**EXHIBIT L**

FC 1090 - 2011 - T - 1
RECEIVED 2011 AUG 26 3:29 PM (E)

**Office of the People's Counsel**
**District of Columbia**
1133 15th Street, NW • Suite 500 • Washington, DC 20005-2710
202.727.3071 • FAX 202.727.1014 • TTY/TDD 202.727.2876

**Sandra Mattavous-Frye, Esq.**
People's Counsel

August 26, 2011

**VIA ELECTRONIC FILING**

Mr. Jesse P. Clay, Jr.
Acting Commission Secretary
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005

**Re: In the Matter of the Petition of the Office of the People's Counsel for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia**

Dear Mr. Clay:

Enclosed for filing are an original and three (3) copies of "Petition of the Office of the People's Counsel for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia" in the above referenced proceedings.

If there are any questions regarding this matter, please contact me at (202) 727-3071.

Sincerely,

Arthur L. Brown
Assistant People's Counsel

Enclosure

**BEFORE**
**THE DISTRICT OF COLUMBIA**
**PUBLIC SERVICE COMMISSION**

| | | |
|---|---|---|
| **In the Matter of** | § | |
| | § | |
| **The Petition of the Office of the People's** | § | **Formal Case No. _____** |
| **Counsel for an Investigation into the** | § | |
| **Reliability of Verizon's** | § | |
| **Telecommunications Infrastructure** | § | |
| **in the District of Columbia** | § | |

## PETITION OF THE OFFICE OF THE PEOPLE'S COUNSEL FOR AN INVESTIGATION INTO THE RELIABILITY OF VERIZON'S TELECOMMUNICATIONS INFRASTRUCTURE IN THE DISTRICT OF COLUMBIA

Pursuant to D.C. Code Ann. §§ 1-204.93, 34-808, 34-903, and 34-908, and Rule 101.1, Rule 101.2, and Rule 101.4 of the Public Service Commission's ("Commission" or "PSC") Rules of Practice and Procedure,[1] the Office of the People's Counsel of the District of Columbia ("Office" or "OPC") respectfully petitions the Commission under its plenary authority over Verizon Washington, DC Inc. ("Verizon" or "the Company") to initiate and conduct a formal investigation into the reliability of Verizon's existing telecommunications infrastructure and the quality of Verizon's telephone service in the District of Columbia.

The Office petitions the Commission for a formal investigation as the statutory legal representative of the District's utility consumers and ratepayers using products and services provided by public utilities under the jurisdiction of the Commission.[2]

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1 15 D.C.M.R. §§ 101.1, 101.2, and 101.4 (2008).

2 D.C. Code § 34-804 (d) (2009).

## I. SUMMARY OF OPC'S REQUEST

All public utilities operating in the District of Columbia are required to provide safe, adequate and reliable service.[3] The Office has been contacted by ratepayers and consumers throughout the city regarding recurring service outages and interference on their telephone lines, essentially complaining about the reliability of Verizon's existing telecommunications infrastructure in the District of Columbia. These affected District ratepayers and consumers seek investigation and resolution of these matters, including a determination of the actual causes of the telephone service outages and poor quality of telecommunications services; Verizon's failure or refusal to repair or upgrade its infrastructure; and fair compensation and remedies for the damages they have suffered. The affected ratepayers and consumers continue to express dissatisfaction with Verizon's service reliability and are seeking answers to why they continue to experience and receive poor quality telecommunications services.

The Office requests the initiation of a formal investigation into the causes and resolution of the matter of these telephone service outages and poor quality telecommunications services experienced in the District of Columbia. The Office further requests that the Commission use the full breadth of its statutory plenary authority[4] and responsibility to ensure the formal proceeding include an investigation of: (1) the causes of the telephone service outages, (2) the condition of the system infrastructure in the affected areas, (3) the corrective action necessary to enable the provision of safe and reliable service in the District, (4) Verizon's efforts to resolve these problems, (5)

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3 *See*, D.C. Code § 34-1101(a).

