

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU  
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RE: PROPOSED REVISION TO  
COMMISSION REGULATIONS  
GOVERNING EXTENDED AREA  
SERVICE (EAS), 52 PA. CODE §§  
63.71-77

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Docket No. L-00050173

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COMMENTS OF THE OFFICE OF CONSUMER ADVOCATE

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RE: PROPOSED REVISION TO COMMISSION :  
REGULATIONS GOVERNING EXTENDED :  
AREA SERVICE (EAS), 52 Pa. Code §§ 63.71-77 :

Docket No. L-00050173

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**I. INTRODUCTION**

On October 27, 2006, the Pennsylvania Public Utility Commission (PUC or Commission) entered an Order (*EAS Order*) in the above-referenced docket. The *EAS Order* was published in the April 22, 2006 Pennsylvania Bulletin.<sup>1</sup> In the *EAS Order*, the Commission determined that it was necessary to retain the Extended Area Service (EAS) regulations.<sup>2</sup> While the Commission determined that it was necessary to retain those regulations, the Commission also determined that amendments to the EAS regulations may be appropriate. These proposed amendments are the subject of the OCA's Comments here. The OCA has attached as Appendix A the Commission's current EAS regulations for ease of reference.

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<sup>1</sup> 36 Pa. Bull. 1886 (Apr. 22, 2006).

<sup>2</sup> Id. at 1891.

Over the last six years, the Commission has provided ILECs and CLECs with waivers regarding the traffic study requirements of the EAS regulations. In June 1999, the Commission entered an Order (June 1999 Order) that adopted the Extended Area Service (EAS) Report of the Monitoring and Reporting/Subscribership Subcommittee of the Universal Telephone Service Task Force.<sup>3</sup> In addition to suspending the biennial traffic usage study requirement at that time, that Order required the Monitoring Subcommittee to review the EAS regulations for possible revision.<sup>4</sup> Id. In April 2003, however, the Commission created an EAS Task Force and eliminated the Monitoring Subcommittee. Id.

The EAS Task Force evaluated current EAS regulations through a series of collaboratives in an attempt to make the Commission's EAS regulations more reflective of the realities existing in the current marketplace. Id. The collaboratives included industry representatives, the Office of Consumer Advocate (OCA), and Commission personnel. The process involved a section-by-section review of the existing regulations. The Commission personnel attempted to develop EAS amendments based on the collaborative process – given that participants were not able to reach consensus on all of the proposed changes to the regulations. Id. Particularly, the Pennsylvania Telephone Association (PTA) suggested that EAS relief is no longer necessary because it believed that local and long distance competition provides customers with enough options. Id. The OCA does not agree and believes that EAS relief is still necessary, in part, because rural areas have little or no competition. Id. Staff reviewed the consensus language, as well as the language proposed by the PTA and OCA, and the result of this effort is now before the Commission. Id.

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<sup>3</sup> Id. at 1887.

<sup>4</sup> Id.



## II. COMMENTS

### A. Introduction – *the ongoing need for Extended Area Service relief*

In the EAS Order, the Commission discussed the ongoing need for EAS relief. The

Commission wrote:

Although the emergence of wireless and more recent innovations such as Voice over Internet Protocol (VoIP) provides customers with expanded choice, the relatively uneven deployment of these innovative technologies and services warrants the continuation of some form of EAS. This is particularly true for those rural areas where there is less deployment of these technologies than may be the case at a future time. Moreover, section 3014(b)(7) of Chapter 30 grants some rural carriers a continuous suspension from certain interconnection requirements with alternative service providers under TA-96 through December 31, 2008.

Significant low-cost alternatives to traditional long distance programs are also not widely available in rural and urban areas. It appears that the unlimited statewide calling plans of some IXCs or local phone companies with long distance service affiliates continue to cost considerably more than an expanded local calling area. Finally, the continuing existence of customer complaints seeking EAS warrants continuation of a revised form of EAS regulations to provide these customers with an opportunity to obtain EAS as a remedy in appropriate circumstances.<sup>5</sup>

The OCA agrees with the Commission's reasoning and its conclusion that the Commission should continue to make EAS relief available to Pennsylvania telephone consumers. Pennsylvania's weak competitive calling options do not support a market-based approach to ensuring that basic local calling areas are of a reasonable size, or that basic local calling is available at a reasonable price. Consumer complaints to the Commission about unreasonable toll calling charges still continue. The option of seeking EAS relief is necessary now and for the future. Competition for basic local calling is not yet a market reality in Pennsylvania. While the OCA acknowledges that some areas of the Commonwealth have access to multiple providers of voice services, the OCA submits that this limited availability does not constitute a fully

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<sup>5</sup> 36 Pa. Bull at 1887.

competitive market, and that cost considerations render many of these services non-viable options to basic local service.

In the *EAS Order*, the Commission references the fact that many bundled calling plans cost considerably more than an adequately sized and reasonably priced basic local calling plan.<sup>6</sup> This is quite correct. As an example, Verizon Pennsylvania offers Local Area Unlimited Service at prices ranging from \$3.80 to \$8.85 depending on location (i.e., rate band).<sup>7</sup> To purchase Verizon Freedom Essentials, a bundled calling plan offering unlimited local, regional toll and long distance calling, a customer would have to pay \$39.95.<sup>8</sup> Clearly, choosing between these two options does not represent a reasonable choice particularly for low-income consumers who are simply interested in avoiding toll charges for calls within their community of interest.

Also, the availability of wireless services is not a substitute for an adequately sized local calling area. This is true because wireless services are not available throughout Pennsylvania. In addition, wireless services may have reception issues that make substitution unfeasible for many consumers. This is particularly true regarding 9-1-1 emergency services. For example, it would be unreasonable to expect consumers to abandon reliable wireline 9-1-1 service simply because their local calling area is too small. Regarding this aspect of wireless service, the FCC provides the following information in the consumer area of its website:

A wireless phone is actually a radio with a transmitter and a receiver that uses radio frequencies or channels -- instead of telephone wire -- to connect callers. Because wireless phones are by their very nature mobile, they are not associated with one fixed location or address. A caller using a wireless phone could be calling from anywhere. While the location of the cell tower used to carry a 911 call may provide a very general indication of the location of the caller, that

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<sup>6</sup> 36 Pa. Bull. at 1887.

<sup>7</sup> Calling Plans and Freedom Packages, <http://www22.verizon.com/pages/callingplans/> (last visited May 31, 2006).

<sup>8</sup> Id.

information is not usually specific enough for rescue personnel to deliver assistance to the caller quickly.<sup>9</sup>

While the FCC notes that it is attempting to address these limitations in conjunction with wireless providers and Public Safety Answering Points (PSAPs), it will be some time before E9-1-1 services are fully functional throughout Pennsylvania.

Regarding the reliability of wireless services, the FCC provides the following on its consumer website:

Mobile or "cell" phones work through a system of radio waves and towers or antennas to transmit calls. Since cell phones rely on radio waves, and radio waves travel through the air, completing calls can, at times, be unreliable. Like other radio transmissions, cell phone calls can be interrupted by severe weather, large buildings, or other objects between you and the nearest cell tower.

A number of factors can interrupt or prevent the completion of a call. Even when a carrier offers coverage in a certain geographic area, you may not be able to complete a call due to limitations in network architecture (where antennas are located), capacity (how many callers are using the airwaves/antenna at a given time), and topography (your surroundings). When a carrier fails to hand off a call in progress as a consumer travels from one part of the carrier's network to another, it is called a "dropped call." A dropped call usually occurs when you are on the move and there are too few (or no) antennas in the area where you are traveling; the network architecture is limited. If there are no available antennas for you to use, your call has nowhere to go, so it gets dropped by the system.

When many consumers use a carrier's network at the same time and its capacity is strained, other customers trying to connect will hear a "busy signal" instead of being able to complete their calls. The landscape and architecture of your surroundings - topography - can affect cell phone coverage, causing "dead spots." A dead spot is a local area where service is not available because the signal between the handset and the cell tower is blocked, usually by hilly terrain, excessive foliage or tall buildings.<sup>10</sup>

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<sup>9</sup> FCC Consumer and Governmental Affairs Bureau *available at* <http://www.fcc.gov/cgb/consumerfacts/wireless911srvc.html> (May 15, 2006).

<sup>10</sup> FCC Consumer and Governmental Affairs Bureau *available at* <http://www.fcc.gov/cgb/consumerfacts/cellcoverage.html> (May 11, 2006).

This shows that unpredictable wireless service may make it unreasonable to assert that wireless phones are a direct a substitute for wireline basic local service in all cases.

In addition, the OCA points out that wireless services are not available throughout all areas of Pennsylvania. Simply viewing the coverage maps of the major carriers shows that there are large portions of Pennsylvania that do not have wireless coverage. Cingular, T-Mobile, Alltel, Nextel, Sprint, Verizon Wireless, and Immix coverage maps all show large swaths of Pennsylvania that these companies state they do not cover.<sup>11</sup> On the FCC's website, the FCC directs consumers to the website DEADCELLZONES.com for information regarding wireless coverage.<sup>12</sup> On that website, the OCA performed searches on T-Mobile, Sprint, AT&T, Cingular, and Verizon Wireless.<sup>13</sup> The OCA formatted the searches for Philadelphia and for Pittsburgh. The results show that consumers frequently complain about a lack of wireless service even in the densely populated Philadelphia and Pittsburgh regions. All this shows that service available through the wireless industry is far from uniform throughout Pennsylvania.

Regardless of outdoor coverage, the Commission should also consider that wireless services do not always work indoors. Poor in-building coverage is an issue that the Commission should not ignore when considering the efficacy of wireless service. Unfortunately, common building materials like concrete and tinted glass, and even buildings located in shadowed areas, can interfere with wireless service. Most wireless customers have experience with this aspect of wireless service. It would be unreasonable to assert that wireless service is a complete substitute for residential basic local service when this shows that some wireless customers must be

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<sup>11</sup> The OCA has attached these coverage maps in Appendix B.

<sup>12</sup> FCC Consumer and Governmental Affairs Bureau *available at* <http://www.fcc.gov/cgb/consumerfacts/cellcoverage.html> (May 11, 2006).

<sup>13</sup> The OCA has attached these searches in Appendix B.

outdoors to make wireless telephone calls.

Like the wireless industry, cable television providers do not provide voice services that are generally comparable to reasonably sized and priced basic local calling areas. For example, Comcast's website currently indicates that digital voice services are unavailable to customers in the Harrisburg region. Regarding price, Comcast offers voice services as a package for "as low as \$39.95 per month."<sup>14</sup> The OCA points out that Verizon's website indicates that Verizon offers Local Area Unlimited Service in the range of \$3.80 to \$8.85 depending on location.<sup>15</sup> This is a huge discrepancy in price. In addition, the purchase of some form of cable service is required to obtain the voice pricing provided by Comcast. Given that Comcast promotes its standard cable service at approximately \$50 per month, a consumer unhappy with Verizon's basic local calling area would have to pay Comcast approximately \$90 per month to obtain basic local telephone service. It would be unreasonable to claim that this Comcast service is comparable to basic local service when the price difference between them is so large. Not all consumers want packages offerings, and the Commission is correct not to adopt a "Hobson's choice," whereby consumers must chose between high toll bills and alternative local calling services at similar or even higher rates.

In the *EAS Order*, the Commission also correctly notes that broadband-based local calling alternatives, namely VoIP, are not yet widely available.<sup>16</sup> Indeed, the ALJ in the *Verizon Merger*

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<sup>14</sup> Comcast Digital Voice Benefits, <http://www.comcast.com/benefits/voicebenefits.ashx> (last visited on June 1, 2006).

