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December 11, 2015

Via Electronic Filing

Notice of Ex Parte Communication

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

Re: WC Docket No. 14-192

Dear Ms. Dortch:

On December 9, 2015, Benjamin Dickens, on behalf of the Alarm Industry Communications Committee (“AICC”), David Schwenke, President, Full Service Network, Inc. (“FSN”) (together, the “Joint Parties”), and the undersigned met with Claude Aiken, Associate General Counsel, and Randy Clarke of the Wireline Competition Bureau. The Joint Parties urged the Commission to deny forbearance with respect to 64 Kbps UNE loops, Section 271, and the ONA/CEI requirements.

The Commission has not established its prima facie case to forbear on any of these issues. The Commission must establish that these requirements are “not necessary for the protection of consumers” and that forbearance would be “consistent with the public interest.”¹ The Commission, in making the public interest determination in Section 160(a)(3), must “consider whether forbearance from enforcing the provision or regulation will promote competitive market conditions, including the extent to which such forbearance will enhance competition among providers of telecommunications services.”² Notably, every competitive local exchange carrier and every consumer group commenting in this proceeding has opposed forbearance, while support for forbearance comes entirely from incumbents like Verizon and its trade association USTelecom that filed the petition. While Chairman Wheeler has trumpeted that the IP Transition will not

¹ 47 U.S.C. § 160(a)(3).

² 47 U.S.C. § 160(b).

eliminate competition, that is exactly what will happen if incumbents are no longer required to offer 64 Kbps UNEs when withdrawing copper. The Commission indicated in our meeting that it must consider competition, but that competition need not be the deciding factor. This excuse for ignoring competition is inconsistent with the letter and spirit of 47 U.S.C. § 160(b) and directly conflicts with Chairman Wheeler's repeated declarations in support of "competition, competition, competition" at CompTel and elsewhere.

The Commission has an increasingly broad view of its forbearance powers under the Act, which has at times led to results that are contrary to the public interest and the interests of competitors and consumers. In the *Open Internet Order*, the Commission took the position on appeal that a different forbearance standard applies when the Commission forbears on its own motion as opposed to when competitors ask for forbearance. Full Service Network does not believe that the Commission is above the law, or that there can be multiple standards to be applied to public and private entities acting under the same statutory provision.³ Here again the Commission seems to suggest that yet another forbearance standard applies and that the Commission's rules are inapplicable. The proposed order as we understand it does not meet the requirements of the Commission's rules, particularly the requirement to conduct a market-by-market geographic analysis.⁴ As FSN has indicated in its *Open Internet* brief:

The FCC's assertion that "[b]ecause the Commission is not responding to a petition... we conduct our forbearance analysis under... the Administrative Procedure Act, without the burden of proof requirements that section 10(c) petitioners face" is no defense. *Order* ¶ 438 (JA 3682). Any grant of forbearance under 47 U.S.C. § 160(a) is subject to the Administrative Procedure Act ("APA"). But the agency has adopted rules that it now claims require parties seeking forbearance, but not the agency, to meet a higher standard. *Id.* That dual standard has no basis in law and is contrary to the Supreme Court's holding that agencies are bound to follow their own rules. *Service*, 77 S. Ct at 1157. *See also Reuters Ltd. v. FCC*, 781 F.2d 946, 951 (D.C. Cir. 1986) ("fidelity to the rules... is required of those whom Congress

³ In another display of the Commission's sweeping view of its unilateral forbearance authority, the Commission designated interconnected VoIP providers as telecommunications carriers solely for the purposes of numbering, while effectively forbearing from the application of Section 251, Section 252 and other core pro-competition provisions of Title II without discussion. *See In the Matter of Tel. No. Requirements for IP-Enabled Servs. Providers Local No. Portability Porting Interval & Validation Requirements IP-Enabled Servs. Tel. No. Portability Final Regulatory Flexibility Analysis Numbering Res. Optimization*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, FCC 07-188, 22 F.C.C. Rcd. 19531, 19543, ¶ 21 (2007).

⁴ *See* 47 C.F.R. 1.54(a)(4); 47 C.F.R. 1.53–1.59.