4 *See*, D.C. Code § 1-204.93 (2010).

whether Verizon is deliberately failing or refusing to adequately repair or upgrade infrastructure or service, (6) Verizon's efforts to compensate District ratepayers and consumers for losses sustained, and (7) whether Verizon has sufficient manpower to address the problem.

## II. JURISDICTION

### A. Office of the People's Counsel

The Petitioner is the People's Counsel, acting under the Office's authority to represent District of Columbia consumers before the Commission involving the interests of users of the products and services furnished by public utilities under the jurisdiction of this Commission.[5] The Office also has the authority to represent and appear for petitioners before the Commission for the purpose of complaining in the matters of rates or service.[6] Further, the Office may investigate independently, or within the context of formal proceedings before the Commission, the services given by, the rates charged by, and the valuation of the properties of the public utilities under the jurisdiction of the Commission.[7] The Office has the right to obtain from the public utility all information and documents reasonably relevant to its investigation. If a public utility refuses or fails to produce the requested information in a timely manner, the Office may, by motion, petition the Commission to issue an order compelling its production.[8]

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5 D.C. Code § 34-804 (d)(1).

6 D.C. Code § 34-804 (d)(3).

7 D.C. Code § 34-804 (d)(4).

8 D.C. Code § 34-1118(c).

### B. Public Service Commission

The Commission has the statutory obligation to ensure that every public utility doing business within the District of Columbia furnishes services and facilities that are reasonably safe and adequate and in all respects just and reasonable.[9] Further, the Commission must ensure any facility or services furnished, or rendered, or to be furnished or rendered, shall be reasonable, just, and nondiscriminatory.[10] The Commission has the authority, upon a reasonable complaint made against any public utility, to investigate that public utility if its services or time and conditions of payment are in any respect unreasonable, insufficient, or unjustly discriminatory or that any service is inadequate or cannot be obtained.[11] The Commission has the authority to inquire into any neglect or violation of the laws or regulations in force in the District of Columbia by any public utility.[12] The Commission has exercised this authority in other matters affecting the rights of District of Columbia consumers. [13]

### C. Verizon

Verizon is subject to the jurisdiction of the Commission, as it is a public utility and a corporation organized under the laws of the District of Columbia and authorized by the Commission

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9 D.C. Code §1-204.93.

10 *Id.*

11 D.C. Code §34-908.

12 D.C. Code §34-402.

13 *See*, Formal Case No. 1071, *In the Matter of the Investigation of the High Energy Bills of the Potomac Electric Power Company*, Order No. 15567 rel. October 1, 2009; Formal Case No. 1062, *In the Matter of the Investigation of the Electric Power Outage in the District of Columbia on June 13, 2008*, Order No. 16432 rel. July 8, 2011.

to do business in the District of Columbia.[14]

## III. STATEMENT OF PUBLIC CONCERN

OPC's petition is in response to a series of communications about the experience District ratepayers and consumers are having with recurring telephone service outages, poor quality telecommunications service, and Verizon's failure or refusal to address these problems associated with its landline service provided over its copper infrastructure. Specifically, OPC has been contacted by District residents and staff of District of Columbia Councilmembers representing residents of Wards 4 and 6 and other areas of the District relaying consumer complaints about problems with their telephone service in the District of Columbia. *See* Consumer Affidavits attached as Exhibit 1. The Office respectfully reserves the right to supplement this Petition with additional consumer affidavits.

Indeed, Councilmember Phil Mendelson (At Large) has voiced concern about the reliability of Verizon service, specifically, widespread outages in the Adams Morgan area of the District. *See* Councilmember Mendelson's August 25, 2011 email attached as Exhibit 2. In addition, consumers are expressing their frustration through social media, including neighborhood listservs. *See* Exhibit 2. Essentially, District consumers complain as follows: (1) in many cases there is always noise or a hum on the line or the line is totally inoperable; (2) that there are other calls on the line; (3) that Verizon has acknowledged that repairs, replacements or upgrades need to be made to its copper infrastructure, but has failed to make them; (4) that there are constant telephone service outages, especially when it rains or during other inclement weather. The complainants also state that some of

[14] D.C. Code § 34-214.

these problems have gone unchecked for several years.

