



Debra P. Dexter  
Associate Director  
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 500 East  
Washington, DC 20005  
Phone 202.515.2497  
Fax 202.336.7922  
[debra.p.dexter@verizon.com](mailto:debra.p.dexter@verizon.com)

January 12, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Verizon Public Notice of Network Change(s), 47 C.F.R. §§51.325–51.335**  
**Copper Retirement ID No. 2018-01-A-PA**

Dear Ms. Dortch:

Pursuant to Sections 51.325 – 51.335 of the Commission’s rules, Verizon hereby submits the attached Public Notice of Copper Retirement under rule 51.332. Specifically, Verizon is providing notification of the replacement of copper distribution and loop facilities with fiber-to-the-home facilities at specific locations in the Chestnut Hill and Saratoga, PA wire centers. Upon completion of the copper retirement, Verizon will provide services available over its fiber optic network.

This project was undertaken as a result of two upcoming bridge closings in the area of the Chestnut Hill and Saratoga, PA wire centers that are scheduled for April 1, 2018 by the Southeastern Pennsylvania Transportation Authority (“SEPTA”) and the Pennsylvania Department of Transportation (“PennDOT”). Concurrent with the filing of this copper retirement notification, Verizon has also filed a petition for waiver of the Commission’s current rules so that it can meet the April 1, 2018 deadline set by SEPTA and PennDOT.

Approximately 900 addresses with about 90 active circuits will be impacted by this copper retirement. The majority of customers served by copper at these locations purchase “plain old telephone service.” Following transition to fiber, Verizon will continue to offer these customers the same POTS over fiber at the same or better price as they received on copper facilities, with no change in the underlying features and functionalities of their service. Also, Verizon is working with customers to ensure that services other than POTS are transferred to the fiber network or handled on a customer-by-customer basis to address their particular needs.

A copy of the attached notice was mailed to the Pennsylvania Public Utility Commission, Governor Tom Wolf, and the Department of Defense Chief Information Officer. Verizon has not provided notification to tribal entities as no tribal entity will be impacted by this copper retirement.

Please contact me should you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert P. Dax" with a stylized flourish at the end.

cc: Pennsylvania Public Utility Commission  
Governor Tom Wolf  
Department of Defense Chief Information Officer

On January 12, 2018, Verizon provided notice of copper retirement to the following:

Secretary's Bureau  
Pennsylvania Public Utility Commission  
400 North Street  
2<sup>nd</sup> Floor, Room N201  
Harrisburg, PA 17120

The Honorable Tom Wolf  
Office of the Governor  
508 Main Capitol Building  
Harrisburg, PA 17120

Department of Defense Chief Information Officer  
Attn: Military Asst./Mobility Team  
The Pentagon  
Washington, DC 20301



6929 N. Lakewood Avenue  
Tulsa, OK 74117

**PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332**  
**Copper Retirement ID No. 2018-01-A-PA**

January 12, 2018

**Carrier:** Verizon Pennsylvania LLC, 1717 Arch Street, Philadelphia, PA 19103

**Contact:** For additional information on these planned network changes, please contact:

Janet Gazlay Martin  
Director – Network Transformation  
Verizon Communications  
230 W. 36<sup>th</sup> Street, Room 802  
New York, NY 10018  
1-844-881-4693

**Implementation Date:** On or after, April 1, 2018

**Planned Network Change(s) will occur at the following wire center areas in Pennsylvania:**

| Wire Center       | Address  | CLLI     |
|-------------------|--|----------|
| CHESTNUT HILL, PA | 8318 Germantown Avenue, Philadelphia, PA 19108 | PHLAPACH |
| SARATOGA, PA      | 5400 Woodland Avenue, Philadelphia, PA 18143   | PHLAPASA |

**Exhibit A to this copper retirement notification provides information about the specific addresses at which the copper network facilities will be retired. Exhibit A addresses may also be viewed on Verizon’s website at <http://www.verizon.com/about/terms-conditions/network-disclosures>**

**Description of the planned network change(s):**

Verizon has been working with the Southeastern Pennsylvania Transportation Authority (“SEPTA”) and the Pennsylvania Department of Transportation (“PennDOT”) to develop a schedule to retire copper in connection with two bridge replacement projects in the City of Philadelphia: 1) for Allens Lane Bridge served by Verizon’s Chestnut Hill, PA wire centers and 2) for the Woodland Avenue Bridge served by the Saratoga, PA wire center. Verizon was recently notified by SEPTA and PennDOT that the bridge replacements will occur on April 1, 2018, which prevents Verizon from meeting the 180-day public notice period under the existing copper retirement rules. Therefore, Verizon has filed for a waiver of those rules. Verizon has deployed its fiber-to-the-home network in the Chestnut Hill and Saratoga, PA areas, and therefore, intends to retire a number of copper facilities in these two wire center serving locations listed in the attached Exhibit A and provide services over the fiber network infrastructure.