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has entrusted with the regulatory missions of modern life”) and *Wilkinson v. Legal Serv’s. Corp.*, 27 F.Supp.2d 32, 61 (D.D.C. 1998).⁵

Moreover, in this case, it is not the Commission forbearing on its own motion but USTelecom, a competitor, representing the most dominant carriers, requesting forbearance from market-opening regulations designed to encourage Section 251, UNE-P and Section 271 competition. There is no reason why the Commission would not apply the same standard as in the *Qwest Phoenix* case that requires a prima facie case that includes a demonstration based on geographic area.⁶ No such demonstration has been made here, and the Commission cannot contrive a new standard every time a new forbearance petition is filed.

The Commission indicated in our meeting that the reason for its forbearance was because Verizon had claimed that unbundling 64 Kpbs UNEs imposed costs on Verizon that were precluding it from laying fiber. Verizon’s November 9, 2015 ex parte states: “the costs of unbundling a 64 kbps voice-grade channel over fiber are real and significant. And these costs threaten to impede ILECs from retiring copper and fully embracing superior fiber facilities.”⁷ However, the Commission has recently indicated that broadband expansion is proceeding at a rapid clip in many parts of the country, *with* the current Section 251, Section 271 and ONA/CEI requirements in place:

The nation has made significant progress expanding high-speed Internet access in recent years, but further implementation of major reforms newly adopted by the Federal Communications Commission is required before broadband will be available to the approximately 19 million Americans who still lack access, according to the FCC’s Eighth Broadband Progress Report.⁸

The Commission also indicated that it now has granular data on where competition exists and where it does not exist:

Having good data is critical to attacking these problems, and this Broadband Progress Report arms the FCC with the best information it has had yet on broadband in the U.S. This is our first progress report ever to include extensive data on mobile broadband and the availability of next-generation, high-speed

⁵ Final Brief of Petitioners, Full Service Network, et al., at 12, *Full Service Network et al. v. F.C.C., et al.*, No. 15-1151 (D.C. Cir. Nov. 13, 2015).

⁶ *Petition of Qwest Corp. for Forbearance Pursuant to 47 U.S.C. 160(c) in the Phoenix, Arizona Metropolitan Statistical Area*, Mem. Op. and Order, 25 FCC Rcd 8622 (2010), aff’d, *Qwest Corp. v. FCC*, 689 F.3d 1214 (10th Cir. 2012).

⁷ Ex Parte Letter from Maggie McCready Vice President Federal Regulatory and Legal Affairs, Verizon to Ms. Marlene H. Dortch, Secretary, F.C.C., p. 3, Docket No. 14-192 (Nov. 9, 2015).

⁸ *Eighth Broadband Progress Report*, FCC.GOV, available at <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/eighth-broadband-progress-report> (last visited Dec. 11, 2015)(“FCC Progress Report”).

services. It incorporates the most robust analysis of international data that the Commission has ever done. The report includes online, interactive maps which show exactly where broadband is and isn't available, and deployment statistics—by technology type—for every county in the nation.⁹

Given that this data is available, and given that the Commission has established that broadband deployment is spreading rapidly in many parts of the country, it was incumbent upon the USTelecom to provide a showing as to the impact on consumers and competition from the forbearance sought by geographic location.¹⁰ The Joint Parties do not believe that it can be shown that competition is impeded only in areas where ILECs offer Section 251 64 Kbps, Section 271 and ONA/CEI elements to competitors. The failure to provide this type of geographic demonstration should be fatal to the USTelecom Petition.

Despite this availability of data,¹¹ there is no data in the USTelecom prima facie filing, as required by the Commission's rules, to establish that fiber deployment is being delayed in areas where Full Service Network is currently serving, or in any specific geographic areas where other competitive providers are competing based on 251 64 kbps UNEs, 271 UNEs, or ONA/CEI elements.

Moreover, the Commission has not provided any process to ensure that the supposed cost-savings that will accrue to Verizon and other incumbents will be dedicated to the development of broadband. The Commission must establish that there will be a higher rate of fiber deployment than today, effectively an acceleration of deployment. This requires some measurement mechanism or the Commission will only be providing a revenue windfall to the incumbents at the expense of much smaller carriers. This must also be balanced against the distinct harm to competition that will result from the Commission's proposal as we understand it today.