## IV. SPECIFIC RELIEF REQUESTED

Rule 101.2 authorizes the Commission, upon the petition of any person, to order a formal investigation.[15] OPC respectfully petitions the Commission for the initiation of a formal investigation into the causes and resolution of the matter of these telephone service outages and poor quality telecommunications services experienced in the District of Columbia. The Office further requests that the Commission use the full breadth of its statutory plenary authority and responsibility to ensure the formal proceeding include: (1) an investigation of the causes of the telephone service outages, (2) the condition of the system infrastructure in the affected areas, (3) the corrective action necessary to enable the provision of safe and reliable service in the District, (4) Verizon's efforts to resolve these problems, (5) whether Verizon is deliberately failing or refusing to adequately repair or upgrade its copper infrastructure, and (6) Verizon's efforts to compensate District ratepayers and consumers for losses sustained.

## V. BASIS FOR RELIEF REQUESTED

OPC, as the statutory legal representative of District ratepayers and consumers, must take appropriate steps to protect the interests of District ratepayers and consumers to ensure they receive safe, adequate and reliable telephone service as required by law.[16] To that end, there should be a formal Commission investigation to determine the causes and appropriate resolution of all issues regarding the telephone service outages and poor quality telecommunications services to ensure

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15 15 D.C.M.R § 101.2 (2009).

16 *See,* D.C. Code § 34-804 (2009).

satisfactory and timely resolution of this matter.

The Commission has express authority to investigate and resolve these issues.[17] The Commission further has the authority to direct Verizon to make repairs, improvements, changes, replacements, or additions to service or equipment within a reasonable time if it determines that repairs, improvements or changes in any telephone plant equipment and/or services should be made in order to promote the comfort or convenience of the public or employees, or in order to secure adequate service or facilities.

## VI. REQUEST FOR FORMAL HEARING

D.C. Code § 34-908, D.C. Code § 34-914 and D.C. Code § 34-915 require the Commission to hold a formal hearing before issuing an order affecting the complained upon rate, regulation, act or making a final determination as to whether Verizon is fulfilling its legal obligation to provide safe, adequate and reliable service in the District.

## VII. CONCLUSION

**WHEREFORE**, for the reasons stated above, OPC respectfully requests the PSC grant this petition and conduct a full and complete investigation into the quality and reliability of Verizon's telecommunications service and underlying copper network infrastructure in the District of Columbia.

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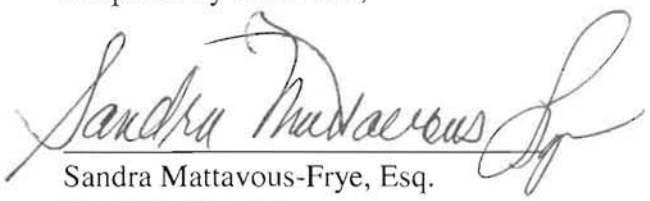
17 D.C. Code §§ 34-908 and 34-914 (2009).

Respectfully submitted,



Sandra Mattavous-Frye, Esq.
People's Counsel
D.C. Bar No. 375833

Karen R. Sistrunk, Esq.
Associate People's Counsel
D.C. Bar No. 390153

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Assistant People's Counsel
D.C. Bar No. Pending

OFFICE OF THE PEOPLE'S COUNSEL
1133 15th Street, N.W., Suite 500
Washington, D.C. 20005
(202) 727-3071

Dated: August 26, 2011

## CERTIFICATE OF SERVICE

**In the Matter of the Petition of the Office of the People's Counsel for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia**

I hereby certify that on this 26th day of August, 2011, a copy of the "Petition of the Office of the People's Counsel for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia" was served on the following parties of record by hand delivery, first class mail, postage prepaid, or electronic mail:

Honorable Betty Ann Kane
Chairman
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005
bakane@psc.dc.gov

Honorable Richard E. Morgan
Commissioner
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005
rmorgan@psc.dc.gov

Honorable Lori Murphy Lee
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Richard Beverly, Esq.
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William Roberts
President, Verizon - DC
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Washington, D.C. 20005

