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March 9, 2017

***Via Electronic Filing***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: **Core Communications, Inc. v. Verizon Pennsylvania Inc. and Verizon North LLC**  
Docket Nos. C-2011-2253750 and C-2011-2253787

Dear Secretary Chiavetta,

On February 6, 2016, Verizon Pennsylvania Inc. and Verizon North LLC (“Verizon”) submitted a filing to the Commission stating that Verizon had complied with Ordering Paragraph 23 (“OP-23”) of the Commission Order entered December 23, 2016 in the above-referenced matter. OP-23 requires Verizon to “prepare and submit revised invoices to Core Communications, Inc.”, consistent with the Commission’s rulings relative to the proper rating of interconnection facilities and local traffic.

Core disagrees that Verizon has complied with OP-23. On February 2, 2017, Core acknowledged receipt of a letter and compact disc from Verizon. The disc contained spreadsheets outlining Verizon’s calculation of amounts due pursuant to the Commission’s Order. The letter summarized the amounts claimed to be due as calculated in the spreadsheets. However, neither the letter nor the spreadsheets constitute “revised invoices.”

Meanwhile, Verizon continues to issue invoices to Core which ignore the Order’s directives. That is, Verizon continues to bill Core for interconnection facilities at interstate and

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intrastate access rates, and has not revised its actual invoices to Core in the wake of the Order.<sup>1</sup>  
Therefore, Verizon is not presently in compliance with OP-23.

Sincerely,

STEVENS & LEE



Michael A. Gruin

Enclosures

cc: Suzan Paiva, Esq. (via email and First Class U.S. Mail)

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<sup>1</sup> Appendix A hereto summarizes Verizon's invoices to Core for interconnection facilities in the 814 area code before and after the Commission's Order was released.

## Appendix A

Table: BAN 814 M11-0006 202  
Billed Charges November, 2016 – February, 2017

Bill Date	Total Charges	Interstate Access Charges	Intrastate Access Charges	Local (TELRIC) Charges
11-10-2016	\$27,644.64	\$24,376.14	\$2,119.60	\$1,148.90
12-10-2016	\$27,644.64	\$24,376.14	\$2,119.60	\$1,148.90
12-23-2016	<b>Commission Order Issued</b>			
1-10-2017	\$27,644.64	\$24,376.14	\$2,119.60	\$1,148.90
2-10-2017	\$27,644.64	\$24,376.16	\$2,119.60	\$1,148.90