



Frederick E. Moacidieh  
Executive Director  
Federal Regulatory and Legal Affairs

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February 26, 2018

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

**Re: Section 63.71 Application of Verizon New England Inc., Verizon New Jersey Inc.,  
Verizon New York Inc., Verizon Pennsylvania LLC, and Verizon Virginia LLC**

Dear Ms. Dortch:

The Verizon incumbent local exchange companies captioned above submit the enclosed Application for authority under Section 214(a) of the Communications Act and 47 C.F.R. § 63.71 to discontinue four legacy interstate DS0 services in multiple wire centers. These legacy voice and low-speed data services are Voice Grade Service, WATS Access Line Service, Digital Data Service and DIGIPATH Digital Service II. A list of affected wire centers is included in the Application at Exhibit A.

Sincerely

A handwritten signature in black ink, appearing to be "Frederick E. Moacidieh".

Enclosure

cc: Department of Defense Chief Information Officer  
Governor of Each Impacted State  
Public Utilities Commission of Each Impacted State

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	
Verizon New England Inc.,	)	
Verizon New Jersey Inc.,	)	
Verizon New York Inc.,	)	
Verizon Pennsylvania LLC, and	)	File No. _____
Verizon Virginia LLC	)	
	)	
For Authority Pursuant to Section 214 of	)	
the Communications Act of 1934, As	)	
Amended, To Discontinue the Provision of	)	
Service	)	

**SECTION 63.71 APPLICATION OF  
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above (collectively “Verizon”) submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission’s rules to grandfather and discontinue four legacy interstate DS0 services in multiple wire centers.<sup>1</sup> Today, there are relatively few customers still using these products, as customers continue to migrate away from these older services toward more modern options. Given the low numbers of subscribers and high costs of supporting these services, we plan to grandfather these services on or after June 1, 2018, in the specified wire centers. At that time, no new customers will be added and existing customers will not be

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<sup>1</sup> These legacy voice grade and low-speed data services are Voice Grade Service, WATS Access Line Service, Digital Data Service, and DIGIPATH Digital Service II. A list of the affected wire centers is included at Exhibit A.

permitted to continue to submit orders for moves, adds, and changes. We plan to discontinue the services completely on or after February 28, 2019.<sup>2</sup>

Customers in these areas are being migrated to all-fiber facilities in a multi-stage process. Many customers have already made the decision to move either to our fiber-based services or to competitors' services; others are in the process of transitioning. During this transition, we have been working closely with our customers receiving service over copper facilities to discuss their existing services and their needs going forward. For the vast majority of our customers, there has been a like-for-like, fiber-based service available for them, making this transition straightforward. This is the case for customers purchasing plain old telephone service ("POTS") from us. These POTS customers will continue to receive the same POTS over fiber at the same or better price, and there is no change in the underlying features and functionalities in their service. For those customers purchasing broadband Internet services over copper facilities, Fios Internet will provide them far more than they are getting today. Notwithstanding the greater speed and reliability they will experience, our offerings for these customers will also include comparable pricing. Similarly, customers can continue to buy DS1 level services as they do today, just over the more reliable fiber network.<sup>3</sup>

However, there are a small number of legacy interstate special access services – Voice Grade Service, WATS Access Line Service, Digital Data Service ("DDS"), and DIGIPATH Digital Service II – that no longer serve a substantial need for the majority of our customers. These services are outdated legacy voice grade and data transmission services that have largely

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<sup>2</sup> Modifications in service offerings for customers with existing contracts are subject to the terms of their contracts.