<sup>15</sup> See footnote 7 *supra*.

<sup>16</sup> 36 Pa. Bull. 1887

*Order*, noted that a digital divide exists in Pennsylvania.<sup>17</sup> In fact, the Commission pointed this out in its Opinion and Order in that proceeding. The Commission wrote:

ALJ Rainey, however, agreed with Senator White, OCA, and those witnesses who testified at the public input hearings, that a “digital divide” exists in the Commonwealth. He specifically noted that certain areas in rural and Northwestern Pennsylvania lag behind other areas of the state in regard to access to broadband services.<sup>18</sup>

Indeed, Verizon PA and Verizon North have elected to delay providing DSL service throughout the full area of their large Pennsylvania service territory until 2015.<sup>19</sup> This delay means that VoIP services may not be available over telephone lines for many Pennsylvanians for years to come. While the OCA believes that there is a growing need for broadband service in Pennsylvania, the OCA submits that broadband access is insufficient to consider broadband-based voice services a fully competitive alternative to local basic telephone service. This is particularly true in rural areas of the state.

In addition, a May 2006 study by the United States Government Accountability Office (GAO) questions the accuracy of FCC data commonly cited to show that broadband services are widely available – particularly in rural areas. Concerning the FCC’s zip code-based deployment analysis, the GAO noted: “[b]ased on our analysis it appears that these data may not provide a highly accurate depiction of deployment of broadband infrastructures for residential service in

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<sup>17</sup> *Joint Applications of Verizon Communications Inc. and MCI, Inc. For Approval of Agreement and Plan of Merger*, Docket No. A-310580F0009 *et al.*, Opinion and Order at 46 (January 11, 2006)(*Verizon Merger Order*).

<sup>18</sup> *Verizon Merger Order* at 46.

<sup>19</sup> *Verizon Pennsylvania Inc.’s Petition and Plan for Alternative Form of Regulation Under Chapter 30 and Act 183*, Modification and Compliance Filing at 20, June 20, 2005.



some [rural] areas.”<sup>20</sup> The GAO Report supports the information the OCA has provided above.

The 2006 GAO Report found that, in 2005, about 28% of Americans subscribed to broadband, 30% subscribed to dial-up internet access, and 41% did not access the internet from their home.<sup>21</sup> Thus, according to this GAO report, 71% of all citizens would not fall into the group using broadband or VoIP technologies. The GAO Report added that rural households were less likely to subscribe to broadband services, and on this point noted that this may result from the fact that broadband services are not largely available in rural areas.<sup>22</sup>

The GAO Report also noted that high-income households were 39% more likely than low-income households to subscribe to broadband services and that higher education correlated with higher rates of broadband use.<sup>23</sup> The GAO report also noted that while satellite broadband service is available throughout the country, there were physical limits to its availability – taking particular notice of difficulties in heavily wooded areas. The GAO report pointed out that satellite broadband is more expensive than other types of broadband in terms of both necessary equipment and monthly fees.<sup>24</sup>

This evidence shows that broadband deployment is not sufficiently widespread to serve as a fully competitive alternative to traditional basic local telephone service. It makes little difference whether this is a matter of availability or of price. The facts support the Commission’s conclusion that EAS regulations remain necessary and the OCA supports the

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<sup>20</sup> *Broadband Deployment Is Extensive throughout the United States, but It Is Difficult to Assess the Extent of Deployment gaps in Rural Areas*, United States Government Accountability Office, Report to Congressional Committees, GAO-06-426 at 3 (May 2006)(GAO Report).

<sup>21</sup> Id.

<sup>22</sup> Id. at 5.

<sup>23</sup> Id. at 5.

<sup>24</sup> Id. at 5.

Commission's focus on the reality of how Pennsylvania consumers use and purchase telephone services.

In addition, the OCA points out that purchasing broadband service is a prerequisite to obtaining many of these types of services and that this, too, introduces significant up-front costs to utilizing these types of voice services. While the OCA acknowledges that Vonage VoIP voice service is available for approximately \$25, the additional purchase of broadband service is a prerequisite to utilizing this calling option. Thus, for a consumer to choose this type of service, the consumer must 1) have access to broadband service; 2) purchase broadband service; and 3) purchase voice service from Vonage or a similar company. Of course, all of this is meaningless if the customer cannot reasonably afford broadband or the VoIP services that are available through broadband communications.

In addition, these are the terms of service under which Verizon will provide consumers with its broadband services – including any broadband-based voice services that ride on Verizon's broadband offering:

THE SERVICE SUPPLIED HEREUNDER IS PROVIDED ON AN "AS IS" OR "AS AVAILABLE" BASIS, WITH ALL FAULTS.<sup>25</sup>

This, apparently, is an attempt to deny any obligation to provide reasonable, reliable, adequate or safe service. Voice services offered under these terms are not comparable to local basic telephone service.

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<sup>25</sup> Verizon Internet Access Service Terms of Service at ¶ 16.1 *available at* [https://www22.verizon.com/ForHomeDSL/Channels/OrderDSL/olo\\_eulaprinterfriendly.asp](https://www22.verizon.com/ForHomeDSL/Channels/OrderDSL/olo_eulaprinterfriendly.asp) (May 11, 2006) (emphasis in original).



## B. Specific Comments

It is clear that the Commission is correct that there is a continuing need for EAS relief, and the OCA supports its conclusion to retain its EAS regulations. While the OCA agrees that many of the proposed amendments are worthwhile, the OCA does not agree that all the proposed amendments are appropriate. In addition, the OCA submits that some of the proposed amendments would result in regulations that conflict with the Public Utility Code. The OCA will discuss each of these instances below

### 1. 52 Pa. § 63.71. Definitions

The OCA supports the following definition, as amended by the Commission. For ease of reference, the OCA includes this and subsequent definitions in these Comments in their amended form.

- **Administrative costs** --The costs of EAS balloting, traffic studies, consultant fees, documentation, billing and clerical costs to provide EAS for the routes added.

The OCA would also point out that the phrase "lost-toll revenue" is not defined in Section 63.71 of the proposed regulations. The meaning of this term could form the basis of substantial litigation in each and every EAS relief proceeding and the Commission should define the term within this section. To this end, the OCA would propose the following:

**Lost revenues** – the LEC revenues associated with the toll charges that form the basis of an EAS complaint, net of anticipated increases in basic rates due to any rate band changes.<sup>26</sup>

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<sup>26</sup> The OCA agrees with Vice Chairman Cawley that the Commission has not traditionally permitted ILECs to recover lost toll revenues from consumers whose local calling area has been expanded through EAS. 36 Pa. Bull. 1892. The OCA agrees that references to lost toll revenues should be eliminated from the Commission's proposed amendments to its EAS regulations. *Id.* The OCA will address the issue of lost toll revenues at length below.

While the OCA believes that the Commission should not generally permit the recovery of these costs, as noted, defining the phrase within the regulations will save some time and litigation expense, as this terms appears frequently in EAS proceedings.

The OCA supports the following definitions which would read, after Commission-proposed amendments, as follows:

- **Basic local calling area** --The area, consisting of one or multiple telephone exchanges consistent with 66 Pa.C.S. (relating to the Public Utility Code) and this title as they exist or may come to exist, and as set forth in the incumbent local exchange carrier's tariff, within which calls may be completed without having additional interexchange calling rates apply.
  - **Customer** --A person or entity that contracts directly with a local exchange carrier for telephone service.
  - **EAS--extended area service** --The expansion of a local calling area to include additional exchanges.
  - **Exchange** --An area served by one or more central offices which has a basic local calling area and a defined rate center from which toll distances are measured.
  - **Facility costs** --The costs of all leased or purchased plant, equipment and computer software necessary to provide EAS for the routes added.
  - **Interexchange telecommunications carrier** --A carrier, other than a local exchange carrier, authorized by the Commission to provide interexchange telephone services to the public.
  - **LATA** --A local access and transport area set forth in Federal regulations (47 CFR 53.3 (relating to terms and definitions)).
  - **Local exchange carrier** --A competitive or incumbent public utility that is authorized to provide intraexchange telephone service.
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## 2. 52 Pa. Code § 63.72. Traffic Usage Studies

The OCA has four major concerns regarding the proposed amendments to Section 63.72 relating specifically to 1) Section 63.72a; 2) Section 63.72(a)(2); 3) Section 63.72(a)(3), and 4) Section 63.72(a)(4). The *EAS Order* proposes the following language for Section 63.72(a):

- (a) A local exchange carrier and interexchange telecommunications carrier serving the originating exchange shall conduct traffic usage studies at the direction of an administrative law judge in connection with a formal EAS complaint proceeding. ...

Subsection 63.72(a) provides that “a” local exchange carrier and interexchange telecommunications carrier serving the originating exchange shall conduct traffic usage studies. This appears to be inconsistent with later sections of the proposed 63.72 amendments. For example, Section 63.72(a)(4) refers to the multiple LECs and IXC generally involved in EAS cases. Also, the revised Section 63.75 expressly provides for multiple LECs and IXCs to be joined as indispensable parties. The Commission should resolve this issue by amending the language of 63.72(a) to read as follows:

- (a) **[A]** Local exchange carriers and interexchange telecommunications carriers serving the originating exchange shall conduct traffic usage studies at the direction of an administrative law judge in connection with a formal EAS complaint proceeding. ...

This language better reflects the requirements of EAS proceedings, Commission policy and precedent, and is in accord with the proposed Section 63.75. In previous EAS proceedings, all carriers that serve an originating exchange have been considered indispensable parties. In *Thomas v. Verizon Pennsylvania Inc.*, for example, the Commission was quite clear on this point – the Commission remanded the case to the ALJ for the specific purpose of obtaining 100% of

the available toll traffic on the route in question.<sup>28</sup>

The *EAS Order* proposes the following language for Section 63.72(a)(2):

(a)...Traffic usage studies shall be conducted according to the following:

- (1) The traffic study must measure traffic over both IntraLATA and InterLATA routes, and include all traffic originating from the calling exchange. The study must measure the average calling frequency between the originating and the target exchanges.
- (2) In measuring calling frequency, all classes and methods of making wireline calls including customers with optional calling plans, direct dialed tolls, calling cards (prepaid or otherwise), operator-handled, directory assistance call completion or through text telephone (TTY/TDD), must be considered collectively.

The proposed amendment is insufficiently clear as to the types of calls to be counted as toll traffic between the originating and terminating exchange(s). The Commission has made clear that all the relevant calling traffic must be included in the toll traffic measurements. Commission regulations and precedent would argue for the inclusion of all the toll traffic data available regardless of source – payphone, IXC, regional toll, and to consider all other forms that toll traffic may take -- calling card, cell phone, dial-around, or any other method. That is the only way to provide for a fair consideration of the toll traffic between exchanges. In the interest of flexibility regarding future technological developments, it would be prudent to avoid categorizing too exactly the technologies that might account for “all” toll traffic data in the future.

In any event, all traffic for which there is a fee above the local basic calling fee constitutes toll traffic, and should be included in toll traffic measurements. For example, traffic

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<sup>28</sup> See *Harry and Loretta Thomas v. Verizon Pennsylvania Inc.*, Docket No. C-00004254, Remand Order (September 25, 2002) (“Thomas”); see also *Keith McCall v. Bell of Pa.*, Docket No. C-00981941, Order (March 15, 2001).

that originates as part of a flat-rate bundled package would be considered toll under this principle. All toll traffic data should be counted, regardless of how a carrier characterizes that traffic. The Commission Orders on this issue have clarified that toll calling does not become “local” because it is offered at a discount, in conjunction with other services, or outside a minute-of-use billing scheme.<sup>29</sup> A call should be considered toll if the call requires any additional payment or subscription to a service beyond the basic flat-rate local calling plan.

