

Pennsylvania Telephone Association

*"The Communications
Leader in Pennsylvania"*

Steven J. Samara
President

May 25, 2021

VIA ELECTRONIC FILING

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

Re: Rulemaking to Comply with the Competitive Classification of Telecommunication Retail Services Under 66 Pa. C.S. Section 3016(a); General Review of Regulations 52 Pa. Code, Chapter 63 and Chapter 64
L-2018-3001391

Dear Secretary Chiavetta:

The Pennsylvania Telephone Association (PTA) files this correspondence in response to the Notice of Proposed Rulemaking published in the Pennsylvania Bulletin on April 10, 2021 in the docket referenced above.

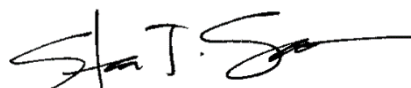
As it has in previous filings in this docket, the PTA member companies commend the Pennsylvania Public Utility Commission for undertaking this much needed and overdue review of the regulatory provisions of 52 Pa. Code, Chapters 53, 63, and 64.

On October 4, 2018, Pennsylvania's rural local exchange carriers (RLEC) and member companies of the PTA filed extensive and detailed comments establishing a modernized regulatory framework which recognized not only the significantly diminished market share of traditional landline telcos, but the customer benefits of allowing these companies to more fairly compete in today's dynamic and highly competitive telecommunications environment. This initial filing was buttressed by reply comments filed on November 2, 2018 and a letter in lieu of written comments filed on March 18, 2020 pointing to the public policy benefits of this modernized regulatory model.

While the proposed rulemaking as published does advance the discussion, it does not adequately capture many of the forward-looking provisions included in the modernized model as envisioned by the RLECs and falls short of bringing about meaningful change.

The PTA and its member companies look forward to continued dialogue on this critical matter with the Commission and all interested parties.

Sincerely,



Steven J. Samara, President