

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: 09/08/06
8. DOCKET NO: C-20066833	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: BERKOWITZ, LINDA S.

RESPONDENT/APPLICANT: VERIZON PENNSYLVANIA INC

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 310200

ALLEGATION OR SUBJECT

COMPLAINANT STATES THERE IS A RELIABILITY, SAFETY OR QUALITY PROBLEM WITH HER UTILITY SERVICE. SHE WOULD LIKE THE PUC TO INVESTIGATE THE COMPANY'S REPAIR RECORD TO DETERMINE WHETHER HER SITUATION IS AN ANOMALY OR WHETHER IT IS INDICTIVE OF A LARGER PROBLEM WITH THE COMPANY'S PROVISION OF SERVICE.

DOCUMENT
FOLDER

SEP 27 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

SECRETARY'S (SECRET)

2006 SEP - 8 AM 9: 50

RECEIVED

310200
Please print or type. C-20066833

1. CUSTOMER NAME (COMPLAINANT)

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

Name LINDA S. BERKOWITZ

Street/P.O. Box 212 W. HIGHLAND AVE Apt # B2

City PHILADELPHIA State PA Zip 19118

County PHILADELPHIA

Area Code/HOME Phone 215 242 6429

Area Code/^{CELL}WORK Phone 215 803 3927

Utility Account Number NOT AVAILABLE AT THIS TIME
(from your bill)

ORIGINAL

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

Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: VERIZON

3. TYPE OF UTILITY (check one)

ELECTRIC

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.

On Monday, Aug. 28, 2006 I awoke to find my telephone out of order for the second time in approximately six weeks, both times after rain during the night. I reported the situation to Verizon repair and was told to unplug all phones, etc. and try again because "the system was not showing any problems with Verizon equipment." Although I was exceptionally confident that the problem was external to my apartment, as it was the last time, I complied. I reported back to V. repair and was scheduled for an appointment between 8 a.m. and 12 noon the following day. At 12:50 p.m. on Tuesday, August 29, a technician appeared (after I had called V. to inquire where he was and I won't describe that conversation here). I requested that he begin his exploration with Verizon's external equipment and directed him to the site of the last problem (V.'s box down the block). He agreed, left, came back several minutes later to say he was going to the box, and would call on my land line if fixed or on my cell phone if not. Two hours later I received a call from Verizon dispatch saying that a repair technician would be out to fix the problem on Wednesday, September 6. Needless to say, I found that response to be entirely unsatisfactory. After several attempts I finally reached a supervisor in repair who looked into the problem. He advised me of the following: (1.) the problem was indeed external to my apartment; (2.) the technician that had been sent out to me was not able to work on external equipment; (3.) Verizon had a shortage of "external" techs; (4.) Verizon had eliminated all overtime for technicians; (5.) Verizon was sending "internal" techs because they believed that was better than sending no one, regardless of the nature of the problem; (6.) Verizon no longer provided repair service on weekends and only had one emergency tech for my geographic area on the weekends; and (7.) even repairs on residential phones needed for medical emergencies were backlogged a week.

On Wednesday, August 30, I filed an informal complaint with the PUC, which responded on August 31 by advising me to file a formal complaint and providing me with the telephone number for Verizon's Chief Executive Officer. I called that office and left a voicemail for the CEO's secretary who, according to the answering message, was on vacation until Friday, September 1. Coincidentally, approximately two hours later a Verizon repair technician arrived at my building, gained access to the basement, and phoned me approximately one hour later to advise me that my service was now restored. The problem had been a short in the cable running between the apartment building and the Verizon equipment located down the block. When I questioned the technician about being told by Verizon initially that the problem was not in Verizon's cable, he

advised me that they routinely tell customers that because the service repair-line representatives have no way of knowing where the problem might be.

