

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00	:	
2. BUREAU: ALJ	:	
3. SECTION(S):	:	
5. APPROVED BY:	:	4. PUBLIC MEETING DATE:
DIRECTOR:	:	00/00/00
SUPERVISOR:	:	
6. PERSON IN CHARGE:	:	7. DATE FILED: 05/17/07
8. DOCKET NO: C-20077796	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: BOLAND, CAROL

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: CENTRE

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES THERE IS A RELIABILITY, SAFETY OR QUALITY PROBLEM WITH HER UTILITY SERVICE.

DOCKETED
MAY 29 2007

DOCUMENT
FOLDER

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

310200
Please print or type.

C-20077796

ORIGINAL

1. CUSTOMER NAME (COMPLAINANT)

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

Name Carol Boland

Street/P.O. Box 315 Rosemont Dr. Apt # _____

City State College State PA Zip 16801

County Centre

Area Code/HOME Phone 814-234-8415

Area Code/WORK Phone _____

Utility Account Number 814-234-8415 082 204
(from your bill)

RECEIVED
2007 JUL 17 PM 8:22
REGISTRATION DIVISION

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

Name _____

Street/P O. Box _____

City _____ State _____ Zip _____

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Verizon

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER
(taxi, moving company, limousine)

TELEPHONE
(local, long distance)

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other.
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

There is no telephone service in the Pine Grove Mills area of State College when there is a power outage. I was told in March I would be contacted. It is now May & still no remedy has been made.

5. RELIEF

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

I was told by the foreman of our area that we need a new battery for our area. This is supposed to be an upgrade done on a regular basis. Since it has not been done for years, we are without phone service during power outages. I am told funding needs to be obtained & the placement takes 3-4 weeks. I need to know why we need to wait indefinitely for funding & repair for something that is due to their neglect.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company **AND** your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES

(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I Carol Boland, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Carol Boland
(Signature)

5/15/07
(Date)

9. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.



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

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: May 29, 2007

C-20077796

LEIGH A. HYER
VERIZON PENNSYLVANIA INC
FLOOR 10W
1717 ARCH ST
PHILADELPHIA PA 19103

**DOCUMENT
FOLDER**

Dear Ms. Hyer:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by CAROL BOLAND. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

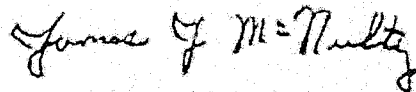
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

May 29, 2007

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,



James J. McNulty
Secretary

ane

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: May 29, 2007

DOCUMENT
FOLDER

CAROL BOLAND
Complainant

v.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No: C-20077796

DOCKETED
MAY 29 2007

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: VERIZON PENNSYLVANIA, INC.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

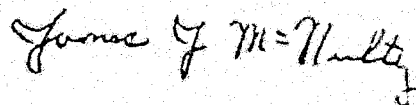
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

Hawke
 Mckeon &
 Sniscak LLP
ATTORNEYS AT LAW

William T. Hawke
Kevin J. McKeon
Thomas J. Sniscak
Lillian Smith Harris
Scott T. Wyland
Todd S. Stewart
Craig R. Burgraff

Steven D. Snyder
Janet L. Miller
Steven K. Haas
William E. Lehman
Rikardo J. Hall
Katherine E. Lovette
Amy A. Whitney

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

June 21, 2007

BY HAND DELIVERY

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

ORIGINAL

SECRETARY'S OFFICE

2007 JUN 21 PM 3:21

RE: Carol Boland v. Verizon Pennsylvania Inc., Docket No. C-20077796; ANSWER OF VERIZON PENNSYLVANIA INC.

Dear Mr. McNulty:

Enclosed for filing with the Commission are an original and three (3) copies of Verizon Pennsylvania Inc.'s ("Verizon PA") Answer to the Formal Complaint filed in the above-captioned matter. A copy of this document has been served in accordance with the attached Certificate of Service.

Based on discussion Verizon PA had with the Complainant in this matter prior to the filing of this Answer, Verizon PA believes Ms. Boland may be willing to withdraw the Formal Complaint on the basis of an upgrade to facilities providing service to her area that is currently being undertaken by Verizon PA. Verizon PA understands, however, that Mrs. Boland would like to wait a few months before deciding if she feels the project has satisfied the issues raised in the Formal Complaint. Therefore, Verizon PA respectfully requests that this case be assigned for mediation.