The *EAS Order* proposes the following language for Section 63.72(a)(3):

- (3) Each local exchange carrier and interexchange telecommunications carrier that is ordered to conduct a traffic usage study shall produce a study that has the following information:
  - (i) The total number of presubscribed access lines served in the exchange involved.
  - (ii) The number of presubscribed access lines in the originating exchange that makes at least one call to the target exchange during the study month.
  - (iii) The total number of calls placed from the originating exchange to the target exchange.

The OCA proposed, in the context of the collaborative process, that the Commission eliminate the 50% “distribution rate”<sup>30</sup> requirement from traffic studies. As more entities provide regional or local toll services, it becomes more difficult to obtain toll data and to

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<sup>29</sup> See, e.g., *Golden and Warner v. Bell of Pa*, Docket No. C-981878, Order, Jan. 26, 2001, at 26-28 (non-proprietary version), citing *Fenske, et al v. GTE North, Inc.*, Docket No. C-00968442, Order (Feb. 16, 1999) 1999 PAPUC LEXIS 95 at \*10-\*14; *Norton v. Verizon PA, Inc.*, Docket No. C-00992980, Order, March 29, 2002, 2002 WL 31097472 at \*4.

<sup>30</sup> The phrase “distribution rate” has become shorthand for the percentage of lines making at least one call to the terminating exchange.

calculate a distribution rate.<sup>31</sup> Given this issue, the Commission should reconsider the need for both requirements, that is, the average call rate of 5.5 per month and the 50% distribution rate for mandatory EAS or the Optional Calling Plan requirements of 2.5 calls per month and a 25% call distribution.

The OCA proposes that the Commission eliminate the 50% and 25% distribution rates. Although the current and proposed rules are designed to account for both the volume of calls and the percentage of access lines from which at least one call to the terminating exchange is made, the evidence in litigated cases demonstrates that the two measurements move in tandem, *i.e.*, where one is high, so is the other. The OCA suggests the elimination of the 50% distribution rate because it is often much harder for carriers to produce that number, while the average call data appear relatively easier to develop. This would also eliminate much of the difficulty encountered in collecting and aggregating the toll traffic data from IXCs.

The *EAS Order* proposes the following language for Section 63.72(a)(4):

- (4) The traffic usage study must measure calling in March or October preceding the date on which an administrative law judge directs that a traffic usage study be conducted. The local exchange carriers and interexchange telecommunications carriers shall provide the results of the traffic usage studies to the Commission, or to an entity designated by the Commission, within 60 days of the administrative law judge's order that a traffic usage study be conducted.

Regarding the proposed Section 63.72(a)(4) period for measuring traffic, the regulations should not designate that the period must be "preceding" the date on which an ALJ directs that a traffic study be performed, in the OCA's opinion. The carriers and the OCA agree that those two months are reasonably representative of the average calling levels throughout the year. There

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<sup>31</sup> In several cases, IXCs were able to provide the number of calls from one exchange to another with ease, but were unable to provide the specific number of lines served within a particular exchange.



may be times, however, when use of the upcoming March or October may be more appropriate than using the preceding one, and this decision should be left to the discretion of the administrative law judge who directs that the study be performed.

The OCA has no comment on the following proposed Section 73.72(b):

- (b) A local exchange carrier or interexchange telecommunications carrier may elect to conduct a single traffic usage study for its entire service territory instead of conducting a route-specific toll usage study in connection with an EAS proceeding. A single traffic usage study shall be conducted according to the following:
  - (1) The study must be performed at least once every 24 months.
  - (2) The study must measure the calling frequency in the month of March or October.
  - (3) The study must measure traffic over intraLATA and interLATA routes.
  - (4) The study must measure the average calling frequency between contiguous exchanges and between each exchange and each noncontiguous exchange having a toll rate center within 16 miles.
  - (5) The local exchange carrier or interexchange telecommunications carrier shall file the results of this study with the Commission.
- (c) A local exchange carrier or interexchange telecommunications carrier that chooses to conduct a single traffic usage study as set forth in subsection (b) may use the results of that study to provide route specific traffic usage data in connection with an EAS complaint proceeding and is not required to perform an additional traffic usage study for the route on which EAS has been requested unless unique circumstances exist with respect to that route or unless specifically ordered to do so.
- (d) A local exchange carrier or an interexchange telecommunications carrier is not required to conduct a traffic usage study for a particular exchange if a study on the same toll route has been performed within the preceding 2 years and the results of the study did not require the implementation of EAS or a customer poll for EAS, or if the local exchange carrier already has implemented EAS on that same route.

The *EAS Order* proposes the following language for Section 63.72(e):

- (e) The Commission staff will prepare a report for any route-specific toll usage study ordered in connection with an EAS proceeding or for any local exchange carrier or interexchange telecommunications carrier that conducts a single traffic usage study. The Commission staff report will contain the aggregated results of the studies submitted. The Commission staff will issue the report within 90 days from receipt of the study data. The Commission staff will treat the report as proprietary and will file it under protective seal. The Commission staff will provide the results of the report to participating local exchange carriers, interexchange telecommunications carriers, petitioning customers, the Office of Trial Staff, the Office of Consumer Advocate and the Office of Small Business Advocate. Upon request, the Office of Trial Staff, the Office of Consumer Advocate and the Office of Small Business Advocate may release the aggregated results for a specific route to a customer or to a customer's legal representative.
- (f) In accordance with 66 Pa.C.S. § 308(g) (relating to bureaus and officer), the appropriate Commission staff shall appear as witnesses in a proceeding to present the compiled results of the traffic usage study or studies for the record and shall be subject to cross-examination.<sup>32</sup>

The OCA is concerned with the procedural and substantive impact of Sections 63.72(e) and (f), requiring Commission staff from an unspecified bureau to prepare reports and to appear as witnesses. These proposed amendments may be impractical or even unworkable. In cases where the OCA has intervened in support of formal complainants, efforts of Commission staff to aggregate traffic data would be duplicative. As noted, no mention is made of whether BCS, FUS, Law Bureau Prosecutory Staff or Office of Trial staff would assume this function.

In addition, the *EAS Order* references estimated consumer cost increase calculations in its discussion of the proposed amendments of Section 63.72.<sup>33</sup> First, the calculation of consumer cost increases due to rate band changes are not estimates. These discrete costs are calculated by simple addition based on the rate bands included in the LEC's tariff. If EAS relief would move

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<sup>32</sup> 36 Pa. Bull. at 1893-94.

<sup>33</sup> 36 Pa. Bull. at 1888



the originating exchange into a higher rate band, then that exchange simply would pay the appropriate monthly rate for the new rate band, assuming a poll were successful. Again, no need exists for the Commission staff to perform this calculation and to testify to it, as OCA and Company witnesses generally have been able to agree on this issue.

All other costs associated with EAS proceedings relate to LEC costs and the primary source of that data is the LEC itself. For example, the LEC will make the initial determination whether additional trunks, switching upgrades, or other equipment would be required to implement EAS. The Commission should make clear that parties to an EAS proceeding are free to challenge this evidence, to engage in discovery regarding this aspect of EAS proceedings, and to present alternative evidence to that provided by the carrier. Variation from this customary practice would raise due process issues.

In addition, the *EAS Order* raises concerns regarding proprietary traffic data and questions whether it is better that Commission staff analyze this data, rather than an ILEC analyzing this data on behalf of its competitors.<sup>34</sup> Because all parties to EAS proceedings have a right to challenge traffic data evidence, there is little that the Commission can or should do to prevent parties to an EAS proceeding from obtaining this data. The OCA points out that almost all EAS proceedings involve proprietary data, and that Commission-approved protective orders have sufficiently protected this data in the past and there is no reason to expect that they would not do so in future cases. In fact, EAS adjudications could not legitimately proceed based on wholly "secret" data or evidence under fundamental rules of administrative law. There are many aspects to toll traffic data – from its source all the way through to its presentation format – that are subject to challenge in an EAS proceeding. To deny parties the opportunity to examine and

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<sup>34</sup> 36 Pa. Bull. at 1888 (April 22, 2006).

challenge all the evidentiary aspects of traffic data would involve due process issues that the administrative law judges or the Commission would have to address at some juncture.

**3. 52 Pa. Code § 63.72a. InterLATA Traffic Studies**

The OCA supports the deletion of this section from the Commission's EAS regulations.

**4. 52 Pa. Code § 63.73. Customer polls**

The OCA supports the updated and amended Section 63.73 as those amendments relate to customer polls resulting from a Commission order to conduct a poll to determine whether a majority of the voting customers favor EAS implementation. Nevertheless, the OCA would propose a number of further amendments in the interest of streamlining and greatly simplifying all future EAS proceedings. For ease of reference, Section 63.73<sup>35</sup> as the Commission proposes to amend it, would read as follows:

- (a) When a traffic usage study qualifies for EAS or EAS is determined to be appropriate, the local exchange carriers in the exchange or exchanges subject to extended area service shall conduct a customer poll of the originating exchange in accordance with this section, with oversight by the Commission, to determine if the basic local calling area of the exchange should be extended. Customer polls shall be conducted using only balloting materials approved by the Commission.
- (b) A route qualifies for EAS if it has an average monthly calling frequency of 5.50 or more calls per access line from an originating exchange to the target exchange, and if at least 50% of the access lines in the originating exchange have been used to make 1.00 or more calls per month to the target exchange.
- (c) A poll is not required if customers have affirmatively rejected the

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<sup>35</sup> While the OCA will not repeat its comment regarding discontinuing the distribution rate requirement for traffic studies (as pertained to Section 63.72(a)(3)(ii), *supra*), the OCA would note that, if the Commission were to adopt that suggestion, the references to the 50% distribution rate as a traffic study requirement should be deleted from Section 63.73(b) as well.

implementation of EAS from the originating exchange to the target exchange during the preceding 2 years.

- (d) A poll is not required when usage standards are met on a specific route and there will be no increase in the local service charge for extending the basic local calling area. In those cases, the local exchange carrier shall implement one-way EAS over the qualifying route.
- (e) The local exchange carrier shall mail one ballot to each customer in the originating exchange. Ballots must be preaddressed, postage prepaid postcards, returnable directly to the Commission. The Commission will tabulate the ballots. At the time the ballots are mailed, the local exchange carrier shall provide the Commission with a list of customers polled, together with their addresses and telephone numbers.
- (f) The poll is valid when at least 50% of the ballots mailed to customers in a polled exchange are returned.
- (g) The local exchange carrier shall implement EAS when greater than 50% of the returned ballots in a valid poll are in favor of EAS.
- (h) The Commission may specify additional conditions under which customer polls shall be conducted when circumstances require.
- (i) A local exchange carrier or interexchange telecommunications carrier may petition the Commission for waiver of a provision of this section to address unique circumstances, such as a local exchange carrier that already has EAS from the originating exchange to the target exchange.

The current section 63.74(3), EAS polls, expressly prohibits petitions as a means to initiate an EAS proceeding. The proposed section 63.73, Customer polls does not mention this restriction. The Commission should clarify that its regulations do not funnel all those seeking EAS relief immediately to the formal complaint process. Toward the objective of avoiding adjudication of every EAS case, the OCA proposes, as in the context of the collaborative process, that the Commission develop an alternative informal petition procedure.

