30  
20 that just went into effect, but the amendments to the  
21 plans wouldn't change the original conditions, it was  
22 additional things that were added to the new Chapter  
23 30.

24                   JUDGE JANDEBEUR:

25                   The Verizon North tariff is online,

1 available online?

2 A. Yes.

3 JUDGE JANDEBEUR:

4 And Chapter 30 is in that?

5 A. It's not part of the tariff, Chapter 30.

6 JUDGE JANDEBEUR:

7 Chapter 30 is the reg?

8 A. Regulations, yes.

9 ATTORNEY MILLER:

10 It's the Statute, Your Honor.

11 JUDGE JANDEBEUR:

12 It's the statute, okay. I'm going to  
13 take judicial notice of your tariff so that I can g  
14 online and look at it; does anybody have any proble  
15 with that? Okay. That just means that you don't h  
16 to submit it. I'll just look at it online.

17 ATTORNEY SWINDLER:

18 Just to warn you, Your Honor, as long  
19 you verify again which tariff.

20 JUDGE JANDEBEUR:

21 Verizon North.

22 ATTORNEY SWINDLER:

23 Verizon North has a number of differen  
24 tariffs, so get the right number.

25 JUDGE JANDEBEUR:

1 Okay.

2 ATTORNEY MILLER:

3 It is the number 3 tariff.

4 JUDGE JANDEBEUR:

5 Thank you. Would it be your testimony  
6 that should the EAS be approved and Verizon North tags  
7 on that \$3.12 annual charge, that because of the low  
8 volume that you've testified to, the other customers  
9 would be unhappy?

10 A. What would happen is, if we were able to put the  
11 charge on, we would have to poll the customers to see  
12 if they're willing to pay that charge. We would have  
13 to send a notification with a ballot, they would have  
14 to fill out the ballot to see if they agree to the  
15 increase in order to get that as part of the local  
16 calling area.

17 JUDGE JANDEBEUR:

18 What if they said no?

19 A. Then it wouldn't go through.

20 JUDGE JANDEBEUR:

21 On your page four, your testimony, where  
22 you changed that first number, did the second number  
23 stay the same or does the second number also change?

24 A. No, that stayed the same.

25 JUDGE JANDEBEUR:

1 That's all my questions. Redirect, Ms.  
2 Miller?

3 ATTORNEY MILLER:

4 Thank you, Your Honor.

5 REDIRECT EXAMINATION

6 BY ATTORNEY MILLER:

7 Q. Ms. Ryan, Mr. Swindler asked you about why, in  
8 making your traffic calculations, you only used the  
9 access lines PIC'd to Verizon North; do you remember  
10 that testimony?

11 A. That's correct.

12 Q. In your experience, is Verizon North able to get  
13 access line or call information from the other  
14 carriers that would be carrying the traffic?

15 A. No.

16 Q. At the bottom of page four of your testimony, Mr.  
17 Swindler pointed out that the New Tripoli exchange is  
18 actually located in the Philadelphia rather than the  
19 Northeast LATA; do you see that testimony?

20 A. Correct.

21 Q. For toll traffic purposes, does it make any  
22 difference what LATA the New Tripoli exchange is  
23 located in?

24 A. No.

25 Q. Why?

1 A. Because where the customer wants to call is still  
2 on that same LATA.

3 Q. At the bottom of page 5, lines 22 and 23, Mr.  
4 Swindler asked you some questions about, wouldn't you  
5 agree that the needs of the New Tripoli customers must  
6 have changed over the years; do you remember that  
7 testimony?

8 A. Yes.

9 Q. Why doesn't Verizon North change the local calling  
10 area of an exchange as the needs of the customers  
11 change?

12 A. Well, the majority of the time, we don't know that  
13 the needs of the customers have changed. If the  
14 traffic isn't there, it tells us that the call volumes  
15 haven't gone up.

16 Q. What would happen if the company changed the local  
17 calling area of an exchange every time the needs of  
18 the customers in that exchange shifted from one place  
19 to another?

20 A. The calling areas would be huge.

21 Q. At page six and seven, Mr. Swindler also pointed  
22 out that the rates included in your testimony were  
23 inaccurate; do you see that testimony?

24 A. Yes.

25 Q. Does the fact that the monthly rate shown on page

1 six and seven have any effect on the traffic volumes  
2 that you would have in your testimony?

3 A. No.

4 Q. At the top of page nine, you're talking about the  
5 toll traffic information and the data for this  
6 particular route; do you see that testimony?

7 A. Yes.

8 Q. What are the EAS requirements for traffic  
9 thresholds?

10 A. The percentage is 50 percent of the customers  
11 calling from the terminating exchange to the receiving  
12 exchange and 5.5 calls per customer.

13 Q. Could you restate your response? I believe you  
14 said from the terminating exchange to the receiving  
15 exchange?

16 A. From the receiving exchange, no.

17 Q. Use New Tripoli and Ironton.

18 A. Customers, there would have to be 50 percent of  
19 the customers calling from New Tripoli to Ironton, and  
20 5.5 calls per customer in New Tripoli to Ironton.

21 Q. At page 12, Mr. Swindler had a discussion with you  
22 regarding the 67 cents per month that Ms. Reese is  
23 paying now for toll calls versus the 35 cents that she  
24 would pay with the surcharge if EAS were implemented.  
25 Do you remember that testimony?

1 A. Yes.

2 Q. Isn't it true that all extended area of service  
3 cases, what the customer pays for toll calls before  
4 implementation of EAS is more than what the customer  
5 will pay after EAS is implemented?

6 A. Yes.

7 Q. Does the fact that the customer's telephone bill  
8 will be reduced if EAS is implemented justify in all  
9 cases that EAS should be implemented?

10 A. No.

11 Q. Mr. Swindler asked you a number of questions about  
12 Verizon North Exhibit Number One, and about your  
13 testimony on pages 13 and 14 regarding the businesses  
14 in the local calling area. Was the intent of that  
15 exhibit and your testimony to show the physical  
16 location of all of the businesses listed?

17 A. No.

18 Q. What was the intent of the exhibit and the  
19 testimony meant to be?

20 A. To show the availability of businesses in the  
21 local calling area.

22 Q. Whose decision is it for a competitive local  
23 service provider to implement service in a particular  
24 exchange?

25 A. It's up to the competitive local service provider

1 to file with the Commission to be able to offer  
2 service.

3 Q. If the CLEC is authorized to provide service, does  
4 it have to provide service in every exchange in  
5 Pennsylvania?

6 A. No.

7 Q. You also testified that in most cases the CLEC  
8 offers the same local calling area as the incumbent  
9 local exchange carrier; correct?

10 A. That's correct.

11 Q. What other factors may come into play that would  
12 provide a Verizon North customer with an alternative?

13 A. The CLEC may be offering a different bundle or  
14 package.

15 Q. Mr. Swindler also asked you some questions about  
16 your testimony on page 17 at lines 4, 5, and 6  
17 regarding similarly situated exchanges. When you  
18 prepared your testimony, did you mean similarly  
19 situated exchanges in a physical sense?

20 A. No, usually by access lines, the number of access  
21 lines the customers can call.

22 ATTORNEY MILLER:

23 Thank you, Your Honor, nothing further.

24 JUDGE JANDEBEUR:

25 Does that raise anything for you?

1                   ATTORNEY SWINDLER:

2                   Your Honor, actually something that you  
3 asked. I do have one question.

4                   JUDGE JANDEBEJR:

5                   Go ahead.

6 RE CROSS EXAMINATION

7 BY ATTORNEY SWINDLER:

8 Q. Ms. Ryan, are you absolutely certain that  
9 implementation of a surcharge would require polling of  
10 the customers?

11 A. Yes.

12 Q. Would the surcharge be considered part of the  
13 local service charge?

14 A. It would be a separate charge.

15 Q. It's not part of the local service charge; right?

16 A. No.

17 Q. Can you point me to where in the Commission's EAS  
18 regulations it says that implementation of a surcharge  
19 that isn't part of the local service charge requires  
20 polling of customers?

21 A. I don't think it specifically says it, but we  
22 can't put a charge on a customers bill without ---  
23 especially to raise the rate without them agreeing to  
24 it.

25 Q. Are you involved at all with Verizon North Chapter

1 30 filings?

2 A. No.

3 Q. You're not involved with the rate rebalancings or  
4 the price of building mechanism filings that might  
5 include increase in rates?

6 A. I did the rate rebalancing for the dial tone line  
7 charges that were changed.

8 Q. Did you poll the customers?

9 A. No, we sent them a notice.

10 Q. So you sent them a customer notice, you didn't  
11 poll the customers?

12 A. No.

13 Q. Do you have reason to disagree with me that when  
14 you look at Section 63.74, the Commission's EAS  
15 regulations, at Section (7). It says a poll is not  
16 required when usage standards are met on a specific  
17 route and there will be no increase in the local  
18 service charge?

19 A. I agree, because you're reading from the ---.

20 ATTORNEY SWINDLER:

21 That's all I have, thank you.

22 MS. REESE:

23 If I may, Your Honor.

24 JUDGE JANDEBEUR:

25 I'm sorry.

1                   MS. REESE:

2                   I just have a couple questions, can I ask  
3 them?

4                   JUDGE JANDEBEUR:

5                   Yes, I'm assuming you're just going to  
6 have to deal with this last question?

7                   ATTORNEY MILLER:

8                   Yes.

9                   JUDGE JANDEBEUR:

10                  Why don't we just stay, and I will  
11 remember that you'll want to ask some?

12                  ATTORNEY SWINDLER:

13                  Sure.

14 REDIRECT EXAMINATION

15 BY ATTORNEY MILLER:

16 Q.    Would you look at that paragraph that Mr. Swindler  
17 referred to you and explain why poll in this case  
18 would be necessary if the surcharge were to be  
19 implemented?

20 A.    I'll read this again.  A poll is not required when  
21 usage standards are met on a specific route and there  
22 will be no increase in the local service charge for  
23 extending the local calling area.  Normally, if we're  
24 extending the local calling area and there's not going  
25 to be any rate increase, regardless of whether there's

1 not going to be any surcharge, there's not going to be  
2 any increase to the customer at all, there is no poll  
3 required. I know on previous cases, as in the Wilhelm  
4 case, we did poll the customers regarding the  
5 surcharge.

6 Q. The beginning of that section says, when usage  
7 standards are met on a specific route. Has that been  
8 satisfied in this case, the calling from New Tripoli  
9 to Ironton?

10 A. No.

11 ATTORNEY MILLER:

12 Thank you. Thank you, Your Honor.

13 JUDGE JANDEBEUR:

14 Ms. Reese?

15 MS. REESE:

16 I just got a little lost here. I'm not  
17 clear as to what the \$3.12 represents.

18 A. I think that's an annual.

19 JUDGE JANDEBEUR:

20 I think he multiplied it out. I'm  
21 assuming that Mr. Swindler multiplied the 27 cents  
22 times 12 and came up with \$3.12.

23 MS. REESE:

24 Okay. That's all right.

25 ATTORNEY SWINDLER:

1 Twenty-six (26) cents, Judge.

2 JUDGE JANDEBEUR:

3 Twenty-six (26).

4 MS. REESE:

5 I was just a little confused as to where  
6 that come from.

7 JUDGE JANDEBEUR:

8 Yes, we just switched to an annual.

9 RE CROSS EXAMINATION

10 BY MS. REESE:

11 Q. I also have a question concerning, why is New  
12 Tripoli under the highest rate thing?

13 A. Because of the number of access lines that you  
14 have access to call.

15 Q. But in my testimony there were customers that I  
16 talked to that their rates were lower and they can  
17 access more areas? I don't understand that. I mean,  
18 I know \$6-something right off the top of my head came  
19 up as to areas that certainly have more calling areas  
20 than what New Tripoli has.

21 A. Well, I think it was \$6.48 that you're referring  
22 to?

23 Q. I'm not 100 percent sure.

24 A. Is the dial tone line charge. That doesn't  
25 include the usage.

1 Q. The \$6.85, what I did here was all the numbers for  
2 unlimited local calls. It was \$6.85 for Allentown  
3 residents, \$6.85 for Slatington residents and \$8.10  
4 for New Tripoli residents, which obviously I have  
5 right, you confirmed that. Both of those areas have  
6 more areas that they can call to. So Allentown has 18  
7 areas, Slatington has eight areas, New Tripoli has the  
8 least. How did they end up being the highest calling  
9 rate?

10 A. I'd have to look at the number of access lines  
11 they can call. It doesn't go by how many areas you  
12 can call. It goes by the number of access lines you  
13 can call.

14 Q. Well, both of those areas include Allentown, which  
15 New Tripoli does, plus additional places, so I would  
16 think that their lines would be more.

17 A. But the rates are different in Verizon North,  
18 which is New Tripoli, and Allentown is former Bell  
19 Atlantic. So the monthly rates are different. I'd  
20 have to look it up when I get back to the office. I  
21 don't have the Allentown information here.

22 MS. REESE:

23 Just maybe two more questions, is that  
24 okay?

25 JUDGE JANDEBEUR:

1                   Go ahead.

2 BY MS. REESE:

3 Q.   We talked about the New Tripoli customer rate  
4 coming down if the EAS is approved.  Have you ever had  
5 a situation where people wanted this and their rates  
6 were going to go up?  It was sort of implied that we  
7 were doing this because your rate would come down.  I  
8 would think that would be the basic reason why people  
9 are trying to get an EAS?

10 A.   We've had cases where if the EAS was implemented  
11 the customer would be put into the next rate band, so  
12 the rate would go up.

13 Q.   But depending on their of volume calls, they could  
14 end up actually not actually paying less money per  
15 month on their phone bill?

16 A.   On their phone bill, that's correct.

17 Q.   So implying that your rate coming down is a bad  
18 reason to do this, doesn't make any sense.

19 A.   I don't understand what you are saying.

20 Q.   When Ms. Miller just questioned you, she kind of  
21 implied that one of the reasons I'm pursuing this is  
22 that my phone bill will come down.  Well, doesn't that  
23 make sense to you?  That my phone bill will come down  
24 by pursuing this EAS?

25                   MS. REESE:

1           Your Honor, I believe we're kind of  
2 talking over one another. The rates to be charged to  
3 New Tripoli customers will not change as a result of  
4 the EAS. However, some customers telephone bills,  
5 overall, will go down, others will not. But that's  
6 not bad thing. I guess is what I'm trying to  
7 establish. We're trying to make that sound like  
8 that's a bad thing, I'm not getting where it is.