This situation is unacceptable. One should certainly expect rain in Philadelphia, and one should be able to expect a public utility to upgrade and maintain its equipment in manner necessary to ensure continued service despite inclement weather that is within a range of normalcy. Moreover, Verizon should manage its organization in a manner consistent with providing the highest level of reasonable response to needed repairs of its equipment, such as either maintaining a larger work force of permanent, full-time technicians or using overtime to compensate for a smaller one. And, if a smaller work force and the elimination of overtime result from budgetary constraints, are the ramifications felt by Verizon executives through their compensation packages or are they felt only by Verizon customers?

The last time I complained to the PUC, I was content to receive a \$7-and-some-cents reduction in my bill and a call from the PUC to see if my problem had been resolved. Now, in addition to a reduction in my bill to cover the nonservice days, I will expect Verizon to cover the cost of any overage in my cellular phone service (also through Verizon), which now has had to be the substitute for my land line, and for the inconvenience of missing calls from individuals who may not have my cell phone number. In addition, I would like additional information from the PUC:

1. What customer-service standards (call-answering response time, call-abandonment rates, and service-restoration time) does the PUC have for Verizon and other noncellular phone providers?
2. What penalties does the PUC impose for failure to comply with standards and has the PUC imposed such penalties on Verizon within the last three years?
3. What penalties does the PUC impose when such a provider deliberately misleads the consumer as to the origins of service interruptions (for example, both last time and this time I was initially advised by Verizon repair that the problem was not with Verizon equipment when it most certainly was)?
4. Has the PUC been aware of Verizon work-force management practices that could be resulting in inordinate delays in repairs?

5. RELIEF

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

In addition to answering my questions, I would like the PUC to investigate Verizon's repair record to determine whether my situation is an anomaly or whether it is indicative of a larger problem with the company's provision of service. Naturally, I would like the PUC to take whatever action might be necessary to ensure that consumers receive an acceptable level of service from Verizon.

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

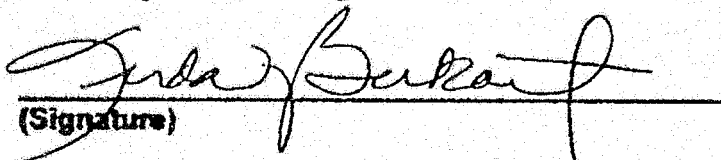
If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

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 LINDA BERKOWITZ, 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).


(Signature)

8/31/2006
(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: September 27, 2006

C-20066833

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 LINDA S. BERKOWITZ. 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.

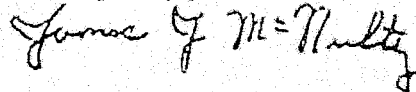
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

September 27, 2006

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

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

Very truly yours,

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

James J. McNulty
Secretary

ane

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: September 27, 2006

DOCUMENT
FOLDER

LINDA S. BERKOWITZ
Complainant

v.

VERIZON PENNSYLVANIA, INC.
Respondent

Complaint Docket
No: C-20066833

SEP 27 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: VERIZON PENNSYLVANIA, INC.

TAKE NOTICE:

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

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

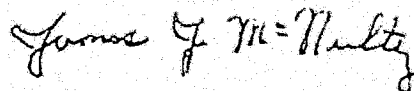
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

Hawke **ORIGINAL**
 McKeon
 Sniscak &
 Kennard LLP
ATTORNEYS AT LAW

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

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

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

October 31, 2006

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

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PA P.U.C.
SECRETARY'S BUREAU

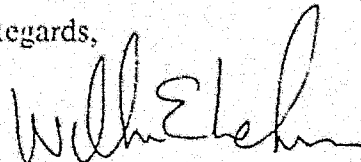
RE: Linda S. Berkowitz v. Verizon Pennsylvania Inc.; Docket No. C-20066833.
ANSWER AND NEW MATTER

Dear Mr. McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Verizon Pennsylvania Inc.'s ("Verizon PA") Answer and New Matter in the above-captioned proceeding. A copy of this document has been served upon the Complainant in accordance with the attached Certificate of Service. Because of the nature of this Complaint, Verizon PA requests that this matter be assigned to the Mediation Department for informal mediation.

