

DOCKET NOS. C-2021-3027358,  
C-2021-3030086, C-2021-3028645

Hearing Date: June 21, 2022

Verizon Pennsylvania LLC

St. 1.0 Reply Testimony of Mayra Cevallos with  
Exhibit 1

St. 2.0 Reply Testimony of Mario Dieudonne

St. 3.0 Reply Testimony of Joshua Cheesman

Complainant

St. 1 Complainant's Statement in C-2021-3027358  
(Retained by Judge Vero)

St. 2 Complainant's Statement in C-2021-3030086  
(Retained by Judge Vero)

St. 3 Complainant's Statement in C-2021-3028645  
(Retained by Judge Vero)



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. 1.0  
(REPLY TESTIMONY)

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WITNESSES: Mayra Cevallos

DATED: April 15, 2022

**EXHIBIT**

**Verizon St. 1.0**

exhibitsticker.com

**I. Introduction**

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

A. My name is Mayra Cevallos. I am a Verizon Executive Relations Senior Analyst. My business address is 6955 W. Morelos Pl, Chandler, AZ 85226. I am responsible for handling customer agency complaints.

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

A. I am submitting this testimony on behalf of Verizon Pennsylvania LLC (“Verizon PA”) to respond to the written complaints filed by James Hill docketed at C-2021-3027358, C-2021-3028645 and C-2021-3030086. At the hearing on April 11, 2022 the complaints and their attachments were deemed to be Mr. Hill’s written testimony in these cases.

**Q. ARE YOU FAMILIAR WITH THE THREE COMPLAINTS FILED BY MR. HILL?**

A. Yes.

**Q. WHEN DID VERIZON PA RECEIVE THE FIRST COMPLAINT?**

A. The first complaint at Docket C-2021-3027358 was served on Verizon PA electronically on July 21, 2021.

**Q. WERE YOU ASSIGNED TO CONTACT MR. HILL AND ATTEMPT TO ANSWER ANY QUESTIONS AND SETTLE THE COMPLAINT?**

A. Yes.

**Q. WHAT DID MR. HILL COMPLAIN ABOUT IN THE FIRST COMPLAINT AT DOCKET C-2021-3027358?**

A. Mr. Hill’s complaint stated that “Verizon has refused to restore my long distance Verizon service.” The complaint was dated June 28, 2021 and attached a letter dated June 24,

2021 addressed to Hans Vestberg, the CEO of Verizon, providing more details. As I understand it, while Mr. Hill was in Florida he kept the line in his Starlight Pennsylvania home working to support his security system but did not have long distance service on the line. When he returned to Pennsylvania, he ordered long distance added to the line but it was not added as of the date of this letter to Hans Vestberg.

**Q. WAS THE LONG DISTANCE SERVICE ALREADY WORKING WHEN YOU RECEIVED THE COMPLAINT?**

A. Yes. Mr. Hill's letter to Hans Vestberg was assigned to another executive relations representative who had already contacted Mr. Hill, resolved the issue and confirmed that the long distance service was working before the Commission served the formal complaint on Verizon PA.

**Q. DID YOU INVESTIGATE TO DETERMINE WHAT HAPPENED WHEN MR. HILL TRIED TO ADD LONG DISTANCE SERVICE TO HIS LINE?**

A. Yes. Based on the account notes it looks like he had not completed the third-party verification that is required to change long distance carriers or add long distance to an account. Once that was done, we were able to get his long-distance working.

**Q. WHAT IS THIRD PARTY VERIFICATION AND WHY IS IT REQUIRED?**

A. The FCC requires third party verification before a local telephone company such as Verizon PA can submit a preferred carrier change order for a long distance service change on the line. 47 C.F.R. 64.1120(c)(3). As I understand it, the purpose is to prevent "slamming," the unauthorized change of someone's long distance service. The rules have detailed requirements including that the Verizon PA representative must drop off the line while the customer continues the process with the third party verifier, who is an

independent entity not affiliated with Verizon. Even if the customer begins the process with the third party verifier, if it is not completed in full then the order to change long distance service cannot go through. It appears in this case the third party verification was not marked complete and needed to be completed before Verizon PA could add to the account long distance service provided by its affiliate Verizon Long Distance.

**Q. ATTACHED TO THIS TESTIMONY IS THE DOCUMENT THAT WAS MARKED VERIZON EXHIBIT NO. 1 FOR THE HEARING. COULD YOU EXPLAIN WHAT THIS DOCUMENT IS?**

A. This is a log of my attempts to contact Mr. Hill from the time I was assigned the first complaint to the time we were required to submit exhibits in advance of the April 11, 2022 hearing.

