

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held May 12, 2022

Commissioners Present:

Gladys Brown Dutrieuille, Chairman
John F. Coleman, Jr., Vice Chairman
Ralph V. Yanora

Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement

M-2022-3024130

v.

Verizon Pennsylvania LLC

OPINION AND ORDER

BY THE COMMISSION:

Before the Pennsylvania Public Utility Commission (Commission) for consideration and disposition is the Joint Petition for Approval of Settlement (Settlement or Petition) filed on January 31, 2022, by the Commission's Bureau of Investigation and Enforcement (I&E) and Verizon Pennsylvania LLC (Verizon PA or Company) (collectively, the Parties), to resolve all issues with respect to an informal investigation conducted by I&E based upon complaints received by the Bureau of Consumer Services (BCS) involving alleged improper telephone service suspensions and terminations by Verizon PA. Both Parties submitted Statements in Support of the Settlement. The Parties submitted that the proposed Settlement, which has been filed pursuant to

52 Pa. Code §§ 5.41, 5.231-232, and 3.113(b)(3), is in the public interest and consistent with the Commission's Policy Statement at 52 Pa. Code § 69.1201, *Factors and standards for evaluating litigated and settled proceedings involving violations of the Public Utility Code and Commission regulations – statement of policy (Policy Statement)*. Petition at 10. For the reasons set forth herein, we shall grant the Parties' request and approve the proposed Settlement based on our finding that the Settlement is in the public interest.

Background and History

Under its network transformation program, and in accordance with the rules and procedures of the Federal Communications Commission (FCC), Verizon PA filed appropriate notice with the FCC to retire its copper network and to provide all of its services over fiber optic facilities in 158 wire centers in Pennsylvania.¹ Petition at 4.

The Commission recognizes that the retirement of copper telephone lines is an activity that is regulated primarily by the FCC. Petition at 4. In areas where Verizon PA is migrating its copper facilities to fiber, the Commission also recognizes that applicable federal law permits Verizon PA to suspend and ultimately terminate service of any customer who refuses to provide the Company with the necessary access to transition the service to fiber. Petition at 4-5.

¹ See *In the Matter of: Technology Transitions; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 30 FCC Rcd 9372, 9383-84, para. 16 (Rel. August 7, 2015), codified in 47 C.F.R. 51.332.

Notwithstanding the above acknowledgments, the Commission has previously determined that, during the conversion from copper to fiber, Verizon PA still must comply with Section 1501 of the Public Utility Code (Code) and Chapter 64 of the Commission's Regulations as they relate to service and suspension/termination of regulated voice service when completing its copper wire retirement.² Petition at 5.

On March 13, 2020, in response to the COVID-19 pandemic, the Commission issued its *March 2020 Moratorium Order*³ that, *inter alia*, imposed a moratorium on the termination of utility services, including regulated telecommunications services, pending the Proclamation of Disaster Emergency issued by Governor Tom Wolf. Petition at 5.

On October 8, 2020, the Commission issued an Order lifting the absolute utility service termination moratorium and allowing disconnections of service to resume, in accordance with Commission Regulations, effective November 9, 2020. Verizon PA halted its migration to fiber efforts during the moratorium and ceased suspensions and terminations of regulated services (both for nonpayment and copper retirement) from March 13, 2020, through December 8, 2020, in compliance with the *March 2020 Moratorium Order*. Verizon PA resumed contacting customers to inform them about

² See *Irwin Fox v. Verizon Pennsylvania, LLC*, Docket No. C-2016-2576094 (Order entered July 12, 2018). Also see *Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC for Competitive Classification of All Retail Services in Certain Geographic Areas and for a Waiver of Regulations for Competitive Services; Rulemaking to Comply with the Competitive Classification of Telecommunication Retail Services Under 66 Pa. C.S. § 3016(a); General Review of Regulations 52 Pa. Code, Chapter 63 and Chapter 64*, Docket Nos. P-2014-2446303; P-2014-2446304; L-2018-3001391 (Final Order entered February 27, 2020) (revisiting waivers previously designated as temporary).

³ See generally *Re: Public Utility Service Termination Moratorium, Proclamation of Disaster Emergency – COVID-19*, Docket No. M-2020-3019244 (Order ratified at March 26, 2020 Public Meeting) (*March 2020 Moratorium Order*).

copper retirement and the need to migrate services to fiber on or about September 10, 2020, but it did not resume suspending services until December 8, 2020. Petition at 5.

