

DOCKET NO.: C-20016333
RESPONDENT OR APPLICANT: VERIZON PENNSYLVANIA INC
PARTY OR COMPLAINANT: SHEA BEVERLY

ENTRY TYPE	DATE	BUREAU	PERSONNEL
1 N	10/26/01	SEC	IMES
FORMAL COMPLAINT OF BEVERLY SHEA V. VERIZON			
2 N	10/30/01	SEC	IMES
NOTICE OF COMPLAINT SERVED ON RESPONDENT TO ANSWER IN 20 DAYS			
3 N	11/19/01	SEC	FRISCIA
RESP FLD MOT CONSOLIDATE C-20016333/16334/16335/16336/16337/16338/16339/16340			
4 N	11/19/01	SEC	
DUPLICATE ENTRY			
5 N	11/19/01	SEC	
DUPLICATE ENTRY			
6 N	11/19/01	SEC	BENJAMIN
RESPONDENT FILED ANSWER TO COMPLAINT WITH CERTIFICATE OF SERVICE			
7 N	12/05/01	SEC	FRISCIA
CALJ CHRISTIANSON INTERIM ORDER SETTING SETTLEMENT CONFERENCE ISSUED			
8 N	04/17/02	SEC	FRISCIA
OALJ MEMO TO SEC-CASE IN MEDIATION PROCESS REVIEW; PROGRESS REPORTS BEING MADE			
9 N	07/09/02	SEC	FRISCIA
OALJ MEMO TO SEC-CASE STILL IN MEDIATION PROCES REVIEW; PROGRES RPTS BEING MADE			
10 N	10/28/02	SEC	JACOBDIANE
RESPONDENT FILED CERTIFICATE OF SATISFACTION WITH CERTIFICATE OF SERVICE			
11 N	11/12/02	SEC	MOTTER
OALJ MEMO ACKNOWLEDGING WITHDRAWAL & CLOSING IN 10 DAYS			
12 N	11/21/02	SEC	MOTTER
SEC LETTER TO PARTIES ADVISING COMMISSION HAS MARKED PROCEEDING CLOSED			

- 1. REPORT DATE: 00/00/00 :
- 2. BUREAU: ALJ :
- 3. SECTION(S): :
- 4. PUBLIC MEETING DATE: 00/00/00 :
- 5. APPROVED BY: DIRECTOR: SUPERVISOR: :
- 6. PERSON IN CHARGE: :
- 7. DATE FILED: 10/26/01 :
- 8. DOCKET NO: C-20016333 :
- 9. EFFECTIVE DATE: 00/00/00 :

PARTY/COMPLAINANT: SHEA BEVERLY

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: NORTHAMPTON

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES THE SHEA FAMILY AND THEIR EIGHT NEIGHBORS HAVE BEEN RUNNING OFF THE SAME PHONE LINE FOR ALOT OF YEARS. THE LINES HAVE BEEN CROSSED THAT THEY ALL HAVE HAD PROBLEMS WITH THE PHONE GOING DEAD FOR DAYS AT A TIME. AT THIS TIME THEY STATE IT IS ONLY GETTING WORSE.

DOCUMENT
FOLDER

DOCKETED

OCT 30 2001

2033 Quarter Mile Rd
Delaware, PA 18015
October 24, 2001

PA Public Utility Commission
P.O. Box 5265
Harrisburg, PA 17105

OPRA

Dear Sirs:

Enclosed please find some of the complaints from this neighborhood.

Several neighbors have forwarded their forms separately.

There are more involved, but the usual lags can no longer be waited for so I am mailing these as a representative sampling of the 28 years of poor service. Sometimes I was without service for an entire holiday weekend. Before they became Verizon, no one ever came out to fix it before the holiday was over.

Thank you

Sincerely,
Brenda M. Shea (Mrs James R.)

Telephone # 610-867-1493

SECRET
BUREAU

2001 OCT 25 PM 10:33

58

Formal Complaint Form
Pennsylvania Public Utility Commission

MAIL

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

1. Your name, mailing address and telephone number:

Name Mrs. James R. Shea

Street/P.O. Box 1033 Quarter Mile Rd

City Bethlehem State PA Zip 18015

County Northampton Area Code/Home Phone 610-867-1493
Area Code/Work Phone _____

2. Name of company your complaint concerns RPL Verizon

3. What is your complaint? (Use additional paper if need more space)

*over the last 28 years, wires have been crossed with
neighbors, the phone lines have gone dead for days at a
time it is getting worse.*

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

*Have the company correct it by replacing the cable
or whatever caused the problems.*

5. You must sign and date your complaint below.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Dorothy M. Shea
Signature

October 22, 2001
Date

Continued on next page

OCT 25 PM 1:37
BUREAU

- 6 If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

Mail to:
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

For more information, please contact the Secretary's Bureau at 717-772-7777.

