



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

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October 21, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. 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 Secretary Chiavetta:

Enclosed for filing on behalf of the Pennsylvania Telephone Association is its Prehearing Conference Memorandum in the above-referenced proceeding. Copies of the Memorandum are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Encl.

cc: Certificate of Service (w/encl.)
Steve Samara (w/encl.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition of Verizon Pennsylvania LLC :
and Verizon North LLC for Competitive : Docket Nos. P-2014-2446303
Classification of All Retail Services in : P-2014-2446304
Certain Geographic Areas, and for a Waiver :
of Regulations for Competitive Services :**

**PREHEARING CONFERENCE MEMORANDUM
OF THE PENNSYLVANIA TELEPHONE ASSOCIATION**

AND NOW, comes the Pennsylvania Telephone Association (“PTA”), on behalf of its member companies,¹ by its attorneys, and submits this Prehearing Conference Memorandum in accordance with the Prehearing Conference Order of Administrative Law Judge Joel H. Cheskis, dated October 9, 2014, and in connection with the Prehearing Conference scheduled to be held in the above-captioned matter on October 23, 2014.

I. Introduction

This proceeding concerns a Joint Petition filed on October 6, 2014 by Verizon Pennsylvania LLC and Verizon North LLC (collectively, “Verizon”) pursuant to Section 3016 of the Public Utility Code, 66 Pa. C.S. § 3016, requesting the competitive reclassification of all

¹ The Pennsylvania Telephone Association is the representative of the following member companies for purposes of this proceeding: Armstrong Telephone Company – Pennsylvania; Armstrong Telephone Company – North; Citizens Telephone Company of Kecksburg; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Consolidated Communications of Pennsylvania Company; FairPoint Communications/Bentleyville Telephone Company; FairPoint Communications/Marianna and Scenery Hill Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Oswayo River, LLC; Frontier Communications of Pennsylvania, LLC; Hancock Telephone Company; Hickory Telephone Company; Ironton Telephone Company; Lackawaxen Telecommunications Services; Laurel Highland Telephone Company; The North-Eastern Pennsylvania Telephone Company; North Penn Telephone Company; Palmerton Telephone Company; Pennsylvania Telephone Company; Pymatuning Independent Telephone Company; South Canaan Telephone Company; TDS Telecom/Deposit Telephone Company; TDS Telecom/Mahanoy & Mahantango Telephone Company; TDS Telecom/Sugar Valley Telephone Company; The United Telephone Company of Pennsylvania, LLC d/b/a CenturyLink; Venus Telephone Corporation; West Side Telephone Company; Windstream Buffalo Valley, Inc.; Windstream Conestoga, Inc.; Windstream D&E, Inc.; Windstream Pennsylvania, LLC; and Yukon-Waltz Telephone Company.

retail protected and any other services to residential and business customers yet to be competitively classified (excluding intrastate switched and special access) in select metropolitan areas, viz. Philadelphia, Pittsburgh, Erie, Harrisburg/York, and Scranton/Wilkes-Barre. Verizon's Joint Petition also seeks a waiver of the Commission's regulations found at 52 Pa. Code Chapters 63 and 64 as applied to competitive services in these geographic areas, including Chapter 63, Subchapters B (Services and Facilities), C (Accounts and Records), E (Telephone Quality Service Standards), F (Extended Area Service), G (Public Coin Telephone Service), and all of Chapter 64 (relating to the standards and billing practices for residential telephone service).

Notice of the filing of the Joint Petition was published in the *Pennsylvania Bulletin* on October 11, 2014, which set a protest, answer, and intervention deadline of October 21, 2014. See 44 Pa.B. 6643. Contemporaneously with the submission of this Memorandum, the PTA is filing its Petition to Intervene in the proceeding. The PTA incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Cheskis grant its intervention.

II. Counsel for the PTA

The names, business address, telephone number, and email addresses of counsel for the PTA are:

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The PTA designates the above counsel for purposes of inclusion on the official service list.

III. Settlement

The PTA will actively participate in settlement discussions as they may occur.

IV. Discovery

The PTA agrees to cooperate with Judge Cheskis and all other parties at the Initial Prehearing Conference to develop a proposed plan and schedule of discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

V. Proposed Litigation Schedule

The PTA understands that the Commission, pursuant to Section 3016(a)(1) of the Public Utility Code, must enter an order granting or denying the Joint Petition within 150 days of the October 6, 2014 filing date since timely protests have been filed. The PTA, accordingly, will cooperate with Judge Cheskis and the other parties to finalize a schedule for the submission of testimony, hearings, and briefs at the Initial Prehearing Conference, which would require the filing of reply briefs no later than January 16, 2015.

VI. Witnesses

The PTA will notify Judge Cheskis and the parties should the PTA elect to call any witnesses and submit testimony in this proceeding and will comply with all deadlines established for the service of testimony.

VII. Issues

The PTA is presently reviewing and analyzing Verizon's Joint Petition and direct testimony. As such, the PTA has not yet identified the issues it may pursue in this proceeding, but reserves the right to present its position and address any appropriate issues in accordance with the litigation schedule established at the Initial Prehearing Conference.

VIII. Public Input Hearings

The PTA takes no position on whether public input hearings are needed.

IX. Protective Orders

Verizon filed a petition for a proposed protective order on October 6, 2014. In light of its contemporaneous intervention in this proceeding, the PTA has not had an opportunity to review the proposed protective order, but will cooperate in its finalization at the Initial Prehearing Conference.

Respectfully submitted,



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DATED: October 21, 2014

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Verizon North LLC for Competitive : Docket Nos. P-2014-2446303
Classification of All Retail Services in Certain : P-2014-2446304
Geographic Areas, and for a Waiver of :
Regulations for Competitive Services :

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of October, 2014, served a true and correct copy of the foregoing Prehearing Conference Memorandum of the Pennsylvania Telephone Association, upon the persons listed below by e-mail and first class mail, postage prepaid:

Honorable Joel H. Cheskis
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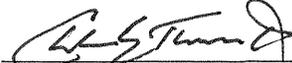
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