On or about February 12, 2021, after receiving multiple informal complaints, BCS submitted a memo to I&E outlining its concerns that Verizon PA was improperly suspending and terminating telephone service. BCS provided I&E with a copy of seven informal complaints, some of which alleged suspension/termination without notice. Petition at 6.

By letter dated March 24, 2021, I&E informed Verizon PA that it was initiating an investigation into suspension/termination of telephone service allegedly in violation of the *March 2020 Moratorium Order* and Chapters 55 and 64 of the Code and included its first set of data requests. *Id.*; Verizon PA Statement in Support (St.) at 2. The investigation was initiated based on the information provided to I&E by BCS. I&E requested information from Verizon PA relating to telephone service suspensions and terminations associated with nonpayment and copper retirement for the time period from March 13, 2020 (the beginning of the moratorium) to March 24, 2021 (the date of I&E's letter). Verizon PA St. at 2. On April 21, 2021, Verizon PA provided responses to I&E's requests for information and cooperated in the investigation. Petition at 6; Verizon PA St. at 2.

On May 4, 2021, I&E submitted a second set of data requests, to which Verizon PA provided timely responses on May 25, 2021. Petition at 6.

While the data demonstrated Verizon PA's overall compliance with the moratorium, in the course of reviewing the responses, I&E identified five categories of potential regulatory violations. Verizon PA denied the alleged violations had occurred and/or provided mitigating information. Petition at 6; Verizon PA St. at 3. The

underlying facts of these issues will be discussed in more detail in the following section of this Opinion and Order.

In light of the facts involved in the informal investigation, I&E and Verizon PA began settlement discussions to amicably resolve the alleged violations. Those discussions ultimately resulted in the instant Petition, which, as noted, was filed by the Parties on January 31, 2022, to resolve the contested allegations.

On March 10, 2022, the Commission adopted an Order (*March 2022 Order*) that was published in the *Pennsylvania Bulletin* and provided interested parties with the opportunity to file comments. To be considered timely, the Commission directed those comments be filed no later than twenty-five days from the date of entry of the *March 2022 Order*. No comments were filed.

The Petition

A. Alleged Violations

The Petition includes details concerning the five categories of potential violations that I&E identified as a result of its investigation. The five categories are as follows:

- (a) Customer Letters to Residents of Multiple Dwelling Units;
- (b) Suspensions on a Sunday;
- (c) Terminations on a Sunday;

- (d) One Account Allegedly Suspended and Terminated During the March 2020 moratorium; and
- (e) Letter to a Health Care Facility

Petition at 6-9.

The Petitioners averred that had this matter been fully litigated, I&E would have proffered evidence and legal arguments to demonstrate that Verizon PA committed the following violations, broken down by category:

[a. Customer Letters to Residents of Multiple Dwelling Units]

- a. Verizon PA's notification letters to tenants who are residents of multiple dwelling units relating to the suspension and termination of service due to the retirement of copper wire and installation of fiber optics were confusing, conflicting, and misrepresented the customer's ability to call 911 after service was suspended/terminated. If proven, I&E alleges that such conduct would have violated 66 Pa. C.S. § 1501 (multiple counts). [footnote omitted]

[b. Suspensions on a Sunday]

- b. Verizon PA unlawfully suspended telephone service on a Sunday. If proven, I&E alleges that such conduct would have violated 52 Pa. Code § 64.62 (multiple counts).

[c. Terminations on a Sunday]

- c. Verizon PA unlawfully terminated telephone service on a Sunday. If proven, I&E alleges that such conduct would have violated 52 Pa. Code § 64.62 (multiple counts).

[d. One Account Allegedly Suspended and Terminated During the March 2020 Moratorium]

- d. Verizon PA unlawfully suspended and terminated a customer's service on September 14, 2020. If proven, I&E alleges that such conduct would have violated the March 2020 Moratorium Order and 52 Pa. Code § 64.121.

[e. Letter to a Health Care Facility]

- e. Verizon PA's notification letters to a health care facility relating to suspensions and terminations were not compliant. If proven, I&E alleges that such conduct would have violated 52 Pa. Code §§ 55.101-55.115.

Petition at 9-10.