**Description of reasonably foreseeable impact(s) of the planned change(s):**

After the retirement of the copper facilities, Verizon will: (1) no longer offer services over copper facilities; and (2) cease maintaining the copper facilities.

**Description of any changes in prices, terms or conditions that will accompany the planned change(s):**

As a general matter, the retirement of copper facilities will not result in changes to rates, terms, and conditions in cases where the affected service is converted to a like-for-like service that is available on fiber facilities. Interconnecting entities, however, should review the applicable tariff or agreement for certain terms that may apply specifically in cases where the service is provisioned on fiber. In cases where interconnecting entities elect to replace the affected service with an alternative service that Verizon offers on fiber facilities, the rates, terms and conditions will be as set forth in the tariff or agreement under which Verizon offers the replacement service that the interconnecting entity selects. Verizon, separately from this notice, will provide interconnecting entities with further information regarding service migration options that Verizon offers.

**Exhibit A**  
**Copper Retirement ID No. 2018-01-A-PA**

The copper facilities associated with the following addresses served by Verizon's wire center located at  
8318 GERMANTOWN AVE, PHILADELPHIA PA 19108  
CLLI: PHLAPACH (CHESTNUT HILL)

| Community     | Street           | Building Number  |
|---------------|------------------|--|
| CHESTNUT HILL | ALLENS PL        | 7250, 7255, 7258, 7261, 7264, 7280   |
| CHESTNUT HILL | CHARLTON ST      | 7201, 7203, 7205, 7207, 7208, 7209, 7213, 7215   |
| CHESTNUT HILL | CRESHEIM RD      | 7300, 7302, 7401   |
| CHESTNUT HILL | ELBOW LN         | 7302, 7304, 7307, 7308, 7311, 7312, 7315, 7316, 7319, 7321   |
| CHESTNUT HILL | EMLIN ST         | 7211, 7214, 7215, 7216, 7218, 7219, 7220, 7221, 7222, 7223, 7224, 7303, 7305, 7306, 7312, 7403   |
| CHESTNUT HILL | GATE LN          | 403, 407, 411, 415, 419  |
| CHESTNUT HILL | GLEN ECHO RD     | 600, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 630, 632   |
| CHESTNUT HILL | GREENE ST        | 7035, 7037, 7043, 7101, 7103, 7105, 7201, 7203   |
| CHESTNUT HILL | HURON ST         | 7300, 7301, 7309, 7360   |
| CHESTNUT HILL | LINCOLN DR       | 7101, 7107, 7111, 7113, 7115, 7117, 7118, 7119, 7120, 7121, 7122, 7123, 7124, 7125, 7126, 7127, 7128, 7129, 7131, 7133, 7135, 7137, 7139, 7141, 7143, 7145, 7200, 7201, 7202, 7203, 7204, 7205, 7206, 7207, 7208, 7209, 7210, 7212, 7214, 7216, 7218, 7220, 7222   |
| CHESTNUT HILL | LIVEZEY LN       | 1000, 1001, 1003, 1007, 1010, 1020, 1040, 1050, 1100   |
| CHESTNUT HILL | MC CALLUM ST     | 7020, 7022, 7024, 7026, 7038, 7042, 7046, 7100, 7102, 7104, 7108, 7109, 7110, 7111, 7112, 7114, 7116, 7118, 7120, 7141, 7200, 7206, 7210, 7215, 7217, 7303, 7321, 7329   |
| CHESTNUT HILL | MT AIRY PL       | 7128, 7136, 7141, 7144, 7153, 7154, 7164, 7165   |
| CHESTNUT HILL | MT AIRY TERR     | 7111, 7116, 7121, 7130, 7131, 7143, 7144, 7153, 7162, 7163   |
| CHESTNUT HILL | N MT PLEASANT PL | 7101, 7115, 7116, 7125, 7126, 7133, 7137, 7138, 7149, 7150, 7157   |
| CHESTNUT HILL | N MT PLEASANT RD | 633, 645, 701, 707, 717, 725, 809, 815, 827, 845, 847  |
| CHESTNUT HILL | NIPPON ST        | 214, 216, 218, 220, 222, 224, 225, 229   |
| CHESTNUT HILL | ORWELL RD        | 7201, 7225, 7245   |
| CHESTNUT HILL | S MT PLEASANT RD | 608, 628   |
| CHESTNUT HILL | SHERMAN ST       | 7103, 7200, 7201   |
| CHESTNUT HILL | ST GEORGES RD    | 600, 601, 615, 620, 621, 627, 631, 636, 641, 701, 702, 707, 709, 711, 713, 714, 715, 718, 721, 736, 740, 748, 752, 756, 758, 815   |
| CHESTNUT HILL | W ALLENS LN      | 1001, 1007, 1011, 1015, 1019, 1022, 1027, 1030, 1031, 1035, 1039, 1070, 1100, 201, 210, 219, 220, 221, 222, 230, 233, 238, 239, 240, 241, 245, 247, 312, 315, 321, 323, 325, 326, 334, 336, 338, 340, 341, 342, 348, 350, 354, 356, 364, 400, 401, 412, 415, 420, 429, 430, 434, 435, 441, 501, 502, 504, 508, 512, 535, 537, 600, 601, 614, 624, 630, 700, 701, 702, 705, 706, 710, 714, 716, 737, 741, 747, 749, 751, 753, 755, 757, 759, 790, 911 |
| CHESTNUT HILL | W DURHAM ST      | 311, 313, 315, 317, 319, 321, 323, 325, 327, 329, 331, 333, 335, 337, 339, 341   |