**Q. DID YOU MAKE ANY CORRECTIONS TO THE VERSION OF THE DOCUMENT THAT WAS SUBMITTED FOR THE APRIL 11, 2022 HEARING?**

A. Yes. There was one typo in the original document. On the second page it listed the date of 12/7 twice. The second one (which is the second to last entry on the second page) should have been 12/17. It is corrected on the version of the exhibit that is attached to this testimony.

**Q. THE TOP OF THE DOCUMENT LISTS VARIOUS CONTACT INFORMATION FOR MR. HILL. COULD YOU EXPLAIN WHERE YOU OBTAINED THE INFORMATION?**

A. Yes. The first entry is the BTN or the "Billing Telephone Number." This is the Verizon PA landline number at the address at 387 Autumn Leaves Rd., Starlight, Pennsylvania, that is the subject of the complaints. The second entry is a Mobile Telephone Number.

This is the number listed in Verizon's records as the customer's alternate "can be reached" number. I heard Mr. Hill say at the April 11, 2022 hearing that this is not his mobile number. This is the mobile number listed in Verizon PA's records database known as Optix. Mr. Hill did not include an alternate can be reached number with his PA PUC formal complaint documents. If he changed his mobile number Verizon PA would not know of it unless he informed us. In any event, I never succeeded in reaching Mr. Hill on the mobile number and the vast majority of my calls and messages were to the BTN, as indicated on the exhibit. The email address is the one listed on Mr. Hill's letters attached to his complaint and the home address is the physical address where Verizon PA's telephone service is provided.

**Q. LOOKING AT EXHIBIT 1, THE FIRST ENTRY IS ON JULY 21, 2021, THE SAME DAY VERIZON WAS SERVED WITH THE FIRST COMPLAINT. DID YOU ATTEMPT TO CONTACT HIM THAT DAY?**

A. Yes. I called the BTN that day and left a message. After a few days passed and I didn't hear from him I left another voice message and sent an email.

**Q. WERE YOU ABLE TO SPEAK WITH HIM?**

A. Yes. I was able to speak with Mr. Hill on July 28, 2021.

**Q. WHAT HAPPENED?**

A. I was able to verify that the long distance service was working. I attempted to discuss settlement of the complaint but Mr. Hill became upset and hung up on me.

**Q. WAS THIS THE LAST TIME YOU SUCCEEDED IN SPEAKING TO HIM?**

A. Yes. I did speak with Mrs. Hill on November 15, 2021 but I never reached Mr. Hill again.

**Q. WHEN WAS THE SECOND COMPLAINT SERVED ON VERIZON PA?**

A. The second complaint at Docket No. C-2021-3028645 was served on Verizon PA electronically on September 23, 2021.

**Q. DID YOU ATTEMPT TO CONTACT MR. HILL ABOUT HIS FIRST COMPLAINT NUMEROUS TIMES BEFORE THE SECOND COMPLAINT WAS SERVED?**

A. Yes. Exhibit 1 shows the dates on which I called Mr. Hill and left messages. On August 9 and August 30 I also sent emails.

**Q. DID HE RETURN ANY OF YOUR CALLS?**

A. No.

**Q. DID HE ANSWER YOUR EMAILS?**

A. No.

**Q. WERE YOU ASSIGNED TO CONTACT MR. HILL AND ATTEMPT TO ANSWER ANY QUESTIONS AND SETTLE THE SECOND COMPLAINT?**

B. Yes.

**Q. WHAT WAS THE SUBJECT OF THE SECOND COMPLAINT?**

A. He states that his Verizon internet service went out on July 14, 2021 and that he made five calls to Verizon with no result as of July 16.

**Q. WHAT KIND OF INTERNET SERVICE DOES HE SUBSCRIBE TO FROM VERIZON?**

A. High Speed Internet, which is a Digital Subscriber Line or DSL service. It is provided by Verizon PA's affiliate Verizon Online.