There is a separate problem with the Commission's policy of encouraging broadband services at the expense of narrowband and that is that not all consumers want to buy expensive broadband services. "Even in areas where broadband is available, approximately 100 million Americans still do not subscribe." FCC Progress Report. FSN has itself signed up over 900 narrowband customers in the last two years. AICC members strongly prefer copper-based services to fiber in light of the alarm monitoring and related services they provide that work better on copper than on fiber.

In our meeting, Full Service Network detailed how Verizon has already been replacing copper with fiber in the FSN serving area under the current rules. Verizon has also been

⁹ *Id.*

¹⁰ 47 C.F.R. 1.54(a)(4).

¹¹ "The report includes online, interactive maps which show exactly where broadband is and isn't available, and deployment statistics—by technology type—for every county in the nation." FCC Progress Report, *supra*, n. 8.

allowing copper to degrade to the point where the Communications Workers of America filed a petition at the Pennsylvania Public Utilities Commission to prevent Verizon's practices. In that proceeding, Full Service Network explained how it had seen first-hand evidence of this degradation, but had also watched as Verizon pulled out perfectly good copper so as to disrupt existing FSN customers being served over those copper facilities.¹² Verizon then attempted to sell these FSN customers on Verizon fiber-based services. If the Commission eliminates the 64 Kbps alternative for competitive providers, it will encourage Verizon to continue to rip out and degrade existing copper, knowing that it will be leaving no alternative means for competitors to compete. As long as the Section 251 64 Kbps UNE loop alternative continues to exist, Verizon will not have such incentives to act anti-competitively.

In the meeting, Full Service Network also indicated that it is currently using Section 251 64 Kbps UNEs, Section 271 UNEs, and ONA/CEI elements. It also routinely relies on Section 271 as leverage in its commercial negotiations. Eliminating these pro-competitive elements will harm FSN's ability to compete with Verizon.

The Commission has indicated that it might engage in conditional forbearance, creating a process to allow incumbents to withdraw services on a case-by-case basis. The Joint Parties strongly oppose such a process because it will put competitors on the defensive: miss a notice or a filing and you lose customers, file a response late and you lose customers. More likely, smaller carriers lack the resources to engage in such routine regulatory advocacy. Note that while there are hundreds of resellers and UNE-P providers, only a handful have filed in this proceeding. If forbearance is to be granted, it must be based on data in this record as part of USTelecom's prima facie case. No such record exists and forbearance on at least these three issues must therefore be denied. The Commission cannot effectively extend the window to provide such data by opening up future avenues for USTelecom and its member companies to produce the data they were required to produce within the forbearance timeline.

If the Commission does intend to establish such a process, which would harm both consumers and competitors, it should include the following conditions:

- Surrogates like USTA cannot file petitions and carriers themselves must file.
- Carriers must file on a service by service or element by element basis.
- Carriers must provide 120 days' notice to all affected carriers and must indicate which of that carrier's end user customers/locations will be implicated.

¹² See *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*, Answer of Full Service Network, LP in Support of Petition of Communication Workers of America, Pennsylvania Public Utility Commission Docket No. P-2015-2509336, p. 6 (Nov. 10, 2015), attached hereto as Exhibit 1.

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- The Commission should grandfather any existing carrier agreements. (Full Service Network alone has over 10,000 customers in Western Pennsylvania supported by these agreements.)
- The Commission should grandfather any end user service as long as that end user remains a customer of the competitive carrier. This will avoid customer disruption.
- Provide a 120-day instead of a 60-day notice period of any withdrawal of service so small carriers have ample time to react and respond.
- Require that the ILEC list all carriers that are currently using the services or elements when they file.
- Preserve the Section 271(d)(6)(B) 90-day complaint process for complaints that will now have to be filed under Section 208.
- In every filing, BOCs must specifically detail all alternative arrangements, including the rates for each such alternative.