|               |                  |   |
|---------------|------------------|---|
| CHESTNUT HILL | W ELLET ST       | 515, 517, 519, 521, 523, 525, 527, 529, 531, 533, 535, 537, 539, 541, 543, 545  |
| CHESTNUT HILL | W MT AIRY AV     | 214, 215, 216, 217, 218, 219, 221, 222, 223, 224, 225, 226, 228, 230, 317, 319, 321, 323, 325, 327, 329, 330, 331, 332, 333, 334, 336, 337, 338, 340, 341, 342, 344, 346, 347, 348, 349, 350, 352, 353, 354, 356, 357, 358, 359, 360, 362, 364, 366, 368, 370, 372, 374, 376, 401, 403, 405, 407, 409, 411, 413, 500, 502, 504, 506, 508, 510, 511, 512, 515, 517, 519, 520, 521, 523, 525, 600, 615, 617, 618, 620, 621, 622, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 712, 714, 716, 717, 723, 730, 731, 742, 814, 815, 823, 826, 831, 844, 852, 860, 900, 901, 902, 904, 905, 906 |
| CHESTNUT HILL | W MT PLEASANT AV | 275, 277, 633, 645  |
| CHESTNUT HILL | WAYNE AV         | 7100, 7101, 7110, 7200, 7201, 7216, 7219  |
| CHESTNUT HILL | WELLESLEY RD     | 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 501, 503, 505, 507, 509, 511, 513, 515, 517, 519, 521   |
| CHESTNUT HILL | WISSAHICKON AV   | 6800, 7100, 7105, 7110, 7113, 7120, 7125, 7130, 7140, 7150, 7201, 7209, 7220, 7240, 7260, 7280  |

The copper facilities associated with the following addresses served by Verizon's wire center located at  
5400 WOODLAND AVE, PHILADELPHIA PA 18143;  
CLLI: PHLAPASA (SARATOGA)

| Community | Street       | Building Number  |
|-----------|--------------|--|
| SARATOGA  | GRAYS AVE    | 4800   |
| SARATOGA  | PASCHALL AVE | 4600, 4601, 4602, 4603, 4604, 4605, 4606, 4607, 4608, 4609, 4610, 4611, 4613, 4614, 4615, 4616, 4617, 4618, 4619, 4620, 4621, 4622, 4623, 4624, 4625, 4626, 4627, 4629, 4630, 4631, 4632, 4633, 4634, 4635, 4637, 4638, 4639, 4640, 4641, 4645 |
| SARATOGA  | REINHARD ST  | 4700, 4702, 4704, 4706, 4708, 4710, 4712, 4714, 4716, 4718   |
| SARATOGA  | S 47 ST      | 1226, 1228, 1230, 1242, 1250, 1310, 1312, 1314, 1413, 1417, 1419, 1421, 1423, 1425, 1427, 1429, 1431, 1433, 1435, 1437, 1439, 1441, 1443, 1501, 1505, 1509, 1511   |
| SARATOGA  | S 48 ST      | 1220, 1222, 1224, 1226, 1228   |
| SARATOGA  | UPLAND ST    | 4710, 4711, 4712, 4713, 4714, 4715, 4716, 4717, 4718, 4720, 4721, 4722, 4723, 4724, 4726, 4727, 4728, 4729, 4730, 4731, 4732, 4733, 4734, 4735, 4736, 4737, 4738, 4739, 4740, 4741, 4745, 4747, 4749, 4751                                     |
| SARATOGA  | WOODLAND AVE | 4700, 4702, 4704, 4708, 4712, 4714, 4716, 4718   |