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Via Electronic Filing

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: Richard Valentino v. Verizon Pennsylvania LLC;
Docket No. C-2023-3041051

Dear Secretary Chiavetta:

As directed in ordering paragraphs 2 and 3 of the Initial Decision (“ID”) issued January 17, 2024, Verizon Pennsylvania LLC (“Verizon”) provides the following report. Neither Verizon nor the Complainant has filed exceptions to the ID and therefore we are submitting this letter to comply with its requirements.

The ID directed Verizon to “return to the service address and attempt to resolve the telephone service issues within 30 days from the date of the Initial Decision and create a report outlining what actions were taken, what solutions were suggested and what solutions succeeded, if any,” and that Verizon “shall provide to the Bureau of Technical Utility Services a copy of the report outlined in Ordering Paragraph 2, within 60 days from the date of the Initial Decision.”

Prior to the hearing Verizon had already visited the premises a number of times and made several precautionary equipment upgrades to address the Complainant’s report of intermittent static and interruptions in voice and DSL service, even though technicians did not always find these issues when they responded to service calls. As discussed in the evidentiary record, service is provided through a fiber-optic fed remote terminal, so that the lines from the main switch to the remote terminal are fiber optic (approximately 8.1 miles). From the remote terminal to the home service is on copper for 1,200 feet. Verizon replaced the batteries and electronic equipment in the

remote terminal to address possible issues with the equipment resetting after commercial power outages. Verizon replaced equipment at the main switch (central office) and also replaced the DSL filter and modem at the home. Verizon also tested the lines and service multiple times and found no defects and that the DSL was providing the speed of 3Mbps it was provisioned for. Remote testing of the DSL service showed that there is no network congestion and there is ample bandwidth available for the service provisioned. Verizon's witnesses testified at the hearing that any issues with the voice or DSL service are likely being caused by devices at the home trying to use more than 3 Mbps of bandwidth at the same time, causing interference. The ID concluded that "[t]he evidence presented proved Verizon took the calls it received from Complainant seriously and responded reasonably quickly." (ID at 15).

Following the hearing, on October 3, 2023, Verizon conducted end-to-end testing with a technician on site while the remote testing team worked to test the throughput in real time. There were two cell phones and two tablets actively using the service. By testing with each device, the team isolated a 7" Fire tablet as using full line capacity just by being powered on and sitting there. The technician observed that there were notifications emails but did not know what was using so much bandwidth. The technician let Mr. Valentino know what we saw and recommended that if he experiences trouble again to try powering off that tablet and see if it makes a difference. The team concluded that there was a customer utilization issue and not a network problem.

After the ID was issued, Verizon's operations team visited customer's location on February 9, 2024. Facilities were tested up to the Network Interface Device. All Verizon facilities were found to be working properly. As a preventative measure, the customer's modem was replaced. At some point, the customer had installed an old D-Link modem, with outdated firmware that possibly could have caused service issues. It was replaced on February 9 with an Actiontec modem, which seemed to improve service. The team could not enter the home to conduct more testing at that time because the residents were experiencing an illness, so it was agreed to follow up once they were feeling better.

On February 20, 2024 the team again conducted end-to-end testing with a technician onsite and another team member testing the network remotely in the same manner described above. The customer was not experiencing any issues that day and the service tested good. The team noticed that one tablet seemed to use the maximum bandwidth sporadically when turned on, syncing, and updating notifications but not otherwise in use. The team was still able to use a laptop to play a video, open a webpage, and play another video even with the tablet operating. No issues were found with the network and it was working properly. It was explained to the customer that occasional buffering they experience watching videos is likely caused by the bandwidth limitation of 3 Mbps, particularly if the tablet is operating.

In sum, Verizon believes that the telephone and DSL service are operating as expected with no network problems and we have discussed the bandwidth limitation issue with the customer.

Please do not hesitate to contact me with any questions.

Very truly yours,



Suzan D. Paiva
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SDP/sau

cc: Paul Diskin, Director, Bureau of Technical Utility Services (pdiskin@pa.gov)
Honorable Katrina L. Dunderdale (kdunderdal@pa.gov)
Richard Valentino