**Q. LOOKING AT HIS SECOND COMPLAINT, HE SAYS “THE PA PUC SHOULD PUNISH VERIZON FOR ITS FAILURE TO PROVIDE ... ACCESS TO VERIZON PERSONNEL WHO COULD INITIATE INTELLIGENT RESPONSE.” IN YOUR MULTIPLE VOICEMAIL MESSAGES AND EMAILS DID YOU PROVIDE CONTACT INFORMATION WHERE HE COULD REACH YOU?**

A. Yes.

**Q. DID HE EVER CONTACT YOU ABOUT HIS INTERNET OUTAGE, EITHER BEFORE OR AFTER HE FILED HIS SECOND COMPLAINT?**

A. No.

**Q. AFTER YOU WERE ASSIGNED THE SECOND COMPLAINT, DID YOU AGAIN ATTEMPT TO CONTACT MR. HILL TO ANSWER ANY QUESTIONS AND RESOLVE THAT COMPLAINT?**

A. Yes. From the day we received the second complaint until we received the third complaint on December 17, 2021, I made numerous calls to the BTN and left messages as indicated on Exhibit 1. Certain of these times I also tried to call the mobile number as indicated. On September 30, 2021 I sent him a letter asking him to call me. On October 19, 2021 I sent him an email. On November 15, 2021, I reached Mrs. Hill on the BTN who said Mr. Hill was not available but she would pass on my message.

**Q. DID HE EVER RETURN ANY OF YOUR CALLS OR EMAILS?**

A. No.

**Q. WHEN WAS THE THIRD COMPLAINT SERVED?**

A. The third complaint at Docket No. C-2021-3030086 was served electronically on Verizon PA on December 17, 2021.

**Q. WERE YOU ASSIGNED TO ASSIST MR. HILL AND ATTEMPT TO SETTLE THAT THIRD COMPLAINT?**

A. Yes.

**Q. WHAT WAS THE SUBJECT OF THE THIRD COMPLAINT?**

A. He states that he was experiencing issues with his telephone service. Another witness will address the details.

**Q. DID HE EVER CONTACT YOU ABOUT THE ISSUES RAISED IN THE THIRD COMPLAINT, EITHER BEFORE OR AFTER HE FILED THE COMPLAINT?**

A. No.

**Q. IN THE ATTACHMENT TO THE THIRD COMPLAINT HE STATES THAT “VERIZON HAS NEVER CONTACTED ME ABOUT THIS CURRENT OUTAGE.” DID YOU ATTEMPT TO CONTACT HIM DURING THIS TIME PERIOD?**

A. Yes.

**Q. DID HE RETURN YOUR CALLS?**

A. No.

**Q. BY THE TIME YOU RECEIVED THE THIRD COMPLAINT ON DECEMBER 17, 2021 WAS THE ISSUE RAISED IN THAT COMPLAINT ALREADY RESOLVED?**

A. Yes.

**Q. DID YOU CONTINUE TO TRY TO CONTACT MR. HILL AFTER THE THIRD COMPLAINT?**

A. Yes. As listed on Exhibit 1, I placed more calls from December 17 forward.

**Q. DID YOU EVER REACH HIM?**

A. No.

**Q. IN ADDITION TO THE CONTACTS LISTED ON EXHIBIT 1, DID VERIZON PA EMAIL AND FEDERAL EXPRESS A SETTLEMENT OFFER TO MR. HILL IN ADVANCE OF THE APRIL 11, 2022 HEARING?**

A. Yes.

**Q. DID HE RESPOND?**

A. He did not respond to the offer but at the hearing on April 11, 2022 he stated that he was not interested in settling.

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

A. Yes.

**Mayra Cevallos Attempted Contacts with James Hill**

Billing Telephone Number (BTN): 570-798-2438

Mobile Telephone Number: 570-251-0639

Email Address: [JAMESFRANCISHILL@VERIZON.COM](mailto:JAMESFRANCISHILL@VERIZON.COM)

Home Address: 387 Autumn Leaves Road, Starlight, PA 18461

7/21 – Called the BTN and left a message

7/27 – Called the BTN and left a message

7/27 – Emailed

7/28 – Spoke w/ customer on BTN and he hung up.

7/30 – Called the BTN and left a message

8/2 – Called the BTN and left message

8/9 – Called the BTN and left message

8/9 – Emailed

8/10 – Called the BTN and left message

8/11 – Called the BTN and left a message

8/16 – Called the BTN but rang busy. Called again but someone picked up and hung up.

8/16 – Emailed

8/24 – Called the BTN twice but rang busy

8/30 – Called Mobile twice but rings busy.

8/30 – Emailed

9/1 – Called Mobile but rings busy

9/7 – Called the BTN but rings busy

9/7 – Called the Mobile number but got a busy tone. Called the BTN from my Jabber phone and left a message.

9/8 – Called the BTN and left message.