J. Henry Ambrose
Vice President State Public Policy Maryland &
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Phylicia Fauntleroy Bowman
Executive Director
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1333 H Street, N.W., 6th Floor East
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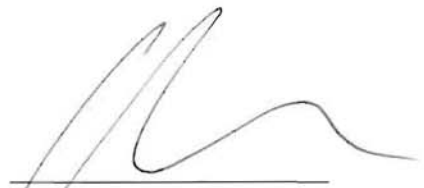

Arthur L. Brown
Assistant People's Counsel

Attachment 1

**From:** Mendelson, Phil (COUNCIL) [mailto:PMENDELSON@DCCOUNCIL.US]
**Sent:** Thursday, August 25, 2011 10:18 AM
**To:** Herbert Jones
**Subject:** Verizon outage in Adams Morgan going on 10 days

This is a quick cut and paste of postings I have found on the Adams Morgan Listserv. Thanks for helping.

# Verizon outage

**Posted by: "nitestarr17"** elham17@gmail.com nitestarr17

**Tue Aug 16, 2011 9:59 am (PDT)**

Now that we have our electricity back, our phone line is dead. Verizon has workers on strike and is slow to respond--apparently sending their workers out to the neighborhood on Thursday...the soonest they can get out here.

Our home is on Lanier Pl. Not sure how widespread the outage is, but if your phone doesn't work, please call the Verizon area manager at 202-755-0549.

Elham Lipton

# Re: Verizon outage

**Posted by: "lancefromdc"** salonial@aol.com lancefromdc

**Wed Aug 17, 2011 6:33 am (PDT)**

They might be blaming it on the strike now, but their response time has been incredibly bad now for many years on going. My mom had a similar problem with her phone line going out and they'd take a week or two to get out to her house and she'd have to do without phone service in the meantime. She got fed up with it and changed to another carrier who responds immediately. I had an issue with my Internet connection with them earlier this

year and it took over 2 months to resolve as they kept steering me through their helpdesk in India which require my re-explaining the problem each time (intermittant connectivity), their running a test from that end and then they're telling me that the problem had been fixed. I got 'lucky' on about my 12th call into them in that I reached someone in India who finally agreed to schedule a service call to my house. Once they actually came out in person it was a simple fix ... One that in years past would have been done the day after you called to report it in. If they treat their workers half as bad as they treat their customers, I can easily understand why they are facing a strike now.

Lance

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 3b.

## Verizon outage

**Posted by: "elizabeth@innercity.org"** elizabeth@innercity.org mailinnercity

**Wed Aug 17, 2011 5:27 pm (PDT)**

1640 Columbia Rd is out too

How about a roll call of who is without phone service.

Misery loves company and knowledge is power.

Elizabeth

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 3c.

## Re: Verizon outage

**Posted by: "Mindy Moretti"** mindymoretti@yahoo.com mindymoretti

**Wed Aug 17, 2011 7:43 pm (PDT)**

It could be out as long as till 9pm Saturday night according to Verizon, which I was able to call from the cell.

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4)

## Land Line Phones

**Posted by: "Car2Dav@aol.com"** Car2Dav@aol.com

**Fri Aug 19, 2011 7:48 am (PDT)**

So, has anyone heard if Verizon intends to fix the phones? Thanks.

Carol Davis
Lanier Place

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 7b.

## Re: Land Line Phones

**Posted by: "Mindy Moretti"** mindymoretti@yahoo.com mindymoretti

**Fri Aug 19, 2011 7:52 am (PDT)**

When I called on the 17th, they said should be fixed by 9pm Saturday night. The phone support person did caution though that because thousands of Verizon workers are on strike right now, it could be longer.

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 7c.

## Re: Land Line Phones

**Posted by: "B A"** twcdcorp@yahoo.com twcdcorp

**Fri Aug 19, 2011 2:07 pm (PDT)**

I saw some trucks on euclid street for 2 days but didn't have a chance to ask why.sorry!

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 7d.