9           ATTORNEY MILLER:

10           I don't remember that. Of course it's  
11 not a bad thing if it all goes down.

12           MS. REESE:

13           Just one more question.

14 BY MS. REESE:

15 Q. In talking about going with this EAS, it keeps  
16 coming up alternative methods of making your phone  
17 call, obviously, so that you don't have pay the toll  
18 charge from New Tripoli to Schnecksville. We're also  
19 considering the amount of traffic volume that goes  
20 from New Tripoli to Schnecksville, which has bearing  
21 on whether or not this is approved. However, if all  
22 of the people who already make large volumes of calls  
23 to the Schnecksville area have gone to alternative  
24 methods, and you have no way of polling those --- this  
25 is sort of a no win situation even now. If all of the

1 residents of New Tripoli decide that, okay, they're  
2 not going to put this through. We're all going to get  
3 alternative methods so that we can call Schnecksville  
4 without paying a toll, by using our cell phones, by  
5 using e-mail, all of the ways that have been listed in  
6 testimony. Ten years down the line, should this come  
7 up again, the same answer is going to be here.  
8 There's no traffic, because everybody figured out for  
9 themselves how to do something about it. So I don't  
10 understand how the traffic surveys are any true  
11 representation of what's going on at this point. Do  
12 you believe that ---?

13 A. Yes. The traffic is --- this is the traffic that  
14 we're carrying for customers that are PIC'd to us.  
15 That's all I can go by.

16 Q. But it's no way indicative of the traffic from the  
17 total calling area ---.

18 A. I don't have that ---.

19 JUDGE JANDEBEUR:

20 Ms. Reese. This is your opportunity to  
21 ask questions. We know your position on it, so you  
22 don't need to re-testify as to your position. Do you  
23 have any more questions for her?

24 MS. REESE:

25 No, I just wanted to know if there was

1 anyway to accurately know what the traffic was.

2 JUDGE JANDEBEUR:

3 Anything from either of the attorneys  
4 additional?

5 ATTORNEY MILLER:

6 No, thank you.

7 JUDGE JANDEBEUR:

8 Everybody rests?

9 ATTORNEY SWINDLER:

10 Your Honor, I believe Ironton Cross  
11 Exhibits One and Two need to be admitted into the record.

12 ATTORNEY MILLER:

13 As well as Verizon North's Statement One  
14 and Verizon North Exhibit Number One.

15 JUDGE JANDEBEUR:

16 Okay. Well, first Ms. Miller, do you  
17 have any objections to the Cross Exhibits?

18 ATTORNEY MILLER:

19 No.

20 JUDGE JANDEBEUR:

21 They are so admitted. Mr. Swindler, do  
22 you have any objections to the Verizon exhibit?

23 ATTORNEY SWINDLER:

24 No, Your Honor.

25 JUDGE JANDEBEUR:

1 Ms. Reese?

2 MS. REESE:

3 No.

4 JUDGE JANDEBEUR:

5 They are so admitted. You may step down,  
6 Ms. Ryan.

7 Now, do we need to put closing statements  
8 on the record?

9 ATTORNEY MILLER:

10 I have nothing, Your Honor.

11 JUDGE JANDEBEUR:

12 Okay.

13 ATTORNEY SWINDLER:

14 If you desire a closing statement, I'd be  
15 glad to make one, Your Honor.

16 JUDGE JANDEBEUR:

17 No, I do not. I think I understand  
18 everybody's position. As the Complainant, do you feel  
19 like you would like to have an opportunity to put a  
20 closing statement on the record?

21 MS. REESE:

22 I'm sure I said what I needed to.

23 JUDGE JANDEBEUR:

24 All right. Then we are finished here  
25 today.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

ATTORNEY SWINDLER:

Thank you, Your Honor.

JUDGE JANDEBEUR:

Mr. George, are you still here?

MR. GEORGE:

Yes, I am.

JUDGE JANDEBEUR:

Thank you, sir. We are going to  
disconnect. We are finished.

MR. GEORGE:

Thank you.

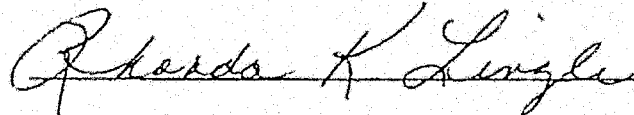
\* \* \* \* \*

HEARING CONCLUDED

\* \* \* \* \*

C E R T I F I C A T E

1  
2  
3 I hereby certify, as the  
4 stenographic reporter, that the foregoing  
5 proceedings were taken stenographically by  
6 me, and thereafter reduced to typewriting  
7 by me or under my direction; and that this  
8 transcript is a true and accurate record  
9 to the best of my ability.  
10

11  
12   
13 Court Reporter  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JEAN REESE,

Complainant

v.

VERIZON NORTH INC.,

Respondent

**DOCKETED**

JUL 14 2005

Docket No. C-20043520

**DOCUMENT  
FOLDER**

---

DIRECT TESTIMONY OF REGINA RYAN  
ON BEHALF OF VERIZON NORTH INC.

---

**PROPRIETARY VERSION**

**RECEIVED**

JUN 01 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dated: May 11, 2005  
Admitted: May 17, 2005

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JEAN REESE

Complainant

v

Docket No. C-20043520

VERISON NORTH INC.

Respondent

**DOCKETED**  
JUL 14 2005

The attached are signatures totaling over 200 of Verison North customers in the 298 prefix area.

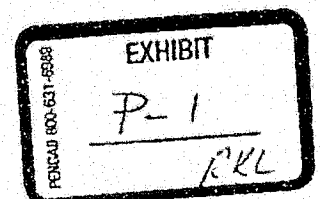
The undersigned support he request for extension of local calling area to include Schnecksville exchanges 769 & 799

**RECEIVED**

JUN 11 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**DOCUMENT  
FOLDER**



WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE- DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 799 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Ronald Smith	Ronald Smith	7567 Bausch Rd New Tripoli Pa
2	Derric Allen	<i>[Signature]</i>	8158 Alleraengel Rd New Tripoli PA
3	Joh. W. Hansousky	<i>[Signature]</i>	7892 Sarsofans Pl New Tripoli Pa.
4	Suzanne Casale	Suzanne Casale	7085 Ulrich Mill Rd New Tripoli, 18066
5	DON ROPPANT	<i>[Signature]</i>	6344 ROUTE 309 NEW TRIPOLI PA
6	Andrew Casale	ANDREW J CASALE	7085 ULRICH MILL RD New Tripoli PA 18066
7	<i>[Signature]</i>	Dwight E Henricks	6239 RT 309 Greensville PA 18053
8	Brian Baker	<i>[Signature]</i>	7273 Admitt New Tripoli PA 18066
9	Wm. R. Beisel, Jr.	Wm. R. BEISEL, JR.	7545 Kings Hwy New Tripoli, Pa 18066
10	Darel Schuler	<i>[Signature]</i>	7670 King Highway New Tripoli PA 18066
11	Dean Miller	Dean Miller	5065 Berry Dr New Tripoli 18066
12	Jesse Hunsberger	<i>[Signature]</i>	4537 Senny Ct. New Tripoli, 18066
13	Susan Stadler	S. Stadler	6629 Jefferson Ct New Tripoli PA 18066
14	Steph Herlinger	Steph Herlinger	7708 Herstracht New Tripoli PA 18066
15	Shelly Age	<i>[Signature]</i>	7164 RT 309 New Tripoli PA 18066
16	Todd Baer	<i>[Signature]</i>	6920 Rockland Rd. New Tripoli PA 18066
17	Shawn Hansut	Shawn Hansut	7794 Sechler Rd New Tripoli PA 18066
18	Shanna Matthews	Shanna Matthews	5737 Peiffer Cir Greensville PA 18053
19	David Knoedler	David W. Knoedler	New Tripoli PA
20	TAMARA FLAAS	<i>[Signature]</i>	4708 RT. EVERETT RD New Tripoli, PA 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Kernot Delong		6919 Weiss Rd New Tripoli PA
2	Bernadette Calser		7559 Dresher Rd Hampton Pa 19529
3	Diana Billig		4907 Selbach Rd New Tripoli PA
4	Beth Ann Senouel		7223 Old Orchard Ct. New Tripoli PA 18066
5	Aileen Yadush		7434 Falcon Ct New Tripoli, PA 18066
6	Trevor Koch		7768 Fort Everett Rd New Tripoli, PA 18066
7	Keith Rex		6939 Monmouth Rd New Tripoli, PA 18066
8	James Dragoni		6264 Glen Ct Germanville PA 18053
9	Karen Haas		6562 Knoll Ct New Tripoli, Pa. 18066
10	CHRISTINE PIERCE		8119 LAUREL CT New Tripoli PA 18066
11	<del>Ed KLOSARITZ</del>	<del>6435 BAKSEVEN RD Germanville PA</del>	<del>610 767-1799</del>
12	CARL HERMAN		7126 HALPIN RD NEW TRIPOLI PA
13	Carol Keith		6872 Sweitzer Rd New Tripoli 18066
14	Tonya		7382 Lincoln Ct New Tripoli
15	Melissa Marx		7126 Hoffacker Ct New Tripoli Pa
16	Shellyn Ritter		1811 WEISS Rd New Tripoli, Pa 18066
17	Phara Giraldo		5853 Bachman New Tripoli
18	Susan Giraldo		8140 Weaver Ct. New Tripoli, PA 18066
19	Constance Finley		4485 Windy Ln Rd New Tripoli PA 18066
20	sarah Murray		7427 Aulemaer Rd New Tripoli, PA

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 799 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Robert Fenstermaker		7159 Spring Lane Rd New Tripoli, PA 18066
2	Christine Lenhart	Christine Lenhart	7222 Decatur St. New Tripoli, PA 18066
3	Gary Best		7934 Sassafras Rd New Tripoli, Pa
4	CHRIS CAFFYN		6619 MEMORIAL RD. NEW TRIPOLI PA
5	LINDA HREPNK		7976 SASSAFRAS ROAD NEW TRIPOLI, PA
6	Angelique Christian	Angelique Christian	7240 Gun Club Rd New Tripoli, PA 18066
7	Jerry Jukanic		8005 Penny Ct. New Tripoli, PA
8	Jeremy Blase		7070 Rt 309 New Tripoli PA 18066
9	Cynthia L. Chambers	Cynthia L. Chambers	7811 Decatur St. New Tripoli, PA 18066
10	RANDY L KUNTZ		6757 MADISON ST APT B NEW TRIPOLI
11	Jennifer McAvoy		7416 Kings Hwy New Tripoli, PA 18066
12	marianne Richardson	Maryanne Richardson	7465 Rt 309 New Tripoli Pa 18066
13	Thomas Kovalick	Thomas Kovalick	4022 Five Point Rd New Tripoli, PA 18066
14	P-Ann Blatke		7679 Hilltop Ct. New Tripoli, Pa 18066
15	Peggy Laxson		6705 Jefferson Ct. New Tripoli PA 18066
16	Diane Doleiden		8487 Carper Rd New Tripoli PA 18066
17	Ann Reiter		70165 Herber Rd New Tripoli, PA 18066
18	Gene Tapper		6750 KOA DR New Tripoli, PA 18066
19	Micki Tapper		6750 KOA DR. New Tripoli, Pa 18066
20	Karen Sue Rex		5068 Schochary Rd. New Tripoli, PA 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Pamela J Sutphen	Pamela J Sutphen	8009 Kings Hwy Lynnport, PA 18066
2	James D. Bachman	James D Bachman	18095 Bausch Rd New Tripoli, PA 18066
3	Melinda Rose	Melinda Rose	6994 Demas Peak New Tripoli PA 18066
4	Ania Bachman	Ania Bachman	7492 Ulrich Mill Rd. New Tripoli, PA 18066
5	Greg RASSLER Greg Ressler	Greg Ressler	7195 Cedar Drive New Tripoli, Pa. 18066
6	Phillip Castrine	Phillip Castrine	616 Washington St New Tripoli, Pa 18066
7	Leonard Rex	Leonard Rex	5068 Schochong Pt New Tripoli 18066
8	James SUTJAK	James SUTJAK	4816 Ross Valley New Tripoli 18066
9	CRAIG GIMBEL	Craig Gimbel	6890-1 Rte 309 NEW TRIPOLI, PA
10	Paul	Paul	6825 LEE CT, NEW TRIPOLI, PA
11	TERRI KNOEXER	Terri Knoexer	6821 Ulrich Mill Rd. New Tripoli, PA 18066
12	William Fozal	William Fozal	7399 Autumn Rd New Tripoli, Pa 18066
13	FLA MEDIC RICH	Fla Medic Rich	75492 <del>Ulrich Mill Rd</del> New Tripoli Pa
14	DAVID WRIGHT	David Wright	7500 Kings Hwy NEW TRIPOLI PA 18066
15	TOM MURPHY	Tom Murphy	7628 20.5 Loop Rd New Tripoli PA 18066
16	Jennie L Cope	Jennie L Cope	Lantz Rd New Tripoli, Pa 18066
17	Jay B Cope	Jay B Cope	
18	Loreyn Mitchell	Loreyn Mitchell	7067 Ulrich Mill Rd New Tripoli PA 18066
19	JOAN HAYES	Joan Hayes	8261 Weaver Ct NEW TRIPOLI, PA 18066
20	Glenis Mance	Glenis Mance	8655 Mance Rd New Tripoli, PA