9/13 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

9/22 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

9/23 – Called the BTN and left message. Maybe blocked on Mobile; rings busy.

9/24 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

9/29 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

9/30 – Please call letter mailed

10/5 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

10/8 - Called the BTN and left message. Blocked on Mobile.

10/8 – Randy called the BTN and left message. Mobile rings busy.

10/12 - Called the BTN and left message.

10/13 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

10/18 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

10/19 – Called the BTN and left message

10/19 – Emailed

10/25 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

10/27 – Called the BTN and left message

11/1 – Called the BTN and left message

11/3 - Called the BTN voicemail box full. Maybe blocked on Mobile; rings busy.

11/9 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

11/15 – Called the BTN and spoke with Mrs. Hill who said Mr Hill was not available but would pass along my message

11/18 – Customer did not return call. Called the BTN and left message.

11/22 – Called the BTN and left message

11/30 - Called the BTN and left message

12/7 - Called the BTN and left message

12/9 - Called the BTN and left message

12/13 - Called the BTN and left message

12/17 - Called the BTN and left message

12/20 - Called the BTN and left message. Maybe blocked on Mobile; rings busy.

12/27 - Called the BTN and left message.

1/3 - Called the BTN and left message.

1/11 - Called the BTN and left message.

1/24 - Called the BTN and left message.

1/31 - Called the BTN and left message.

2/7 - Called the BTN and left message.

2/15 - Called the BTN and left message.

2/22 - Called the BTN and left message.

3/2 - Called the BTN and left message.

3/7 - Called the BTN and left message.

3/14 - Called the BTN and left message.

4/4 - I called and left a message for Mr. Hill on the BTN. I asked him to call me back to discuss settling his complaints. I also called the mobile number but got a busy tone.

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

**EXHIBIT**

Verizon St. 2.0

exhibits.ticker.com

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.

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. 3.0  
(REPLY TESTIMONY)

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WITNESSES: Joshua Cheesman

DATED: April 15, 2022

**EXHIBIT**

Verizon St. 3.0

exhibitsticker.com

1 **I. Introduction**

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

4 A. My name is Joshua Cheesman. I am a Supervisor of Network Operations Verizon. My  
5 business address is 420 Delaware St., Olyphant, Pennsylvania. I am responsible for the  
6 group of technicians that operate and maintain the switching equipment in central offices  
7 and remote switches.

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, specifically to the third complaint  
11 docketed at C-2021-3030086. At the hearing on April 11, 2022 the complaints and their  
12 attachments were deemed to be Mr. Hill’s written testimony in these cases.

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

15 A. Yes. As I discuss below, these issues related to the Carbondale switch and the Lake  
16 Como remote switch that operates off of the Carbondale host switch. Both of those  
17 locations come under my responsibility.

18 **Q. THE THIRD COMPLAINT AT DOCKET NO. C-2021-3030086 WAS SERVED**  
19 **ON VERIZON ON DECEMBER 17, 2021. IT IS DATED BY MR. HILL AS**  
20 **DECEMBER 4, 2021. MR. HILL SAYS “OUTGOING PHONE CALLS OFTEN**  
21 **DO NOT RING AT THE NUMBER CALLED. OFTEN, THE CALLER WILL BE**  
22 **PATCHED INTO ANOTHER CONVERSATION GOING ON BETWEEN**  
23 **OTHER PERSONS. INCOMING CALLS SHOW THE CALLER NAME ON**

1           **CALL ID BUT WHEN ANSWERED, NO ONE IS THERE.” ARE YOU**  
2           **FAMILIAR WITH THAT ISSUE?**

3    A.    Yes. Mr. Hill is served by the Lake Como remote switch. In late November of 2021  
4           Verizon PA was upgrading the equipment that connects the Lake Como remote switch to  
5           the Carbondale host switch, a job that was intended to improve service in the area. After  
6           the new equipment was turned on, we began to receive reports from customers in the area  
7           experiencing interference, dropped calls and cross talk, similar to what Mr. Hill reports in  
8           his complaint. We immediately began troubleshooting to find the cause of this  
9           unforeseen problem, which we concluded was related to the equipment upgrade.  
10          Unfortunately it was not easy to find the source of the intermittent interference. We  
11          reverted to the original equipment and began with a process of elimination to find the part  
12          that went bad. Ultimately we found that certain circuit boards in the Carbondale office  
13          unexpectedly went bad during the upgrade process. We replaced those circuit boards and  
14          the problem was resolved on December 6, 2021.

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

16    A.    Yes.