<sup>3</sup> Higher bandwidth services are today already regularly provisioned over fiber facilities and customers will continue to be able to buy them.

fallen out of favor as customers have chosen new options and technologies. Today we have approximately 9 wholesale customers and approximately 41 retail customers on these services in the affected areas. Given the decreased demand for these outdated offerings, we plan to grandfather these services on or after June 1, 2018, preventing new customers from ordering them, and prohibiting moves, adds, or changes for existing customers. We plan to discontinue the services on or after February 28, 2019.<sup>4</sup>

Consistent with Section 63.71(a) and (b) of the Commission's rules, Verizon provides the following information:

**1. Name and Address of Carrier (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):**

Verizon New England Inc.  
6 Bowdoin Square  
9th Floor  
Boston, MA 02114

Verizon New Jersey Inc.  
One Verizon Way  
Basking Ridge, NJ 07920

Verizon New York Inc.  
140 West Street  
New York, NY 10007

Verizon Pennsylvania LLC  
900 Race Street  
Philadelphia, PA 19107

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

**2. Date of Planned Service Discontinuation (47 C.F.R. §§ 63.71(a)(2), (b)(2)):**

Subject to the Commission's authorization, on or after June 1, 2018, Verizon will stop accepting orders from new customers for Voice Grade Service, WATS Access Line Service, Digital Data Service, and DIGIPATH Digital Service II in the affected wire centers.<sup>5</sup> At that

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<sup>4</sup> For customers on tariffed term plans, Verizon will waive any applicable tariffed early termination liability.

<sup>5</sup> Please see Exhibit A for a list of the affected wire centers. Subject to the Commission's authorization, Verizon intends to file tariff revisions to effectuate the changes requested in this application.

time, we will not allow existing customers to submit orders for moves, adds or changes. We plan to discontinue the services on or after February 28, 2019.

**3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):**

Subject to the Commission's authorization, Verizon intends to discontinue the aforementioned services in the wire centers listed in Exhibit A.

**4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):**

The services at issue here are all legacy voice grade and very low-speed data transmission services. Specifically, the four services here are:

*Voice Grade Service* uses dedicated lines to provide voice frequency transmission capability for connecting location-to-location or to the public network. Voice Grade Service terminations transmit in the nominal frequency range of 300 to 3000 Hz. It may be terminated as analog two-wire or four-wire. Voice Grade channels are provided between customer-designated premises or between a customer-designated premise and a Verizon hub. Voice Grade Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

*WATS Access Line Service* provides voice frequency transmission capability for toll free calling in a limited geographic area. The service provides a customer-premise-to-customer-premise connection with the combination of WATS Access Connection, a dedicated channel between the customer's end user's premises and a WATS Serving Office equipped with a Switched Access Service arrangement. WATS Access Line Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

*Digital Data Service* provides duplex transmission of synchronous serial data at 2.4, 4.8, 9.6, or 56 Kbps. The actual bit rate is a function of the channel interface selected by the

customer. Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No. 11, Sec. 7.2.8.

*DIGIPATH Digital Service II* is a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56, or 64 Kbps. The actual bit rate is a function of the channel interface selected by the customer. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.11.

*Alternative Services and Products:* Customers today can obtain alternative services and products from Verizon or other providers that perform the same functions as these services. Verizon's alternative wholesale products and services include Wholesale Advantage or Resale, Fiber to the Internet Service, Transparent LAN Service ("TLS"), Private Internet Protocol Service, and DS1 Service. Verizon's alternative retail products and services include fiber-based voice services, Fios Internet, Switched Ethernet Service, Private Internet Protocol Service, DS1 services, machine-to-machine services, and LTE. Verizon will work with affected customers to find suitable alternative solutions.

**5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):**

Verizon sent notices to customers that currently subscribe to the affected services by U.S. Mail on or before February 26, 2018. Copies of the notices are attached as Exhibit B.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Department of Defense Chief Information Officer, as required by Section 63.71(a) of the Commission's rules.

**6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):**

Verizon is classified for regulatory purposes under the Commission's rules as dominant with respect to the services to be discontinued.

## CONCLUSION

Verizon respectfully requests that the Commission approve this Application.