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 799 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Ruth T. Morris	Ruth T. Morris	6770 Flint Hill Rd. New Tripoli, PA 18066
2	Kathy Troxell	Kathy Troxell	6751 Hunters Hill Rd. New Tripoli, PA 18066
3	Dawn Howell	Dawn Howell	7295 Adams St New Tripoli PA 18066
4	Tim S. Eves	Tim S. Eves	7421 Gun Club Rd New Tripoli, PA 18066
5	Kenneth HATHel	Kenneth HATHel	6724 Madison St New Tripoli, PA 18066
6	JEAN MILLER	Jean Miller	6833 Schiller Rd New Tripoli, PA 18066
7	TODD STANLEY	Todd Stanley	2609 Zeisloff Rd New Tripoli, Pa. 18066
8	Linda Brady	Linda Brady	7192 Birch Mill Rd New Tripoli, Pa 18066
9	Lisa Kresse	Lisa Kresse	6913 Route 309 New Tripoli, Pa 18066
10			
11	<del>XXXXXXXXXX</del>		
11	Peggy Powell	Peggy Powell	6083 Schochary Rd New Tripoli PA 18066
12	Lois Schneider	Lois Schneider	6825 Mosserville Rd 18066
13	Robert E. Ressler Robin E. Ressler	Robert E. Ressler	8660 Kistler Valley Rd. Kempton, PA 19529
14	Robert S. Nester	Robert S. Nester	6026 Mt. Romp. Germantown, Pa 18033
15	LISA HERRMANN	Lisa Herrmann	8844 Perry Ln Ct Kempton PA 19529
16	Mary Ellen Place	Mary Ellen Place	7655 Hilltop Ct. New Tripoli PA 18066
17	James R. Place	James R. Place	7143 Straw Berry Ct New Tripoli
18	Crystal Reis	Crystal Reis	7030 Springhouse Rd New Tripoli
19	P. J. Tull II	P. J. Tull II	9447 Behrman Rd Schnecksville PA 18055
20	John Kennedy	John Kennedy	7262 Decatur St New Tripoli Pa. 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE- DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	ANDY GEORGE	<i>[Signature]</i>	858028 Springfield Rd New Tripoli PA 18066
2	Mike Whit	<i>[Signature]</i>	4322 Riva Road New Tripoli PA 18066
3	PA R. BULLA	<i>[Signature]</i>	PA 18066 NT, PA 18066
4	<i>[Signature]</i>	<i>[Signature]</i>	New Tripoli PA 18066
5	JOHN SCHERL	<i>[Signature]</i>	7786 WEISENBERG C <sup>110</sup> NEW TRIPOLI PA 18066
6	SOCIETE STRONG	<i>[Signature]</i>	New Tripoli
7	JASON KERSCHNER	<i>[Signature]</i>	8471 Kings Hwy Kempton PA 19529
8	Cody Shultz	<i>[Signature]</i>	1567 King & Hwy NEW TRIPOLI PA 18066
9	Janice Bortz	<i>[Signature]</i>	7185 Logan Dr. New Tripoli PA 18066
10	Don Bullog	<i>[Signature]</i>	6806 Rt. 305 (St 300) New Tripoli PA 18066
11	Michelle Strong	<i>[Signature]</i>	6918 Whitetail Ct New Tripoli, PA 18066
12	WM SYMONS	<i>[Signature]</i>	7509 RUMMARD NEW TRIPOLI PA 18066
13	SUSAN SNYDER	<i>[Signature]</i>	6881 Lentz Rd New Tripoli PA 18066
14	Brian Snyder	<i>[Signature]</i>	6719 MADISON ST New Tripoli, PA 18066
15	Colleen Anderson	<i>[Signature]</i>	1953 Kings Hwy New Tripoli PA
16	TRACEY EHRET	<i>[Signature]</i>	6191-4 Schrockway Rd New Tripoli PA
17	MARK NEWMAN	<i>[Signature]</i>	7711 SEELER RD N.T., PA, 18066
18	Judy Horn	<i>[Signature]</i>	9635 W. Kempton RD Kempton PA 19529
19	Timothy J. Ginn	<i>[Signature]</i>	6682 Madison St N.T. PA 18066
20	Joell Vennera	<i>[Signature]</i>	7880 Cassabys Rd New Tripoli PA 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Josc Grimaldo	<i>Josc Grimaldo</i>	3999 Steinsville Rd. Kempston, PA 19529
2	Harley Newman	<i>Harley Newman</i>	2096 Kings Hwy New Tripoli PA
3	<i>D. W. ...</i>	<i>D. W. ...</i>	New Tripoli
4	Banks Malloy	<i>Banks Malloy</i>	Flint Hill Rd New Tripoli, Pa
5	Justine Herringer	<i>Justine Herringer</i>	New Tripoli
6	Ed Bockman	<i>Ed Bockman</i>	New Tripoli
7	Jackie Scott	<i>Jackie Scott</i>	New Tripoli
8	Ed Reiter Jr	<i>Ed Reiter Jr</i>	7065 Heber Road New Tripoli, PA 18066
9	Robert M. Hendricks	<i>Robert M. Hendricks</i>	6682 Memorial Rd NEW TRIPOLI PA 18066
10	Cynthia Miller	<i>Cynthia Miller</i>	7607 Allamcappel Rd New Tripoli PA 18066
11	Karen Winiarz	<i>Karen Winiarz</i>	8249 Sun Club Rd New Tripoli PA 18066
12	STANLEY BILLYG	<i>Stanley Billyg</i>	6895 Golden Key Rd New Tripoli 18066
13	MARLIN Metzger	<i>Marlin Metzger</i>	6334 Lg Ct New Tripoli Pa 18066
14	Karen Keichel	<i>Karen Keichel</i>	6764 Flint Hill Rd New Tripoli
15	Ed Keichel	<i>Ed Keichel</i>	" "
16	Rose Blithe	<i>Rose Blithe</i>	New Tripoli Pa
17	PATRICIA GROW	<i>Patricia Grow</i>	New Tripoli
18	<i>Lynn Beigh</i>	<i>Lynn Beigh</i>	New Tripoli
19	Kathleen Glaser	<i>Kathleen Glaser</i>	7485 Camp Meeting Rd New Tripoli Pa 18066
20	Richard Metzger	RICHARD Metzger	7096 Herbert Dr New Tripoli Pa

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE- DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Jeff Lindtner	<i>Jeff Lindtner</i>	7492 Camp Mtg Rd. New Tripoli, Pa
2	Gyan Parky	<i>Gyan Parky</i>	7290 Adams St #9 New Tripoli
3	Josh Rex	<i>Josh Rex</i>	7403 Behler Rd. Lynnport 18066
4	DAVIS MILLARD	<i>DM</i>	7442-1 Donna Dr New Tripoli, PA 18066
5	Dawn Murray	<i>Dawn Murray</i>	7427 Allemaugel Rd New Tripoli PA 18066
6	William G. Ash	<i>William G. Ash</i>	5976 Dogwood Dr New Tripoli, Pa. 18066
7	Jim Alexander	<i>Jim Alexander</i>	5424 S. Parkway New Tripoli, PA 18066
8	Juelle Morehouse	<i>Juelle Morehouse</i>	6289 Sandy Ct New Tripoli
9	KATHY Van Allen	<i>Kathy Van Allen</i>	7508 Springhouse Rd New Tripoli PA 18064
10	Wendy Bockman	<i>Wendy Bockman</i>	7145 Flint Hill Rd. New Tripoli, PA 18066
11	David Ganser	<i>David Ganser</i>	7495 Camp Meeting Rd New Tripoli PA 18066
12	Kim Borsman	<i>Kim Borsman</i>	LYNNPORT, PA
13	Donna Snyder	<i>Donna Snyder</i>	7284 Decatur Street New Tripoli, Pa. 18066
14	Brian B Herb	<i>Brian Herb</i>	7288 D- " New Tripoli Pa
15	Billy Klein	<i>Billy Klein</i>	7843 Sachler Rd New Tripoli
16	Paula Klein	<i>Paula Klein</i>	7843 Sachler Rd New Tripoli
17	KAREN LEISEK	<i>Karen Leisek</i>	6876 Flint Hill Rd New Tripoli PA
18	Paula Thompson	<i>Paula Thompson</i>	6559 Epona Dr New Tripoli, Pa 18066
19	Sue Collins	<i>Sue Collins</i>	6586 Knoll Ct New Tripoli PA 18066
20	ANDREW BANUAR	<i>Andrew Banuar</i>	6550 MARSH STREET NEW TRIPOLI, PA 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	ADRIENNE MORPHY	<i>Adrienne Morphy</i>	7087 HERBERT PLIVE
2	LEE ANDERSON	<i>Lee Anderson</i>	7953 KING'S HWY
3	M J GROW	<i>M J Grow</i>	6604 Jefferson Ct
4	James Selan	<i>James Selan</i>	7722 Seelen Rd New Tripoli PA
5	Isa Reitz	<i>D. Reitz</i>	New Tripoli
6	K. S. HITE	<i>K. S. Hite</i>	7453 Kriesch Hill New Tripoli
7	Susan L. Bittenbender	<i>Susan L. Bittenbender</i>	7173 Borman Rd New Tripoli, PA 18066
8	D. Schantz	<i>D. Schantz</i>	8865 Currier Dr. Kempton PA 19524
9	Daniel Heimberg	<i>Daniel Heimberg</i>	7708 Horst St New Tripoli PA 18066
10	Charlotte Miller	<i>CHARLOTTE MILLER</i>	7947 King's Hwy LYNNPORT PA 18066
11	Amanda Krater	<i>Amanda Krater</i>	7318 King's Hwy New Tripoli PA 18066
12	Joseph S. Chao	<i>Joseph S. Chao</i>	7830 Seelen Rd New Tripoli PA 18066
13	Dawn Strangher	<i>Dawn Strangher</i>	6949 Conant Rd New Tripoli PA 18066
14	Cady Wesser	<i>Cady Wesser</i>	5184 Seelen Rd New Tripoli PA 18066
15	Tom Foyck	<i>Tom Foyck</i>	8321 King's Hwy New Tripoli
16	Raymond (Moe) ...	<i>Raymond (Moe) ...</i>	710's Musskill New Tripoli PA 18066
17	Amanda Krater	<i>Amanda M. Krater</i>	4553 Epura Dr New Tripoli, PA 18066
18	KAREN A. DILCHER	<i>KAREN A. DILCHER</i>	7257 DECATUR ST NEW TRIPOLI PA 18066
19	Virginia Turner	<i>Virginia Turner</i>	906 Kemper Hwy New Tripoli PA 18066
20	<i>[Signature]</i>	<i>Sherry Rex</i>	7417 Camp Mecklin Rd New Tripoli PA 18066

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE- DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 797 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Mik Hunt	Mike Hunt	New Tripoli
2	Susan Kling	Susan Kling	NT
3	FREDERICK MUSTO	Frederick Musto	"
4	MARTIN PODORSKI	M. J. Podorski	NEW TRIPOLI
5	THOMAS SWISSER	Thomas Swisser	New Tripoli
6	GAIL Regan	Gail P. Regan	New Tripoli
7	Angela Dalrymple	Angela Dalrymple	New Tripoli
8	MITCH MASTERS	Mitch Masters	NEW TRIPOLI
9	BETTY HENNELY	Betty Hennesly	New Tripoli
10	Jennifer Bernhard	Jennifer Bernhard	New Tripoli
11	Michael Derr	Michael Derr	New Tripoli
12	Alice Bastian	Alice Bastian	New Tripoli
13	Karen Kressley	Karen Kressley	2255 Hoffacker Ct New Tripoli PA 18066
14	Mike Strouhan	Mike Strouhan	New Tripoli PA
15	Michael Rader	Michael S Rader	7280 Lincoln Court New Tripoli, PA 18066
16	Sharon Lawley	Sharon Lawley	6543 Madison St New Tripoli Pa
17	Joyce Eckhart	Joyce A. Eckhart	3998 Windy Rd Ortfield, PA 18069
18	Linda Bowman	Linda Bowman	7652 Fairglen New Tripoli PA 18066
19	Michael Schock	Michael G Schock	6648 Weiland Ct New Tripoli PA 18066
20			

WE, THE RESIDENTS OF THE NEW TRIPOLI AREA, CUSTOMERS OF VERIZON NORTH, INC. - IN THE 298 EXCHANGE - DO HEREBY PETITION VERIZON NORTH, INC. TO EXTEND THE LOCAL CALLING AREA TO INCLUDE SCHNECKSVILLE EXCHANGES 769 & 799 - IRONTON TELEPHONE CO.

	PLEASE PRINT NAME	SIGNATURE	ADDRESS
1	Scott Nagle	Scott Nagle	8076 Sassafras Rd New Tripoli, PA 18066
2	Sheila Nagle	Sheila Nagle	8076 Sassafras Rd New Tripoli, PA 18066
3	Melinda Rose	Melinda Rose	6995 Dimas Park New Tripoli, PA 18066
4	Cheree Wessner	Cheree Wessner	7129 Coburn Spring Rd New Tripoli, PA 18066
5	DEAN JAY GROSS	Dean Jay Gross	7960 Allendale Rd. NEW TR. POXI. PA 18066
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JEAN REESE,

Complainant

v.

VERIZON NORTH INC.,

Respondent

Docket No. C-20043520

**DOCKETED**  
JUL 14 2005

**DOCUMENT  
FOLDER**

---

DIRECT TESTIMONY OF REGINA RYAN  
ON BEHALF OF VERIZON NORTH INC.

---

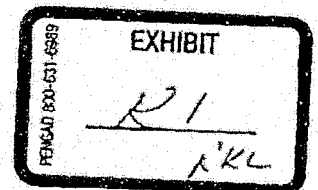
**NONPROPRIETARY VERSION**

**RECEIVED**

JUN 01 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dated: May 11, 2005  
Admitted: May 17, 2005



1 Q. Please state your name and business address.

2 A. My name is Regina Ryan, and my business address is 1717 Arch Street, Philadelphia, PA  
3 19103.

4  
5 Q. By whom are you employed and in what capacity?

6 A. I am employed by Verizon Pennsylvania Inc., Manager, Regulatory.

7  
8 Q. What are your responsibilities as Manager, Regulatory?

9 A. I am responsible for all of the tariff filings, including introduction of new services,  
10 investigation of customer requests for Extended Area Service or "EAS" and exchange  
11 boundary changes, and the preparation, filing and interpretation of Exchange Service tariffs  
12 that Verizon North Inc. ("Verizon North" or "Company") and Verizon Pennsylvania Inc.  
13 ("Verizon PA") make with the Pennsylvania Public Utility Commission ("Commission").

14  
15 Q. How long have you been employed by Verizon PA?

16 A. I have been with Verizon PA for 25 years in a variety of disciplines and departments. I have  
17 been in my present position since July 2001.

18  
19 Q. On whose behalf are you offering testimony in this proceeding?

20 A. I am presenting testimony on behalf of Verizon North.

21

22

1 Q. What is the purpose of your testimony in this proceeding?

2 A. The purpose of my testimony is to address the Formal Complaint filed by Jean Reese  
3 requesting the Commission to direct Verizon North to implement toll-free calling from  
4 the Company's New Tripoli exchange to the Ironton exchange served by Ironton  
5 Telephone Company. I also will be discussing the Prepared Testimony filed by  
6 Mr. William George on behalf of Ironton Telephone Company.

7  
8 Q. In his written testimony, Mr. George explained the meaning of a number of items that have  
9 to do with Extended Area Service. Are you familiar with that testimony?

10 A. Yes.

11  
12 Q. Do you agree with Mr. George's explanation of an exchange?

13 A. For the most part yes. I would add, however, that an exchange usually contains many  
14 communities -- not a central community and its immediate surroundings as described by  
15 Mr. George. The most significant impact of a telephone exchange is that the facilities  
16 needed to provide service to the customers of each exchange (e.g., switches, cables, etc.) are  
17 designed to serve a specific geographic area and the Company's investment is premised on  
18 those facilities serving a defined and designated area.

19  
20 Q. From a customer's perspective, what is the significance of being in a particular exchange?

21 A. The customer's exchange determines the rate the customer pays for local usage packages  
22 and whether particular calls the customer places are considered local calls or toll calls.

23

1 Q. Please explain?

2 A. Each telephone exchange is placed in a rate band according to the number of access lines a  
3 customer in that exchange can call without incurring a toll charge. Verizon North currently  
4 has three rate bands. The rates for each band reflect the value of the customer's local calling  
5 ability based on the number of access lines in the exchange, plus application of a weighting  
6 factor that reflects the value of the distance between the home exchange and the exchanges  
7 included in the local calling area.

8  
9 Q. Do you agree with Mr. George's explanation of a local calling area?

10 A. I agree, but I would point out that the most important criterion of an exchange's local calling  
11 area is that it meets the day-to-day needs of the MAJORITY of the people in the exchange.  
12 As Mr. George pointed out, the local calling area of an exchange cannot be designed to  
13 serve each customer's unique community of interest or personal calling pattern. A local  
14 exchange carrier should not be required to change or expand the local calling area of an  
15 exchange simply to meet the personal desires of certain customers.

16  
17 Q. What is the local calling area of the New Tripoli exchange?

