

PUBLIC VERSION - WITHOUT
PROPRIETARY ATTACHMENT

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March 17, 2017

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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:

This letter responds to Core's March 9, 2017 letter claiming that Verizon is "not in compliance" with Ordering Paragraph ("OP") 23 of the Commission's December 23, 2016 Order, which required Verizon to "prepare and submit revised invoices" to Core "outlining all amounts that Core . . . has not paid and for which Verizon . . . seek[s] payment."

Core concedes that it received from Verizon on February 2, 2017 a letter and spreadsheets detailing the amounts due, but contends without explanation that this transmission does not constitute "revised invoices." Verizon's letter states that "this letter and the accompanying materials constitute the revised invoices required to be provided by Verizon in accordance with the Order." It provides a narrative explanation of the revised invoices, and the accompanying spreadsheets include approximately 70,000 lines of data underlying the facility and usage charges for the entire period. To avoid confusion, Verizon is providing a copy of its letter to Core to the Commission, and would be happy to provide a copy of the 36MB spreadsheet upon request.¹

Core's claim that these documents are not "revised invoices" is spurious. The Order does not define an "invoice" or specify exactly how it should look or what information it should contain. An "invoice" is commonly understood as "a list of goods sent or services provided, with a statement of the sum due for these."² Verizon's letter and spreadsheets more than satisfy

¹ This document is marked "proprietary" because it contains confidential and proprietary information of Core.

² <https://en.oxforddictionaries.com/definition/invoice>

that definition. OP 24 requires Core to “pay the bills referenced in Ordering Paragraph No. 23 within ninety (90) days of receipt” and “file a letter with the Commission indicating that the bills have been paid.” If Core does not do this on or before May 3, 2017 Core will be in violation of the Order.

While accusing Verizon of non-compliance with the Order, Core concedes that it has not been paying Verizon’s current invoices issued after the date of the Order, nor (to Verizon’s knowledge) has Core escrowed any amount that it has withheld. Core has no basis to dispute the facilities invoices of Verizon North LLC (for which the Commission held that access rates should continue to apply (OP 20)) or the usage charges billed by either Verizon company (which the Commission affirmed). Core alerted Verizon a few weeks ago to its issue with the post-Order Verizon Pennsylvania LLC invoices for facilities and Verizon is in the process of changing the billing tables to TELRIC rates, which will apply back to December of 2016. The Commission’s requirement that Core pay, or at least escrow (OP 17), Verizon’s current invoiced amounts could not be more clear. Core’s latest claims do not excuse Core of its duty to comply with the Commission’s Order.

Very Truly Yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva" with a stylized flourish at the end.

Suzan D. Paiva

SDP/slb

Attachment

Via E-Mail and First Class Mail

cc: Michael A. Gruin, Esquire, for Core Communications, Inc.

**THIS PUBLIC VERSION OF VERIZON'S LETTER
DOES NOT INCLUDE THE PROPRIETARY ATTACHMENT**