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

DATE SERVED: OCTOBER 30, 2001

C-20016333

JULIA A CONOVER ESQUIRE
VERIZON PENNSYLVANIA INC
FLOOR 32-N 1717 ARCH ST
PHILDELPHIA PA 19103

DOCUMENT
FOLDER

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by BEVERLY SHEA. 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.

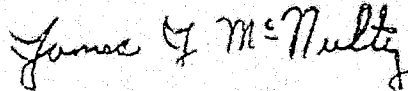
OCTOBER 30, 2001

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

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,

A handwritten signature in cursive script that reads "James J. McNulty".

James J. McNulty
Secretary

DDI

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: OCTOBER 30, 2001

BEVERLY SHEA
Complainant

DOCUMENT
FOLDER

VS.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No: C-20016333

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

DOCKETED

TO: VERIZON PENNSYLVANIA, INC.

OCT 30 2001

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 17120, an answer (original and two 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).

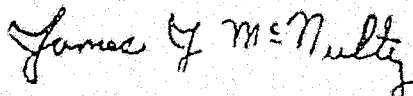
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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

THE LAW FIRM OF

MALATESTA HAWKE & McKEON LLP

HARRISBURG ENERGY CENTER
100 NORTH TENTH STREET
HARRISBURG, PENNSYLVANIA 17101
(717) 236-1300
FAX (717) 236-4841

<http://www.mhm-law.com>

JOSEPH J. MALATESTA, JR.
WILLIAM T. HAWKE
KEVIN J. McKEON
LOUISE A. KNIGHT
THOMAS J. SNISCAK
NORMAN JAMES KENNARD
LILLIAN SMITH HARRIS
SCOTT T. WYLAND
TODD S. STEWART

CRAIG R. BURGRAFF
JANET L. MILLER
SUSAN J. SMITH
WILLIAM E. LEHMAN
STEVEN K. HAAS
ANDREW S. TUBBS

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

ORIGINAL

November 19, 2001

RECEIVED

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Second Floor, Commonwealth Keystone Building
PO Box 3265
Harrisburg, PA 17105-3265

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PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

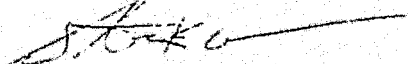
RE: Beverly Shea v. Verizon Pennsylvania Inc.; Docket No. C-20016333; ANSWER
OF VERIZON PENNSYLVANIA INC. TO THE FORMAL COMPLAINT
OF BEVERLY SHEA/REQUEST FOR MEDIATION

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s Answer to the Formal Complaint filed in the above-captioned proceeding. As indicated in the Answer, Verizon PA has begun the process of replacing the telephone cable that serves the Complainant and other customers residing in the Complainant's vicinity. Verizon Pa also is upgrading certain other facilities serving these customers. Verizon PA anticipates that these upgrades will completely address the problems raised in the Complaint. Verizon PA will communicate with the Complainant throughout this process. Accordingly, Verizon PA requests that this proceeding be referred to the Commission's mediation process to enable the parties to attempt to work toward an informal resolution of this matter.

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,



Steven K. Haas
Counsel for Verizon Pennsylvania Inc.

SKH:cea
Enclosures
cc: Beverly Shea

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

BEVERLY SHEA,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016333

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ANSWER OF VERIZON PENNSYLVANIA INC. TO THE COMPLAINT OF BEVERLY SHEA
A PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Verizon Pennsylvania Inc. ("Verizon PA"), by its attorneys in this proceeding, Malatesta Hawke & McKeon LLP, hereby submits its Answer to the Formal Complaint filed by Beverly Shea ("Complainant"). In support thereof, Verizon PA represents and avers as follows:

1. ADMITTED.
2. ADMITTED. The correct corporate name of the Respondent is Verizon Pennsylvania Inc.
3. Verizon PA ADMITS that it has received trouble reports from customers who live in the Complainant's vicinity concerning crossed lines and outages. Verizon PA has conducted extensive testing of its facilities, and has undertaken various repair efforts to restore telephone service in response to these trouble reports. Verizon PA is without sufficient information or knowledge to either ADMIT or DENY the Complainant's allegations about the frequency and duration of specific service problems and, accordingly, demands strict proof thereof at hearing. By way of further response, Verizon PA is currently in the process of completely replacing the

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telephone cable that serves the Complainant and other customers in the Complainant's vicinity. In addition, other facilities serving these customers are being upgraded as well. These facility replacements and upgrades should completely address and correct the problems described in the Formal Complaint.

