



**900 Race Street  
6<sup>th</sup> Floor  
Philadelphia, PA 19107**

**Suzan DeBusk Paiva  
Associate General Counsel  
Suzan.d.paiva@verizon.com**

June 23, 2022

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – Filing Room (2 North)  
Harrisburg, PA 17120

**Re:** James Hill v. Verizon Pennsylvania LLC;  
Docket Nos. C-2021-3027358, C-2021-3028645, C-2021-3030086;

Dear Secretary Chiavetta:

Enclosed please find the following reply testimony submitted on behalf of Verizon Pennsylvania LLC (“Verizon”) in the cases listed above, which is being filed pursuant to 52 Pa. Code § 5.412a following its admission into the record at the June 21, 2022 hearing in these matters.

Verizon PA Statement 2.0, Reply Testimony of Mario Deiudonne

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

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva/sau".

Suzan D. Paiva  
Counsel for Verizon Pennsylvania LLC

SDP/sau  
Enclosure

cc: Attached Certificate of Service

**CERTIFICATE OF SERVICE**

I, Suzan D. Paiva, hereby certify that I have this day served a copy of Verizon's Statement No. 2.0, upon the participants listed below.

Dated at Philadelphia, Pennsylvania, this 23<sup>rd</sup> day of June, 2022.

**VIA EMAIL AND/OR US FIRST CLASS MAIL**

James F. Hill  
387 Autumn Leaves Road  
Starlight, PA 18461  
[jamesfrancishill@gmail.com](mailto:jamesfrancishill@gmail.com)

Administrative Law Judge Eranda Vero  
PA Public Utility Commission  
Pennsylvania Public Utility Commission  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107  
[evero@pa.gov](mailto:evero@pa.gov)  
[pmcneal@pa.gov](mailto:pmcneal@pa.gov)



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Suzan D. Paiva  
Verizon Pennsylvania LLC  
900 Race Street, 6<sup>th</sup> Floor  
Philadelphia, PA 19107

JAMES HILL  
V.  
VERIZON PENNSYLVANIA LLC

DOCKET NOs. C-2021-3027358  
C-2021-3028645  
C-2021-3030086

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VERIZON PENNSYLVANIA LLC

STATEMENT NO. 2.0  
(REPLY TESTIMONY)

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WITNESSES: Mario Dieudonne

DATED: April 15, 2022

1 **I. Introduction**

2 **Q. PLEASE STATE YOUR NAME, TITLE, BUSINESS ADDRESS AND JOB**  
3 **RESPONSIBILITY.**

4 A. My name is Mario Dieudonne. I am employed by Verizon as a Local Manager. My  
5 business address is 134 Progress St., East Stroudsburg, PA. I am responsible for managing  
6 field technicians and general day to day activities and assisting technicians and customers  
7 with challenges in the field relating to repairs and maintenance.

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 A. I am submitting this testimony on behalf of Verizon Pennsylvania LLC (“Verizon PA”) to  
10 respond to the written complaints filed by James Hill. I am primarily responding to the  
11 allegations in the second complaint, docketed at C-2021-3028645, relating to an internet  
12 outage on July 14, 2021, and more generally regarding the quality of Verizon PA’s service  
13 to Mr. Hill. At the hearing on April 11, 2022 the complaints and their attachments were  
14 deemed to be Mr. Hill’s written testimony in these cases.

15 **Q. DOES YOUR TERRITORY COVER THE AREA WHERE MR. HILL’S**  
16 **RESIDENCE IN STARLIGHT PA IS LOCATED?**

17 A. Yes

18 **Q. GENERALLY, WHERE IN PENNSYLVANIA IS STARLIGHT LOCATED?**

19 A. It is in Wayne County near the New York border, roughly an hour’s drive northeast of  
20 Scranton.

21 **Q. WOULD YOU CONSIDER THIS TO BE A RURAL AREA?**

22 A. Yes

1 **Q. HAVE YOU REVIEWED VERIZON'S TROUBLE HISTORY RECORDS FOR**  
2 **2021 AND 2022 FOR MR. HILL'S NUMBER OF 570-798-2438 SERVING 387**  
3 **AUTUMN LEAVES RD., STARLIGHT, PENNSYLVANIA?**

4 A. Yes.

5 **Q. GENERALLY WHAT DID YOU FIND?**

6 A. There are three trouble reports in 2021 and zero trouble reports in 2022 up to now.

7 **Q. IN MR. HILL'S SECOND COMPLAINT AT DOCKET NO. C-2021-3028645 HE**  
8 **STATES THAT HIS INTERNET WENT OUT ON JULY 14. DO THE RECORDS**  
9 **INDICATE A TROUBLE REPORT ON JULY 14, 2021?**

10 A. The records show there was a trouble reported on July 14, 2021. This was the first  
11 trouble report for 2021. It was determined to be due to a loss of power to certain  
12 electronic equipment at a remote terminal that affected a group of customers. A  
13 technician was dispatched to restart the equipment (a rectifier) and that restored service  
14 on July 15, 2021.

15 **Q. WHAT WAS THE SECOND TROUBLE REPORT?**

16 A. There is a report of an internet issue on August 15, 2021. It was noted that the customer  
17 wants to speak with someone in the US. Per testing that was done on August 16, it  
18 appears as though there was a sync issue with the customer's modem, meaning that the  
19 modem had no internet connectivity. This can occur due to a loss of power either  
20 because the router at the home is unplugged or if there was a power surge in the area.  
21 When electricity is restored the modem normally will power cycle and come back up. If  
22 it does not reset automatically, it may need a hard reset. Other issues can occur where the  
23 power surge/outage damages the equipment causing a loss of power.

1 **Q. WHAT WAS THE THIRD TROUBLE REPORT IN 2021?**

2 A. There was a trouble report on November 26, 2021. This issue was not related to trouble  
3 in the field but rather was an issue in the central office that will be addressed by Mr.  
4 Cheesman. This is the issue that is the subject of the third complaint.

5 **Q. WERE THERE ANY OTHER TROUBLE REPORTS AFTER THIS ONE?**

6 A. No. This last issue as listed as resolved on December 7, 2021 and there were no other  
7 trouble reports in 2021 and none in 2022.

8 **Q. DOES THIS CONCLUDE YOUR REPLY TESTIMONY?**

9 A. Yes.