Under the alternative procedure, in lieu of a formal complaint, the OCA proposes that consumers and advocates may petition for a traffic study directly to the Commission or a local

exchange carrier(s). The OCA proposes that when a municipality or at least ten customers in an exchange sign and submit a petition for EAS relief, the company (or companies, as the case may be) shall be obligated to perform traffic studies to measure the amount of traffic on the route in question. The companies would perform these traffic studies in response to specific requests in lieu of the biennial studies now required by the EAS regulations.<sup>36</sup>

The resulting traffic study would either establish the basis for a mandatory Optional Calling Plan or EAS poll if the average call data warrant it or would be offered into evidence in a discretionary EAS proceeding, if the petitioners wish to seek that relief. In addition, the OCA proposes that a traffic study should be performed at the request of the OCA, OSBA, or other community or consumer representative, for good cause shown. The petition option could reduce litigation in this area. The OCA proposes this as a reasonable alternative to the current formal complaint procedure, and this process would focus the companies' efforts on those areas where customers actually express a need for relief for high calling bills incurred for day-to-day calling needs.

Regarding the elimination of optional calling plans from the current version of Section 63.73, the OCA does not agree that the Commission should eliminate its OCP requirements at this time, as noted above. Regarding this, the Commission wrote in the EAS Order:

The proposed regulation eliminates Optional Calling Plan requirements. The proposed deletion addresses the advent of competition in the interLATA and intraLATA toll calling markets in Pennsylvania. The Commission recognizes a view that Optional Calling Plans may retain their validity for customers that lack competitive choices or where the customers' carrier is exempt from local wireline telecommunications competition under Chapter 30 or section 251(f) of the

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<sup>36</sup> The OCA would note that, for companies that opt to perform biennial traffic studies in their entire service territories under proposed Section 63.72(b), the proposed alternative petition process would not be necessary, so long as those studies were made available to the OCA or the customers in order to evaluate the potential for EAS.

Telecommunications Act of 1996. See generally 66 Pa.C.S. § 3014(b)(7). The Commission seeks comment on this issue and suggested language addressing how the final regulations should resolve the matter.<sup>37</sup>

The Commission is correct to question the elimination of OCPs when not all areas of Pennsylvania have adequate alternatives to high toll calling costs. The OCA points out that this is the reasoning behind the Commission determination that EAS relief remains a necessary option for Pennsylvania telephone consumers. The Commission is correct that wireless and VoIP provide some customers with expanded choice, the uneven deployment of these options warrants the continuation of EAS.<sup>38</sup> As the OCA discussed above, this is particularly true for rural areas where there is less deployment of competitive options.

The OCA agrees with the Commission that significant low-cost alternatives to traditional long distance programs are not widely available in rural and urban areas. The OCA also agrees that unlimited toll calling bundles of some ILECs and IXC's cost considerably more than an expanded local calling area -- the OCA provided a clear example of this in its comparison of Verizon's Local Area Unlimited Service and Verizon's Freedom Essentials packages above.

The OCA acknowledges that expanding the toll-free local calling area in response to every EAS complaint is neither warranted nor appropriate. However, OCPs provide a reasonable alternative to high toll costs where inadequate competitive toll calling options exist.<sup>39</sup> The OCA submits that the Commission should retain its OCP requirements and simply allow those

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<sup>37</sup> 36 Pa. Bull. at 1889.

<sup>38</sup> 36 Pa. Bull. at 1889.

<sup>39</sup> In at least two cases, the OCA was able to negotiate improved OCPs for an exchange where traffic data were insufficient to support even discretionary EAS to the exchange of interest. See *Mary Harvey, et al. v. Commonwealth Telephone Company*, Docket No. C-20026959, Order, (June 16, 2005)(approving settlement) and *Popowsky v. Verizon PA*, Docket No. C-20028373, Order (Jan. 13, 2005)(approving settlement).

requirements to be applied on a case-by-case basis as has occurred in the past. Regarding this, the OCA points out that the amended Section 63.76 Evaluation criteria expressly address the “availability of adequate and reasonably priced alternatives to EAS.” By proposing to eliminate the OCP standards and requirements, the Commission proposes to remove one of the alternatives to EAS from Commission consideration.

#### 5. 52 Pa. Code § 63.74. Cost Recovery

The proposed amendments to Section 63.74 would in part serve to codify the Commission’s past practice of permitting some forms of cost recovery in the context of EAS relief. While the OCA acknowledges that the PUC has permitted some types of cost recovery in the past, the OCA does not generally agree that cost recovery is appropriate in EAS cases.<sup>40</sup> There are numerous reasons why the Commission should not provide for cost recovery and particularly not “lost toll revenue” recovery in EAS cases. In the Concurring Statement, Vice Chairman Cawley points out:

Existing Commission precedent strongly suggests that the Commission traditionally has not permitted local exchange carriers (LECs) implementing EAS routes to recover ‘lost revenues’ from their customers that benefit from expanded local calling areas. For example, the Commission has not considered the recovery of ‘lost revenues’ where the LEC in question does not have rate groups for its basic local exchange service. More recently, the Commission addressed the issue of ‘lost toll revenue’ recovery in situations where a LEC has had its long-distance services classified as ‘competitive’ under the pertinent provisions of the past and current version of Chapter 30, now codified as 66 Pa.C.S. §§ 3011-3019. The Commission has ruled that the potential recovery of ‘lost toll revenues’ through EAS-related rate increases to a LEC’s ‘non-competitive services,’ where the LEC’s long-distance services had been classified as ‘competitive,’ would violate Chapter 30’s statutory prohibition against the cross-subsidization of ‘competitive

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<sup>40</sup> The Commission has permitted some types of *facility cost* recovery (but not ‘lost revenues’) in EAS cases where a Company’s Chapter 30 Plan has allowed for it. See e.g. *Botti et al v. Verizon PA*, Docket No. C-20030153, *et al* (Order approving Joint Petition for Settlement).



services' with revenues from 'non-competitive services.'"<sup>41</sup>

Concurring Statement, citing *Jeb Billet, et al. v. The United Telephone Company of Pennsylvania et al.*, Docket No., C-0014854, Order entered April 8, 2005, at 12-13.<sup>42</sup> The Vice Chairman is correct.

Section 63.74(a)(3) would be inconsistent with 66 Pa. C.S. § 3016(f)(1). This section of Chapter 30 of the Public Utility Code provides that "[a] local exchange telecommunications company shall be prohibited from using revenues earned or expenses incurred in conjunction with noncompetitive services to subsidize competitive services." Allowing this type of lost toll cost recovery would violate the Code when a telecommunications provider has declared that its toll services are competitive while its basic local services were not, and the company proposes to recover its lost toll revenue as a basic service increase or surcharge. As noted by Vice Chairman Cawley, the Commission addressed this prohibition in the *Jeb Billet* proceeding. The Commission should remove lost toll recovery from its proposed amendments to its EAS regulations because of this conflict with 66 Pa. C.S. § 3016(f)(1).

In addition, the *EAS Order* notes the connection between EAS and reasonable service.<sup>43</sup> The Commission is correct to note that EAS relief is "a means of ensuring reasonable service to Pennsylvanians."<sup>44</sup> All Pennsylvania telephone utilities are required to provide reasonable service at reasonable rates. Section 1301 of the Public Utility Code provides:

Every rate made, demanded, or received by an public utility, or by any two or more public utilities jointly shall be just and reasonable and in conformity with

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<sup>41</sup> 36 Pa. Bull. at 1892.

<sup>42</sup> The case can be found a 2005 WL 994734 (PaPUC).

<sup>43</sup> 36 Pa. Bull. at 1889-90.

<sup>44</sup> 36 Pa. Bull. at 1889 (April 22, 2006).

the regulations and orders of the Commission.<sup>45</sup>

Thus, the Code makes clear that all Pennsylvania telephone utilities must provide service at reasonable rates.

An EAS complaint, at its core, alleges that the basic toll-free local calling area established by the ILEC to serve a particular exchange is, or has become, inadequate to meet the daily needs of the consumers in that exchange. That is, EAS complaints allege that consumers must incur unreasonable toll charges to make necessary calls within their community of interest. When the Commission considers the merits of such a complaint, the Commission must determine whether the toll-free local calling area of the exchange in question is inadequate, and whether this causes these consumers to incur unreasonable toll charges. If the Commission determines that the local toll-free calling area is inadequate, the Commission will then order the ILEC (and other telephone utilities operating in the exchange) to provide some form of EAS relief to the exchange consumers as a remedy. The cases in which the Commission has ordered EAS relief consistently match this pattern.

The form of the EAS relief itself is simple—either the cessation or reduction (in the case of an OCP) of toll charges for the route in question with either no change in basic local rates or a modest change to those rates, if a rate band change were to occur because of EAS. Here, however, the proposed amendments to Section 63.74 provide for something entirely different.

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<sup>45</sup> 66 Pa. C.S. § 1301. Likewise, section 1501 of the Public Utility Code also addresses the requirement that services be reasonable:

Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, 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.

66 Pa. C.S. § 1501.



The proposed Section 63.74 provides the following:

- (a) A local exchange carrier may petition the Commission to recover revenues lost and costs incurred in connection with the implementation of EAS, under the provisions of this section, beginning on the date on which EAS is implemented. To qualify for recovery, the costs must be prudently incurred and reasonable in amount. The items that may be recoverable include:
  - (1) Administrative costs.
  - (2) Facility costs.
  - (3) Lost revenues.
- (b) The claim set forth in the petition shall be the net of any revenue increases and cost decreases experienced as a result of the implementation of EAS.
- (c) The local exchange carrier shall include the proposed method of recovery in its petition. The customer poll must identify the rates and method utilized when the recovery shortfall is to be collected from customers.

The language of this section proposes that all EAS cases will hold the promise of rate increases above normal rate band rates. That is, when a LEC must implement EAS relief, it may petition the Commission to recover costs associated with implementing EAS relief and lost revenues (*i.e.*, lost toll revenue). Thus, the proposed Section 63.74 provides that if the Commission determines that a LEC must cease collecting unreasonable toll charges (that is, implement EAS), the LEC may petition the Commission to resume collecting those same unreasonable rates in a different form under Section 63.74.

This aspect of Section 63.74 is plainly contradictory to the requirements of Sections 1301 and 3016(f)(1) of the Public Utility Code, as discussed above. The Commission cannot authorize a utility to collect unreasonable rates, whatever their form. The Commission should simply delete the proposed amendments to Section 63.74 because of this legal defect.

In addition, the proposed amendments to Section 63.74 do not make clear when the LEC

is to file its petition for cost recovery. Under this section, the LEC could conceivably file for recovery subsequent to the implementation of EAS. This would be unacceptable, because whether a majority of consumers is in favor of EAS turns on whether they would be subject to any proposed increase and, if so, in what amount. If the Commission decides to retain this section rather than delete it, the Commission should amend it to read as follows:

- (a) A local exchange carrier may petition the Commission **no later than the time of filing its answer to a Formal Complaint seeking EAS** to recover revenues lost and costs incurred in connection with the implementation of EAS, under the provisions of this section, beginning on the date on which EAS is implemented. To qualify for recovery, the costs must be prudently incurred and reasonable in amount. ...

Regarding the recovery of administrative and facility costs as provided for in Section 63.74(a)(1) and (2), the OCA submits that, in most cases, a LEC will have previously realized all these amounts through the collection of toll charges associated with its unreasonably small calling area. The OCA points out that the imposition of the fees proposed under Section 63.74(a)(1) and (2) fail to recognize the years of unreasonable charges that the utility has collected from its consumers.