As required by Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ James C. Falvey

James C. Falvey
Counsel for the Full Service Network, Inc.

cc: Claude Aiken
Randy Clarke
Nick Degani
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Amy Bender

EXHIBIT 1

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November 10, 2015

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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 electronic filing please find the Answer of Full Service Network, LP in Support of
Petition of Communication Workers of America with regard to the above-referenced matter.
Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Full Service Network's Answer in Support of Petition of Communications Workers of America upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

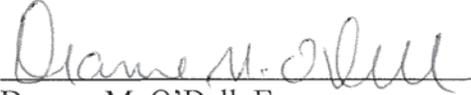
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Deanne M. O'Dell, Esq.

Date: November 10, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ANSWER OF FULL SERVICE NETWORK, LP
IN SUPPORT OF PETITION OF COMMUNICATIONS WORKERS OF AMERICA**

On October 21, 2015, the Communications Workers of America (“CWA”) filed the above-captioned Petition asking the Commission to initiate a public, on-the-record investigation into the safety, adequacy, and reasonableness of the facilities and services of Verizon Pennsylvania LLC (“Verizon”). According to the Petition, Verizon is seriously and systematically neglecting its copper infrastructure. As a result of this neglect, Verizon is creating unsafe situations for its employees and customers and failing to provide safe, adequate and reasonable service to its customers.

Full Service Network, LP (“FSN”) is one of those customers who is not receiving safe, adequate and reasonable service from Verizon due to Verizon’s neglect of the copper infrastructure. As a wholesale customer of Verizon, FSN purchases products from Verizon and then resells those products to retail customers. These products include those supported by the copper infrastructure. As explained more fully below, FSN has first-hand experience regarding Verizon’s decision to effectively abandon the copper infrastructure and, as a result, FSN is seriously concerned about the negative impact of Verizon’s decisions on FSN’s ability to continue to provide resale service to FSN’s retail customers.

For these reasons, FSN supports the CWA Petition and recommends that the comprehensive, state-wide investigation also include an analysis of: (1) whether Verizon is

offering its retail services for resale on nondiscriminatory and reasonable terms, (2) whether Verizon is assuring the provision of adequate access to its services and facilities to wholesale customers; (3) whether Verizon is giving itself, or any other corporate subunit, any preference or advantage in the repair and maintenance of its facilities; (4) whether Verizon's actions are a de facto or other effort to abandon its copper infrastructure; and, if so, (5) whether Verizon has received the appropriate authority from the Commission to do so. FSN is available and willing to participate in the investigation in anyway the Commission may deem useful.

In further support of this answer, FSN avers as follows:

I. INTRODUCTION AND BACKGROUND

1. FSN is a Pennsylvania certificated competitive local exchange carrier ("CLEC") and facilities-based interexchange carrier ("IXC"). FSN was created in Pittsburgh, Pennsylvania in 1989 as a long distance reseller serving only business accounts following the divestiture of AT&T. In 1999, FSN entered the local telecommunications market. Over time, FSN installed its own network facilities and expanded its corporate structure and today provides a complete range of services including long distance, toll-free service, internet and local telephone services. FSN serves primarily residential customers, largely via resale. Thus, FSN purchases services from Verizon as a wholesale customer of Verizon and then resells the services to FSN's retail customers.

2. Resale is a competitive alternative to Verizon's service and one of the fundamental methods of competitive entry envisioned by the Telecommunications Act as it can and does provide an attractive landline competitive voice alternative which can be particularly important for customers who are not interested in broadband, broadband/VoIP, or wireless services or may live in areas where such services are not availability. FSN purchases services from Verizon as a wholesale customer of Verizon

and offers resold retail services primarily to residential customers. Oftentimes, FSN can offer these resold products to retail customers for less cost or with additional products and services beyond the Verizon equivalent offering.

3. Many of FSN's resale customers are in locations where alternatives to Verizon's copper based services are not available. Additionally, some of FSN's resale customers prefer landline service which is based on Verizon's copper infrastructure. Through resale, FSN is able to provide a competitive landline alternative to Verizon. However, FSN's ability to resale landline service to retail customers is dependent on Verizon's maintenance and repair of the underlying copper infrastructure which is the subject of the Petition. As such, FSN is dependent on Verizon to maintain and service the underlying copper infrastructure so that FSN can continue to offer these alternative products to retail customers on a resale basis..