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

Regards,



William E. Lehman
Counsel for Verizon Pennsylvania Inc.

**DOCUMENT
FOLDER**

WEL/kmg
Enclosures

cc: Herbert R. Nurick, Chief Mediator
Linda S. Berkowitz

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

21

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA S. BERKOWITZ,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

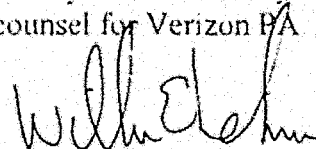
Docket No. C-20066833

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2006 OCT 31 PM 3:36
PENNSYLVANIA PUBLIC
UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE TO PLEAD

TO: Linda S. Berkowitz
212 W. Highland Avenue, #B2
Philadelphia, PA 19118

Pursuant to 52 Pa. Code §§5.62 and 5.63, you are hereby notified that, if you do not file a written response denying or correcting the enclosed New Matter of Verizon Pennsylvania Inc., within twenty (20) days from service of this notice, the facts set forth by Verizon PA in the New Matter may be deemed to be true, thereby requiring no other proof. All pleadings such as a Reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Verizon PA.



William E. Lehman
Hawke McKeon Sniscak & Kennard LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
E-mail: wlehman@hmsk-law.com
Attorney I.D. #83936
Telephone: (717) 236-1300
Facsimile: (717) 236-4841
Counsel for Verizon Pennsylvania Inc.

DATED: October 31, 2006

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA S. BERKOWITZ.

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

Docket No. C-20066833

ANSWER AND NEW MATTER OF
VERIZON PENNSYLVANIA INC.
TO THE COMPLAINT OF LINDA S. BERKOWITZ

PA PUC
SECRETARY'S BUREAU

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Verizon Pennsylvania Inc. ("Verizon PA"), by and through its counsel in this proceeding, Hawke McKeon Sniscak & Kennard LLP, hereby submits its Answer to the Complaint filed by Linda S. Berkowitz ("Complainant" or "Ms. Berkowitz") and raises New Matter. Because of the nature of this Complaint, Verizon PA requests that this matter be assigned to the Mediation Department for informal mediation. In support of its Answer, Verizon PA avers and represents as follows.

DOCUMENT
FOLDER

ANSWER

DOCKETED
NOV 03 2006

I. ADMITTED upon information and belief.

2. DENIED. The correct corporate name of the Respondent in this matter is "Verizon Pennsylvania Inc."

3. ADMITTED upon information and belief.

4. (a) Verizon PA DENIES there is a reliability, safety or quality problem with the Complainant's utility service. Verizon PA ADMITS that the Complainant filed a trouble report with Verizon PA on August 28, 2006 at 10:24 a.m. to report no dial tone on her line. Verizon PA DENIES the Complainant's allegations regarding her description of contacts she had with Verizon PA personnel. By way of further answer, Verizon PA AVERS that the Complainant opened a trouble report with Verizon PA repair on August 28, 2006 at 10:24 a.m. to report no dial tone on her line. Verizon PA provided a commitment to respond to the trouble on or before August 29, 2006 by 5:00 p.m. When a trouble report is filed, Verizon PA performs a mechanized line test ("MLT") that gives an indication of where, if any, problems appear on the line. The MLT that was performed indicated possible trouble with the Complainant's inside wiring; therefore, an inside wiring specialist was dispatched to the customer's premises on August 29, 2006 at 12:13 p.m. At 1:08 p.m., this technician returned the job to Verizon PA's Dispatch Repair Center for a splicing technician, noting that he found no dial tone at the Network Interface Device ("NID"). On August 29, 2006, Verizon PA changed the commitment time to September 6, 2006 by 4:59 p.m. due to heavy workloads associated with severe weather occurring in the area. On August 30, 2006, Verizon PA changed the commitment to August 31, 2006 by 4:59 p.m. A technician was dispatched on August 31, 2006 at 10:01 a.m. and closed the report at 12:08 p.m. after restoring service by changing the cable facilities.

