

The Commission should either disapprove the application or request significant changes to the services that Verizon proposes to substitute for the discontinued services. Verizon should be required to provide the same level of service at the same cost. If Verizon can accomplish this standard without providing wireline service the substitution should be approved. The storm should not allow Verizon to reduce the level of service provided to its customers.

Verizon should not be allowed to reduce service on any measurable basis or increase costs to consumers as part its substitution of a newer technology for an older technology. The bulk of these comments are devoted to enumerating measures of services that should not relaxed (or reduced) as Verizon substitutes technology. The fact of the storm should not allow Verizon to rewrite terms of service to match what is convenient for (or desired by) Verizon to provide using a new technology.

This application is a thinly disguised attempt by Verizon to substitute new technology with a reduced capability as the only way to provide service while blaming the storm for the reduction in service.

The Commission should not deciding what technical approach Verizon uses to provide services but rather should be safeguarding the consumers??? ability to obtain equivalent (or better) services at same cost. The substitution of technical approach is not excuse to reduced service to the consumer.

For example 10-10-xxxx can be implemented but such an implementation may either require more programming of switches or diminish Verizon???'s income. Similarly, 7-digit dialing could be maintained???there is nothing magic about wireline service that makes 7-digit dialing possible. The commission should require Verizon to maintain same level of service according to these measures.

I believe that the criteria for an acceptable substitute should include:

For a substitute for DSL service (i.e. data service):

- Equivalent reliability included availability and mean-to-restore service.

- Equivalent or better throughput (both directions)

- Equivalent cost

- Unlimited data transfers without additional cost

Each of these criteria for a substitute for DSL service must be meet at each and every location that DSL service was previously provided. Verizon not be allowed to claim that average speeds, availability or costs for all users makes the substitute acceptable. Verizon must provide equivalent service not just for the average but the disadvantaged or remotely located user (in terms of speed, reliability, availability, etc) but also provide unlimited data transfers to all users. The commission should not allow any substitution based on schemes such as the ???average DSL user???

transferred 6 gigabytes of data per month and therefore Verizon will charge any user transferring more than 6 gigabytes of data in a month a premium.

Verizon should not be allowed to make unsubstantiated claims about its inability to provide wireline services and their claim to a reduced level of service is the best that its customers are entitled to. For example, Verizon claims that ground or seawater will contaminate wireline service. This claim is clearly false since undersea cables exist and operate for years. Cables are manufactured that are immune to both ground and seawater, Verizon is seeking to avoid having to install and use truly waterproof cables in affected areas. Throughout its application Verizon claims that things cannot be done when such things can be done but at a higher cost.

The commission should require Verizon to provide support for legacy communications protocols used by medical alert systems, credit card machines, facsimile transmission, alarm systems, etc or require that Verizon provide replacement equipment without cost. Since Verizon proposes its 4G LTE service can substitute for broadband services, Verizon could provide adaptors that convert legacy protocols to IP for transmission across its 4G LTE service and the conversion back to the original legacy protocols at a suitable location elsewhere on Verizon's network. Again, the Commission's objective should be continued service to the consumer without regard to the technology used by Verizon. Any claim that Verizon cannot provide a service must be subject to the strictest examination. The Verizon application often equates "???"does not want/ it requires extra effort/extra expense or requires a change in terms of service???" with "???"cannot provide???".

Verizon should be required to revise its Voice Link Terms of Service for consumers in the affected area to match the terms of service provided via wireline. When Voice Link is an alternative to wireline service Verizon can be allowed to develop alternative terms of service but when Verizon proposes to replace wireline services with Voice Link, the previous terms of service must be continued.

Verizon should not be allowed to claim that the cost of providing wireline (or equivalent service) makes reduced service the only option. Just as insurance companies are severely impacted by a large storm but required to make good on their policies, the impact of a storm is not reason for the Commission to allow Verizon to reduce its service.