II. LEGAL AUTHORITY

4. As the Petition correctly notes, the Public Utility Code requires Verizon to provide "adequate, efficient, safe, and reasonable service and facilities" and to "make all such repairs, changes, alternations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public." Petition at ¶ 10, citing 66 Pa. C.S. § 1501.

5. In addition, federal law requires Verizon to offer for "resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers..." and the Commission is tasked with the duty of ensuring that Verizon is offering its retail services

for resale on nondiscriminatory and reasonable terms.¹ Consistent with this authority, the Commission's competitive safeguards regulations require Verizon to "assure the provision of adequate" access to its services and facilities.² These regulations also prohibit Verizon from giving itself, or any other corporate subunit, "any preference or advantage. . . in the repair and maintenance. . ." of Verizon's facilities.³ Thus, the Commission is required to ensure that Verizon's actions as described in the Petition: (1) do not result obviate Verizon's requirement to provide FSN adequate access to its facilities; and, (2) do not give Verizon, or any other corporate subunit, a preference or advantage in the repair and maintenance of Verizon's facilities.

6. Finally, to the extent Verizon's actions as described in the Petition are a de facto or other effort to abandon its copper infrastructure, the Commission has made clear that before Verizon can abandon its copper in Pennsylvania, it must comply "with applicable state notice and other procedures, including those set forth in Section 1102(a)(2) of the Code."⁴

7. To address violations of any or all of these legal requirements, the Commission is authorized to grant the relief requested in the Petition to conduct a thorough investigation into the adequacy, safety, efficiency, and reasonableness of Verizon's services and

¹ 47 U.S.C. 251(b)(1) and (c)(4)(B); 66 Pa. Code § 63.143(1)(i). *See also, Wholesale Rate for Resale of Telecommunications Provided by Verizon Pennsylvania Inc. and Verizon North Inc.*, Docket No. R-00038516, Final Order entered March 4, 2005 ("*Wholesale Rates Order*").

² 52 Pa Code § 63.141(a)(1)(emphasis added).

³ 52 Pa Code § 63.143(1)(i).

⁴ *Joint Petition of Verizon Pennsylvania LLC and Verizon North LLC for Competitive Classification of All Retail Services in Certain Geographic Areas and for a Waiver of Regulations for Competitive Services*, Docket Nos. P-2014-2446303 and P-2014-2446304, Final Implementation Opinion and Order entered September 11, 2015 at 25.

facilities in the non-FiOS portions of Pennsylvania and impose substantial civil penalties on Verizon as may be appropriate upon the conclusion of such investigation. 66 Pa. C.S. §§ 331(a), 501, 506, 1505(a), 3301.

III. IMPACT OF VERIZON'S FAILURE TO MAINTAIN AND REPAIR ITS COPPER INFRASTRUCTURE ON FSN AND ITS RESALE RETAIL CUSTOMERS

8. For those services FSN resells to retail customers that are dependent on the copper infrastructure, FSN is dependent on Verizon to maintain and repair the copper infrastructure.

9. FSN's own experiences support the allegations in the Petition that Verizon is failing to maintain and repair its copper infrastructure. Petition at ¶ 14. Throughout the Pittsburgh region, FSN technicians dispatched to test from resold Verizon NIDs are reporting back to FSN's dispatch an increasing number of Verizon copper DMARCs found to be in disrepair, wet terminals, and telco-side fractures in cables. In almost all cases it appears that upon receipt of a copper cable trouble ticket Verizon is moving the subscriber to another pair within the damaged facility and neglecting to repair the original damaged pair or the cable facility itself. This is consistent with the allegations in the Petition the Verizon is failing to maintain its current copper infrastructure and make necessary repairs.

10. In addition to not maintaining the copper infrastructure, Verizon is now systemically closing out many copper repair tickets stating "No Trouble Found" or "Good to the NID." In some of those cases, the customers do not even have a NID. If Verizon had actually dispatched to the location, it could have easily discovered that the customer is missing an actual NID. In other cases, FSN technicians have waited at customer sites for Verizon to arrive to make the repair while the ticket is mysteriously

closed by Verizon stating no trouble found. In those egregious examples it was not possible for Verizon to have shown up to make that “No Trouble Found” determination as FSN’s technicians were at the site waiting for the dispatch which never happened.