4. Paragraph 4 of the Complaint contains requests for relief to which no responses are required.

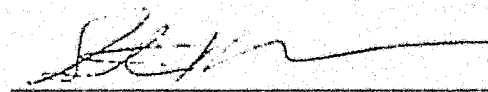
WHEREFORE, for the reasons set forth above, Verizon PA Inc. respectfully requests that the Formal Complaint filed by Beverly Shea at Docket No. C-20016333 be dismissed or denied in its entirety. Alternatively, Verizon PA requests that this proceeding be referred to the Commission's mediation process to enable the parties to attempt to resolve this matter informally, based on the actions Verizon PA has initiated in response to the complaint.

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Respectfully submitted,



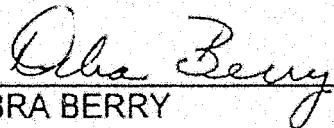
Steven K Haas
Malatesta Hawke & McKeon LLP
Harrisburg Energy Center
100 North Tenth Street
Harrisburg, PA 17105-1778
(717) 236-1300

Counsel for Verizon Pennsylvania Inc.

DATED: November 19, 2001

AFFIDAVIT

I, DEBRA BERRY, Director, Regulatory Planning 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.

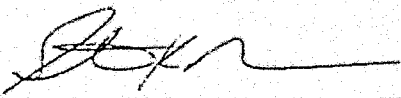

DEBRA BERRY
Director, Regulatory Planning

CERTIFICATE OF SERVICE

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

Service by first class mail

Beverly Shea
2033 Quarter Mile Road
Bethlehem, PA 18015



Steven K. Haas

DATE: November 19, 2001

THE LAW FIRM OF

MALATESTA HAWKE & McKEON LLP

JOSEPH J. MALATESTA JR.
WILLIAM T. HAWKE
KEVIN J. McKEON
LOUISE A. KNIGHT
THOMAS J. SNISCAK
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HARRISBURG ENERGY CENTER
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James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Second Floor, Commonwealth Keystone Building
PO Box 3265
Harrisburg, PA 17105-3265

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SECRETARY'S BUREAU

KJR

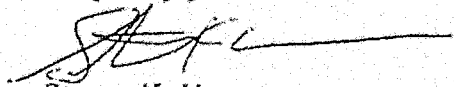
RE: Beverly Shea v Verizon Pennsylvania Inc.; Docket No. C-20016333
Dorothy Herring v Verizon Pennsylvania Inc.; Docket No. C-20016334
Julius Barkis v Verizon Pennsylvania Inc.; Docket No. C-20016335
Evelyn G. Zumas v Verizon Pennsylvania Inc.; Docket No. C-20016336
James & Alexia Kunkle v Verizon Pennsylvania Inc.; Docket No. C-20016337
Robert & Alyse Iocco v Verizon Pennsylvania Inc.; Docket No. C-20016338
James & Sarah Norwine v Verizon Pennsylvania Inc.; Docket No. C-20016339
Marjorie Brown v Verizon Pennsylvania Inc.; Docket No. C-20016340
**MOTION OF VERIZON PENNSYLVANIA INC. TO CONSOLIDATE
FORMAL COMPLAINTS**

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s Motion to Consolidate the above-captioned complaint proceedings.

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,



Steven K. Haas
Counsel for Verizon Pennsylvania Inc.

SKH:cea
Enclosures

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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BEVERLY SHEA,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016333

NOV 19 2001

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

DOROTHY HERRING,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016334

JULIUS BARKIS,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016335

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FOLDER

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EVELYN G. ZUMAS
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016336

JAMES & ALEXIA KUNKLE,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016337

ROBERT & ALYSE IOCCO
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

JAMES & SARAH NORWINE,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

MARJORIE BROWN,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016338

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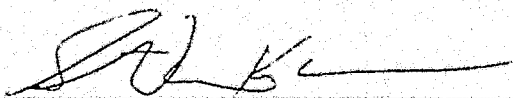
PUBLIC UTILITY COMMISSIO.
SECRETARY'S BUREAU

Docket No. C-20016339

Docket No. C-20016340

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.101, you are hereby notified that Verizon Pennsylvania Inc. ("Verizon PA") has filed a Motion to which you may answer within ten (10) days unless otherwise provided in Chapter 5 of Title 52 of the Pennsylvania Code. Your failure to answer will allow the presiding officer to rule on the Motion without a response from you, thereby requiring no other proof. All Pleadings such as a reply to this Motion must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Verizon PA.