Verizon PA DENIES the Complainant's alleged description of contacts or the content of conversations she had with a Verizon PA repair supervisor.

(b) Verizon PA is without sufficient information or knowledge at this time to respond to the Complainant's allegations regarding her contact with the Pennsylvania Public Utility Commission ("Commission"); therefore, these allegations are DENIED. Verizon PA DENIES the Complainant's allegations regarding her description of contact with Verizon PA personnel.

(c) The remaining statements set forth in Paragraph 4 are statements of opinion or requests for relief to which no response is required. In addition, the Complainant lists questions that she would like the Commission to answer. To the extent that an answer is deemed necessary, Verizon PA DENIES that it has failed to comply with service standards set by the Commission; that it deliberately misleads the consumer as to the origin of service interruptions; or that its work-force management practices lead to inordinate delays in repairs.

5. The statements set forth in Paragraph 5 are requests for relief to which no response is required. By way of further answer, Verizon PA AVERS that the Complainant has no standing to advocate on behalf of the public at large.¹

¹ *Camille "Bud" George v. Pennsylvania Public Utility Commission*, 735 A.2d 1282 (Pa. Cmwlth. 1999) (legislator has no authority and thus lacks standing to bring complaint on behalf of his constituents).

NEW MATTER

Pursuant to 52 Pa. Code §5.62(b), Verizon PA avers by way of New Matter as follows:

1. Complainant is a residential telephone customer of Verizon PA under account number 215-242-6429

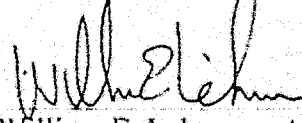
2. Service is currently rendered to Complainant at 212 West Highland Avenue, Apartment B2, Philadelphia, PA 19118.

3. In accordance with Commission regulations at 52 Pa. Code §63.4, Verizon PA has provided the following out-of-service adjustment to the Complainant:

- A three-day credit of \$5.67 was applied to the Complainant's September 23, 2006 telephone bill.
- A two day credit of \$3.79 was applied to the Complainant's July 23, 2006 telephone bill
- A \$7.26 courtesy credit was applied to the Complainant's account on July 10, 2006.

WHEREFORE, for the reasons set forth above, Verizon Pennsylvania Inc. respectfully requests that the Formal Complaint of Linda S. Berkowitz be dismissed preliminarily.

Respectfully submitted.



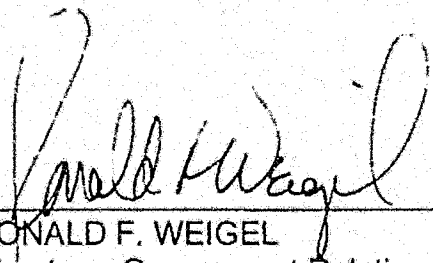
William E. Lehman - Attorney I.D. #83936
Hawke McKeon Sniscak & Kennard LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
E-mail: welehman@hmsk-law.com
Telephone: (717) 236-1300
Facsimile: (717) 236-4841

DATED: October 31, 2006

Counsel for
Verizon Pennsylvania Inc.

AFFIDAVIT

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



RONALD F. WEIGEL
Director – Government Relations

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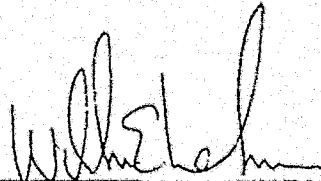
CERTIFICATE OF SERVICE

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 §1.54 (relating to service by a party).

Service via first class mail:

Linda S. Berkowitz
212 W. Highland Avenue, #B2
Philadelphia, PA 19118

Dated this October day of 31st, 2006.



William E. Lehman
Counsel for Verizon Pennsylvania Inc.

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