In the context of service bundles, the *EAS Order* questions whether allowing cost and lost revenue recovery implicates Section 1304 of the Public Utility Code.<sup>46</sup> The OCA submits that cost and lost revenue recovery implicates Section 1304 in a number of ways in addition to those involving bundled packages. Section 1304 of the Public Utility Code, *discrimination in rates*, provides:

No public utility shall, as to rates, make or grant any unreasonable preference or advantage to any person, corporation, or municipal corporation, or subject any person, corporation, or municipal corporation to any unreasonable prejudice or disadvantage. No public utility shall establish or maintain any unreasonable

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<sup>46</sup> 36 Pa. Bull at 1890.

difference as to rates, either as between localities or as between classes of service. Unless specifically authorized by the commission, no public utility shall make, demand, or receive any greater rate in the aggregate for the transportation of passengers or property of the same class, or for the transmission of any message or conversation for a shorter than for a longer distance over the same line or route in the same direction, the shorter being included within the longer distance, or any greater rate as a through rate than the aggregate of the intermediate rates. This section does not prohibit the establishment of reasonable zone or group systems, or classifications of rates or, in the case of common carriers, the issuance of excursion, commutation, or other special tickets at special rates, or the granting of nontransferable free passes, or passes at a discount to any officer, employee, or pensioner of such common carrier. No rate charged by a municipality for any public utility service rendered or furnished beyond its corporate limits shall be considered unjustly discriminatory solely by reason of the fact that a different rate is charged for a similar service within its corporate limits.<sup>47</sup>

At its most basic level, Section 1304 provides that utilities will charge similar rates to consumers receiving similar services. Telephone rate bands are a perfect example of Section 1304 in action. While all consumers in a telephone utility's hypothetical Rate Band A pay the same amount for telephone service, consumers in the utility's other Rate Bands, B and C for instance, would pay different amounts based on the number of access lines they may call toll free. If the consumers in one exchange within Rate Band A were the subject of EAS cost or lost revenue recovery, however, those consumers would pay more than all other Rate Band A consumers for comparable telephone service.

Thus, consumers in an exchange subject to the proposed cost recovery mechanisms would be forced to pay additional amounts above what other consumers in the same Rate Band might pay. The only reason that these consumers must now pay these additional "recovery" fees is because these consumers were subject to unreasonable toll charges in the past. This is an offense to section 1304; it is no justification for charging different rates for the same service.

The OCA also wishes to clarify that consumers who obtain EAS relief do not receive a

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<sup>47</sup> 66 Pa. C.S. § 1304.

benefit *per se* as a result of being able to call toll free within their community of interest. When the Commission determines that that EAS relief is appropriate, the Commission frees consumers from unreasonable toll calling charges that consumers ought not to have incurred in the first place. Consumers subject to EAS relief receive no benefit other than receiving what they were due under the Public Utility Code from the start. This is because EAS is a **remedy**. The Commission designed EAS to correct a wrong – not to perpetuate a wrong in different form as the proposed cost recovery sections would permit.

**6. 52 Pa. Code § 63.75. EAS Complaints**

The OCA supports the updated and amended Section 63.75. The OCA would point out, however, that the discussion section of the EAS Order states that the only major revision to section 63.75 is “one that requires a *customer* to file a formal complaint to have EAS considered for a particular route.”<sup>48</sup> It is unclear where this language may be found in the proposed section 63.75. Nevertheless, the OCA would make it clear that it has independent statutory authority file formal complaints on behalf of Pennsylvania telecommunications ratepayers in any matter before the Commission.<sup>49</sup>

**7. 52 Pa. Code § 63.76. Evaluation Criteria**

The OCA generally supports the updated and amended Section 63.76 with the following exceptions – Sections 63.76(a)(2), 63.76(a)(3), and 63.76(b). The OCA will address each of these in turn. Regarding section 63.76(a)(2), the OCA will not repeat its above Comments that lost toll revenues should not be considered as a part of an EAS case, even as an evaluation

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<sup>48</sup> EAS Order at 63.75 discussion section (emphasis added).

<sup>49</sup> 71 P.S. § 309-4.

criterion.

Regarding section 63.76(a)(3), the OCA submits that this is not an evaluation criterion but is instead an instruction on how the amount of recovered costs are to be calculated. This would more properly belong in Section 63.74, albeit a section that the OCA has previously recommended that the Commission omit.

The *EAS Order* would include the following provision as Section 63.76(b):

The criteria in subsection (a) shall be evaluated based on the majority of customers in the exchange under consideration for EAS.

It is not clear what the intent of this provision is, but to the extent it suggests that complainants must show “majority” support for EAS at the time of hearings, such a standard is unworkable, unnecessary and unreasonable. The EAS polling procedures that the Commission proposes at Section 63.73 properly address whether a majority of the consumers in an exchange support the implementation of EAS. The OCA questions how it might be demonstrated at a hearing that 51% or more of the customers in an exchange support EAS. That is the purpose of polling all the customers in an exchange following a successful EAS Formal Complaint adjudication and would make such a showing during the hearing process redundant.

The OCA does not believe that by proposing this section the Commission intends to have in excess of 700 to 1,500 or more customers testify at public input hearings that would stretch out over weeks or months and would generate thousands of pages of transcripts, not to mention greatly increased legal fees and administrative expense. Since it would be impossible to accommodate hundreds of customers in one day of testimony (which is generally what has been provided for customer testimony), the Commission would be obligated under due process requirements to schedule adequate hearing time and resources for at least 51% of the customers in any originating exchange to testify to whether they supported EAS relief. In an exchange of

only 1,000 persons, this would require many days of public testimony hearings to accommodate 510 witnesses. The OCA submits that EAS polling procedures adequately address this point, and that no further “majority” evaluation of the Section 53.76(a) criteria is necessary.

### III. CONCLUSION

For all of the above reasons, the OCA requests that the PUC modify the proposed amendments to the EAS regulations, consistent with the above Comments.

Respectfully submitted,

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89042

# **APPENDIX A**



## Subchapter F. EXTENDED AREA SERVICE

Sec.

- 63.71. Definitions.
- 63.72. Traffic usage studies.
- 63.72a. InterLATA traffic studies.
- 63.73. Optional calling plans.
- 63.74. EAS polls.
- 63.75. Subscriber polls.
- 63.76. EAS complaints.
- 63.77. Evaluation criteria.

### § 63.71. Definitions.

The following words and terms, when used in this subchapter, have the following meanings, unless the context clearly indicates otherwise:

*EAS—extended area service*—The expansion of a local calling area to include additional exchanges.

*Exchange*—An area served by one or more central offices which has a unique local calling area and a defined rate center from which toll distances are measured.

*Full billing and collection agreement*—An agreement under which an interexchange carrier contracts with the local exchange carrier to bill and collect the revenues for message toll service calls placed by end users through the interexchange carrier as the presubscribed carrier.

*Interexchange toll rates*—Telephone rates, usually based in part on the length of a telephone call, which are applied to calls between exchanges that are not in the same local calling area.

*LATA*—A local access and transport area as designated by Federal law.

*Local calling area*—The area, consisting of one or multiple telephone exchanges, between which calls may be completed without having interexchange toll rates applied.

*Local exchange carrier*—A public utility which is certificated to provide intraexchange telephone service.



*Optional calling plan*—A tariff provision which establishes the rate option to be offered to residential and business subscribers in exchanges which qualify for alternatives to EAS under § 63.73 (relating to optional calling plans).

*Qualified noncontiguous exchanges*—Exchanges with toll rate centers within 16 miles of each other which do not geographically border each other but which meet the following criteria:

(i) The call-frequency standards between the exchanges established under § 63.74 (relating to EAS polls) are met in at least one direction.

(ii) The local calling area of the calling exchange is contiguous to the receiving exchange.

*Subscriber*—A person or entity which contracts directly with a telephone utility for telephone service.

*Traffic study interexchange carriers*—The five most active interexchange carriers in the service territory of a local exchange carrier as determined by a biennial review of interLATA access charge levels.

#### **Authority**

The provisions of this § 63.71 issued under the Public Utility Code, 66 Pa.C.S. §§ 501 and 1501.

#### **Source**

The provisions of this § 63.71 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179; amended May 17, 1991, effective May 18, 1991, 21 Pa.B. 2340; amended June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829. Immediately preceding text appears at serial page (157989).

#### **§ 63.72. Traffic usage studies.**

A local exchange carrier shall conduct a biennial interexchange toll traffic usage study. The study shall measure traffic over both intraLATA and interLATA routes. The study shall measure the average calling frequency between contiguous exchanges and between each exchange and each noncontiguous exchange having a toll rate center within 16 miles. On intraLATA routes only, the study shall also measure the percentage of total access lines within the exchange over which the calls are placed. In measuring calling frequency, all calling classes shall be considered collectively, including those who have elected optional calling plans under § 63.73 (relating to optional calling plans). The study shall measure usage in a representative 30-day period within the 12-month period preceding the study. The local exchange carrier shall prepare a report containing results of the study. The report is required to address only routes which equal or exceed 1.50 calls per access line per month. The report shall be filed with the Commission with a copy to the Office of Consumer Advocate on or before October 1 of each survey year. The report will be treated as proprietary and shall be filed under protective seal. The Commission and the Office of

Consumer Advocate will release the results of the report, upon request, on a route specific basis to customers or customer representatives. Traffic usage data for routes with less than 1.50 calls per access line per month shall be submitted by local exchange carriers upon request by the Commission or the Office of Consumer Advocate.

#### Authority

The provisions of this § 63.72 issued under the Public Utility Code, 66 Pa.C.S. § § 501 and 1501.

#### Source

The provisions of this § 63.72 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179; amended June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829. Immediately preceding text appears at serial pages (157990) to (157991).

#### Cross References

This section cited in 52 Pa. Code § 63.72a (relating to interLATA traffic studies).

#### § 63.72a. InterLATA traffic studies.

(a) By January 31 of each year in which a biennial traffic study is due, each local exchange carrier will identify and formally notify the Commission of the traffic study interexchange carriers in its service territory. The identity of the traffic study interexchange carriers shall be based upon review of the access charge levels from the most recent 12-month period available. Each local exchange carrier shall concurrently notify each traffic study interexchange carrier of the following:

(1) That the interexchange carrier's traffic will be included in the local exchange carrier's traffic study under this subchapter.

(2) The format which the local exchange carrier will utilize in its traffic usage study.

(3) The representative month the local exchange carrier will use in its study.

(b) Each traffic study interexchange carrier shall provide the local exchange carrier with data which identifies the relevant interexchange traffic completed by the interexchange carrier and which originated in the local exchange carrier's service territory for the representative month used by the local exchange carrier. The data shall be submitted to the local exchange carrier by June 1 of each year in which a biennial traffic usage study is due. The data submitted by traffic study interexchange carriers may not include traffic for which the interexchange carrier bills through the local exchange carrier under a full billing and collection agreement.

(c) The data submitted by each traffic study interexchange carrier shall be organized consistent with the following:

(1) The data shall be in the format specified by the local exchange carrier for the traffic usage study.

(2) The data shall identify the total number of calls completed by the traffic study interexchange carrier and which originated in each exchange in the local exchange carrier's service territory for each interLATA route which requires study under § 63.72 (relating to traffic usage studies) for the representative month.

(3) The data shall identify the total number of access lines presubscribed to the traffic study interexchange carrier in each exchange for which data is submitted under paragraph (2).

(4) Data submitted by a traffic study interexchange carrier to a local exchange carrier shall be considered proprietary to the traffic study interexchange carrier and may not be used by the local exchange carrier for a purpose other than preparing its traffic usage study.

(5) Each traffic study interexchange carrier may petition the Commission to waive the submission of a portion of the data required to be submitted under this section. Each waiver petition shall include the estimated costs of submitting the data and the relative amount of traffic which the data represents. The Commission will approve a waiver petition only if it finds that the costs to the interexchange carrier outweigh the value of the data to the traffic usage study.

(d) Upon receiving the traffic study interexchange carrier data, each local exchange carrier shall complete the following in preparing the interLATA component of the traffic usage study:

(1) Collect and analyze the traffic data for each traffic study interexchange carrier for calls completed by the interexchange carrier which are billed through the local exchange carrier under a full billing and collection agreement.