## Re: Land Line Phones

**Posted by: "nitestarr17"** elham17@gmail.com nitestarr17

**Fri Aug 19, 2011 6:56 pm (PDT)**

I was told the problem should be fixed by Saturday or before. Everyone should make sure they review their bill carefully and request credit for the days you had no phone service.

-Elham

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (4) 8a.

## Re: Verizon outage

**Posted by: "Maureen J. Carroll"** mjcarroll1@verizon.net countrydirector1991

**Fri Aug 19, 2011 8:59 am (PDT)**

Good news re Adams Mill Rd...my house in 2700 block of Ontario is still out. Internet went out yesterday but has come back on, albeit with occasional failures. I hope Verizon's word re a Saturday fix holds up. Do we know if this outage is connected to reported sabotages by strikers?

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (6)

## Verizon Outage update

**Posted by: "Mindy Moretti"** mindymoretti@yahoo.com mindymoretti

**Sun Aug 21, 2011 12:12 pm (PDT)**

Just called Verizon to get an update about the outage and apparently there are 104 us here in Adams Morgan without landline service. The representative that I spoke with said that there is no indication on the work order when service will be restored (they had initially said 9pm last night). He did joke that it will most likely be fixed sometime after Tuesday (when the striking workers go back to work). Anyway, for the 103 other households in the neighborhood without landline service, that's where we stand.

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post

## Re: Verizon Outage update

**Posted by: "peter lyden"** ps.lyden@wap.org

**Mon Aug 22, 2011 7:22 am (PDT)**

My phone service is out too.

Yesterday morning there were Verizon workmen on Ontario Rd between Euclid & Columbia Rd. I asked them if they were working on the phone voice problem and they said yes. They said there was a cable problem on that block and they were not sure when they would have the service restored. But, there was a crew of 4 working on it. I still have my internet access, which I thought was strange to lose the voice but not the digital. They said the nature of the problem affected the analog voice signals, but not the digital DSL.

Peter

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (2)

1a.

# I. Land Lines

**Posted by: "Car2Dav@aol.com"** Car2Dav@aol.com

**Wed Aug 24, 2011 5:33 am (PDT)**

Anyone have a magic number that we all can call about the land lines --
which people did need yesterday during the earthquake. Disrupted phone service
is now entering its 8th day.

Carol Davis

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (2) 1b.

## Re: Land Lines

**Posted by: "elhamlipton"** elham17@gmail.com elhamlipton

**Wed Aug 24, 2011 4:29 pm (PDT)**

If you are a twitter user, try addressing a message to @VerizonSupport. Ironically, they are responsive that way. I suppose if they were the subject of enough negative tweets, they would be forced to respond more quickly. Companies hate bad PR.

Elham Lipton

**Error! Hyperlink reference not valid.**Reply to sender | Reply to group | Reply via web post
Messages in this topic (2)

CONFIDENTIALITY NOTICE: This electronic communication, including any attachments, is intended solely for the use of its intended recipient(s) and might contain information that is legally privileged, confidential, proprietary in nature, or otherwise exempt from disclosure under applicable law. If you are not the intended recipient, any distribution or copying of this electronic communication (including any attachments) is strictly prohibited. If you are not the intended recipient, please delete it (including any attachments) from your system without copying or forwarding it, and notify the sender of the error by reply e-mail.

Attachment 2

**BEFORE**
**THE DISTRICT OF COLUMBIA**
**PUBLIC SERVICE COMMISSION**

| | | |
|---|---|---|
| **In the Matter of** | § | |
| | § | |
| **The Petition of the Office of the People's** | § | **Formal Case No. _____** |
| **Counsel for an Investigation into the** | § | |
| **Reliability of Verizon's** | § | |
| **Telecommunications Infrastructure** | § | |
| **in the District of Columbia** | § | |

**AFFIDAVIT OF COMMISSIONER ANGELIA SCOTT ANC 1D06 IN SUPPORT OF THE OFFICE OF THE PEOPLE'S COUNSEL'S PETITION FOR AN INVESTIGATION INTO THE RELIABILITY OF VERIZON'S TELECOMMUNICATIONS INFRASTRUCTURE IN THE DISTRICT OF COLUMBIA**

1. I, Commissioner Angelia Scott, ANC 1D06, state under oath as follows:

2. I reside at 1845 Harvard Street, NW, Apt. 609, Washington, DC 20009 in Ward 1.

3. I fully support the Office of the People's Counsel Petition for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia.