Respectfully submitted,



William H. Johnson  
*Of Counsel*

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Katharine R. Saunders  
Roy E. Litland  
Verizon  
1300 I St NW, Suite 500E  
Washington, DC 20005-7101  
(202) 515-2464 (Office)

February 26, 2018

## **CERTIFICATE OF SERVICE**

I hereby certify that on or before this twenty-sixth day of February 2018, I caused to be served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

*Roy Litland*

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Roy E. Litland



## SERVICE LIST

Karen Charles Peterson - Commissioner  
Massachusetts Department of  
Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

The Honorable Charlie Baker  
Office of the Governor  
Room 280  
Boston, MA 02133

Aida Camacho  
Office of the Secretary  
New Jersey Board of Public Utilities  
44 S. Clinton Avenue  
3rd Floor, Suite 314  
Trenton, NJ 08625-0350

The Honorable Phil Murphy  
Office of the Governor  
P.O. Box 001  
Trenton, NJ 08625

Honorable Kathleen H. Burgess  
Secretary to the Commission  
New York Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo  
Governor of New York  
NYS State Capitol Building  
Albany, NY 12224

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

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

Office of the Clerk  
Virginia State Corporation Commission  
Joel H. Peck  
P.O. Box 2118  
Richmond, VA 23218

Governor Ralph Northam  
P.O. Box 1475  
Richmond, VA 23219

Margaret E. Curran – Chairperson  
Rhode Island Public Utilities  
Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

The Honorable Gina Raimondo  
Office of the Governor  
82 Smith Street  
Providence, RI 02903

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

## EXHIBIT A

State	Verizon Tariff	Wire Center
MA	FCC 11	BOWDOIN
MA	FCC 11	FRANKLIN ST.
MA	FCC 11	CHELMSFORD STRUCTURE/COB
MA	FCC 11	FRANKLIN
MA	FCC 11	IPSWICH
MA	FCC 11	LITTLETON
MA	FCC 11	RANDOLPH BLDG
MA	FCC 11	SOUTH BOSTON
MA	FCC 11	TAUNTON
NJ	FCC 1	ASBURY PARK
NJ	FCC 1	BOUND BROOK
NJ	FCC 1	ENGLEWOOD
NJ	FCC 1	LEONIA
NJ	FCC 1	GLASSBORO
NJ	FCC 1	IRVINGTON ESSEX BLDG
NJ	FCC 1	KEYPORT
NJ	FCC 1	LIVINGSTON
NJ	FCC 1	MONTCLAIR
NJ	FCC 1	PERTH AMBOY
NJ	FCC 1	PENNINGTON
NJ	FCC 1	RIDGEWOOD
NJ	FCC 1	ROSELLE
NJ	FCC 1	SALEM
NY	FCC 11	BRENTWOOD (Central Islip)
NY	FCC 11	BAYSHORE
NY	FCC 11	CONGERS
NY	FCC 11	DEER PARK
NY	FCC 11	EAST NORTHPORT
NY	FCC 11	FARMINGDALE
NY	FCC 11	FAIRVIEW
NY	FCC 11	LINDENHURST
NY	FCC 11	LYNBROOK
NY	FCC 11	MAHOPAC
NY	FCC 11	MASSAPEQUA
NY	FCC 11	NEW ROCHELLE
PA	FCC 1	AMBLER
PA	FCC 1	BETHEL PARK
PA	FCC 1	CARNEGIE

PA	FCC 1	CONSHOHOCKEN
PA	FCC 1	CAMP HILL
PA	FCC 1	DOYLESTOWN
PA	FCC 1	EDDINGTON
PA	FCC 1	ENOLA
PA	FCC 1	LANSDALE
PA	FCC 1	LINE LEXINGTON
PA	FCC 1	LANSDOWNE
PA	FCC 1	MIDDLETOWN
PA	FCC 1	BALDWIN
PA	FCC 1	DEWEY
PA	FCC 1	GERMANTOWN
PA	FCC 1	IVYRIDGE
PA	FCC 1	ORCHARD
PA	FCC 1	POPLAR
PA	FCC 1	EAST LIBERTY
PA	FCC 1	OAKLAND
PA	FCC 1	POTTSTOWN
PA	FCC 1	PAXTONIA
PA	FCC 1	STEELTON
RI	FCC 11	NARRAGANSETT
RI	FCC 11	RIVERSIDE
RI	FCC 11	SCITUATE STRUCTURE
VA	FCC 1	SECOND AVENUE

## **EXHIBIT B**



**Verizon**  
One Verizon Way,  
VC22W464  
Basking Ridge, NJ 07920

**February 26, 2018**

Business Name  
Billing address 1  
Billing Address 2  
Billing Address 3  
City, State Zip