Steven K. Haas
Malatesta Hawke & McKeon LLP
100 North Tenth Street
Harrisburg, PA 17105-1778

Dated: November 19, 2001

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

BEVERLY SHEA,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

DOROTHY HERRING,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

JULIUS BARKIS,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

EVELYN G. ZUMAS
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

JAMES & ALEXIA KUNKLE,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

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Docket No. C-20016333

NOV 19 2001

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. C-20016334

Docket No. C-20016335

Docket No. C-20016336

Docket No. C-20016337

ROBERT & ALYSE IOCCO
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

JAMES & SARAH NORWINE,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

MARJORIE BROWN,
Complainant

v.

VERIZON PENNSYLVANIA INC.,
Respondent

Docket No. C-20016338

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PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. C-20016339

Docket No. C-20016340

**MOTION OF VERIZON PENNSYLVANIA INC. TO CONSOLIDATE
THE ABOVE-CAPTIONED FORMAL COMPLAINT PROCEEDINGS**

Verizon Pennsylvania Inc. ("Verizon PA") by its attorneys in this matter, Malatesta Hawke & McKeon LLP, and pursuant to 52 Pa. Code § 5.81, hereby files this Motion to Consolidate the above-captioned Formal Complaints for purposes of hearing and decision. In support thereof, Verizon PA represents as follows:

1. Each of the above-captioned Formal Complaints was filed against Verizon PA with the Pennsylvania Public Utility Commission ("Commission"). Verizon PA has filed an answer to each Complaint on this date.

2. Each of the above-captioned Formal Complaints primarily involves allegations of telephone outages and disruptions in service. Additionally, each Complaint seeks, by way of relief, that Verizon PA be directed to undertake the actions necessary to correct the problems complained of.

3. All of the Complainants live in the same vicinity, and all are served by the same Verizon PA central office. Additionally, all of the Complainant's are served by the same telephone cable that connects them to their central office.

4. As indicated in its answers to the complaints, Verizon PA is in the process of completely replacing the cable that connects these customers to their Verizon PA central office. In addition, Verizon PA will be upgrading certain other facilities that serve these customers. Verizon PA anticipates that these replacements and upgrades will completely address and resolve the problems raised in the complaints.

3. The Commission's regulation at 52 Pa. Code § 5.81 provides that separate proceedings may be consolidated if they involve common issues of fact and law. All of the above-captioned Formal Complaints involve nearly identical allegations, and they all contain nearly identical requests for relief. As described above, all of the Complainants are served by the same central office and cable facilities. It is highly likely that any problems found with the facilities serving these customers, if any, will be common to each Complainant.

4. Each of these proceedings involve the same issues of fact and law. Accordingly, the above-captioned Complaint proceedings should be consolidated for hearing.

4. Consolidation of these matters will not prejudice any individual Complainant. Each Complainant will still have a full opportunity to present evidence in support of the allegations raised in his/her complaint, and each will have a full opportunity to state on the record the reasons underlying that individual's specific request for relief.

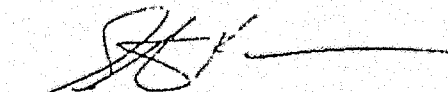
WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the above-captioned Formal Complaint proceedings be consolidated into one proceeding for purposes of hearing and decision.

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Respectfully submitted,

NOV 19 2001

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Steven K. Haas
Malatesta Hawke & McKeon LLP
100 North Tenth Street
Harrisburg, PA 17101
(717) 236-1300

Dated: November 19, 2001

CERTIFICATE OF SERVICE

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

Service by first class mail:

Beverly Shea
2033 quarter Mile Road
Bethlehem, PA 18015

Dorothy Herring
1571 Woodland Drive
Bethlehem, PA 18015

Julius Barkis
2019 Sunderland Drive
Bethlehem, PA 18015

Evelyn G. Zumas
2010 Sunderland Drive
Bethlehem, PA 18015

James & Alexia Kunkle
1984 Sunderland Drive
Bethlehem, PA 18015

Robert & Alyse Iocco
2020 Quarter Mile Road
Bethlehem, PA 18015

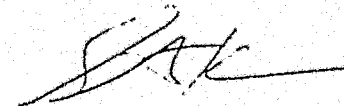
James & Sarah Norwine
1990 Sunderland Drive
Bethlehem, PA 18015

Marjorie Brown
1983 Sunderland Drive
Bethlehem, PA 18015

RECEIVED

NOV 19 2001

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Steven K. Haas

DATE: November 19, 2001