4. I am a Verizon LAN line phone service customer. I have lived at the Harvard Towers for the past 11 years and the resident has been having lots of problems with our telephone LAN line services.

5. We have experienced frequent telephone service outages when it rains, majority of the existing wires in the Verizon telephone box are loosely hanging. Technicians do the repairs and in couple of days or weeks, the phones all become faulty again for which we will be charged for that services and will then return to do more repairs only to be charged again. Most of the residents of this building are: seniors, disability youths, mental health and multicultural with health problems such as the use of life alerts. Some customers are being billed services within a two month period for which they do not have a working phone. Almost every resident in this building receives high bills for package(s) that were never authorized by them. As concerned citizens the services that Verizon does provide for the people is not even close to satisfactory.

Angelia D. Scott

Commissioner Angelia Scott

ANC 1D06

8-25-11

Date

Subscribed and sworn before me this 25th day of August, 2011.

Jean M. Gross-Bethel

*Notary Seal*

Notary Public

Jean M. Gross-Bethel
Notary Public, District of Columbia
My Commission Expires 3-31-2015

**BEFORE**
**THE DISTRICT OF COLUMBIA**
**PUBLIC SERVICE COMMISSION**

| | | |
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| **In the Matter of** | § | |
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| **Telecommunications Infrastructure** | § | |
| **in the District of Columbia** | § | |

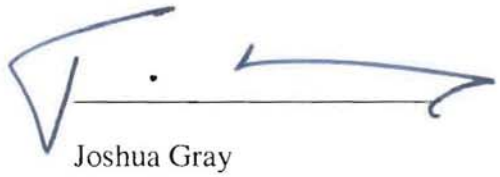
**AFFIDAVIT OF JOSHUA GRAY IN SUPPORT OF THE OFFICE OF THE PEOPLE'S COUNSEL'S PETITION FOR AN INVESTIGATION INTO THE RELIABILITY OF VERIZON'S TELECOMMUNICATIONS INFRASTRUCTURE IN THE DISTRICT OF COLUMBIA**

1. I, Joshua Gray, reside at 2424 2nd Street, NE, Washington, DC 20002 in Ward 6.

2. I fully support the Office of the People's Counsel Petition for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia.

3. I am a Verizon landline phone service customer. I have experienced constant quality of service problems with Verizon for over five years. Verizon technicians have visited my residence on at least 14 occasions from 2006 to 2009. Furthermore, on November 6, 2009, Verizon sent letters to the residents of the 2400 block of 2nd Street, NE, apologizing for the poor quality of phone service. A copy of the November 6, 2009 letter is attached.

4. Specifically, I have experienced frequent phone service outages when it rains or during other inclement weather. I also have experienced persistent static interference on the line and other phone service interruptions, independent of the weather.



Joshua Gray

8.26.11

Date

Subscribed and sworn before me this 26th day of August, 2011.

Jean M. Gross-Bethel *Notary Seal*

Notary Public

Jean M. Gross-Bethel
Notary Public, District of Columbia
My Commission Expires 3-31-2015

Joshua Gray
2424 2nd St., NE
Washington, DC
20002

202-361-6906 (cell)

June 8, 2010

ATTN:

Laurence Jones
Office of People's Counsel

Mr. Jones:

Please find attached a copy of Verizon's letter referencing my ongoing difficulty with local telephone service.

Thank you in advance for your efforts.

