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**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: Request of Verizon Companies for Extension to Provide De Facto Gross Intrastate  
Operating Revenue Under 52 Pa. Code § 69.3701; Docket No. M-2020-3019262

Dear Secretary Chiavetta:

Verizon Pennsylvania LLC, Verizon North LLC, XO Communications Services, LLC, MCImetro Access Transmission Services Corp., and MCI Communications Services, Inc. (the “Verizon Companies”) respectfully request a 45 day extension to report their “de facto gross intrastate operating revenues” pursuant to 69 Pa. Code § 69.3701. This policy statement defines “de facto gross intrastate operating revenues” for jurisdictional telecommunications providers as follows:

- (j) De facto gross intrastate operating revenues are those gross intrastate operating revenues that are actually received for all telecommunications services and traffic between points that are both located within this Commonwealth, including the traffic traversing a special access circuit that is deemed interstate by the ten percent rule set forth in 47 CFR 36.154.

The Verizon Companies intend to file their Assessment Reports for the calendar year 2019 (Form GAO-2019) with their gross intrastate operating revenue calculated in the same manner that they have done in previous years (i.e., without “de facto gross intrastate operating revenues”). Those forms will be filed by the March 31, 2020 deadline.

The Verizon Companies are still in the process of determining whether they had any “de facto gross intrastate operating revenues” in 2019, and, if so, quantifying the amount that 69 Pa. Code § 69.3701 requires to be reported to the Commission. Due to the complexity of the services involved, the fact that this is a new calculation requirement, and the disruption of the business due to the COVID-19 Disaster Emergency, more time is required to complete these

calculations. The Verizon Companies intend to file addenda to their Assessment Reports providing this information (under protest, for reasons including those set forth in their comments at Docket M-2018-3004578).

The Verizon Companies respectfully request an extension to **May 15, 2020** to provide their addenda with this information.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Suzan D. Paiva

SDP/sau

Cc via email: [pucassessments@pa.gov](mailto:pucassessments@pa.gov)