(2) Aggregate the traffic data it collects and analyzes under full billing and collection agreements with the traffic data it receives from each traffic study interexchange carrier. Each local exchange carrier shall report the aggregate interexchange carrier. Each local exchange carrier shall report the aggregate results of the interLATA traffic study to the Commission in its biennial traffic usage study filed under § 63.72.

#### **Authority**

The provisions of this § 63.72a issued under Public Utility Code,

#### **Source**

The provisions of this § 63.72a adopted June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829.

#### **§ 63.73. Optional calling plans.**

(a) When biennial interexchange toll traffic usage studies reveal an average monthly calling frequency of 2.00 or more calls per access line from one exchange to another and where at least 25% of the access lines in the calling exchange have been used for 1.00 or more calls per month to the receiving exchange over a route for which a local exchange carrier provides toll service, a local exchange carrier shall offer one of the following rate

options to each residential and business subscriber within the calling exchange:

(1) The ability to purchase for a flat fee a block of time for calls and a continuing discount for all usage exceeding the initial block of time to the receiving exchange during each billing period.

(2) Another alternative rate option approved by the Commission.

(b) When an exchange qualifies for an optional calling plan over a route served by a local exchange carrier, the local exchange carrier shall notify each residential and business subscriber within 60 days of the availability of the optional calling plan and shall provide to each subscriber a general description of the rates and benefits of the optional calling plan.

(c) When biennial interexchange toll traffic usage studies reveal an average monthly calling frequency of 2.00 or more calls per access line from one exchange to another over an interLATA route, each traffic study interexchange carrier serving the route shall offer one of the following rate options to each residential and business subscriber to whom the traffic study interexchange carrier provides toll service within the calling exchange:

(1) The ability to purchase a block of time for calls for a flat fee and a continuing discount for usage exceeding the initial block of time to the receiving exchange during each billing period.

(2) Another alternative rate option approved by the Commission.

(d) When an exchange qualifies for an optional calling plan over an interLATA route, each traffic study interexchange carrier serving the route shall notify each residential and business subscriber it serves in the exchange within 60 days of the availability of the optional calling plan and shall provide a description of the rates and benefits of the optional calling plan.

(e) A local exchange carrier and a traffic study interexchange carrier, serving a route which qualifies for an optional calling plan under a traffic usage study shall maintain in its tariff a provision which provides for establishment of an optional calling plan. The optional calling plan shall be consistent with subsection (a) or (b) and may establish flat fees to be charged for the installation of the optional calling plan.

(f) A local exchange or traffic study interexchange carrier may not terminate an optional calling plan to an exchange without express Commission approval.

#### **Authority**

The provisions of this § 63.73 issued under Public Utility Code,

#### **Source**

The provisions of this § 63.73 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179; amended May 17, 1991, effective May 18, 1991, 21 Pa.B. 2340; corrected May 31, 1991, effective May 18, 1991, 21 Pa.B. 2555; amended June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829. Immediately preceding text appears at serial page (157991).



### Cross References

This section cited in 52 Pa. Code § 63.71 (relating to definitions); 52 Pa. Code § 63.72 (relating to traffic usage studies); and 52 Pa. Code § 63.102 (relating to definitions).

#### § 63.74. EAS polls.

Whenever a traffic usage study between contiguous exchanges or between qualified noncontiguous exchanges qualifies for EAS under paragraphs (1) and (2), a subscriber poll of the calling exchange shall be conducted by the local exchange carrier serving the calling exchange to determine if the local calling area should be extended.

(1) For intraLATA routes, a route qualifies for extended area service if it has an average monthly calling frequency of 5.50 or more calls per access line from one exchange to another and where at least 50% of the access lines in the calling exchange have been used for 1.00 or more calls per month to the receiving exchange.

(2) For interLATA routes, a route qualifies for EAS if it has an average monthly calling frequency of 5.50 or more calls per access line from one exchange to another.

(3) A subscriber request for polling will not be considered a legal pleading and will not be subject to response by a utility or another party.

(4) A poll is not required if subscribers have affirmatively rejected the implementation of EAS from the calling exchange to the receiving exchange during the preceding 2 years.

(5) Two-way balloting will not be required unless usage standards are met in both directions.

(6) If two-way balloting is required and if the same telephone utility serves each exchange, the utility shall poll subscribers in each exchange for EAS into the other exchange. If different telephone utilities serve each exchange, each utility shall poll its own subscribers.

(7) A poll is not required when usage standards are met on a specific route and there will be no increase in the local service charge for extending the local calling area of an exchange. In this instance, one-way EAS shall be implemented over the qualifying route.

(8) When usage standards are met in both directions, two-way balloting is not required if there will be no increase in the local service charge for extending the local calling area for one of the two exchanges. If one of the two exchanges will receive an increase, than that exchange shall be polled and, if the exchange polled adopts EAS two-way EAS shall be implemented. Otherwise, one-way EAS shall be implemented on the route where there will be no increase.

(9) If circumstances require, the Commission may specify additional conditions under which polls shall be conducted.

(10) A local exchange carrier may petition the Commission for waiver of a provision of this section to address unique circumstances.

### Authority

The provisions of this § 63.74 issued under the Public Utility Code, 66 Pa.C.S. §§ 501 and 1501.

### Source

The provisions of this § 63.74 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179; amended May 17, 1991, effective May 18, 1991, 21 Pa.B. 2555; amended June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829. Immediately preceding text appears at serial pages (157991) to (157992).

### Cross References

This section cited in 52 Pa. Code § 63.71 (relating to definitions); and 52 Pa. Code § 63.75 (relating to subscriber polls).

### § 63.75. Subscriber polls.

The following rules apply to EAS subscriber polls:

(1) Within 180 days of the submission of traffic usage data indicating that a route qualifies for EAS under § 63.74 (relating to EAS polls), a local exchange carrier shall file a petition with the Commission requesting approval of a proposed transmittal letter and ballot which includes an estimate of the increase in the charge for local service to the Commission as a result of extending the local calling area. The Commission will approve a transmittal letter and ballot which shall include an estimate of the increase in the charge for local service, if any, due to the expansion of the local calling area.

(2) The local exchange carrier shall mail one approved ballot to each subscriber in the calling exchange. The local exchange carrier may tabulate the ballots itself but shall submit to the Bureau of Safety and Compliance a list of customers to be polled and their telephone numbers prior to sending out ballots. Upon completion of tabulation by a local exchange carrier, the local exchange carrier shall submit the original returned ballots to the Bureau of Safety and Compliance and shall submit a verified report to the Commission detailing the results of the poll. If the local exchange carrier does not tabulate the ballots itself, the ballots sent by the local exchange carrier to the subscribers shall be preaddressed, postage prepaid postcards to be returned to the Commission for tabulation.

(3) At least 50% of the ballots from an exchange shall be returned for a poll to be considered valid.

(4) In a valid poll, if 50% of the ballots returned from an exchange are in favor of EAS, the affected local exchange carriers shall implement EAS to the receiving exchange.

(5) In cases where interLATA EAS is implemented, telephone service between the calling exchange and the receiving exchange shall be transferred from the interexchange carriers serving the calling exchange to the local exchange carrier serving the calling exchange.



(6) In cases where the local exchange carrier is prohibited from providing service between the calling exchange and the receiving exchange by Federal antitrust consent decree restrictions and a waiver is necessary to implement EAS, the local exchange carrier shall apply for a waiver of Federal antitrust restrictions to allow it to implement EAS. The request for waiver will be made within 60 days of a Commission order or Secretarial Letter approving EAS. The Commission will file a statement affirmatively supporting the waiver application.

#### **Authority**

The provisions of this § 63.75 issued under the Public Utility Code, 66 Pa.C.S. § § 501 and 1501.

#### **Source**

The provisions of this § 63.75 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179; amended June 18, 1993, effective June 19, 1993, 23 Pa.B. 2829. Immediately preceding text appears at serial pages (157992) to (157993).

#### **Cross References**

This section cited in 52 Pa. Code § 63.76 (relating to EAS complaints).

#### **§ 63.76. EAS complaints.**

A formal complaint may be filed seeking the implementation of EAS. A complaint will be evaluated according to the criteria in § 63.77 (relating to evaluation criteria). If multiple telephone utilities are involved, each affected utility shall be an indispensable party to the proceeding. An administrative law judge may, as part of an initial decision, recommend the conduct of subscriber polls under § 63.75 (relating to subscriber polls) to determine if EAS should be implemented. The provisions of this subchapter do not prohibit the filing of complaints seeking the implementation of EAS between noncontiguous exchanges.

#### **Authority**

The provisions of this § 63.76 issued under the Public Utility Code, 66 Pa.C.S. § § 501 and 1501.

#### **Source**

The provisions of this § 63.76 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179.

#### **§ 63.77. Evaluation criteria.**

The Commission will consider the following criteria in evaluating EAS complaints:

- (1) The amount of toll charge traffic between the two exchanges.
- (2) The cost to the utility of implementing extended area service.

(3) The potential increase in local service charge due to implementation of EAS versus the current cost to subscribers for interexchange toll calls.

(4) The demography and the proximity of the exchanges as indicating community of interest.

(5) The availability of alternatives to EAS.

(6) The economic effect on the community if the local service area is not extended.

#### **Authority**

The provisions of this § 63.77 issued under the Public Utility Code, 66 Pa.C.S. §§ 501 and 1501.

#### **Source**

The provisions of this § 63.77 adopted March 17, 1989, effective March 18, 1989, 19 Pa.B. 1179.

#### **Cross References**

This section cited in 52 Pa. Code § 63.76 (relating to EAS complaints).

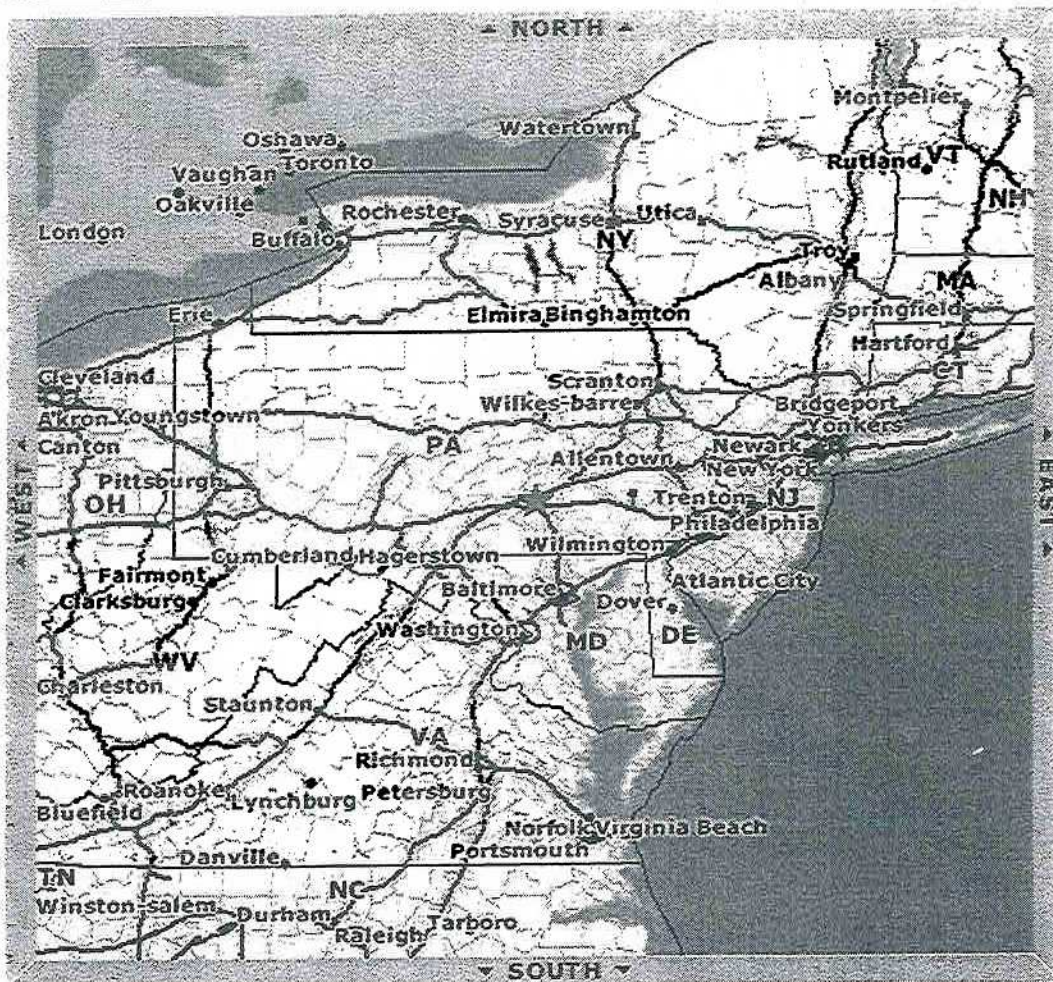
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**APPENDIX B**