**RE: Discontinuation of FCC Special Access DS0 Services**

Dear Valued Customer,  
Account Number:

Verizon is engaged in a multi-year program to update select wire centers to all-fiber facilities. Currently underway are the 62 wire centers listed on **Attachment 1**. In order to complete this fiber initiative we must take steps to limit the number of circuits that are provisioned over the existing copper infrastructure. To that end, we plan to grandfather and eventually discontinue the following Interstate Special Access services in these locations:

**Voice Grade Service** which provides voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz. Voice Grade Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

**WATS Access Line Service** which provides voice frequency transmission capability for toll-free calling in a limited geographic area. WATS Access Line Service is further described in Verizon's FCC Tariff No.1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

**Digital Data Service** which provides duplex transmission of synchronous serial data at the rate of 2.4, 4.8, 9.6, 56 kbps. In addition, Digital Data Service is offered at speeds of 19.2 and 64 kbps in the wire centers subject to Verizon's FCC No. 1. Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No.11, Sec. 7.2.8.

**DIGIPATH Digital Service II** which provides a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56 or 64 kbps. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No.11, Sec 7.2.11.

According to our records, you currently subscribe to one of the services referenced above.

This letter is being sent to inform you of our plans for service discontinuation and urge you to begin making arrangements to migrate applications that use these services to an alternative service or carrier.

**On or after June 1, 2018**, subject to FCC approval, Verizon will stop accepting orders for these services if the circuit will originate or terminate in one of the **Attachment 1** offices. Moves and changes to existing circuits in these locations will also not be allowed.

Verizon will begin disconnecting these circuits on or after **February 28, 2019**, again subject to FCC approval. Verizon may discontinue service before a term commitment expires and will waive early termination liability, if applicable. We will provide you 90 days advance notice of the actual date for your service disconnection.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

Please review your application(s) that use one of these aforementioned services, and determine what alternative Verizon product or other Carrier you may wish to migrate these applications to prior to the disconnect of your current service.

We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

- *Fiber-based voice services*
- *Fios Internet Service*
- *Switched Ethernet Service*
- *Private Internet Protocol Service*
- *DS1 Service*
- *Machine-to-Machine Services through Verizon or Verizon Partner Program*
- *LTE*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. Please contact your Verizon Account Manager to discuss alternative solutions.

Sincerely,  
Verizon

On behalf of:

Verizon New England Inc.  
6 Bowdoin Square  
9th Floor  
Boston, MA 02114

Verizon New Jersey Inc.  
One Verizon Way  
Basking Ridge, NJ 07920

Verizon New York Inc.  
140 West Street  
New York, NY 10007

Verizon Pennsylvania LLC  
900 Race Street  
Philadelphia, PA 19107

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

*FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.*

# ATTACHMENT 1

## State

## Wire Center

MA	BOWDOIN
MA	FRANKLIN ST.
MA	CHELMSFORD
MA	FRANKLIN
MA	IPSWICH
MA	LITTLETON
MA	RANDOLPH BLDG
MA	SOUTH BOSTON
MA	TAUNTON
NJ	ASBURY PARK
NJ	BOUND BROOK
NJ	ENGLEWOOD
NJ	LEONIA
NJ	GLASSBORO
NJ	IRVINGTON ESSEX BLDG
NJ	KEYPORT
NJ	LIVINGSTON
NJ	MONTCLAIR
NJ	PERTH AMBOY
NJ	PENNINGTON
NJ	RIDGEWOOD
NJ	ROSELLE
NJ	SALEM
NY	BRENTWOOD (Central Islip)
NY	BAYSHORE
NY	CONGERS
NY	DEER PARK
NY	EAST NORTHPORT
NY	FARMINGDALE
NY	FAIRVIEW
NY	LINDENHURST