18 A. Customers in the New Tripoli exchange can place toll-free calls to all telephone prefixes  
19 assigned to the exchanges of Allentown, Kempton, New Smithville, New Tripoli, and  
20 Slatington.

21

22

1 Q. How many telephone prefixes are within this local calling area?

2 A. A total of 80 NXXs or telephone prefixes are currently assigned to the exchanges within the  
3 New Tripoli local calling area.

4  
5 Q. Is the local calling area of the New Tripoli exchange properly depicted on Ironton  
6 Exhibit No. 1 that was submitted by Mr. George?

7 A. Yes.

8  
9 Q. How many access lines are available in the local calling area of the New Tripoli exchange?

10 A. The total number of access lines in the local calling area is [START PROPRIETARY]  
11 \*\*\*\*\* [END PROPRIETARY] access lines in the New Tripoli exchange  
12 itself.

13  
14 Q. How many of the access lines in the New Tripoli exchange are subscribed to Verizon  
15 North?

16 A. As of the March 2005 traffic study, [START PROPRIETARY] \*\*\*\*\*  
17 [END PROPRIETARY] of the access lines in the New Tripoli exchange were PIC'd to  
18 Verizon North for IntraLATA toll service.

19  
20 Q. Briefly explain what you mean by IntraLATA toll service.

21 A. LATA stands for Local Access Transport Area, which is a geographic region within which a  
22 telephone exchange is located. Pennsylvania is divided into six different LATAs. The New  
23 Tripoli exchange is located within the Northeast LATA. An IntraLATA call originates and

1 terminates in the same LATA – such as calls placed from New Tripoli to Ironton.  
2 InterLATA calls are calls that originate in one LATA and terminate in a different LATA.  
3

4 Q. Why doesn't Verizon North provide IntraLATA service to 100% of the New Tripoli  
5 exchange access lines?

6 A. Since 1997, the customer can choose the carrier he or she wants to provide IntraLATA and  
7 InterLATA toll service. The customer's choice may be based on personal preference, on  
8 cost or on a service package offered by a particular carrier that best meets that customer's  
9 needs. A customer can have the same or a different carrier providing IntraLATA and  
10 InterLATA service to his or her account.

11  
12 Q. How is the rate for an IntraLATA toll call determined?

13 A. The amount charged for toll calls depends on the call's duration, the time of day and day of  
14 the week when the call is placed, and the distance between the toll rate center of the  
15 customer's exchange and the toll rate center of the exchange where the call terminates. The  
16 rate billed to the customer also can be affected by which carrier is providing the service and  
17 by a calling plan or bundled package to which the customer may subscribe.  
18

19 Q. Once a local calling area is established for a particular exchange, under what circumstances  
20 would Verizon North change or enlarge that local calling area?

21 A. The local calling area of an exchange should be enlarged only if the existing calling area is  
22 so insufficient that it does not meet the needs of the majority of the customers in the  
23 exchange.

1 Q. Does such a situation exist with respect to the New Tripoli exchange and its local calling  
2 area?

3 A. No. Customers of the New Tripoli exchange currently have access to a large local calling  
4 area.

5  
6 Q. Does the physical distance between the place of origination and termination of a telephone  
7 call determine if that call is a local or toll call?

8 A. No. Local calling areas are not determined by the physical distance between one exchange  
9 and another or between one town within an exchange and another. It is not uncommon for a  
10 customer to be able to make toll-free calls to exchanges that are physically farther away  
11 from the customer's location than an exchange that is closer but incurs a toll charge. The  
12 local calling area of a telephone exchange also is not necessarily the same as municipal  
13 boundaries, school district boundaries or United States Post Office delivery areas. As I  
14 stated earlier, the local calling area of an exchange is designed so the majority of the  
15 customers within that exchange can place calls to meet their day-to-day needs without  
16 incurring toll charges.

17  
18 Q. What are the current monthly basic service rates for a New Tripoli exchange customer?

19 A. A residential New Tripoli customer who subscribes to Verizon North's Flat Rate Service  
20 currently pays a base rate of \$13.78 per month for the dial tone line and usage. Not all  
21 customers, however, elect to have Flat Rate Service. Some customers find it more  
22 economical to pay for calls within their local calling area on an individual basis. That

1 customer would pay a monthly rate of \$5.68 for Dial Tone Line and would be billed for  
2 each call made from his or her telephone number.

3

4 Q. Can New Tripoli customers receive Lifeline Service to assist them in paying their  
5 telephone bills?

6 A. Yes. If qualified, a New Tripoli customer can receive a basic service credit each month,  
7 depending on the Lifeline Service selected.

8

9 Q. Can New Tripoli customers contact the local school district on a toll-free basis?

10 A. Yes. It is my understanding that students from the New Tripoli exchange attend schools  
11 in the Northwestern Lehigh School District. The District's administration building, the  
12 middle school, high school and one of the District's two elementary schools are located  
13 within the New Tripoli exchange. The second elementary school is assigned a telephone  
14 number within the New Smithville exchange, which is also a local call for these  
15 customers.

16

17 Q. Mr. George gave a brief explanation in his testimony of what Extended Area Service is. Do  
18 you agree with his explanation?

19 A. Yes.

20

21 Q. What are the regulatory criteria by which the Commission evaluates a request for EAS?

22 A. There are several. The Commission's EAS Regulations (52 Pa. Code §§63.71-63.77)  
23 first provide that EAS be considered when the two involved exchanges are contiguous

1 with each other or when the toll rate centers of the exchanges are within 16 miles of each  
2 other. As Mr. George explained, a toll rate center is a unique point within each exchange  
3 used to determine mileage between telephone exchanges.

4  
5 Q. It is obvious from Ironton Exhibits 1 and 2 that the New Tripoli and Ironton exchanges are  
6 not contiguous. Do they have toll rate centers that are within the 16-mile requirement?

7 A. Yes, the toll rate centers are approximately 10 miles apart.

8  
9 Q. Are there any other regulatory criteria by which the Commission evaluates an EAS case?

10 A. The toll traffic required for implementation of EAS on a toll route is set forth at 52 Pa. Code  
11 §63.74(1). This Regulation provides that at least 50% of the access lines in the originating  
12 exchange must be used to make at least 1.0 call to the terminating exchange during the study  
13 period and the average calls per access line must be 5.50 or more.

14  
15 Q. How is this information determined?

16 A. Until 1997, each local exchange carrier was required to perform a study every other year  
17 that measured the amount of calling between each exchange and its contiguous exchanges  
18 and all surrounding exchanges with toll rate centers that met the 16-mile requirement. This  
19 information was used to determine if the 50% and 5.50 calling thresholds for  
20 implementation of EAS were met. The last traffic study Verizon North filed with the  
21 Commission was for March 1997. While the Company is no longer required to, we  
22 continue to perform traffic studies internally for facility planning purposes. The  
23 Company's most recent study was performed in March 2005.

1 Q. What were the results of the March 2005 toll traffic study for calling from the New  
2 Tripoli exchange to the Ironton exchange?

3 A. The study showed that only [START PROPRIETARY] \*\*\*\*\* [END  
4 PROPRIETARY] of Verizon North customers in the New Tripoli exchange were used to  
5 make at least one call to the Ironton exchange during the study month and an average of  
6 only [START PROPRIETARY] \*\*\*\* [END PROPRIETARY] calls were made per  
7 access line by Verizon North customers. This is well below the 50% and 5.50 calling  
8 thresholds required by the Commission's Regulations.

9  
10 Q. Why did you qualify the results of the Company's March 2005 traffic study in terms of  
11 Verizon North customers?

12 A. As I stated earlier, customers are now permitted to choose the company they want to carry  
13 their IntraLATA toll calls. Verizon North can only track calls placed by its own customers.

14  
15 Q. Did you take this fact into account in making your calculations for the March 2005 toll  
16 traffic study?

17 A. Yes. The calculations were made using only the access lines to which Verizon North  
18 provided IntraLATA service at the time the study was performed.

19  
20 Q. Are you familiar with the six criteria by which the Commission evaluates EAS cases?

21 A. Yes. The Commission's Regulation at 52 Pa. Code §63.77 provides the Commission will  
22 evaluate the following criteria in determining if EAS is appropriate on a particular route:

- 23 1. The amount of toll charge traffic between the two exchanges.  
24 2. The cost to the utility of implementing EAS.

- 1 3. The potential increase in local service charge due to implementation
- 2 if EAS versus the current cost to subscribers for interexchange toll
- 3 calls.
- 4 4. The demography and the proximity of the exchanges as indicating a
- 5 community of interest.
- 6 5. The availability of alternatives to EAS.
- 7 6. The economic effect on the community if the local service area is not
- 8 extended.
- 9

10 Q. What is your evaluation with respect to the first criterion – the amount of toll charge  
11 traffic between the exchanges in question?

12 A. Given the low traffic volumes I just identified on the New Tripoli to Ironton route, this  
13 factor obviously weighs against the granting of EAS in this case.

14

15 Q. The second criterion is the cost to the utility to implement the requested EAS. What  
16 costs will Verizon North incur if the Commission directs the New Tripoli to Ironton route  
17 be made toll-free?

18 A. If the New Tripoli to Ironton route is made toll-free as a result of this case, Verizon North  
19 will incur approximately [START PROPRIETARY] \*\*\*\*\* [END PROPRIETARY] in  
20 expenses to make the required Tariff filings and for customer notification. The Company  
21 also estimates it will lose annual toll and access revenues of approximately [START  
22 PROPRIETARY] \*\*\*\*\* [END START PROPRIETARY].

23

24

1 Q. Is Verizon North permitted to recover any of the costs you described from its customers?

2 A. Yes.

3

4 Q. Under what authority is this recovery permitted?

5 A. Part 3.A.10 of the Company's Commission-approved Chapter 30 plan states:

6 Any revenue shortfall or expense incurred (e.g., expenses  
7 associated with capital outlays, operating & maintenance expense,  
8 etc.) associated with the extension of local service (less other  
9 related revenue increases/expense decreases, if any) may be  
10 recovered by the Company at the time of implementing any  
11 extended area services. This same treatment shall also apply to  
12 Optional Calling Plans.

13

14 Order entered October 10, 2002 at Docket No. P-00981449.

15

16 Q. If EAS is implemented as a result of this proceeding, what costs will Verizon North seek to  
17 recover and how?

18 A. Under its Chapter 30 Plan, Verizon North feels it is entitled to recover it's one-time costs  
19 through the imposition of a monthly surcharge of 26¢ that would be billed to each New  
20 Tripoli customer for one year. The Company would also seek an ongoing monthly  
21 surcharge of 9¢ per New Tripoli customer in order to recover its annual loss of toll and  
22 access revenues.

23

1 Q. The third criterion to be evaluated in an EAS case is the potential increase in local service  
2 charge due to implementation of EAS versus the current cost to subscribers for  
3 interexchange toll calls. If the Commission orders implementation of EAS for the New  
4 Tripoli to Ironton route, will there be a basic service rate increase for the New Tripoli  
5 exchange customers?

6 A. No.

7  
8 Q. Do you believe Ms. Reese presented sufficient testimony this morning to support a  
9 finding that the current cost to New Tripoli subscribers for calls placed to Ironton is  
10 sufficient to warrant EAS?

11 A. No. I reviewed Ms. Reese's bills from August 2004 through May 2005. During that  
12 time, Ms. Reese made only 96 calls from her telephone number to telephone numbers in  
13 the Ironton exchange. The total amount billed for these calls was \$6.72 – or an average  
14 of 67¢ per month. The calling volumes identified by the toll traffic study I described  
15 earlier in my testimony leads me to the conclusion that other customers in the New  
16 Tripoli exchange have similar calling patterns. Therefore, the costs being incurred by  
17 these customers for calls placed to the Ironton exchange does not support the  
18 implementation of EAS.

19  
20  
$$\begin{aligned} & \text{ISTC} \cdot (262 + 94) = \\ & 91 \times 12 = \end{aligned}$$
$$352 \times 12 = 420$$
$$\begin{array}{r} 108 \\ 5.28 \\ \hline 1.06 \end{array}$$
$$\begin{array}{r} 6.72 \\ 5.28 \\ \hline 1.44 \end{array}$$
$$\begin{array}{r} 8.22 \\ 6.72 \\ \hline 1.50 \end{array}$$

12

1 Q. The next criterion to be evaluated is the demography and proximity of the exchanges as  
2 indicating a community of interest. Do you feel a community of interest exists between  
3 the New Tripoli and Ironton exchange?

4 A. While I believe there are people in the exchange who have a personal need or preference  
5 to make calls to the Ironton exchange in order to conduct their day-to-day business, the  
6 customers of the New Tripoli exchange have access to a wide variety of products and  
7 services in their current local calling area and, as indicated by the calling volumes from the  
8 March 2005 study, the majority of the New Tripoli customers appear to be using the  
9 services of organizations that are available within that local calling area.

10

11 Q. On what do you base your opinion that the individuals in the New Tripoli exchange  
12 making calls to Ironton are doing so based on personal preference or for personal  
13 reasons?

14 A. As shown on **Verizon North Exhibit No. 1**, there are a wide variety of businesses  
15 located within the local calling area of the New Tripoli exchange. This exhibit was  
16 created from the June 2004 edition of the Emmaus/Kempton telephone directory and  
17 represents only a sampling of the types of businesses that a New Tripoli exchange  
18 customer can contact on a toll-free basis. In addition to the businesses and organizations  
19 shown on Verizon North Exhibit No. 1, customers of the New Tripoli exchange can make  
20 calls to Allentown on a toll-free basis. The Yellow Pages section of the Allentown  
21 directory is 668 pages and contains in excess of 2,300 categories of business and service  
22 organizations that New Tripoli customers can contact on a toll-free basis. Clearly, this

1 information demonstrates that any community of interest that may exist between New  
2 Tripoli and Ironton is based on personal preferences, not on lack of services.

3  
4 Q. Mr. George testified that Schnecksville, which is in the Ironton exchange, is the retail hub  
5 for New Tripoli customers. Do you agree?

6 A. No. If such a hub exists, it is a matter of customer choice not need. Verizon North  
7 Exhibit No. 1 shows there are in excess of 4 banks and credit unions, 16 churches, 48  
8 doctors, 24 dentists, 2 hospitals and medical centers, 15 attorneys and a choice of  
9 accountants, appliance dealers, automobile dealers, barbers and beauty salons, building and  
10 general contractors, bus lines and taxicabs, child day care centers, financial planning  
11 consultants, funeral directors, grocers and hardware stores, hotels and motels, insurance  
12 agents, optometrists, restaurants, schools and veterinarians located within the New Tripoli  
13 exchange local calling area. The Allentown directory lists 17 banks and credit unions, 250  
14 churches, 905 doctors, 307 dentists, 17 hospitals and medical clinics, 585 attorneys as well  
15 as a wide choice of other professional and service organizations. Given the extensive  
16 number and wide variety of business and service organizations that people in New Tripoli  
17 can contact on a toll-free basis, their use of entities in Schnecksville rather than those  
18 businesses or organizations in their local calling area is based on a personal preference and  
19 not a need. This personal preference is not a sufficient reason to require Verizon North to  
20 implement EAS from the New Tripoli exchange to the Ironton exchange.

