

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

FAX (717) 783-7152  
consumer@paoca.org

November 3, 2015

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17101

Re: Petition of Communications Workers of  
America for a Public, On-the-Record  
Commission Investigation of the Safety,  
Adequacy, and Reasonableness of Service  
Provided by Verizon Pennsylvania, LLC  
Docket No. P-2015-2509336

Dear Secretary Chiavetta:

Enclosed for filing is the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lauren M. Burge".

Lauren Burge  
Assistant Consumer Advocate  
PA Attorney I.D. 311570

Enclosure

cc: Office of Administrative Law Judge  
Certificate of Service  
\*213776

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Communications Workers of America :  
for a Public, On-the-Record Commission : Docket No. P-2015-2509336  
Investigation of the Safety, Adequacy, and :  
Reasonableness of Service Provided by Verizon :  
Pennsylvania, LLC :

---

NOTICE OF INTERVENTION

---

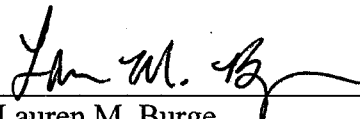
Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above captioned proceeding should be addressed to the following:

Darryl Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Lauren M. Burge  
Assistant Consumer Advocate  
PA Attorney I.D. # 311570  
E-Mail: [LBurge@paoca.org](mailto:LBurge@paoca.org)

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152

Respectfully submitted,



---

Lauren M. Burge  
Assistant Consumer Advocate

DATED: November 3, 2015

PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Intervention to participate in proceedings before the Commission involving the Petition of Communications Workers of America for a Public, On-the-Record Commission Investigation of the Safety, Adequacy, and Reasonableness of Service Provided by Verizon Pennsylvania, LLC.

On October 21, 2015, the Communications Workers of America (CWA) petitioned the Commission to institute an investigation into the state of Verizon Pennsylvania, LLC's (VZPA) physical plant. CWA avers that VZPA has allowed its physical plant to fall into a state of disrepair such that it poses a safety hazard to employees and the public, and fails to provide "adequate, efficient, safe, and reasonable service and facilities" as required by Section 1501 of the Public Utility Code. 66 Pa. C.S. § 1501. CWA alleges that these conditions exist in areas where VZPA has not deployed its FiOS, or fiber-to-the-home, facilities, and that the poor condition of VZPA's plant affects the quality of landline service provided to customers and places utility workers in danger. CWA's petition requests that the Commission inspect both the physical plant as well as VZPA's records, and that the Commission take action to correct the deficiencies in VZPA's plant.

The Consumer Advocate determined to intervene in this matter to protect the interests of VZPA's customers under the applicable sections of the Public Utility Code and Commission regulations.

CERTIFICATE OF SERVICE

Petition of Communications Workers of America :  
for a Public, On-the-Record Commission : Docket No. P-2015-2509336  
Investigation of the Safety, Adequacy, and :  
Reasonableness of Service Provided by Verizon :  
Pennsylvania, LLC :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 3<sup>rd</sup> day of November 2015.

SERVICE BY E-MAIL and INTEROFFICE MAIL

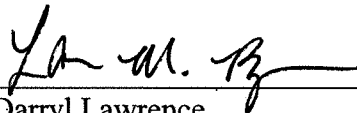
Johnnie E. Simms, Director  
Bureau of Investigations and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Scott J. Rubin, Esquire  
333 Oak Lane  
Bloomsburg, PA 17815-2036

Verizon Pennsylvania, LLC  
1717 Arch Street, 3<sup>rd</sup> Floor  
Philadelphia, PA 19103

John R. Evans, Small Business Advocate  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101



Darryl Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: DLawrence@paoca.org

Lauren Burge  
Assistant Consumer Advocate  
PA Attorney I.D. 311570  
E-Mail: LBurge@paoca.org

Counsel for  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
213778