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City	State	Zip
Harrisburg	PA	17101

[Coverage Options](#) [View descriptions](#)

**America's Choice<sup>sm</sup>**

- Initiated before 2/21/05
- Initiated on or after 2/21/05
- National SingleRate<sup>sm</sup>
- INpulse<sup>sm</sup>/EasyPay
- Verizon Wireless Network
- NationalAccess & Enhanced Services
- BroadbandAccess & V CAST<sup>sm</sup>

[DISPLAY MAP](#)

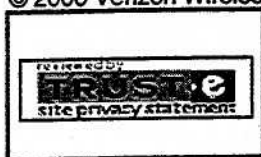
Important information about Coverage Locator Maps

**This map is not a guarantee of coverage and may contain areas with no service.**

This map shows approximately where rates and outdoor coverage apply based on our internal data. Wireless service is subject to limitations, particularly near boundaries and in remote areas. Customer equipment, cell site availability, topography and other environmental considerations also affect service, which may vary significantly within buildings. [With "all-digital" devices you can only make and receive calls when digital service is available. When digital service is not available your device will not operate or be able to make 911 calls.] Check your roaming indicator to determine where rates apply.

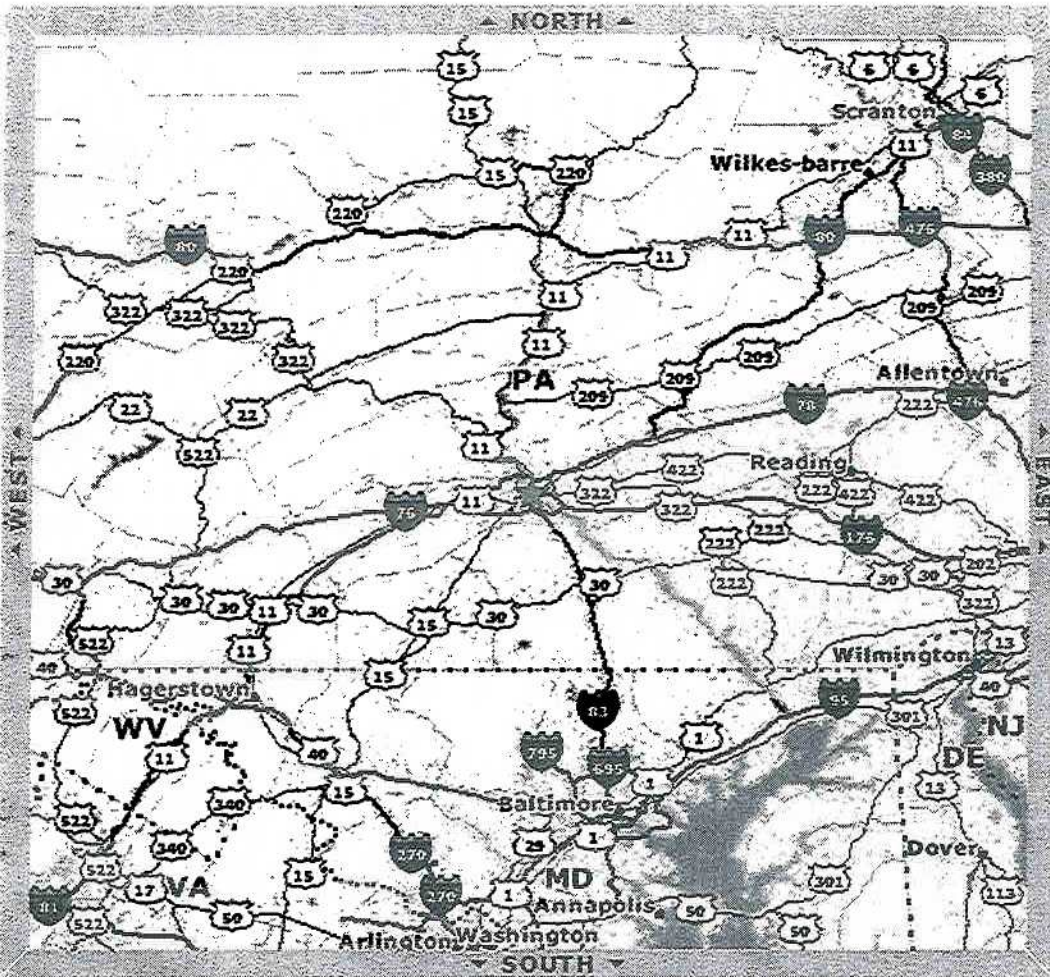
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City	State	Zip
Harrisburg	PA	17101

Coverage Options [View descriptions](#)

**America's Choice<sup>sm</sup>**

- Initiated before 2/21/05
- Initiated on or after 2/21/05
- National SingleRate<sup>sm</sup>
- INpulse<sup>sm</sup>/EasyPay
- Verizon Wireless Network

- NationalAccess & Enhanced Services
- BroadbandAccess & V CAST<sup>sm</sup>

**DISPLAY MAP**



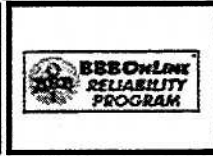
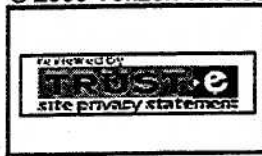
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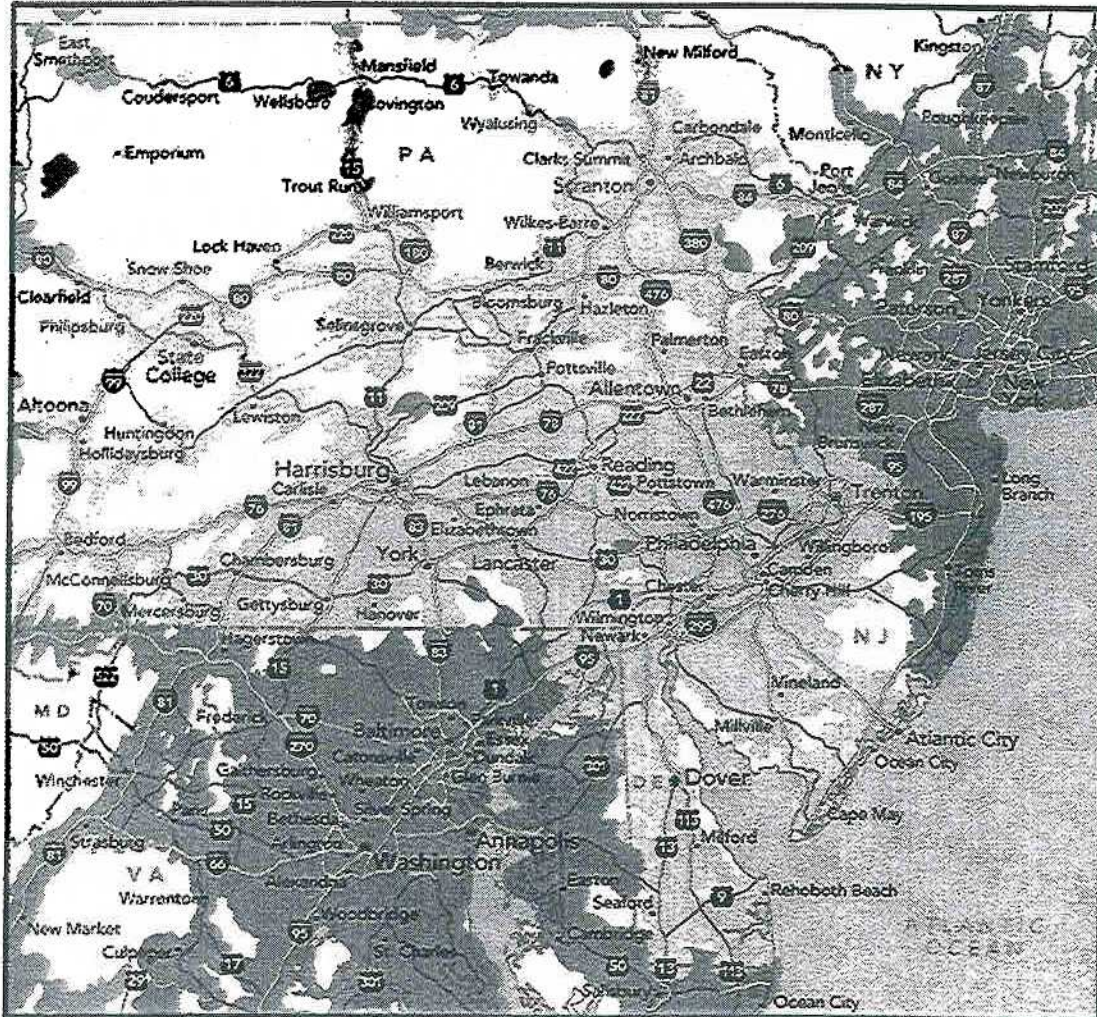
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# NEXTEL | Central Pennsylvania Area Coverage Map

Coverage shown on the coverage maps is a general prediction of outdoor coverage, and does not guarantee that coverage will be available at all covered geographic areas at all times. Wireless coverage is impacted by, among other things, terrain, weather, antenna location, system modification, foliage and man-made structures (such as buildings), and therefore cannot be predicted precisely at all times.