1 Q. The next criterion to be evaluated is the availability of reasonable alternatives to EAS for  
2 New Tripoli exchange customers. Would you comment on this criterion?

3 A. There are a variety of alternatives currently available to New Tripoli exchange customers  
4 to reduce or eliminate toll charges for calls placed to Ironton. There are many  
5 interexchange carriers currently providing service in this exchange, some of which offer  
6 bundled service packages. New Tripoli customers also can use prepaid calling cards,  
7 dial-around (10-10-xxx) numbers, or cellular telephones to help reduce their toll charges.  
8 I have seen prepaid calling cards with rates as low as 3¢ per minute that can be used to  
9 place any type of call -- local or toll. Most cellular providers offer an extensive calling  
10 area that includes most if not all of Pennsylvania, as well as the continental United States  
11 and Canada. Finally, these customers can communicate by e-mail. There are Internet  
12 Service Providers offering access numbers in the local calling area of the New Tripoli  
13 exchange. All of these options provide toll alternatives for the customers of the New  
14 Tripoli exchange to communicate with subscribers of the Ironton exchange and weigh  
15 against the implementation of the EAS requested in this case.

16  
17 Q. Are there other service alternatives available to a New Tripoli customer?

18 A. Yes. A customer can subscribe to service provided by a Competitive Local Exchange  
19 Carrier or "CLEC." According to the Commission's Utility Choice web site, there  
20 currently are 16 CLECs offering residential service in Berks County and 19 CLECs  
21 offering residential service in Lehigh County. There are even more CLECs offering  
22 business service in these areas.

23

1 Q. Did you contact any of these carriers to investigate the service or calling plans each offers  
2 at this time?

3 A. No.  
4

5 Q. The last criterion to be evaluated in an EAS case is the economic effect on the community  
6 if the local service area is not extended. Do you feel this criterion weighs in favor of the  
7 implementation of EAS as a result of this case?

8 A. Based on the low call volumes demonstrated by the March 2005 toll traffic study and the  
9 small amount of monthly charges Ms. Reese is incurring for calls placed to Ironton, I do not  
10 feel the economic effect on the community will be significant if the requested EAS is not  
11 granted. However, I reserve the right to supplement this answer at the time of the hearing, if  
12 that is appropriate based on the testimony presented by Ms. Reese.  
13

14 Q. Is there any requirement that Verizon North must implement EAS from New Tripoli to  
15 Ironton simply because Ironton Telephone Company chose to make calls from Ironton to  
16 New Tripoli toll-free in 2003?

17 A. No. I am not aware of the reasons why Ironton Telephone Company made the decision  
18 in 2003 to make calls from Ironton to New Tripoli toll-free; however, it is Verizon  
19 North's position at this time that EAS for calling in the opposite direction (from New  
20 Tripoli to Ironton) is not warranted and should be denied.  
21  
22

1 Q. Can you summarize Verizon North's position with respect to expansion of the New  
2 Tripoli local calling area?

3 A. It is the Company's position that the toll-free calling area currently available to New  
4 Tripoli exchange customers is consistent with that offered to other Verizon North  
5 customers in similarly situated exchanges. Verizon North currently provides telephone  
6 service to New Tripoli exchange customers consistent with the Commission's EAS  
7 Regulations. In addition, these customers currently have access on a local-call basis to a  
8 wide variety of business and service organizations to satisfy their day-to-day needs.  
9 While the Commission should ensure there are options available for New Tripoli  
10 exchange customers, both local and toll, these options currently exist in the form of  
11 bundled or package service plans, service offerings by interexchange carriers, calling  
12 cards, dial-around numbers, cellular service, Internet access and CLEC service. Based on  
13 the toll traffic volumes relevant to this case and the other criteria set forth in the  
14 Commission's EAS Regulations, it is inappropriate to require Verizon North to convert  
15 the New Tripoli to Ironton toll route to local calling simply to meet the personal  
16 preferences of a single or a small group of customers.

17  
18 Q. Would you like to add anything else to your testimony?

19 A. Not at this time; however, I reserve the right to supplement my testimony later if that  
20 becomes necessary or appropriate.

21

**List of Medical, Social and Business Organizations  
Within the Local Calling Area of the New Tripoli Exchange  
(Excluding Allentown)**

**ACCOUNTANTS**

Dougherty Associates	610-791-0555
Campbell Rappold & Yurasits LLP	610-435-7489
Concannon Miller & Company	610-433-5501
George J. Gerbino	610-285-2076

**APPLIANCES-MAJOR-DEALERS & REPAIRS**

Kruper Brothers Appliances, Inc.	610-432-0017
----------------------------------	--------------

**ATTORNEYS**

Angelo T. Almonti	610-437-3936
John M. Ashcraft III	610-434-6525
Ronald E. Corkery	610-437-9868
Philip Evans	610-298-2886
Gardner Racines & Sheetz	610-435-6765
Brian R. Joyce	610-435-7711
Marc Kranson	610-432-0720
Krasno Krasno & Onwudinjo	610-820-5006
O'Connor & Associates	610-432-4250
Audrey G. Racines	610-435-6765
Roberts Corkery & Almonti	610-437-9867
John E. Roberts	610-437-9867
Shulman Shabbick & Ettinger	610-261-9000

**AUTOMOBILE DEALERS – SALES AND SERVICE**

Audi	610-439-1555
Cadillac Sales & Service	610-820-2950
Chrysler Sales & Service	610-767-1171
Dodge Sales & Service	610-791-1900
Ford Authorized Sales & Service	610-434-4211
Jeep Sales & Service	610-395-3713
	610-767-1171
Mazda	610-791-1221
Pontiac Sales & Service	610-820-6900
Porsche	610-439-1555
Subaru	610-395-3745
Volvo	610-791-1221

## **BANKS & CREDIT UNIONS**

New Tripoli National Bank

610-298-8811

610-395-8834

Patriot Bank

610-433-9050

610-767-3824

610-439-0446

610-336-0103

610-767-2771

610-289-1254

## **BARBERS & BEAUTY SALONS**

Donald Christ Barber Shop

610-298-3213

The Kempton Barber

610-756-4222

Di's Hair Studio

610-285-4959

Jean Henderson

610-285-6120

Holiday Hair

610-797-9928

610-439-9402

610-398-9983

610-395-9613

610-437-3407

Kathy Baush's Styling Salon

610-298-2465

Main Event

610-797-9185

## **BUILDING, HOME & GENERAL CONTRACTORS**

Black Forest

610-298-8482

Mark N. Blose Construction

610-756-3586

Brandon Junge Builder & Contractor Inc.

610-756-3551

Branning Contracting

610-391-0228

Brittlynn Construction

610-391-1172

Alvin H. Butz Inc.

610-395-6871

Dexco Builders

610-285-6510

Lehigh Richfield Inc.

610-298-2870

Lehigh Richfield Constructor

610-298-8850

Bruce H. Nash Incorporated Construction

610-285-6884

L&M Plumbing

610-756-3069

Libero Menarde

610-285-6611

North Berks Construction LLC

610-756-4220

Raudabaugh Plumbing & Heating

610-298-2429

Resolve Rooter (Plumbing)

610-770-8889

610-756-6399

888-973-7658

Roto-Rooter

610-433-8201

RPB Construction

610-298-2835

Rustic Country Homes

610-285-6164

Sherer Building Contracting  
Sorensen Construction  
Jeff Vogels Plumbing & Heating

610-285-2194  
610-298-8098  
610-756-6531

#### **BUS LINES, TAXICABS, & TRANSPORTATION**

Lanta Metro  
Metro Plus Specialized Transportation  
Perkiomen Valley Bus Co.  
Quick Service Taxi Co. Inc.  
Trans-bridge Lines Inc

610-776-7433  
610-432-3200  
610-434-1733  
610-434-8132  
610-776-8687  
610-433-4110  
610-433-7334

Valley Association for Specialized Transportation

#### **CHILD DAY CARE CENTERS**

Academy of Little Learners  
Child Care Inc.  
Creative Kids  
Cuddle Zone Learning Center  
Family Day Care Network  
First Step Day Care  
  
Grace Montessori Preschool & Day Care  
Head Start of Lehigh Valley  
Lehigh Valley Child Care  
Lifespan Day Care  
Lilliput Corner Learning Center  
Little People Child Care School  
Little People Day Care School

610-398-1082  
610-481-9511  
610-298-8335  
610-434-2644  
610-820-5333  
610-820-0855  
610-435-9645  
610-435-4060  
610-437-6000  
610-820-5333  
610-435-7833  
610-285-4234  
610-434-2302  
610-791-4554  
610-776-0655  
610-398-1761  
610-439-2473  
610-402-2949  
610-647-3362  
610-398-1761  
610-433-1450  
610-439-8280  
610-439-1779  
610-791-3906

M & L Family Day Care  
Magic Years Child Care & Learning Centers Inc.

Mulberry Child Care & Preschool  
Our Lady Helping Children After School  
Rotherham Child Care Center  
Small Wonders Child Care & Development Center Inc.  
Truman School Age Center

Werley Day Care Center

610-395-4103

The Wonder Kids Day Care  
YMCA/YWCA Allentown

610-395-6262  
610-262-3244  
610-434-9333

### CHURCHES

Allentown First Presbyterian Church  
Blue Mountain Mennonite Fellowship  
Christ's Church at Lowhill  
Ebenezer United Church of Christ  
Friedens Church  
Jacob's Church  
Jerusalem Red Church  
Kempton New Church  
Mt. Zion Lutheran Church  
New Jerusalem Zion United Church of Christ  
New Life Lutheran Church  
Northern Valley Evangelical Free Church  
Northwestern Lehigh Seventh Day Adventist  
St. Peter's Union Church of Lynnville  
Weisenberg Lutheran Church  
Zeigels Union Church

610-395-3781  
610-298-8059  
610-298-2527  
610-298-8000  
610-756-6875  
610-756-6352  
610-756-6008  
610-756-6140  
610-756-6210  
610-756-6892  
610-298-2710  
610-298-8028  
610-298-3165  
610-298-8064  
610-298-2437  
610-285-6157

### COMPUTERS - DEALERS AND SERVICE

Computer Parts Upgrade & Supply

610-398-8088

### DENTISTS

Allen Oral Surgery Associates  
Brendel, Timothy DMD  
Conrad, Michael A. DDS  
Csanadi Jos A.  
Dileo Oral Surgery  
Dimmich Gregory W.  
Ehrens Victor  
Thomas P. DMD Englert & Associates  
Frey, Gregg T. DDS  
Granich, Frank C. DMD  
Karabasz, Sara  
Keiper, Gary F. DMD  
Lawrence, Christina DMD  
Lentz, Michael  
Lu, Dominic P. DDS  
  
O'Donnell, Hugh J. Jr. DDS  
Oppenheim, Kenneth R.  
Prusack, Nicholas O.

610-821-7021  
610-398-2180  
610-398-1435  
610-797-8245  
610-821-0422  
610-435-6161  
610-435-6161  
610-434-4887  
610-437-4748  
610-395-3541  
610-435-0115  
610-395-3335  
610-395-4400  
610-791-2307  
610-298-8805  
610-398-1430  
610-433-2357  
610-437-9000  
610-821-7021

Schwartz, Stuart	610-435-6161
Sloane, Steven M.	610-437-9000
Snyder, David DMD	610-285-2719
Steciw, John G.	610-820-5550
Tighe, Philip J.	610-432-2242
Trexler Family Dental Care	610-395-3335

**FINANCIAL PLANNING CONSULTANTS**

Lincoln Financial Advisors	610-285-6011
----------------------------	--------------

**FUNERAL DIRECTORS**

Burkholder J. S. Funeral Homes P.C.	610-433-5161
Keller Funeral Home Inc.	610-298-2915
Robert S. Nester Funeral Home	610-756-6006
Sell-Herron Funeral Home	610-433-5630

**GROCERS**

Blose's Market	610-298-2003
----------------	--------------

**HARDWARE – RETAIL AND HOME IMPROVEMENTS**

Brandon Junge Builder & Contractor Inc.	610-756-3551
Libero Menarde	610-285-6611

**HOTELS & MOTELS**

Days Inn	610-797-1234
Gloria's Forget Me Not Lodging	610-756-3398
Hawk Mountain Bed & Breakfast	610-756-4224
Lynnville Hotel	610-298-9991
Stony Run Hotel	610-756-4433
Super 8 Motel Allentown West	610-285-4880
Top Motel	610-756-6021

**INSURANCE**

AAA East Penn Insurance Agency Inc.	610-434-5141
Arbor Insurance Group Inc.	610-437-3340
Bryan G. Billig	610-298-2300
Dan Craver	610-289-2007
Hanawalt Insurance Agency	610-433-6854
Hosfeld Insurance Agency Inc.	610-530-0304
Lechmanik Insurance Agencies	610-435-3900
Matthias Insurance Agency	610-285-2330
MetLife Financial Services/MetLife Life Insurance	610-398-0100
Carl H. Myers Agency LTD Insurance	610-395-5831

Carl W. Peter Insurance Agency  
State Farm Insurance

610-298-2444  
610-433-5753  
610-398-7233  
610-437-1917  
610-435-5921

Townsend Insurance Agency Inc.

### **OPTOMETRISTS**

American Optometric Association

610-435-9888  
610-437-2050  
610-437-0717  
610-395-2474

### **PHYSICIANS & SURGEONS**

Advanced Dermatology Associates Ltd.

Houman Ahdieh MD

Allentown Family Foot Care PC

Children's Healthcare

Michael Cilberti, MD

Laurie A. Cohen, DO

Stephanie Eckert, DO

Fetzer-Clair Urology Association

Barry R. Follweiler MD

Gastroenterology Associates Ltd.