## State

## Wire Center

NY	LYNBROOK
NY	MAHOPAC
NY	MASSAPEQUA
NY	NEW ROCHELLE
PA	AMBLER
PA	BETHEL PARK
PA	CARNEGIE
PA	CONSHOHOCKEN
PA	CAMP HILL
PA	DOYLESTOWN
PA	EDDINGTON
PA	ENOLA
PA	LANSDALE
PA	LINE LEXINGTON
PA	LANSDOWNE
PA	MIDDLETOWN
PA	BALDWIN
PA	DEWEY
PA	GERMANTOWN
PA	IVYRIDGE
PA	ORCHARD
PA	POPLAR
PA	EAST LIBERTY
PA	OAKLAND
PA	POTTSTOWN
PA	PAXTONIA
PA	STEELTON
RI	NARRAGANSETT
RI	RIVERSIDE
RI	SCITUATE STRUCTURE
VA	SECOND AVENUE





**Verizon**  
One Verizon Way,  
VC22W464  
Basking Ridge, NJ 07920

**February 26, 2018**

Business Name  
Billing address 1  
Billing Address 2  
Billing Address 3  
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**RE: Discontinuation of FCC Special Access DS0 Services**

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This letter is being sent to inform you of our plans for service discontinuation and urge you to begin making arrangements to migrate applications that use these services to an alternative service or carrier.

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Verizon will begin disconnecting these circuits on or after **February 28, 2019**, again subject to FCC approval. Verizon may discontinue service before a term commitment expires and will waive early termination liability, if applicable. We will provide you 90 days advance notice of the actual date for your service disconnection.

Modifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.

Please review your application(s) that use one of these aforementioned services, and determine what alternative Verizon product or other Carrier you may wish to migrate these applications to prior to the disconnect of your current service.

We are happy to work with you to find alternative solutions. Verizon offers several alternatives to these services that may suit your needs, including:

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- *Fiber to the Internet Service*
- *Transparent LAN Service (TLS)*
- *Private Internet Protocol Service*
- *DS1 Service*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. Please contact your Verizon Account Manager to discuss alternative solutions.

Sincerely,  
Verizon

On behalf of:

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9th Floor  
Boston, MA 02114

Verizon New Jersey Inc.  
One Verizon Way  
Basking Ridge, NJ 07920

Verizon New York Inc.  
140 West Street  
New York, NY 10007

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Philadelphia, PA 19107

Verizon Virginia LLC  
22001 Loudoun County Parkway  
Ashburn, VA 20147

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# ATTACHMENT 1

## State

## Wire Center

MA	BOWDOIN
MA	FRANKLIN ST.
MA	CHELMSFORD
MA	FRANKLIN
MA	IPSWICH
MA	LITTLETON
MA	RANDOLPH BLDG
MA	SOUTH BOSTON
MA	TAUNTON
NJ	ASBURY PARK
NJ	BOUND BROOK
NJ	ENGLEWOOD
NJ	LEONIA
NJ	GLASSBORO
NJ	IRVINGTON ESSEX BLDG
NJ	KEYPORT
NJ	LIVINGSTON
NJ	MONTCLAIR
NJ	PERTH AMBOY
NJ	PENNINGTON
NJ	RIDGEWOOD
NJ	ROSELLE
NJ	SALEM
NY	BRENTWOOD (Central Islip)
NY	BAYSHORE
NY	CONGERS
NY	DEER PARK
NY	EAST NORTHPORT
NY	FARMINGDALE
NY	FAIRVIEW
NY	LINDENHURST

## State

## Wire Center

NY	LYNBROOK
NY	MAHOPAC
NY	MASSAPEQUA
NY	NEW ROCHELLE
PA	AMBLER
PA	BETHEL PARK
PA	CARNEGIE
PA	CONSHOHOCKEN
PA	CAMP HILL
PA	DOYLESTOWN
PA	EDDINGTON
PA	ENOLA
PA	LANSDALE
PA	LINE LEXINGTON
PA	LANSDOWNE
PA	MIDDLETOWN
PA	BALDWIN
PA	DEWEY
PA	GERMANTOWN
PA	IVYRIDGE
PA	ORCHARD
PA	POPLAR
PA	EAST LIBERTY
PA	OAKLAND
PA	POTTSTOWN
PA	PAXTONIA
PA	STEELTON
RI	NARRAGANSETT
RI	RIVERSIDE
RI	SCITUATE STRUCTURE
VA	SECOND AVENUE