Joshua Gray

1 OF 2

**13101 Columbia Pike**

**Silver Spring, MD 20904**

**November 6, 2009**

**To: The residents of 2400-2438 2nd St NE, Washington, DC**

**Re: Replacing Verizon facilities at 2400-2438 2nd St NE**

**Dear Resident,**

**Verizon regrets the quality of telephone service it has rendered in the past. We are working to resolve this issue.**

**Unfortunately replacing our facilities is not as easy as it would appear. Our easement requires us to take the exact same path as the previously placed Verizon telephone cable. This is currently not possible due to the fact that most residents have built additions enclosing our facilities.**

**Verizon has to determine a new path to replace its facilities. Please contact me so we might discuss the solution to this issue(this is *not* a sales call):**

**Blaise Wagner-Engineering Assistant**
**Verizon Outside Plant Engineering**
**13101 Columbia Pike**
**Silver Spring, MD 20904**
**301-282-2495 office**
**301-282-7973**
**blaise.g.wagner@verizon.com**

**Verizon's greatest priority is to restore quality service to its customers.**

2 of 2

**BEFORE**

**THE DISTRICT OF COLUMBIA**

**PUBLIC SERVICE COMMISSION**

RECEIVED

| | | |
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| **Reliability of Verizon's** | § | |
| **Telecommunications Infrastructure** | § | |
| **in the District of Columbia** | § | |

**AFFIDAVIT OF CAROLYN HARDEN IN SUPPORT OF THE OFFICE OF THE PEOPLE'S COUNSEL'S PETITION FOR AN INVESTIGATION INTO THE RELIABILITY OF VERIZON'S**

**TELECOMMUNICATIONS INFRASTRUCTURE IN THE DISTRICT OF COLUMBIA**

1. I Carolyn Harden reside at 1618 Constitution Avenue, N.E., Apt 1, Washington, DC 20002 in Ward 6.

2. I am a Verizon Landline phone service customer. I have experienced loss of phone service over the past year, regardless of weather conditions. I also have experienced persistent static interference on the line and other phone service interruptions, independent of the weather.

3. Verizon technicians have attempted to repair my phone service on several occasions. However, my service invariably fails again. In addition, Verizon and I have been in constant dispute regarding the inside wire maintenance plan and its effective date. Verizon's poor quality of service has affected my ability to stay in contact with my family and friends.

4. I fully support the Office of the People's Counsel Petition for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia.

Carolyn Harden

Carolyn Harden

8/26/11

Date

Subscribed and sworn before me this_____day of_____, 2011.

_____ *Notary Seal*

Notary Public

**BEFORE**
**THE DISTRICT OF COLUMBIA**
**PUBLIC SERVICE COMMISSION**

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| **The Petition of the Office of the People's** | § | **Formal Case No. _____** |
| **Counsel for an Investigation into the** | § | |
| **Reliability of Verizon's** | § | |
| **Telecommunications Infrastructure** | § | |
| **in the District of Columbia** | § | |

**AFFIDAVIT OF CHARLES TURNER IN SUPPORT OF THE OFFICE OF THE PEOPLE'S COUNSEL'S PETITION FOR AN INVESTIGATION INTO THE RELIABILITY OF VERIZON'S TELECOMMUNICATIONS INFRASTRUCTURE IN THE DISTRICT OF COLUMBIA**

1. I Charles Turner reside at 2201 Savannah Street, S.E., Apt 301, Washington, DC 20020 in Ward 8.

2. I was a Verizon Landline phone service customer. I have experienced loss of phone service over the past 3 years, regardless of weather conditions. In many instances, there were unexplained intermitted interruption of services, and persistent static interference on the line and other phone service interruptions, independent of the weather.

3. Verizon technicians have attempted to repair my phone service on several occasions. However, my service invariably fails again. In addition, Verizon and I have been in constant dispute regarding the distinction between suspension of service and disconnection of service, and credit/refund for lack of service. As a senior with medical conditions, Verizon's poor quality of service has affected my ability to stay in contact with my health providers, family and friends. This poses a threat to my health and safety.

4. I fully support the Office of the People's Counsel Petition for an Investigation into the Reliability of Verizon's Telecommunications Infrastructure in the District of Columbia.

Charles Turner

4/26/11
Date

Subscribed and sworn before me this 26th day of August, 2011.

Jean M. Gross-Bethel *Notary Seal*

Notary Public

Jean M. Gross-Bethel
Notary Public, District of Columbia
My Commission Expires 3-31-2015