Theodore H. Gaylor MD FACS

Charles A. Gordon, MD

Harwick, Dedio & Kim

Khubchandani, Stasik, Rosen & Rakhmanine

Lehigh Valley Center for Sight

Lehigh Valley Foot & Ankle Surgeons

Lehigh Valley Women's Medical Specialties, PC

Anna Linderman, MD

Mark E. Moran, DO

Monique Nebolon, DO

Northwestern Medical Center

Gary Panik DO

Primary Care Associates in the Lehigh Valley

Eric Rittenhouse, MD

Daniel I. Ross, MD

Mark P. Shampain, MD

Donald M. Sledz, MD

David M. Stein, DO

Rima L. Strassman, MD

Kenneth J. Toff, DO

William M. Trachtenberg, MD

Twin Rivers Podiatry

Valley Gastroenterologists

610-437-4134  
610-437-4988  
610-434-7000  
610-395-4444  
610-820-7611  
610-395-4444  
610-437-7000  
610-298-8687  
610-298-8521  
610-439-8551  
610-770-9797  
610-871-2400  
610-437-5222  
610-433-7571  
610-437-4988  
610-391-0066  
610-437-7000  
610-395-4444  
610-437-4988  
610-391-0900  
610-298-8521  
610-298-8521  
610-776-1603  
610-437-7000  
610-437-4988  
610-820-7611  
610-821-2805  
610-776-1603  
610-395-4444  
610-395-4444  
610-437-4988  
610-432-6221  
610-434-5300

## RESTAURANTS

Blue Ridge Inn	610-298-2777
The Brass Rail	610-797-1927
Carrabba's Italian Grill	610-439-6100
DeMarco's Italian Restaurant	610-285-2278
Giovanni's Pizza	610-285-6602
The Inn at Springside	610-285-6584
Kempton Hotel	610-756-6588
Krumville Inn Inc.	610-756-6252
Northwestern Grill	610-298-2255
Pizza Hut	610-398-9010
Schleicher's Family Restaurant	610-298-3388
Sky View Country Restaurant	610-756-6877
Subway	610-298-2860
Two Kings Pizza	610-298-8800

## SCHOOLS

Allentown Business School	610-791-5100
Allentown School of Cosmetology	610-437-4626
Apple of His Eye Early Learning Center	610-439-2399
Cambridge Day School	610-398-0177
Cedar Crest College	610-437-4471
Children First Community Academy	610-433-2323
The Christ King School	610-262-4064
Datzyk Montessori School Inc.	610-395-6344
Early Learning Center	610-434-1456
Greenwich-Lenhartsville School	610-756-6948
Head Start of Lehigh Valley	610-770-7870
Hillcrest Academy for Child Development	610-395-1000
Holy Spirit School – Elementary	610-820-0220
Holy Spirit School – Middle School	610-434-4044
Jefferson Elementary School	610-398-4380
Jewish Day School	610-437-0721
Kaplan Educational Center	610-435-2171
Kempton New Church	610-756-6140
Lehigh Christian Academy	610-776-7301
Lehigh Valley Christian High School	610-821-9443
Lehigh Valley Lutheran School	610-351-8331
	610-351-9402
The Lutheran Academy	610-841-4144
Masonic Learning Centers For Children	610-435-0997
Moravian Midway Manor Church – Nursery School & Playroom	610-434-8041
Muhlenberg College	484-664-3100
Mulberry Child Care & Preschool	610-398-1761

Neff's Union Church Preschool	610-767-5327
Northwestern Lehigh School District - Administrative Office	610-298-8661
Northwestern Lehigh School District High School	610-298-8931
Northwestern Lehigh School District Middle School	610-298-2121
Northwestern Elementary School	610-298-2571
Our Lady of Hungary Regional School	610-262-9171
Penn State Lehigh Valley	610-285-5000
	610-821-6577
Perlis Montessori School	610-437-3278
Roberto Clemente Charter School	610-439-5181
Rosemont College	610-366-1963
Sacred Heart - Elementary School	610-437-3031
St. Francis of Assisi Early Learning Center	610-433-6211
St. Francis of Assisi School	610-435-0364
St. John Neumann Regional School	610-767-2935
St. Paul's School	610-797-5321
St. Peter's Nursery School	610-432-8762
St. Stephen's Nursery School	610-435-4260
Sonshine Nursery School	610-395-0806
Sylvan Learning Center	610-791-5350
Tyke Nursery School	610-433-5892
Weisenberg Elementary	610-285-6169
Young Ideas Day School	610-767-3137

**VETERINARIANS**

Country Doctor Veterinary Hospital	610-298-2520
	610-395-0650
Kutztown Animal Hospital	610-756-6275

Ironton Statement No.1  
Witness: William D. George, II  
Docket No. C-20043520

RECEIVED

JUN 01 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DIRECT TESTIMONY  
OF  
WILLIAM D. GEORGE, II  
ON BEHALF OF  
IRONTON TELEPHONE COMPANY

**DOCKETED**  
JUL 14 2005

DOCUMENT  
FOLDER

EXHIBIT  
*Ironton  
Statement*  
RKL  
PENNSA 800-631-6939

1 Q. WOULD YOU PLEASE STATE YOUR NAME, BUSINESS ADDRESS,  
2 OCCUPATION, AND BY WHOM YOU ARE EMPLOYED?

3 A. My name is William D. George, II. My business address is 4242 Mauch Chunk  
4 Road, Coplay, Pennsylvania 18037-9608. I am President and CEO of Ironton  
5 Telephone Company.

6 Q. WHAT ARE YOUR MAJOR DUTIES AS PRESIDENT AND CEO?

7 A. I am responsible for all of the day-to-day operations of the Company.

8 Q. ARE YOU AUTHORIZED TO APPEAR AND TESTIFY ON BEHALF OF  
9 IRONTON TELEPHONE COMPANY IN THIS PROCEEDING?

10 A. Yes, I am.

11 Q. HOW DID IRONTON BECOME A PARTY TO THIS PROCEEDING?

12 A. By Motion of Respondent, Verizon North Inc., dated January 7, 2005, Ironton  
13 Telephone Company ("Ironton") was named an indispensable party to the  
14 proceeding on the basis that the requested EAS route terminated in Ironton's  
15 exchange. Ironton elected not to oppose the Motion.

16 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

17 A. The purpose of my testimony is to address the formal complaint of Jean Reese  
18 ("Ms. Reese") versus Verizon North Inc. filed with the Pennsylvania Public Utility  
19 Commission ("Commission") at Docket No. C-20043520 and to support Ms.  
20 Reese's request that the Commission direct Verizon-North Inc. ("Verizon-N") to  
21 add the Ironton exchange to the local calling area of Verizon-N's New Tripoli  
22 exchange.

23 Q. FIRST, WOULD YOU PLEASE PROVIDE A BRIEF HISTORY OF IRONTON  
24 TELEPHONE COMPANY?

25 A. Ironton is a small, rural telephone company providing telecommunications  
26 services to approximately 5,450 access lines within its certificated service  
27 territory. Ironton's service territory encompasses approximately 16 square miles

1 with one exchange (Ironton) in Lehigh County, Pennsylvania. The Ironton  
2 exchange lies just northwest of the Allentown exchange of Verizon Pennsylvania  
3 Inc. ("Verizon-PA") and is surrounded by the service territory of Verizon-PA. The  
4 New Tripoli exchange of Verizon-N lies just ten miles to the northwest of the  
5 Ironton exchange.

6 Q. DO YOU HAVE A MAP SHOWING THE LOCATION OF THE EXCHANGES IN  
7 QUESTION?

8 A. Yes. Attached to my testimony are Ironton Exhibit Nos. 1 and 2. **Ironton**  
9 **Exhibit No. 1** is a map that highlights Verizon-N's New Tripoli exchange and its  
10 existing local calling area. The Ironton exchange, which is not currently included  
11 in the New Tripoli local calling area, is shown in red. By comparison, **Ironton**  
12 **Exhibit No. 2** is essentially the same map, but this time highlighting the Ironton  
13 exchange local calling area with the Ironton exchange shown in blue. As these  
14 exhibits show, the Ironton exchange is not within the New Tripoli local calling  
15 area, but the New Tripoli exchange is within the Ironton local calling area.

16 Q. IS THE COMPLAINANT IN THIS PROCEEDING, JEAN REESE, A CUSTOMER  
17 OF IRONTON TELEPHONE COMPANY?

18 A. No. It is my understanding that Ms. Reese resides within the New Tripoli  
19 exchange of Verizon-N. However, based on the work telephone number  
20 provided by Ms. Reese on her formal complaint form, Ms. Reese works within the  
21 Ironton exchange.

22 Q. WHAT IS YOUR UNDERSTANDING OF MS. REESE'S COMPLAINT?

23 A. It is my understanding that Ms. Reese desires a larger local calling area than is  
24 currently provided to customers within Verizon-N's New Tripoli exchange. As  
25 Ms. Reese indicates in her complaint, she requests that "Verizon extend local  
26 calling area to include 769-799 exchanges (Schnecksville area)." Telephone  
27 numbers with a 769 and 799 prefix are within the Ironton exchange. See the

1 attached directory page marked **Ironton Exhibit No. 3**. Schnecksville is in the  
2 Ironton exchange. Ms. Reese further notes in her complaint that there are areas  
3 close to the New Tripoli exchange that are toll calls where areas further away are  
4 local calls. This is true with the Ironton exchange which is close to New Tripoli  
5 and is a toll call whereas portions of the neighboring Statington and Allentown  
6 exchanges are farther away but local calls.

7 Q. WOULD YOU PLEASE DEFINE THE MEANING OF THE WORD "EXCHANGE"?

8 A. An exchange is the basic rate subdivision used in providing telephone service.  
9 Each exchange is unique in that it consists of an exclusive geographic area  
10 usually containing a central community and its immediate surroundings. It has its  
11 own local calling area and a toll rate center for use in determining the charges  
12 that will apply to calls beyond the local calling area. It is also the engineering and  
13 plant facilities subdivision by which telephone service is provided. The  
14 Company's exchanges are set forth in its tariff on file with the Commission.

15 Q. WHAT IS MEANT BY "LOCAL CALLING AREA", AND WHAT CRITERIA ARE  
16 CONSIDERED IN THE ESTABLISHMENT OF A LOCAL CALLING AREA?

17 A. The local calling area consists of the geographic areas or exchanges within  
18 which calls placed by customers residing within their home exchange may be  
19 made without incurring a toll charge. In some instances, the local calling area is  
20 only the immediate exchange itself. However, in other instances, the local calling  
21 area also includes one or more additional exchanges.

22 Generally, the objective is for the local calling area of each exchange to  
23 include the major community or communities of interest of a majority of the  
24 people within that exchange. Clearly, the local calling area cannot be designed  
25 to serve each individual customer's community of interest. Each local calling  
26 area is designed to enable the majority of people in the exchange to place the  
27 majority of their day-to-day calls on a toll-free basis.

1 Q. IN YOUR OPINION, DOES THE EXISTING LOCAL CALLING AREA OF  
2 VERIZON-N'S NEW TRIPOLI EXCHANGE WITHIN WHICH MS. REESE  
3 RESIDES INCLUDE THE MAJOR COMMUNITIES OF INTEREST OF THE  
4 PEOPLE WITHIN THE NEW TRIPOLI EXCHANGE?

5 A. No. Customers of the New Tripoli exchange such as Ms. Reese have a real  
6 interest in having extended area service to the Ironton exchange, including  
7 calling three of Ironton's largest customers - the Lehigh Carbon Community  
8 College, the Lehigh County Vo-tech school a/k/a Lehigh Career and Technical  
9 Institute (LCTI) and the Carbon Lehigh Intermediate Unit, as well as the many  
10 businesses located with the Ironton exchange. Consequently, a major portion of  
11 New Tripoli's "community of interest" is excluded from its local calling area.

12 Q. WHAT IS EXTENDED AREA SERVICE?

13 A. Extended Area Service ("EAS") is a rate arrangement whereby toll-free calling is  
14 permitted from an exchange to a contiguous (adjoining) exchange or qualified  
15 noncontiguous exchange not currently included in that exchange's local calling  
16 area. In this case, Ms. Reese desires that the Ironton exchange of Ironton  
17 Telephone Company be added to the local calling area of the New Tripoli  
18 exchange of Verizon-N.

19 Q. ARE THERE CERTAIN REGULATORY CRITERIA THAT SHOULD BE MET  
20 BEFORE EAS WILL BE CONSIDERED BETWEEN EXCHANGES?

21 A. Yes, there are traffic volume criteria that must be met before a telephone  
22 company is required to automatically implement EAS. Specifically, Section  
23 63.74, 52 Pa. Code § 63.74, provides:

24 "Whenever a traffic usage study between contiguous  
25 exchanges or between qualified noncontiguous exchanges  
26 qualifies for EAS under paragraphs (1) and (2), a subscriber  
27 poll of the calling exchange shall be conducted by the local

1 exchange carrier serving the calling exchange to determine if  
2 the local calling area should be extended.

3 (1) For intraLATA routes, a route qualifies for  
4 extended area service if it has an average monthly calling  
5 frequency of 5.50 or more calls per access line from one  
6 exchange to another and where at least 50% of the access  
7 lines in the calling exchange have been used for 1.00 or  
8 more calls per month to the receiving exchange.

9 (2) For interLATA routes, a route qualifies for EAS  
10 if it has an average monthly calling frequency of 5.50 or  
11 more calls per access line from one exchange to another."

12 \* \* \*

13 "(4) A poll is not required if subscribers have  
14 affirmatively rejected the implementation of EAS from the  
15 calling exchange to the receiving exchange during the  
16 preceding 2 years."

17 Q. ARE TRAFFIC STUDIES MANDATED BY THE COMMISSION'S EXTENDED  
18 AREA SERVICE REGULATIONS STILL REQUIRED?

19 A. Pursuant to the Commission's Opinion and Order in Pennsylvania Public Utility  
20 Commission v. Pennsylvania Telephone Association at Docket No. P-00961130,  
21 entered April 15, 1997, telephone companies are no longer required to conduct  
22 the traffic studies called for under the Commission's EAS regulations. The  
23 Commission-prescribed biennial toll traffic studies have thus not been required  
24 for many years.

25 Q. WHAT WERE THE TRAFFIC STUDY RESULTS FROM THE 1997 BIENNIAL  
26 STUDY FOR THE TOLL ROUTE OF NEW TRIPOLI TO IRONTON?

27 A. This would be a question for Verizon-N and not Ironton.

1 Q. TO YOUR KNOWLEDGE, HAS THE ISSUE OF EAS FROM NEW TRIPOLI TO  
2 IRONTON BEEN RAISED IN THE PAST?

3 A. Yes. A complaint was filed on April 21, 1995 in the matter of Ferne A. Keller, et  
4 al. v. GTE, at Docket No. C-00956768 requesting EAS from New Tripoli to the  
5 Ironton exchange as well as two Bell of PA (now Verizon Pennsylvania Inc. )  
6 exhcanges. A petition carrying over 400 names was attached to the complaint.  
7 The EAS request was ultimately denied. Another complaint was filed November  
8 12, 1999 in the matter of Mary Jo and Phillip Castrine v. GTE North Incorporated  
9 at Docket No. C-00993015. GTE North is now Verizon-N. In that proceeding,  
10 Complainants requested EAS from New Tripoli to Schnecksville - the same  
11 request as here - but the complaint was withdrawn at the time of the scheduled  
12 evidentiary hearing.

13 Q. DOES THE FACT THAT MS. REESE HAS AN INTEREST IN PLACING CALLS  
14 TO NUMBERS OUTSIDE OF NEW TRIPOLI'S EXISTING LOCAL CALLING  
15 AREA MEAN THAT THE LOCAL CALLING AREA OF THE NEW TRIPOLI  
16 EXCHANGE IS NECESSARILY INSUFFICIENT OR CONTRARY TO THE  
17 PUBLIC INTEREST?