11. In addition to failing to maintain or repair the copper infrastructure, in certain instances, Verizon is actually destroying good copper lines without any advance notice to FSN or, presumably the Commission, with the end result of terminating service to FSN’s resale customer. Two of FSN’s business customers, one located at 425 6th Ave in Pittsburgh reported on September 2nd 2015 that a Verizon employee showed up unannounced at the FSN’s customer’s office stating that the “copper to the building is being removed.” The implicit message to FSN’s customer was that if the FSN customer did not switch to FiOS then the customer would lose service. Such an incredulous report seemed to suggest to FSN that perhaps the customer was visited by an overzealous FiOS salesman. Unfortunately, that was not the case and all services served over the resold copper to FSN’s two customers went completely out of service. These terminated services included inbound calling and access to Emergency 911. In response, FSN’s Service manager rushed to the location where he was able speak with two Verizon employees who confirmed that, in fact, they were ripping out all of the copper to the property on orders from Verizon management. One of the Verizon technicians on site agreed to leave enough copper pairs such that FSN’s customer could be put back in service – “for now.” While the customers’ service was restored a few hours later, uncertainly remains as to when Verizon will chose to harvest more perfectly functional copper in its apparent attempt to drive business customers to FiOS.

12. Consistent with the allegations in the Petition, the result of this lack of maintenance and repair and outright destruction of viable copper means that wholesale customers of Verizon, like FSN, are not receiving the safe, adequate, and reasonable service that Verizon is required by law to provide. Petition at ¶ 19.

13. First, as a reseller of Verizon's services, Verizon's lack of maintenance and repairs and/or destruction of copper directly impact FSN's provisioning of the service to FSN's retail customers. When Verizon fails to repair the copper infrastructure of one of FSN's retail customers or, worse yet, simply cuts the copper without any notice to FSN, this directly impacts the product FSN customers are currently using on a resale basis. When the underlying copper infrastructure is not repaired or, worse yet, cut without any notice, then the likelihood of FSN losing the customer is increased.

14. Second, and consistent with the examples set forth in the Petition, FSN's retail end users are negatively impacted by Verizon's failure to maintain and repair its copper infrastructure. Petition at ¶¶ 21-22. They can be negatively impacted by not having a problem adequately addressed or, as in the recent example explained above, by having all service terminated.

15. Finally, to the extent Verizon is not maintaining and repairing its copper infrastructure because of a corporate or other decision to focus money and efforts on its FiOS or wireless networks, Verizon is giving another corporate subunit a preference or advantage regarding repairs and maintenance. As explained above, the implied messaging preceding the destruction of FSN's customers' copper network was the customers should switch to Verizon's FiOS to maintain service.

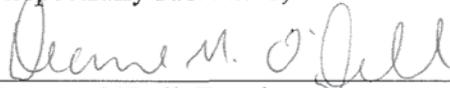
IV. CONCLUSION

16. For all the reasons set forth above in addition to those detailed in the Petition, opening the investigation as requested by CWA is justified and appropriate.

17. That investigation should include an analysis of: (1) whether Verizon is offering its retail services for resale on nondiscriminatory and reasonable terms, (2) whether Verizon is assuring the provision of adequate access to its services and facilities to wholesale customers; (3) whether Verizon is giving itself, or any other corporate subunit, any preference or advantage in the repair and maintenance of its facilities; (4) whether Verizon's actions are a de facto or other effort to abandon its copper infrastructure; and, if so, (5) whether Verizon has received the appropriate authority from the Commission to do so.

18. FSN is available and willing to participate in the investigation in anyway the Commission may deem useful.

Respectfully submitted,



Deanne O'Dell, Esquire
(Pa. Attorney ID No. 81064)
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Fl.
Harrisburg, PA 17108-1248
717 237 6000

Date: November 10, 2015

Attorney for Full Service Network, LP

VERIFICATION

I, David E. Schwencke, hereby state that I am President of Full Service Network LP and am authorized to make this verification on its behalf, and that the facts set forth in the attached Answer are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated:

11/10/15



David E. Schwencke, President
Full Service Network LP