

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Verizon Pennsylvania	:	
LLC and Verizon North LLC for	:	P-2014-2446303
Competitive Classification of all	:	P-2014-2446304
Retail Services in Certain Geographic Areas	:	
and for a Waiver of Regulations for	:	
Competitive Services	:	

Prehearing Memorandum

On October 9, 2014, a Prehearing Conference Order was issued by the Honorable Joel H. Cheskis, Administrative Law Judge, scheduling a prehearing conference for Thursday, October 23, 2014 at 1:00 p.m., advising parties to engage in early discovery, and requiring each party to prepare and serve a prehearing memorandum on or before Monday, October 20, 2014.

In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

A. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

Elizabeth R. Marx, Esquire
Harry S. Geller, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
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B. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding.

C. Discovery

CAUSE-PA supports the discovery modifications submitted by the Office of Consumer Advocate which, in light of the statutorily expedited timeframe for this proceeding (66 Pa. C.S. § 3016(a)), will allow for the efficient and just resolution of the case.

D. Proposed Schedule

CAUSE-PA will work with the parties regarding a proposed schedule.

E. Witnesses and Testimony

CAUSE-PA anticipates calling the following witnesses in this proceeding:

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified below and any other issues that may arise in the course of this proceeding.

Ellen Kramer, Esq.
Legal Director
Pennsylvania Coalition Against Domestic Violence
3605 Vartan Way, Suite 101
Harrisburg, PA 17110
717-671-4767 ext. 186
ekramer@pcadv.org

Ms. Kramer will address the significant physical and financial safety risks – particularly for victims of domestic violence – if Verizon’s basic stand-alone calling service were to become unaffordable as a result of insufficient, unreliable, or unstable competitive service.

In addition to Mr. Miller and Ms. Kramer, CAUSE-PA reserves the right to call additional witnesses, should it become necessary as the proceedings progress and discovery is exchanged, upon timely and appropriate notice to Judge Cheskis and all parties.

F. Issues to be Presented

1. CAUSE-PA is opposed to Verizon’s Petition, as it may impose significant hardship on low and moderate income residential customers who reside in geographical areas affected by the Petition. Verizon’s basic, stand-alone calling service is of significant importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means and those in more rural areas of the affected exchanges. Basic, stand-alone calling service, enables an individual to contact emergency services, seek employment, call their workplace, school, or childcare center, reach out to supportive government and social service agencies, friends and/or family, or attend to other pressing matters. However, the requests contained in Verizon’s Petition appear to jeopardize the continued ability for Pennsylvanians to access this critical calling service. CAUSE-PA intends to present the following issues in this proceeding:

1. Reclassifying 194 local exchanges as competitive will hinder the ability for economically vulnerable individuals who reside in the affected exchanges to access stable, reliable, and affordable calling service.
2. The regulatory waivers sought by Verizon are unreasonably broad, and present a significant likelihood that individuals who reside in the affected exchanges will be

foreclosed from accessing affordable and reliable calling service, without the ability to seek meaningful recourse from the Commission.

3. Broad deregulation of Verizon's basic, stand-alone calling service – together with significantly broad waiver of critical regulation – may negatively impact the Lifeline program, resulting in both physical and financial harm to participants in that program.

Other issues may emerge as the proceedings progress and discovery is exchanged. CAUSE-PA reserves the right to raise further issues based on the information presented throughout this proceeding.

G. Public Input Hearing

CAUSE-PA is not presently proposing a public input hearing, but would support such a proceeding if one or more were requested by other parties in this proceeding. In the event that one or more public input hearings are held, CAUSE-PA would support holding such hearings at a location that is central to the affected areas. Indeed, the individuals residing in the affected areas are best equipped to inform the Commission of their experience in the telecommunications market, and will appropriately supplement expert testimony submitted in the broader proceeding.

H. Opposition to Petition for Protective Order

CAUSE-PA is not opposed to Verizon's Petition for Protective Order, filed October 6, 2014. However, out of an abundance of caution, we note that Appendix A to the Petition for Protective Order, setting forth the form for parties to complete, is incorrectly captioned, and requests that the form be amended by Verizon prior its approval for use in this proceeding.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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DATED: October 20, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL

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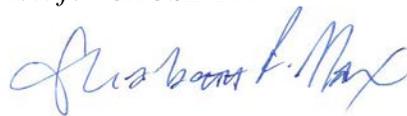
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Dated: October 20, 2014