

RONNIE CROPPER
5615 W. DIAMOND STREET
PHILADELPHIA PENNSYLVANIA 19131

July 20, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room (2 North)
P.O. Box 3265
Harrisburg PA 17105 3265

Re: Ronnie Cropper v. Verizon Pennsylvania LLC.

Docket No. C-2021-3026601; Response to “Answer and New Matter of Verizon Pennsylvania LLC

Dear Secretary Chiavetta:

Enclose find Ronnie Cropper’s response to “Answer and New Matter of Verizon Pennsylvania in connection with the above reference case.

If you have any questions regarding this filing, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely yours,

Ronnie Cropper

DATE OF DEPOSIT

JUL 20 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

RONNIE CROPPER

Complainant

NO.: C-2021-3026601

VERIZON PENNSYLVANIA

Respondent

DATE OF DEPOSIT

JUL 20 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMPLAINANT'S REPLY TO RESPONDENT'S
MOTION FOR JUDGEMENT ON THE PLEADINGS

Complainant Ronnie Cropper hereby files this Response to Respondent Verizon Pennsylvania, LLC's ("Verizon PA) Motion for Judgement on the pleadings and in support thereof avers the following:

RESPONSE TO MOTION

1. **UNDISPUTED**
2. **UNDISPUTED**
3. Mr. Cropper's formal complaint objects to the future migration of his telephone service from copper to fiber optic facilities.

RESPONSE: Disputed. In the complaint it was never stated that there was an objection to future migration of telephone service. Verizon never provided to the Complainant the required information under FCC 47 CFR

51.332. Verizon without providing details or costs of the FIOS system, cancelled a repair ticket and ordered FIOS to be installed without prior authorization from the Complainant.

4. UNDISPUTED

5. UNDISPUTED

6. UNDISPUTED

7. UNDISPUTED

8. Verizon's copper network in the wire center has been retired pursuant to the FCC regulations at 47 C.F.R. 51.325, et seq., and all customers and services are in the process of being migrated to fiber optic facilities so that the copper switching equipment can be shut down and decommissioned.

Response: As of this writing complainant has not been made aware of this switching and furthermore under FCC regulations regarding copper retirement, public notification is required.

9. The complaint states that in March of 2021 Mr. Cropper experienced a service issue and refused to allow Verizon PA to repair service by migrating it from copper to fiber.

Response: At the time of the service issue request, Verizon repair center was informed that the problem was in the line outside of the house. The Verizon repair center stated that they would dispatch a repair person. Verizon emailed stating that the problem was resolved and that the repair order is being cancelled and that they (Verizon) would be installing FIOS. Verizon stated the installation would take several hours inside the home, but the installer would wear a mask. We informed Verizon that as we did

not order FIOS we were rejecting their solution. The country was in the midst of a surge of deadly coronavirus, The CDC was advising citizens to shelter in place and eliminate, if at all possible, visitors to the home. At the time it appeared dangerous to jeopardize the family's health to install FIOS, when the problem to the line could be solved without allowing a stranger to entering the house.

10. UNDISPUTED

11. UNDISPUTED

12. UNDISPUTED

13. RESPONSE: Since Verizon Pennsylvania LLC did not comply with FCC 47 CFR 63.71 and threatened to shut off phone service; the Commission has held the following in part "... Telephone service provider is not required to by Commission statute or regulation to continue to provide service over copper, provided the telephone service provider has complied with the FCC's copper retirement rules."

14. UNDISPUTED This allegation is undisputed as a conclusion of law to which no response is required.

15. UNDISPUTED This allegation is undisputed as a conclusion of law to which no response is required.

16. UNDISPUTED This allegation is undisputed as a conclusion of law to which no response is required.

17. UNDISPUTED This allegation is undisputed as a conclusion of law to which no response is required.

18. UNDISPUTED This allegation is undisputed as a conclusion of law to which no response is required.

19. RESPONSE: Since Verizon Pennsylvania LLC did not comply with FCC 47 CFR 63.71 and threatened to shut off phone service; the Commission has held the following in part “... Telephone service provider is not required to by Commission statute or regulation to continue to provide service over copper, **provided the telephone service provider has complied with the FCC’s copper retirement rules.”**

20. UNDISPUTED

21. UNDISPUTED

22. RESPONSE: Verizon Pennsylvania LLC copper retirement notice was incomplete and did not comply with 47 CFR 63.71.

23. UNDISPUTED

24. UNDISPUTED

25. RESPONSE: Verizon PA never provided Mr. Cropper with a notice of its plan that will be replacing its copper wire lines with fiber optic lines, as required in FCC 47 CFR 51.332.

26. UNDISPUTED

27. REPOSE: Since Verizon Pennsylvania LLC did not comply with FCC 47 CFR 63.71 and threatened to shut off phone service; the Commission has held the following in part “... Telephone service provider is not required to by Commission statute or regulation to continue to provide service over copper, **provided the telephone service provider has complied with the FCC’s copper retirement rules.”**

28. UNDISPUTED

29. UNDISPUTED

30. UNDISPUTED

31. RESPONSE: Since Verizon Pennsylvania LL did not comply with FCC 47 CFR 63.71 and threatened to shut off phone service; the Commission has held the following in part “... Telephone service provider is not required to by Commission statute or regulation to continue to provide service over copper, **provided the telephone service provider has complied with the FCC’s copper retirement rules.”**

32. RESPONSE: Since Verizon Pennsylvania LLC did not comply with FCC 47 CFR 63.71 and threatened to shut off phone service; the Commission has held the following in part “... Telephone service provider is not required to by Commission statute or regulation to continue to provide service over copper, **provided the telephone service provider has complied with the FCC’s copper retirement rules.”**

COMPLAINANT’S REPLY TO RESPONDENT’S NEW MATTER

Complainant Ronnie Cropper hereby files this response to Respondent’s New Matter and in support thereof aver the following:

NEW MATTER

1. **UNDISPUTED**
2. **UNDISPUTED**
3. **UNDISPUTED**
4. **RESPONSE:** The complainant has a copper landline with Verizon since 1969. The landline phone stopped working on 2/24/21 and the

complainant called Verizon for repairs. The Verizon repair shop gave instructions to unplug each phone to see if the phones were causing the outage. The Complainant also checked the access box outside and it indicated that the trouble was not inside the home. The Verizon repair center stated that they would be putting in a ticket for repair. On 2/26/21 the Complainant received a text from Verizon stating the following “Your Verizon repair request, ticket # PAD303TEDX has been resolved.

The Complainant received an email from Verizon’s service group welcoming him to our new system and thanking the Complainant for order.

Since the complainant never ordered this system and after several calls to Verizon it was discovered that this “new system” was FIOS. The Complainant contacted Verizon telling them that we did not order FIOS. Verizon was adamant that the only way to fix the outage is to install FIOS, which involves having a technician come to the Complainant home for several hours to make the installation. The Complainant told Verizon that he did not want a stranger inside his house for the following reasons:

- 1. By February 2021, a total of 477,147 Americans had died from the COVID-19 virus and the CDC was still warning people to restrict family gatherings and contacts with strangers. it appeared foolish to jeopardize the family’s health to install FIOS.**
- 2. The Verizon service center appeared to agree during the initial call by the Complainant that the outage could be fixed without having to go into the house, so why the sudden change.**