B. Terms and Conditions of the Settlement

The Parties submitted that, as a result of successful negotiations, they have reached an agreement on an appropriate outcome to the investigation as encouraged by the Commission's policy to promote settlements. *See* 52 Pa. Code § 5.231. Petition at 3. The Parties further stated that the Settlement is consistent with the Commission's *Policy Statement* for evaluating litigated and settled proceedings involving violations of the Code and Commission Regulations. *Id.* Therefore, the Parties urged the Commission to approve the Settlement as submitted as being in the public interest. *Id.*

The Settlement comprises the Joint Petition for Approval of Settlement containing the terms and conditions of the Settlement, Proposed Ordering Paragraphs, and the respective Statements in Support of the Settlement from I&E (Appendix A to the Petition) and Verizon PA (Appendix B to the Petition).

The essential terms and conditions of the Settlement, as set forth in Paragraphs 40-52 of the Petition, are as follows:

IV. SETTLEMENT TERMS

40. Pursuant to the Commission's policy of encouraging settlements that are reasonable and in the public interest, the Parties held a series of discussions that culminated in this Settlement. I&E and Verizon PA desire to (1) terminate I&E's informal investigation; and (2) settle this matter completely without litigation. The Parties recognize that this is a disputed matter, and given the inherent unpredictability of the outcome of a contested proceeding, the Parties further recognize the benefits of amicably resolving the disputed issues. The conditions of the Settlement, for which the Parties seek Commission approval, are set forth below.

41. Verizon PA shall pay a cumulative civil penalty of thirty thousand dollars (\$30,000.00).

42. The civil penalty shall not be tax deductible or passed through as an additional charge to Verizon PA's customers in Pennsylvania.

43. Verizon PA has and will continue to work with I&E and BCS to modify/edit the notification letters, as future circumstances require, sent to multiple dwelling units and their tenants and the notification letters sent to health care facilities and their tenants relating to copper retirement, to ensure compliance with the Public Utility Code and the Commission's regulations and clarity on the intention and ramifications of the letters.

V. CONDITIONS OF SETTLEMENT

44. The benefits and obligations of this Settlement Agreement shall be binding upon the successors and assigns of the Parties to this Agreement.

45. This Agreement may be signed in counterparts and all signatures attached hereto will be considered as originals.

46. In order to effectuate the Parties' Settlement Agreement, the undersigned Parties request that the Commission issue a Secretarial Letter or Order approving the Petition without modification.

47. The Parties agree that any party may petition the Commission for rehearing or take other recourse allowed under the Commission's rules if the Commission Secretarial Letter or Order substantively modifies the terms of this Joint Petition for Approval of Settlement. In that event, any party may give notice to the other party that it is withdrawing from this Joint Petition for Approval of Settlement. Such notice must be in writing and must be given within twenty (20) business days of the issuance of any Initial or Recommended Decision or any Commission Order or Secretarial Letter which adopts this Joint Petition for Approval of Settlement with substantive modifications of its terms. The consequence of any party withdrawing from this Joint Petition for Approval of Settlement as set forth above is that all issues associated with the requested relief presented in the proceeding will be fully litigated unless otherwise stipulated between the parties and all obligations of the Parties to each other are terminated and of no force and effect. In the event that a party withdraws from this Joint Petition for Approval of Settlement as set forth in this paragraph, I&E and Verizon PA jointly agree that nothing in this Settlement Agreement shall be construed as an admission against or as prejudice to any position which any party might adopt during litigation of this case.

48. I&E and Verizon PA jointly acknowledge that approval of this Settlement Agreement is in the public interest and is fully consistent with the Commission's Policy Statement for evaluating litigated and settled proceedings involving violations of the Code and Commission regulations, 52 Pa. Code § 69.1201. The Commission will serve the public interest by adopting this Joint Petition for Approval of Settlement.

49. The Joint Petition for Approval of Settlement avoids the time and expense of litigation in this matter before the Commission, which likely would entail preparation for and attendance at hearings and the preparation and filing of briefs,

reply briefs, exceptions, reply exceptions. The Parties further recognize that their positions and claims are disputed and, given the inherent unpredictability of the outcome of a contested proceeding, the Parties recognize the benefits of amicably resolving the disputed issues through settlement. Attached as Appendices A and B are Statements in Support submitted by I&E and Verizon PA, respectively, setting forth the bases upon which they believe the Settlement Agreement is in the public interest.

50. Adopting this Settlement Agreement will eliminate the possibility of any appeal from the Commission Secretarial Letter or Order, thus avoiding the additional time and expense that they might incur in such an appeal.

