



COMMONWEALTH OF PENNSYLVANIA

November 10, 2015

**E-FILED**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**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:

I am delivering for filing today the Notice of Intervention and Public Statement, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney I.D. No. 306921

Enclosures

cc: The Honorable Charles E. Rainey, Jr.  
Robert D. Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>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</b>	<b>:</b>	
	<b>:</b>	
	<b>:</b>	<b>Docket No. P-2015-2509336</b>
	<b>:</b>	
	<b>:</b>	

**NOTICE OF INTERVENTION  
OF THE SMALL BUSINESS ADVOCATE**

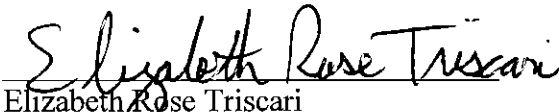
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). Communication Workers of America initiated the proceeding by filing a Petition for a Public, On-the-Record Commission Investigation of the Safety, Adequacy, and Reasonableness of Service Provided by Verizon Pennsylvania LLC on October 21, 2015. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interests of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Elizabeth Rose Triscari, Esquire  
Deputy Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[etriscari@pa.gov](mailto:etriscari@pa.gov)

Respectfully submitted,

  
Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney ID No. 306921



Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
(717) 783-2525  
(717) 783-2831 (fax)

Dated: November 10, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**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**  
:

**PUBLIC STATEMENT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interests of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the "Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Pennsylvania Public Utility Commission ("Commission") or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention in the above-captioned proceeding that was initiated by Communication Workers of America ("CWA") on October 21, 2015, by filing a Petition for a Public, On-the-Record Commission Investigation of the Safety, Adequacy, and Reasonableness of Service Provided by Verizon Pennsylvania LLC ("VZPA").

In the Petition, CWA requests that the Commission institute an investigation into the state of VZPA's physical plant, alleging that it is in such a state of disrepair that it poses a safety hazard to employees and the public, and direct VZPA to take remedial actions. The Small Business Advocate files this Notice of Intervention in order to protect the interests of VZPA's small business customers.

Date: November 10, 2015

**BEFORE THE  
PUBLIC UTILITY COMMISSION**

**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**  
:  
:

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor West  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

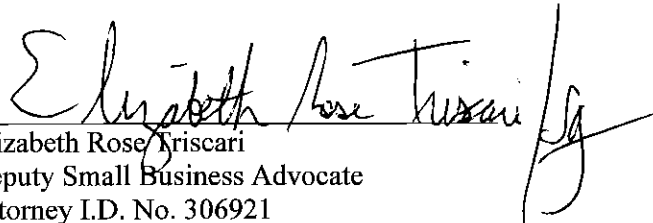
Darryl Lawrence, Esquire  
Lauren M. Burge, Esquire  
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**(E-mail and Hand Delivery)**

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

DATED: November 10, 2015

  
Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney I.D. No. 306921