18 A. Not automatically. Although certain family members, friends, services and  
19 business interests of Ms. Reese may be located in other exchanges outside the  
20 existing local calling area, this is often a matter of personal choice. Calling  
21 interests vary because of the locations of friends, families, employers, business  
22 interests, personal pursuits, choice of living area, etc. Also, these are the kinds  
23 of things which are a matter of personal preference and can be subject to change

1 over time and which alone should not determine one's local calling area.  
2 Nevertheless, in determining whether the exchanges in question are within a  
3 common community of interest, the desires of this customer is a valid  
4 consideration that should cause the Commission to review other criteria which  
5 may further determine whether the requested EAS is warranted, whether or not  
6 the traffic volume criteria have been met. This is especially true where, as here,  
7 the filing of prior complaints of a similar nature suggests that the desire for local  
8 calling from New Tripoli to the Ironton exchange is not merely of personal interest  
9 to Ms. Reese but is desired by many others in the New Tripoli exchange as well.

10 Q. ARE YOU FAMILIAR WITH THE TERMS "MANDATORY EAS" AND  
11 "DISCRETIONARY EAS"?

12 A. I am aware that the Commission has recognized such a distinction. It is my  
13 understanding that "mandatory EAS" refers to a situation where a toll route  
14 qualifies for extended area service pursuant to the criteria relative to the traffic  
15 study data threshold set forth in Section 63.74, 52 Pa. Code § 63.74. It is my  
16 further understanding that "discretionary EAS" refers to a situation where EAS  
17 may not be mandated pursuant to traffic usage study results and their application  
18 in concert with the Section 63.74 criteria, but that a customer nevertheless files a  
19 formal complaint with the Commission requesting EAS. With the elimination of  
20 the biennial toll traffic study requirement, the Commission now appears to be  
21 shifting the evidentiary weight to other criteria.

1 Q. THUS, WHERE AN EAS COMPLAINT IS FILED, WHAT CRITERIA DOES THE  
2 COMMISSION CONSIDER OTHER THAN THE TRAFFIC USAGE STUDY  
3 RESULTS FOR THE ROUTE OR ROUTES IN QUESTION?

4 A. It is my understanding that 52 Pa. Code § 63.77 sets forth the criteria that the  
5 Commission will consider in evaluating a discretionary EAS complaint such as  
6 the formal complaint filed by Ms. Reese in this matter. The first of six criteria  
7 listed is the amount of toll charge traffic between the exchanges in question,  
8 which would appear to be the traffic usage study results. However, in addition,  
9 the Commission will also consider the cost to the utility of implementing EAS, the  
10 potential increase in local service charge due to implementation of EAS versus  
11 the current cost to subscribers for interexchange toll calls, the demography and  
12 the proximity of the exchanges as indicating community of interest, the  
13 availability of alternatives to EAS and the economic effect on the community if  
14 the local service area is not extended.

15 Q. WHAT IS IRONTON'S POSITION REGARDING CRITERION NO. 2, THE COST  
16 TO THE UTILITY TO IMPLEMENT THE DESIRED EAS?

17 A. While I can not speak for Verizon-N, it is my opinion that Ironton and Verizon-N  
18 have had the capability to provide two-way EAS between Ironton and New Tripoli  
19 for a number of years. In December 2003, Ironton took the initiative to implement  
20 one-way EAS from its Ironton exchange to the New Tripoli exchange. Ironton  
21 was able to implement this EAS route with existing facilities and at no increase in  
22 rates to its ratepayers. Those trunking facilities route the traffic from the Ironton  
23 exchange south to Verizon-N's Emmaus exchange central office switch which

1 then transports the traffic on facilities north through Verizon-N's New Smithville  
2 exchange switch and then on to Verizon-N's New Tripoli exchange remote  
3 switch. At the time, Verizon-N chose not to similarly institute EAS in the other  
4 direction from New Tripoli to Ironton, i.e. two-way EAS. If those Verizon-N  
5 facilities are two-way facilities, then traffic should be able to be carried in the  
6 other direction on those existing facilities from New Tripoli to Ironton.

7 Q. WHAT IMPACT WOULD THE IMPLEMENTATION OF THE REQUESTED EAS  
8 HAVE ON IRONTON AS THE TERMINATING EXCHANGE?

9 A. Should the traffic from New Tripoli to Ironton which is currently rated as toll  
10 become local traffic, then Ironton would lose its existing revenue stream of  
11 terminating access. However, Ironton is willing to absorb that loss for the good of  
12 the community for the same reason that Ironton implemented EAS from Ironton  
13 to New Tripoli in 2003.

14 Q. WHAT IS IRONTON'S POSITION REGARDING CRITERION NO. 3, THE  
15 POTENTIAL INCREASE IN LOCAL SERVICE CHARGE TO NEW TRIPOLI  
16 CUSTOMERS DUE TO IMPLEMENTATION OF EAS VERSUS THE CURRENT  
17 COST TO SUBSCRIBERS FOR INTEREXCHANGE TOLL CALLS?

18 A. Ironton is not aware of whether the implementation of the requested EAS will  
19 impact the local service rates of New Tripoli customers.

20 Q. WHAT IS IRONTON'S POSITION REGARDING CRITERION NO. 4, THE  
21 DEMOGRAPHY AND THE PROXIMITY OF THE EXCHANGES AS INDICATING  
22 COMMUNITY OF INTEREST?

1 A. As stated earlier, the exchanges are only about 10 miles apart. In addition, with  
2 the educational entities, businesses, retail shopping center and other business  
3 and community ties, Schnecksville, which is within the Ironton exchange, is  
4 essentially the "retail hub" of the area, including New Tripoli. Therefore, there is  
5 no question that the proximity of the New Tripoli and Ironton exchanges in  
6 combination with the level of interaction among the residents and business of  
7 these exchanges that we see as a member of the community prove a community  
8 of interest and weigh heavily in favor of granting the requested EAS.

9 Q. WHAT IS IRONTON'S POSITION REGARDING CRITERION NO. 5, THE  
10 AVAILABILITY OF ALTERNATIVES TO EAS?

11 A. If Verizon-N would be able to implement this EAS at little or no cost as Ironton  
12 did in the other direction, we believe implementation of this EAS outweighs  
13 reliance on other partial or second-rate alternatives that may exist.

14 Q. WHAT IS IRONTON'S POSITION REGARDING CRITERION NO. 6, THE  
15 ECONOMIC EFFECT ON THE COMMUNITY IF THE LOCAL SERVICE AREA  
16 IS NOT EXTENDED?

17 A. As I have already stated, we believe that implementation of EAS from New Tripoli  
18 to Ironton would provide a positive economic benefit to the entire community.

19 Q. WOULD THERE BE MORE CALLING BETWEEN EXCHANGES IF THERE  
20 WERE NO TOLL CHARGES?

21 A. I would expect so. The volume of calling minutes may increase some.  
22 Customers who now make calls on a toll basis will likely call more and talk longer  
23 if there were no toll charges.

1 Q. BASED UPON YOUR KNOWLEDGE OF THE SERVICE AREA, DO YOU  
2 BELIEVE THAT ADDITIONAL EAS FROM THE NEW TRIPOLI EXCHANGE AS  
3 REQUESTED BY MS. REESE IS JUSTIFIED?

4 A. Yes, I do. As I have already stated, as a presence in the community, we believe  
5 that customers of the New Tripoli exchange have a real interest in calling the  
6 Ironton exchange on a toll-free basis. In my opinion, such a change would be  
7 beneficial to the majority of New Tripoli exchange customers.

8 Q. CAN MS. REESE CALL HER SCHOOL DISTRICT TOLL-FREE?

9 A. Customers in Verizon-N's New Tripoli exchange are served by the Northwestern  
10 School District which is a local call. However, those students desiring vocational  
11 training or attending the intermediate unit or local community college travel to the  
12 educational entities mentioned earlier in my testimony, which are located in  
13 Schnecksville, within the Ironton exchange. Today, any calls on the Verizon-N  
14 network from the New Tripoli exchange to these educational entities is a toll call.

15 Q. ARE YOU CONCERNED ABOUT OVERALL CUSTOMER ACCEPTANCE OF  
16 AN EAS PROPOSAL?

17 A. No. "Customer acceptance" would only become an issue if it were determined  
18 that an increase in local service rates applied and an EAS polling became  
19 necessary. We do not know at this time whether that is the case here. However,  
20 as I have explained, most of the customers in the New Tripoli exchange truly  
21 have a reason or need to call the Ironton exchange. It is safe to say that a  
22 "community of interest" does exist.

23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

24 A. Yes it does, at this time.

25

26

27

JEAN REESE v. VERIZON NORTH INC.

C-20043520

**DOCKETED**  
JUL 14 2005

**RECEIVED**

JUN 01 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



New Tripoli Exchange (Vz-N)

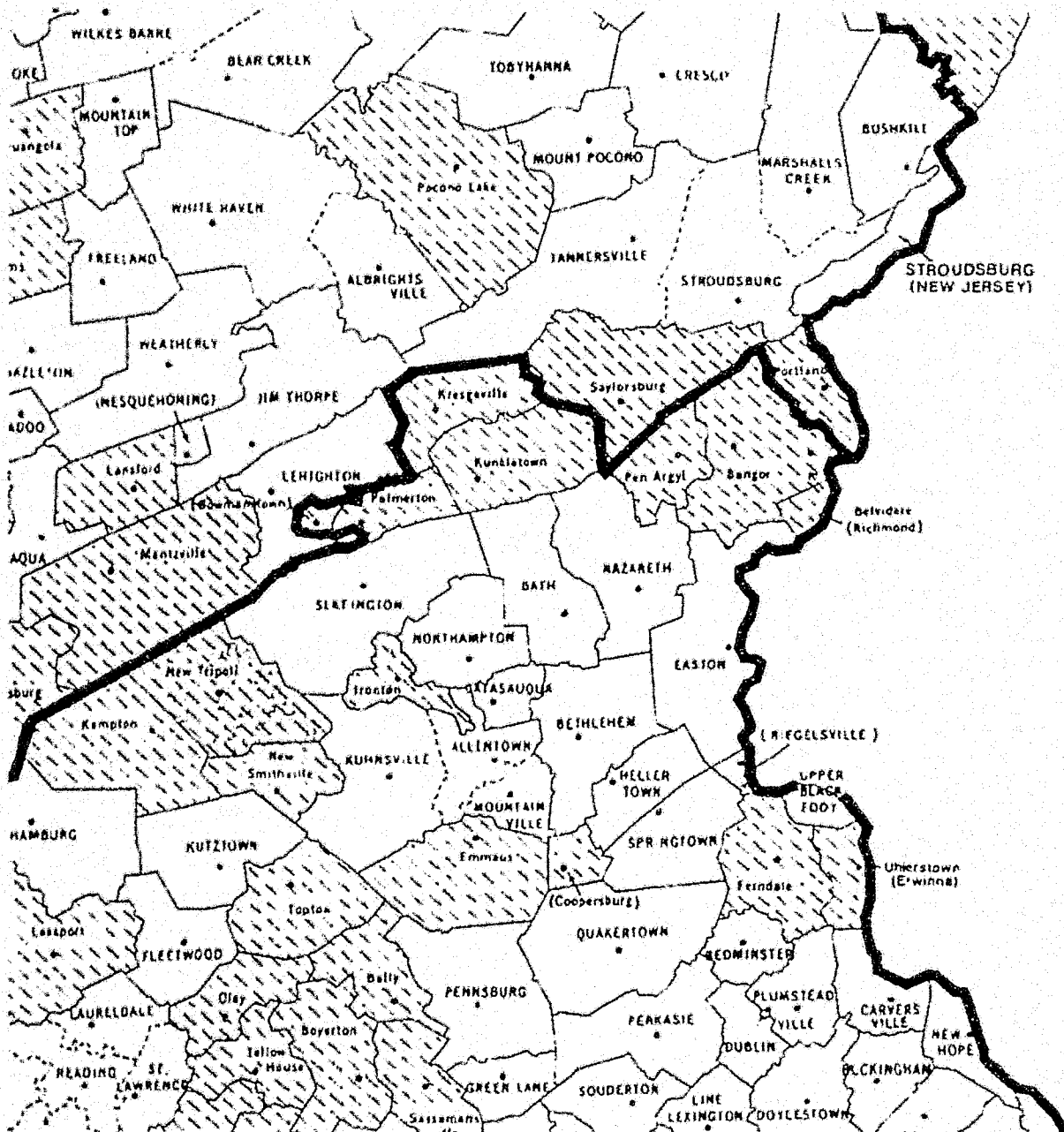


New Tripoli Local Calling Area

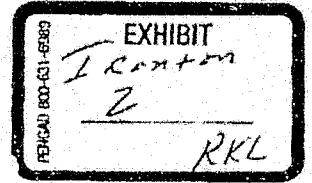


Ironton Exchange

**DOCUMENT  
FOLDER**



JEAN REESE v. VERIZON NORTH INC.



C-20043520

RECEIVED

JUN 01 2005

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU



Ironton Exchange (ITC)



Ironton Local Calling Area

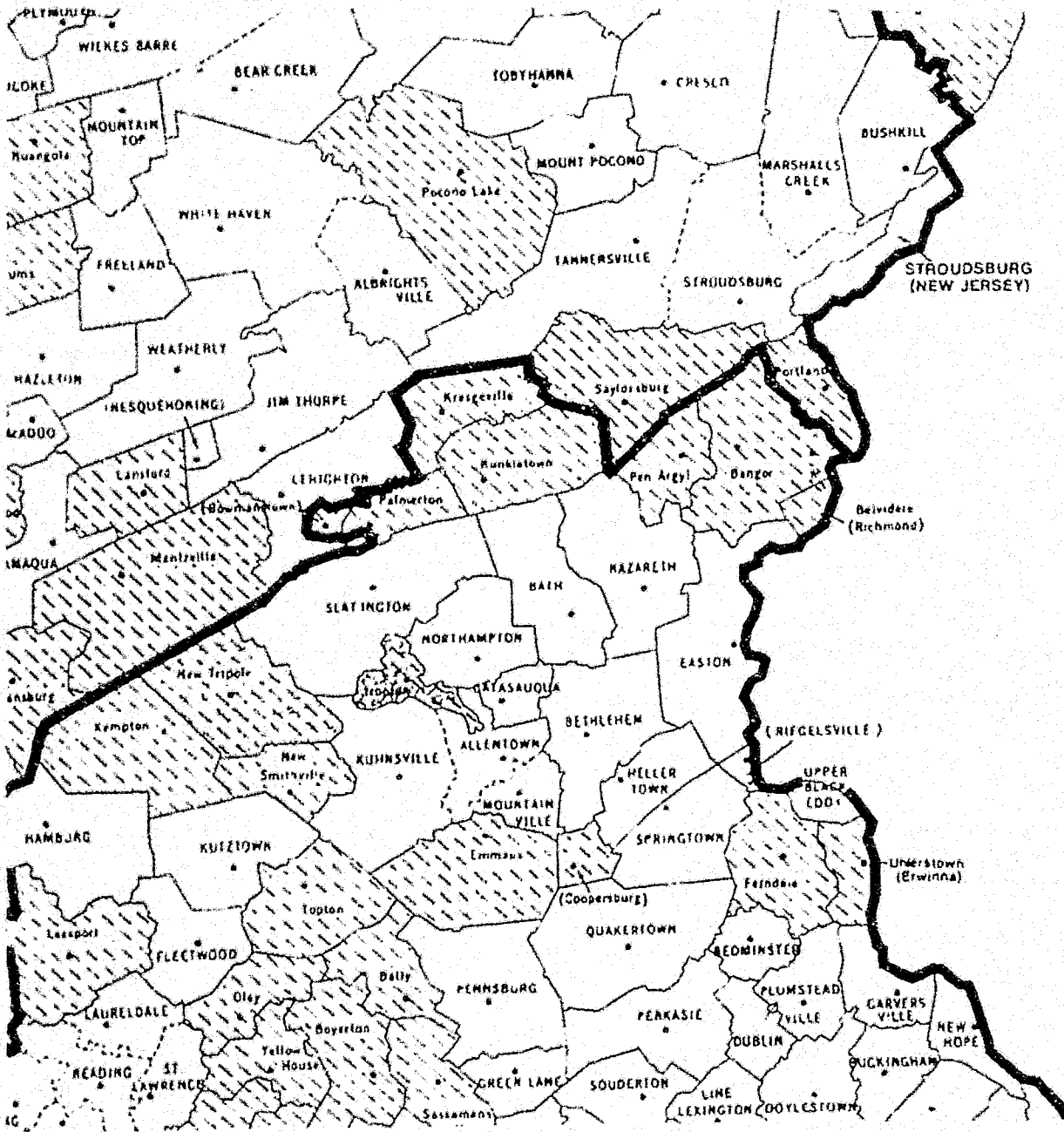


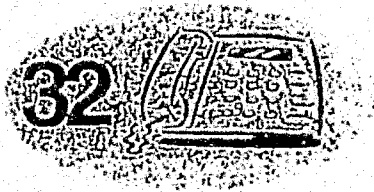
New Tripoli Exchange (Vz-N)