51. This Settlement Agreement consists of the entire agreement between I&E and Verizon PA regarding the matters addressed herein. Moreover, this Settlement represents a complete settlement of I&E's investigation of Verizon PA's alleged violations related to unlawful suspensions and terminations and copper wire retirement notification letters for the time period up to and including March 24, 2021, and fully satisfies I&E's informal investigation of the matters discussed herein. The Parties expressly acknowledge that this Settlement Agreement represents a compromise of positions and does not in any way constitute as a finding or as an admission concerning the alleged violations of the Public Utility Code and the Commission's regulations.

52. The Settlement Agreement contains a summary of alleged violations of the Public Utility Code and the Commission's regulations. *See*, Section III, Alleged Violations. In addition, the Settlement Terms contains Proposed Settlement Terms. *See*, Section IV, Settlement Terms. With the exception of the approval of this Settlement without modification, none of the provisions in this Settlement Agreement shall be considered or shall constitute an admission, a finding of any fact, or a finding of culpability on the part of Verizon PA in this or any other proceeding.

Discussion

Initially, we note that any issue or argument that we do not specifically address shall be deemed to have been duly considered and denied without further discussion. The Commission is not required to consider expressly or at length each contention or argument raised by the Parties. *Consolidated Rail Corp. v. Pa. PUC*, 625 A.2d 741 (Pa. Cmwlth. 1993); *also see, generally, University of Pennsylvania v. Pa. PUC*, 485 A.2d 1217 (Pa. Cmwlth. 1984).

Pursuant to our Regulations at 52 Pa. Code § 5.231, it is the Commission's policy to promote settlements. The Commission must, however, review proposed settlements to determine whether the terms are in the public interest. *Pa. PUC v. Philadelphia Gas Works*, Docket No. M-00031768 (Order entered January 7, 2004). In this regard, the Commission has promulgated the *Policy Statement* at 52 Pa. Code § 69.1201 that sets forth ten factors that we may consider in evaluating whether a civil penalty for violating a Commission order, regulation or statute is appropriate, as well as if a proposed settlement for a violation is reasonable and approval of the settlement agreement is in the public interest. These ten factors also address imposition of a civil penalty in both litigated and non-litigated settled cases. In settled cases, while many of the same factors may still be considered, the settling parties "will be afforded flexibility in reaching amicable resolutions to complaints and other matters so long as the settlement is in the public interest." 52 Pa. Code § 69.1201(b). I&E and the Company addressed the Section 69.1201(b) factors in their respective Statements.⁴ Based on our review of the Settlement and consideration of each of the applicable factors, we find, as discussed in more detail below, that the Settlement should be approved.

⁴ See I&E St. at 5-9; Verizon PA St. at 10-12.

The first factor considers whether the conduct at issue was of a serious nature, such as willful fraud or misrepresentation, or if the conduct was less egregious, such as an administrative or technical error. Conduct of a more serious nature may warrant a higher civil penalty while conduct that is less egregious warrants a lower amount. 52 Pa. Code § 69.1201(c)(1). Both I&E and Verizon PA acknowledged that the conduct did not constitute willful fraud or misrepresentation in that the unlawful suspensions and terminations were isolated errors for which Verizon PA subsequently has taken steps to reduce or eliminate the possibility of such errors in the future. In addition, Verizon PA noted that the Sunday terminations issue was an inadvertent Information Technology (IT) error that it promptly corrected, and the transformation correspondence at issue was intended to comply with applicable regulations even though I&E posited that the letters were confusing, misleading, and conflicting. Nevertheless, Verizon PA agreed to modify the letters. We agree with the Parties that the Company's conduct here was not of a serious nature that could be constituted as "willful fraud or misrepresentation." Thus, we are of the opinion that the nature of the conduct warrants in favor of a lower penalty.

The second factor considers whether the resulting consequences of Verizon PA's alleged conduct were of a serious nature. When consequences of a serious nature are involved, such as personal injury or property damage, the consequences may warrant a higher penalty. 52 Pa. Code § 69.1201(c)(2). The Company claimed that in this case, there was no resulting personal injury or property damage. I&E indicated that it has no knowledge of whether the alleged conduct resulted in personal injury or property damage. Nevertheless, I&E opined that the consequences of Verizon PA's conduct confused and upset the affected customers because they were unsure of the seriousness and intention of the notification letters as to whether they would or would not lose service if they did not agree to migrate to fiber optic service. In addition, I&E noted that those customers whose telephone service was suspended and/or terminated on a Sunday did not have any recourse or ability to timely address the issue. Even though I&E was not aware

whether the Company's conduct resulted in personal injury or property damage, we believe that the lack of access to telephone service could have a serious safety impact on the affected customers which warrants in favor of a higher penalty.