DOCKETED
JUN 22 2007
DOCUMENT FOLDER

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

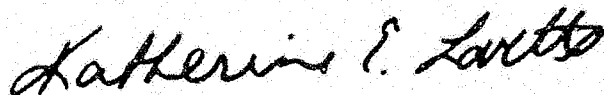
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James J. McNulty, Secretary
Pennsylvania Public Utility Commission
June 21, 2007
Page Two

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,



Katherine E. Lovette
Counsel for Verizon Pennsylvania Inc.

Enclosures

cc: Carol Boland
OALJ Scheduling Office

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

RECEIVED
JUN 21 11:32 AM

CAROL BOLAND,

Complainant

v.

Docket No. C-20077796

VERIZON PENNSYLVANIA INC.,

Respondent

DOCKETED
JUN 22 2007

**ANSWER OF VERIZON PENNSYLVANIA INC.
TO THE FORMAL COMPLAINT FILED BY CAROL BOLAND**

Verizon Pennsylvania Inc. ("Verizon PA" or "Company"), by its attorneys in this proceeding, Hawke McKeon & Sniscak LLP, hereby files its Answer and submits New Matter in response to the Formal Complaint filed by Carol Boland ("Complainant"). In support thereof,

Verizon PA responds and avers as follows:

1. ADMITTED.
2. ADMITTED. Verizon PA AVERS its proper corporate name is "Verizon Pennsylvania Inc."

3. ADMITTED.

4. A. DENIED.

B. Verizon PA ADMITS Complaint has reported intermittent service interruptions to the Company and has claimed that the telephone service outages she has experienced coincided with power service interruptions. Complainant's statement that telephone service outages occur in her area when power outages occur represents Complainant's opinion, belief or conclusion to which no response is required. To the extent a response is deemed to be

**DOCUMENT
FOLDER**

necessary, this statement is DENIED. Verizon PA ADMITS Complainant contacted the Company in March of 2007. Verizon PA DENIES the Company made "no remedy."

5. Verizon PA ADMITS a foreman discussed battery replacement with Complainant. The remaining statements set forth in Paragraph 5 of the Formal Complaint represent Complainant's opinions, beliefs or conclusions or are requests for relief to which no response is required. To the extent a response to these statements is deemed to be necessary, these statements are DENIED.

6. ADMITTED.

7. No statements were made in Paragraph 7; therefore, no response is required.

WHEREFORE, for all of the reasons set forth above, and in accordance with the Commission's Regulations, Verizon Pennsylvania Inc. requests that the Commission dismiss the Formal Complaint filed at Docket No. C-200777796 in its entirety.

Respectfully submitted,



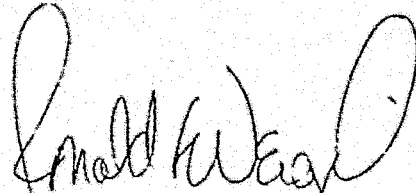
Katherine E. Lovette
Attorney I.D. #91458
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105-1778
717-236-1300 (voice); 717-236-4841 (fax)
kelovette@hmslegal.com

DATED: June 21, 2007

Counsel for Verizon Pennsylvania Inc.

AFFIDAVIT

I, RONALD F. WEIGEL, Director – Government Relations of Verizon Pennsylvania, am authorized to make this affidavit on its behalf, and I verify that the information provided in the foregoing document(s) is true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



RONALD F. WEIGEL
Director – Government Relations

SECRET

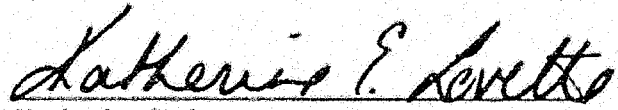
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by first class mail

Carol Boland
315 Rosemont Drive
State College, PA 16801


Katherine E. Lovette

Dated this 21st day of June, 2007

Counsel for Verizon Pennsylvania Inc.

2007 JUN 21 PM 3:21
SECURITY BUREAU