DOCKETED

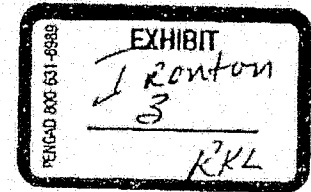
JUL 14 2005

DOCUMENT FOLDER





LOCAL AND VERIZON CALLING AREA



Local Calling Exchanges — Area Codes 610, 484, 215 & 908  
 Outside Philadelphia and Philadelphia Suburbs

Area Code 610

Exchange .....	Code
Allentown .....	204, 218, 289, 295, 336, 349, 351, 366, 390, 391, 392, 393, 395, 398, 402, 424, 432, 433, 434, 435, 437, 439, 462, 477, 481, 504, 508, 509, 512, 530, 533, 554, 573, 597, 606, 628, 652, 657, 663, 703, 704, 706, 709, 712, 720, 737, 739, 740, 751, 762, 770, 774, 776, 778, 782, 791, 794, 797, 798, 820, 821, 830, 839, 841, 844, 871, 904, 912, 920, 972, 973, 979
Bath .....	571, 837
Bethlehem .....	216, 217, 248, 297, 317, 332, 360, 417, 419, 428, 442, 570, 575, 625, 653, 691, 694, 730, 758, 807, 814, 849, 861, 865, 866, 867, 868, 882, 954, 974, 984, 997
Catasauqua .....	231, 264, 266, 403, 443, 465, 596, 686
Coopersburg .....	282
Easton .....	250, 252, 253, 258, 330, 333, 438, 515, 559, 810, 829, 905, 923, 991
Emmaus .....	421, 928, 965, 966, 967
Ferndale .....	847
Hellertown .....	456, 748, 838
Ironton .....	769, 799
Kutztown .....	426, 683, 894
Nazareth .....	365, 614, 746, 759, 813
New Smithville .....	285
New Tripoli .....	298
Northampton .....	261, 262, 440, 502, 697, 851
Palmerton .....	824, 826
Pen Argyl .....	654, 863
Riegelsville .....	510, 749
Stalington .....	224, 760, 767, 978
Springtown .....	346
Topton .....	641, 682
Uhlertown .....	294
Upper Black Eddy .....	600, 982



Area Code 484

Exchange .....	Code
Bethlehem .....	241, 242, 554, 767, 821, 884, 892, 893, 894, 895, 896, 898
Catasauqua .....	240, 245, 246, 249, 488, 834
Coopersburg .....	499, 863
Easton .....	373, 536, 541, 542, 544, 545, 546, 548, 549, 903
Emmaus .....	232, 233, 519
Ferndale .....	833
Hellertown .....	851, 852, 853, 856, 858, 859
Ironton .....	630, 644
Kutztown .....	641, 642, 646, 648, 839
Nazareth .....	291, 292, 293, 296, 298, 299
New Smithville .....	504, 647
New Tripoli .....	217, 601
Northampton .....	271, 272, 273, 275, 276, 279
Riegelsville .....	306, 308, 310, 314, 316
Stalington .....	261, 262, 263, 265, 330
Springtown .....	810, 812, 814, 815, 817, 819
Topton .....	651
Upper Black Eddy .....	305, 309, 312

Area Code 215

Exchange .....	Code
Quakertown .....	529, 536, 538, 804, 892

Area Code 267

Exchange .....	Code
Quakertown .....	347, 371, 372, 373, 375, 376, 377, 378, 379, 733, 999

Area Code 908 (New Jersey)

Exchange .....	Code
Bloomsbury .....	388, 479, 940
Frenchtown .....	628, 996
Milford .....	291, 318, 505, 615, 643, 650, 676, 843, 899, 995
Phillipsburg .....	213, 235, 329, 339, 387, 454, 521, 562, 760, 792, 827, 847, 859, 954

DOCUMENT FOLDER

Area Code 484

Exchange .....	Code
Allentown .....	201, 214, 221, 223, 224, 225, 226, 227, 229, 239, 244, 347, 357, 358, 375, 397, 407, 505, 515, 547, 553, 596, 634, 664, 695, 764, 765, 788, 736, 951
Bath .....	281, 282, 284, 285, 286, 287, 289

RECEIVED

JUN 01 2005

DOCKETED  
 JUL 14 2005

EXHIBIT  
*Iron*  
 5/17/05 RKL

IRONTON CROSS EX 1  
 C-20043520

**MAPQUEST DOCKETED**  
 JUL 14 2005

4750 Orchard Rd  
 Schnecksville PA  
 18078-2536 US

**RECEIVED**

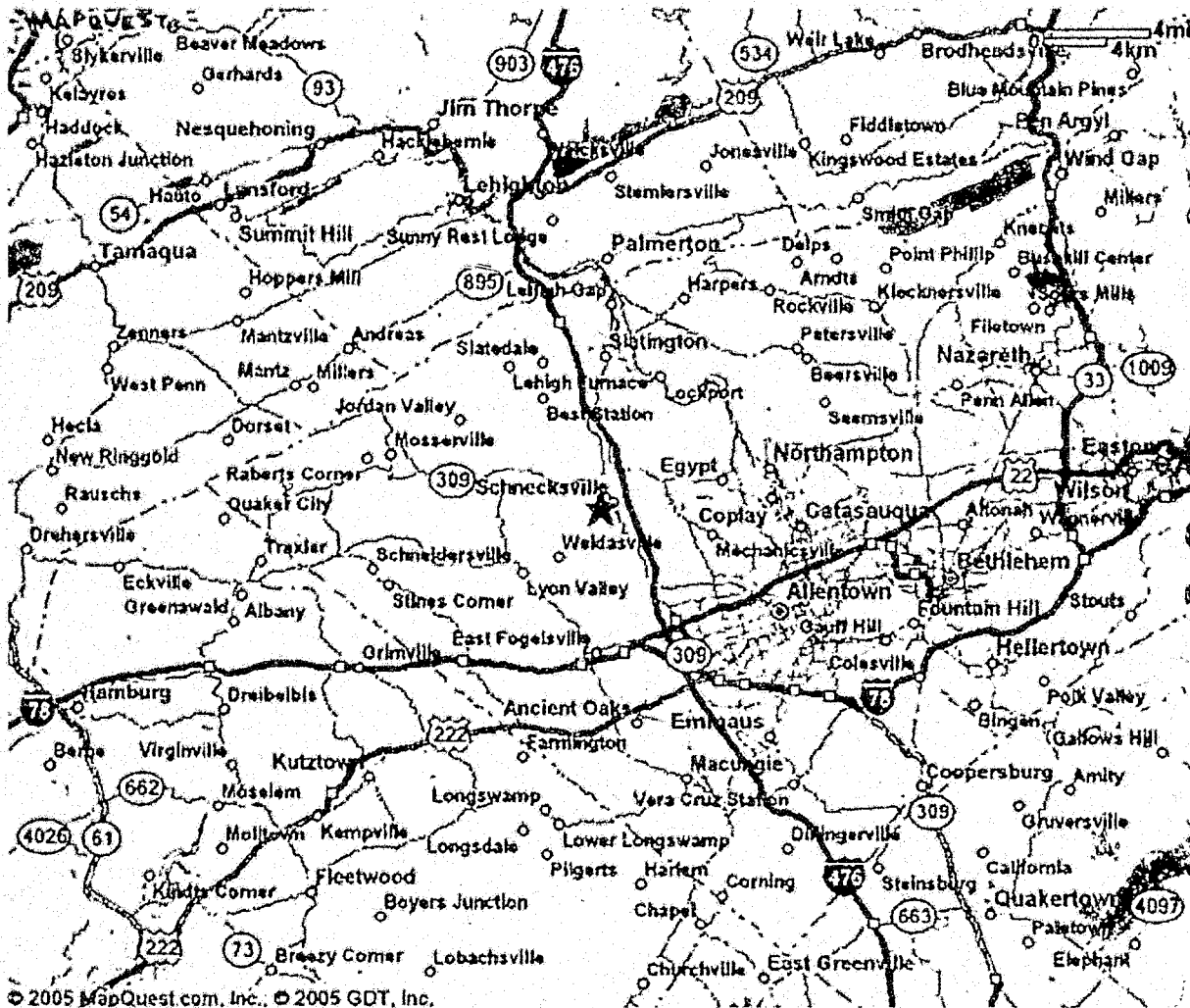
Notes:

JUN 01 2005  
 PA PUBLIC UTILITY COMMISSION  
 SECRETARY'S BUREAU

**Best Western**  
**FREE \$50 Travel Card!**



Stay 5 nights at Best Western and receive The Fairly OddParents \$50 Travel Card starting June 6.



**NAVTEQ ON BOARD** All rights reserved. Use Subject to License/Copyright

This map is informational only. No representation is made or warranty given as to its content. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.

**DOCUMENT FOLDER**

IRONTON CROSS EX 2  
C-20043520

MAPQUEST

4750 Orchard Rd  
Schnecksville PA  
18078-2536 US

RECEIVED

EXHIBIT  
Ironton  
2  
5/17/05 RKL

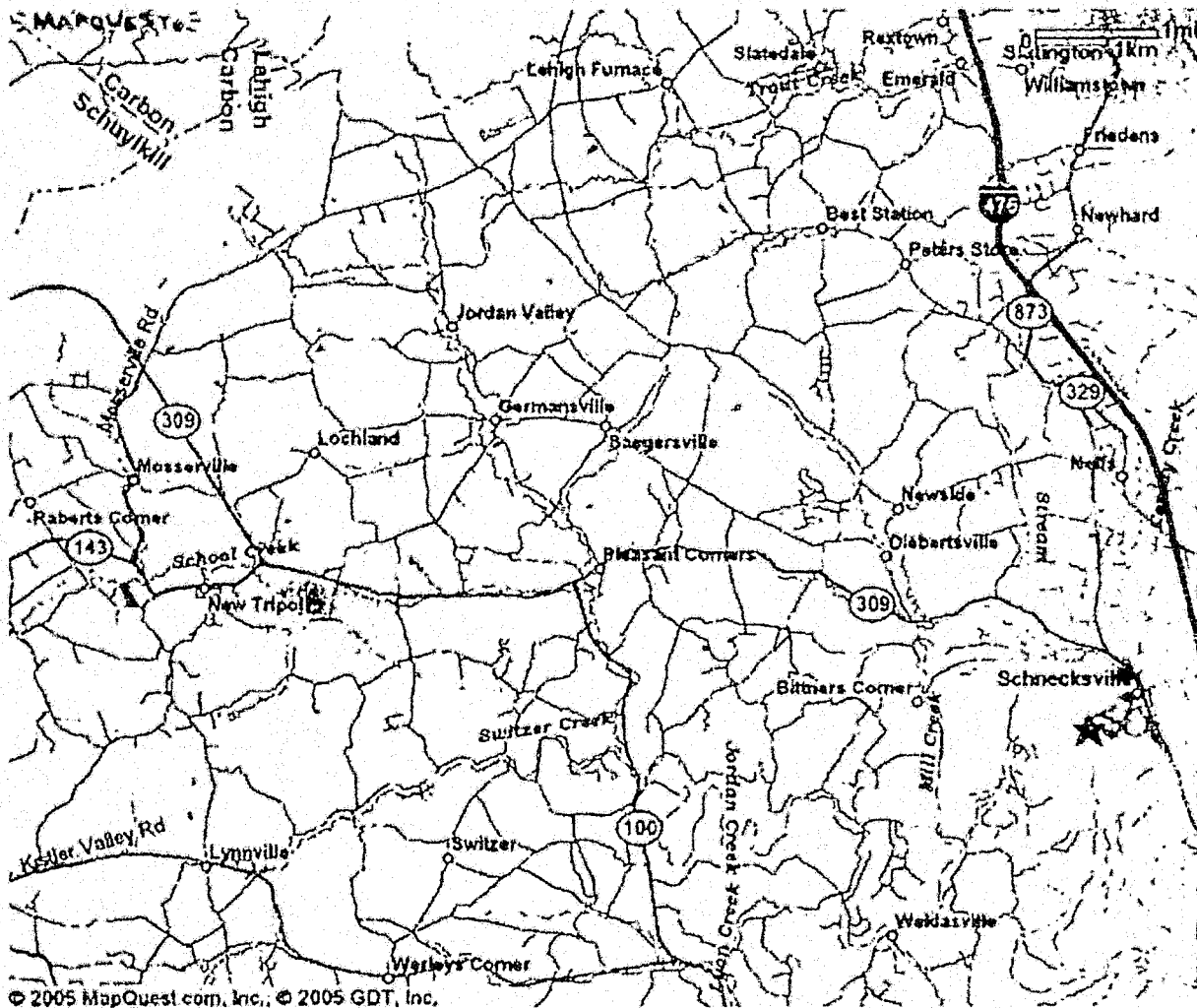
Notes:

JUN 01 2005

**DOCKETED**  
JUL 14 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DOCUMENT  
FOLDER



© 2005 MapQuest.com, Inc.; © 2005 GDT, Inc.

NAVTEQ  
ON BOARD

All rights reserved. Use Subject to License/Copyright

This map is informational only. No representation is made or warranty given as to its content. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.