The third factor to be considered under the *Policy Statement* is whether the alleged conduct was intentional or negligent. 52 Pa. Code § 69.1201(c)(3). "This factor may only be considered in evaluating litigated cases." *Id.* This factor does not apply to the present case because this proceeding is a settled matter that did not involve formal litigation.

The fourth factor to be considered is whether Verizon PA has made efforts to change its internal practices and procedures to prevent similar conduct in the future. 52 Pa. Code § 69.1201(c)(4). I&E and the Company both noted that Verizon PA represented that it has taken steps to reduce or eliminate the possibility of a suspension or termination being processed on a Saturday, Sunday, or holiday in the future by working with its IT department and reviewing its processing systems. With regard to the notification letters, I&E and the Company both indicated that Verizon PA, I&E, and BCS have held multiple meetings and have exchanged multiple drafts of the notification letters to ensure compliance with the Code and the Commission's Regulations, as well as to ensure that the letters are clear and informative. Furthermore, Verizon pledged to continue to work with I&E and BCS as future circumstances require. We believe that this factor supports a lower penalty because Verizon PA has taken prompt and appropriate action to address the concerns of I&E and BCS so that the likelihood of similar incidents in the future will be decreased. This warrants consideration of a lower penalty.

The fifth factor to be considered relates to the number of customers affected by the Company's actions and the duration of the violations. 52 Pa. Code § 69.1201(c)(5). The Company noted that the number of affected customers at issue is

small. I&E provided the following summary showing the number of customers that were affected under each of the alleged violation categories:

Alleged Violation Category	# of Customers Affected
Suspension of Telephone Service on a Sunday	4
Termination of Telephone Service on a Sunday	1,918
Suspension of Telephone Service during the March 2020 Moratorium	1
Receipt of confusing, misleading, and/or conflicting Notification Letters	2*

*I&E noted that these are the only 2 letters it focused on, and it is not aware of the total number of specific notification letters that were actually sent to customers or health care facilities.

See Petition at 7-8; I&E St. at 7; Verizon PA St. at 6. Considering the size of the Company, we are of the opinion that the number of affected customers is not extensive and weighs in favor of a lower penalty.

The sixth factor to be considered relates to Verizon PA's compliance history. 52 Pa. Code § 69.1201(c)(6). An isolated incident from an otherwise compliant company may result in a lower penalty, whereas frequent, recurrent violations by a company may result in a higher penalty. *Id.* To date, I&E is aware of three formal complaints that were filed in relation to this issue (see complaints at Docket Nos. F-2021-3024088, C-2018-3003786, and C-2018-3006579). Verizon PA submitted that it has a good compliance history. We agree that the Company compliance history does not present frequently recurrent violations. We are of the opinion that the compliance matters addressed in this case and the resulting complaints are an anomaly rather than a common occurrence. This militates in favor of a lower penalty.

The seventh factor to be considered relates to whether the Company cooperated with the Commission's investigation. 52 Pa. Code § 69.1201(c)(7). Both I&E and Verizon PA submitted that the Company fully cooperated in the investigation in this matter, including cooperating in both informal discovery and the settlement discussions. We commend the Parties for their cooperation and constructive negotiations which led to the amicable resolution of the issues in the investigation. Accordingly, Verizon's cooperation to work with I&E in crafting the proposed Settlement warrants a lower penalty.

The eighth factor to be considered is the amount of the civil penalty or fine necessary to deter future violations. The size of the utility may be considered to determine an appropriate penalty amount. 52 Pa. Code § 69.1201(c)(8). I&E submits that all the settlement terms, particularly the civil penalty and the continuing cooperation between the Parties to modify the notification letters as needed, are substantial and sufficient to deter Verizon PA from committing future violations. Verizon PA averred that the civil penalty agreed to in the Settlement is reasonable under the circumstances, even though it fully intends to comply with the applicable rules and orders relating to suspensions and terminations and that a civil penalty, therefore, is not necessary for future deterrence. We agree that the civil penalty agreed to by the Parties to the Settlement is reasonable in consideration of the alleged violations.

