

Suzan DeBusk Paiva
Assistant General Counsel



1717 Arch Street, Floor 3SE
Philadelphia, PA 19103

Tel: (215) 466-4755
Fax: (215) 563-2658
Suzan.D.Paiva@Verizon.com

May 6, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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:

Enclosed for filing please find the Motion of Verizon Pennsylvania LLC ("Verizon") to Hold this Proceeding in Abeyance and for a Continuance.

If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva/sau".

Suzan D. Paiva

SDP/sau
Enclosures

cc: Via E-Mail and U.S. First Class Mail
The Honorable Joel H. Cheskis, ALJ

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of Verizon's Motion of Verizon Pennsylvania LLC ("Verizon") to Hold this Proceeding in Abeyance and for a Continuance, upon the parties listed below, in accordance with the requirements of §1.54 (relating to service by a party) and §1.55 (relating to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 6th day of May 2016.

Via E-Mail and First Class Mail

Scott J. Rubin, Esq.
Law Office of Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036

Darryl A. Lawrence, Esq.
Lauren M. Burge, Esq.
Barrett C. Sheridan, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101

Sarah C. Stoner, Esq.
Deanne M. O'Dell, Esq.
Eckert, Seamans, Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

Elizabeth Rose Triscari, Esq.
Office of Small Business Advocate
300 North Second Street, Suite 202
Commerce Building
Harrisburg, PA 17101

Bradley R. Gorter, Esq.
Stephanie M. Wimer, Esq.
Michael L. Swindler, Esq.
PA Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120



Suzan DeBusk Paiva
Pennsylvania Bar I.D. No. 53853
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103
215-466-4755

Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIZON’S MOTION TO HOLD SCHEDULING
ORDER IN ABEYANCE AND FOR A
CONTINUANCE**

Verizon Pennsylvania LLC (“Verizon”) moves to hold this proceeding in abeyance pending resolution of a work stoppage initiated by the Complainant, the Communications Workers of America (“CWA”),¹ including a continuance of the Prehearing Memorandum due May 20, 2016, and the Further Prehearing Conference scheduled for May 26, 2016. In support of its Motion, Verizon avers as follows:

1. On October 21, 2015, in the midst of protracted labor negotiations, CWA petitioned the Commission to “initiate a public, on-the-record investigation into the safety, adequacy, and reasonableness” of Verizon’s facilities and services. On November 10, 2015, Verizon filed a detailed response demonstrating that CWA’s allegations did not justify its requested investigation, which would be a wasteful fishing expedition in search of headlines and publicity to be exploited in labor contract discussions.

2. On February 17, 2016, the Commission issued a Hearing Notice establishing an Initial Prehearing Conference and assigning an Administrative Law Judge (“ALJ”). The Initial Prehearing Conference convened on March 18, 2016, at which various procedural matters were discussed, including a procedural schedule. The parties agreed that depending on the

¹ By order entered April 21, 2016, the Commission deemed this proceeding to be a complaint by CWA against Verizon and not an investigation.

Commission's resolution of Verizon's Petition for Interlocutory Review, a Further Prehearing Conference would be held on May 26, 2016. The purpose of the prehearing conference would be to establish the litigation schedule for this matter; to facilitate that, the parties would submit an updated Prehearing Memorandum no later than May 20, 2016 setting forth a proposed procedural schedule. On March 22, 2016, the presiding officer issued a Scheduling Order memorializing this agreement. On April 21, 2016, the Commission deemed this proceeding to be a complaint rather than an investigation and remanded the matter to the Office of the ALJ for continued proceedings.

3. On April 13, 2016, CWA and the International Brotherhood of Electrical Workers ("IBEW") began a strike against Verizon and its affiliates. Verizon activated its business continuity plans to maintain customer service as its top priority. As a result, the personnel necessary to prepare the Prehearing Memorandum and to attend the Further Prehearing Conference, as well as the subject matter experts necessary to defend Verizon in this proceeding and to respond to any appropriate discovery, are engaged in emergency work assignments.

4. So in the interest of providing a complete record in this proceeding, and allowing Verizon to properly prepare a defense, Verizon requests that the case be held in abeyance for the duration of the strike. As part of that request, Verizon asks that the Prehearing Memorandum due date and Further Prehearing Conference be continued until after CWA employees return to work to permit Verizon to appropriately prepare for the Further Prehearing Conference and its defense of this complaint.

WHEREFORE, Verizon respectfully requests that this case be held in abeyance for the duration of the strike, and that the Prehearing Memorandum due date and Further Prehearing

Conference be continued until 30 and 45 days respectively after Verizon's unionized employees return to work.

Respectfully submitted,



Suzan D. Paiva (Atty ID No. 53853)

Verizon

1717 Arch Street, 3rd Floor

Philadelphia, PA 19103

Telephone: 215-466-4755

Fax: 215-563-2658

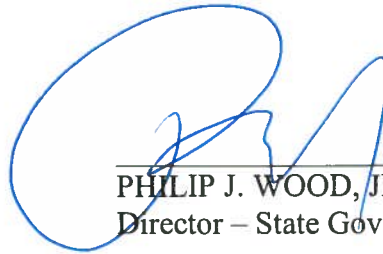
Suzan.D.Paiva@verizon.com

Dated: May 6, 2016

Counsel for Verizon Pennsylvania LLC

VERIFICATION

I, **Philip J. Wood, Jr.**, Director – State Government Affairs of Verizon Pennsylvania LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, (relating to unsworn falsifications to authorities).



PHILIP J. WOOD, JR.
Director – State Government Affairs