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October 20, 2014

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: 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 – Docket Nos. P-2014-2446303 and P-2014-2446304

Dear Rosemary Chiavetta:

Enclosed for electronic filing please find Full Service Network's Prehearing Memo with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Certificate of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Full Service Network's Prehearing Memo upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

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Date: Oct. 20, 2014



Deanne M. O'Dell, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Verizon Pennsylvania LLC :
and Verizon North LLC for Competitive :
Classification Of all Retail Services In Certain : Docket No. P-2014-2446303
Geographic Areas, And For A Waiver Of : P-2014-2446304
Regulations For Competitive Services :

**PREHEARING MEMORANDUM
OF FULL SERVICE NETWORK LP**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notice published in the Pennsylvania Bulletin on October 11, 2014, the Prehearing Conference Order dated October 9, 2014 and subject to the disposition of its Petition to Intervene which is being filed simultaneously, Full Service Network LP (“FSN”) submits this Prehearing Memorandum.

I. SERVICE LIST

Please include the following attorneys on the service list:

Deanne M. O’Dell, Esquire
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FSN agrees to electronic service of all documents to the email addresses listed above with one (1) hard copy mailing of all documents sent to Eckert Seamans.

II. POSSIBILITY OF SETTLEMENT

FSN is willing to participate in settlement discussions with any party to narrow the issues in this matter.

III. PROPOSED MODIFICATIONS TO COMMISSION'S DISCOVERY REGULATIONS

FSN does not have any proposed modifications. FSN is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery.

IV. PROPOSED LITIGATION SCHEDULE

FSN will cooperate with the other parties and the ALJ to facilitate a workable litigation schedule.

V. WITNESSES

At this time, FSN is continuing to evaluate the need to submit the testimony of a witness but will notify the Presiding Officer as well as the other parties as to its decision as soon as practical.

VI. PRESENTLY IDENTIFIED ISSUES

FSN is a Pennsylvania certificated competitive local exchange carrier ("CLEC") and facilities-based interexchange carrier ("IXC") and a wholesale customer of Verizon that purchases the services from Verizon at a wholesale discount and then resells them to FSN's retail customers. The issues preliminarily identified by FSN for this proceeding include:

- The impact of Verizon's requested relief on FSN's ability to continue to resell Verizon's services including access to information about the services as well as pricing. FSN's position is that if these services are deemed competitive, then Verizon

must be required to continue to offer them on a resale basis at the currently applicable wholesale discount rate.

- The specific waivers sought by Verizon related to Chapters 63 and 64. To the extent Verizon is granted waivers of Commission regulations, ensuring that such waivers are equally applicable to similarly situated competitive jurisdictional telecommunications carriers;

At this time, FSN continues to evaluate its position on and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. FSN reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

VII. PUBLIC INPUT HEARINGS

FSN has no position at this time on the need for public input hearings.

VIII. PROTECTIVE ORDER

FSN does not have any oppositions to the Petition for Protective Order filed by Verizon on October 6, 2014.

Respectfully submitted,



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Sarah C. Stoner, Esquire

Attorney I.D. 313793

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Date: October 20, 2014

Attorneys for Retail Energy Supply Association