The ninth factor to be considered relates to past Commission decisions in similar situations. 52 Pa. Code § 69.1201(c)(9). Neither Verizon PA nor I&E is aware of any past Commission decisions that are directly related to the issues addressed in this Settlement. For this reason, I&E averred that this Settlement should be viewed on its own merits.

The tenth factor considers "other relevant factors." 52 Pa. Code § 69.1201(c)(10). I&E submits that the Commission should approve the Settlement

because it avoids the necessity for the governmental agency to prove elements of each allegation, and in return, the opposing party in a settlement agrees to a lesser fine or penalty, or other remedial action. I&E averred that the settlement terms are reasonable because they represent an economic and programmatic compromise while allowing the Parties to move forward to focus on implementing the agreed-upon remedial actions. I&E believes that the edits made to future network transformation suspension and termination letters will fully explain Verizon PA's copper retirement plan, the customer's obligations to accept the migration to fiber, the customer's options in the event either they or their landlord refuse the migration to fiber, how the conversion to fiber will impact their services and/or bill, the general time-frame for each important event (*i.e.*, suspension and/or termination), and the phone numbers of BCS and Verizon PA that customers can call to receive information about Verizon PA's fiber migration program and to have their questions answered. Verizon PA submitted that the Commission should consider that the results of the investigation "showed that it complied with the Commission's terminations moratorium for its collections program and its network transformation program." At the same time, the Company stated that the technical error related to the Sunday terminations, which was an unusual circumstance due to an IT error that occurred after it was restoring its collection process after the moratorium, should be viewed in the context of the entire program. The Company also asked the Commission to consider that it had revised the network transformation letters so they were acceptable to all interested parties even before the Settlement was finalized and that it has agreed under the Settlement that it will continue to work with I&E and BCS to ensure its network transformation letters are clear and there is no question with their compliance.

Upon our review of the proposed Settlement, based on our consideration of the factors in our *Policy Statement* for settled proceedings, and in view of the fact that no adverse comments have been filed against the Settlement, we conclude that the terms of the Settlement reflect a carefully balanced compromise of the interests of the Parties in this proceeding and is consistent with our policy that promotes settlements. Accordingly,

we shall grant the Parties' Petition and approve the proposed Settlement because it is in the public interest and will avoid the need to conduct further administrative and potential appellate proceedings that could otherwise result in a substantial cost to the Company and this Commission while also not necessarily ensuring the improvements to Verizon PA's future letters and processes as agreed to by the Company under the Settlement.

Conclusion

It is the Commission's policy to promote settlements. 52 Pa. Code § 5.231. The Parties herein have provided the Commission with sufficient information upon which to thoroughly consider the terms of the proposed Settlement. Based on our review of the record in this case, we find that the proposed Settlement between I&E and Verizon PA is in the public interest and merits approval; **THEREFORE**,

IT IS ORDERED:

1. That the Joint Petition for Approval of Settlement that was filed on January 31, 2022, between the Commission's Bureau of Investigation and Enforcement and Verizon Pennsylvania LLC, is approved in its entirety, without modification, consistent with this Opinion and Order.

2. That, in accordance with Section 3301 of the Public Utility Code, 66 Pa. C.S. § 3301, within thirty (30) days of the date of entry of this Opinion and Order, Verizon Pennsylvania LLC shall pay a civil penalty in the amount of Thirty Thousand

Dollars (\$30,000). Said payment shall be made by certified check or money order payable to “Commonwealth of Pennsylvania” and shall be sent to:

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

The civil penalty shall not be tax deductible or passed through as an additional charge to Verizon Pennsylvania LLC’s customers in Pennsylvania.

3. That, pursuant to the conditions set forth in the Joint Petition for Approval of Settlement, Verizon Pennsylvania LLC will continue to work with the Commission’s Bureau of Investigation and Enforcement and the Bureau of Consumer Services to modify/edit the suspension and termination notification letters, as future circumstances require, as it relates to the retirement of copper wire and installation of fiber optics.

4. That, after Verizon Pennsylvania LLC remits the civil penalty as set forth in Ordering Paragraph No. 2, above, the Secretary’s Bureau shall mark this proceeding closed.

5. That a copy of this Opinion and Order shall be served upon the Financial and Assessment Chief of the Commission's Office of Administrative Services, the Office of Consumer Advocate, and the Office of Small Business Advocate.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: May 12, 2022

ORDER ENTERED: May 12, 2022