-  Digital Cellular and local walkie-talkie coverage (approximate)
-  Digital Cellular and coast-to-coast walkie-talkie coverage
-  Estimated Future Coverage

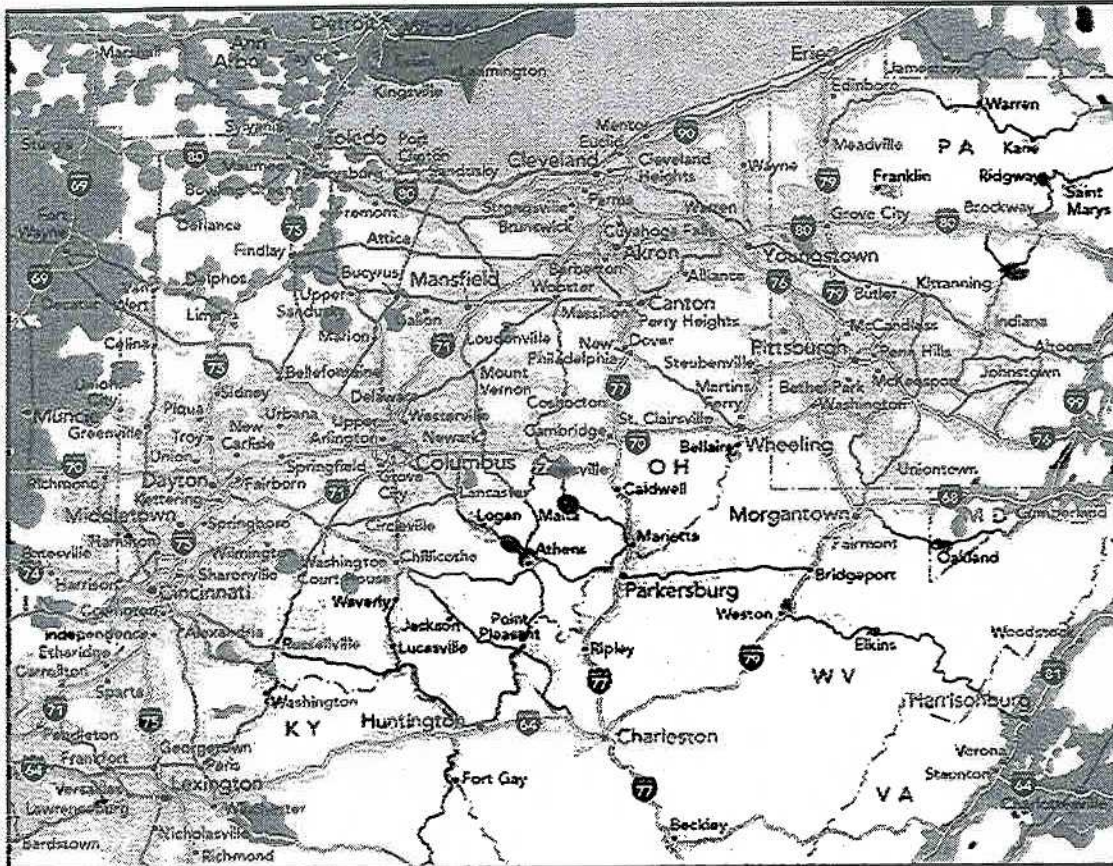




# NEXTEL | Western Pennsylvania Area Coverage Map

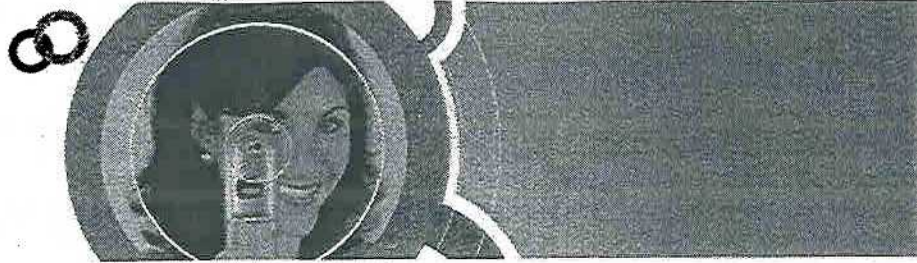
Coverage shown on the coverage maps is a general prediction of outdoor coverage, and does not guarantee that coverage will be available at all covered geographic areas at all times. Wireless coverage is impacted by, among other things, terrain, weather, antenna location, system modification, foliage and man-made structures (such as buildings), and therefore cannot be predicted precisely at all times.

-  Digital Cellular and local walkie-talkie coverage (approximate)
-  Digital Cellular and coast-to-coast walkie-talkie coverage
-  Estimated Future Coverage









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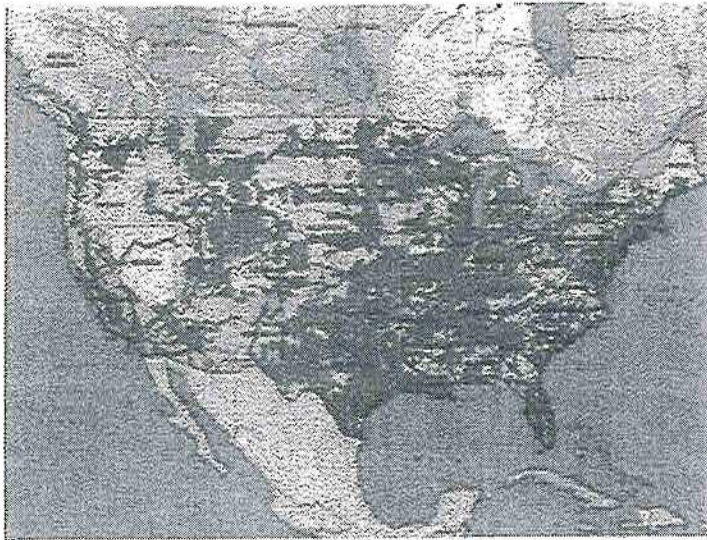
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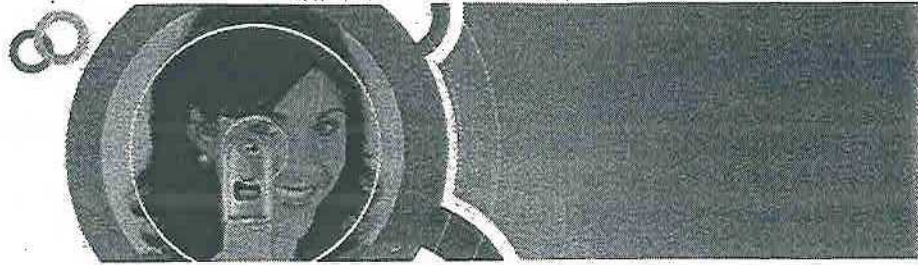


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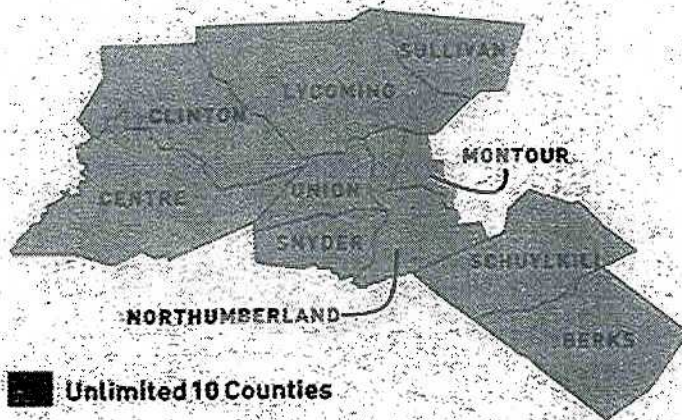
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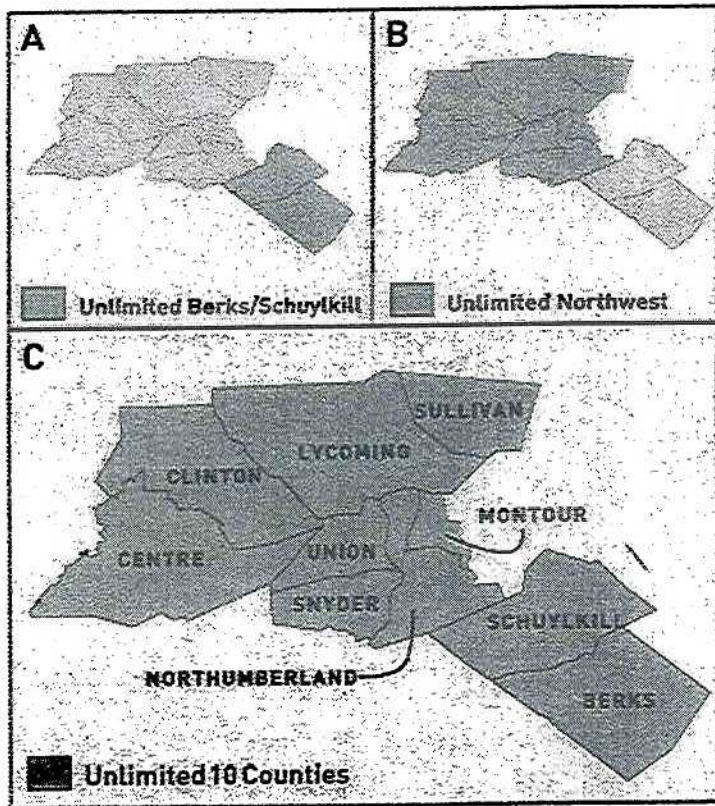
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### ZONE PHONE COVERAGE



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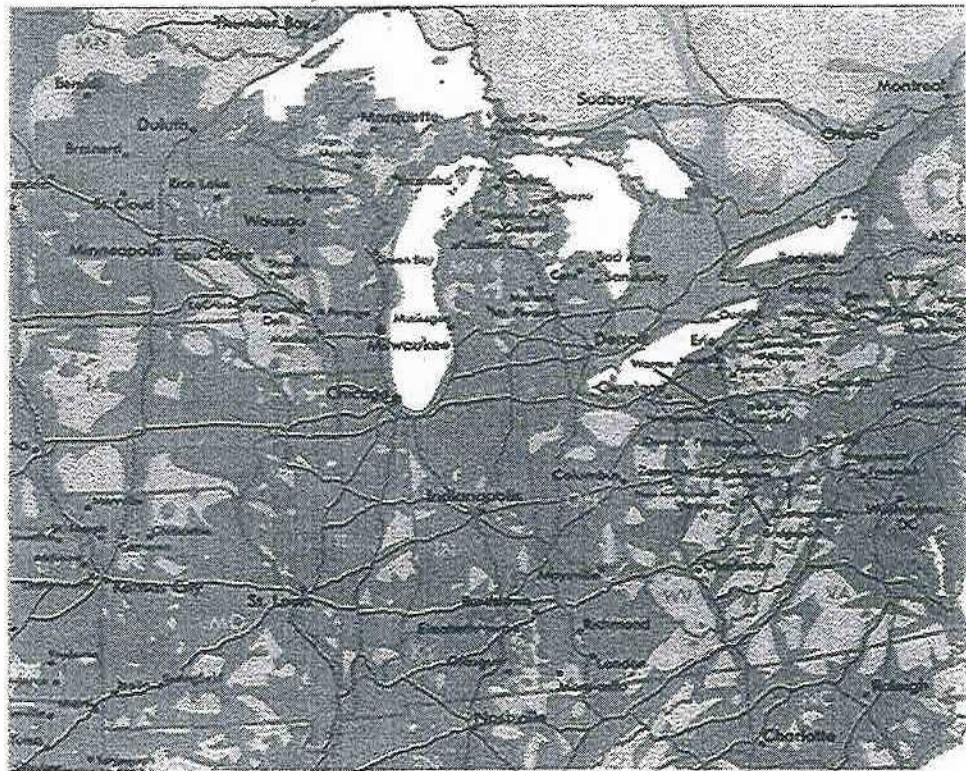
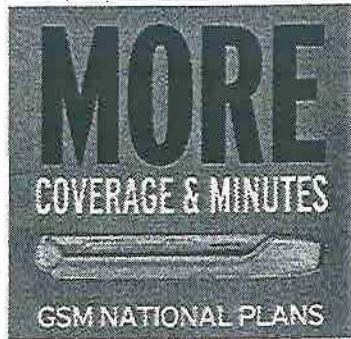
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Home Calling Area    No Service Area

**Canada Roaming is 35¢ per minute and includes any applicable long distance charges. Distance from the Home Calling Area to Canada is 69¢ per minute.**

Maps are an approximation of coverage. Actual cellular coverage may vary due to terrain, weather or customer equipment. Contact a Customer Care representative for more details.

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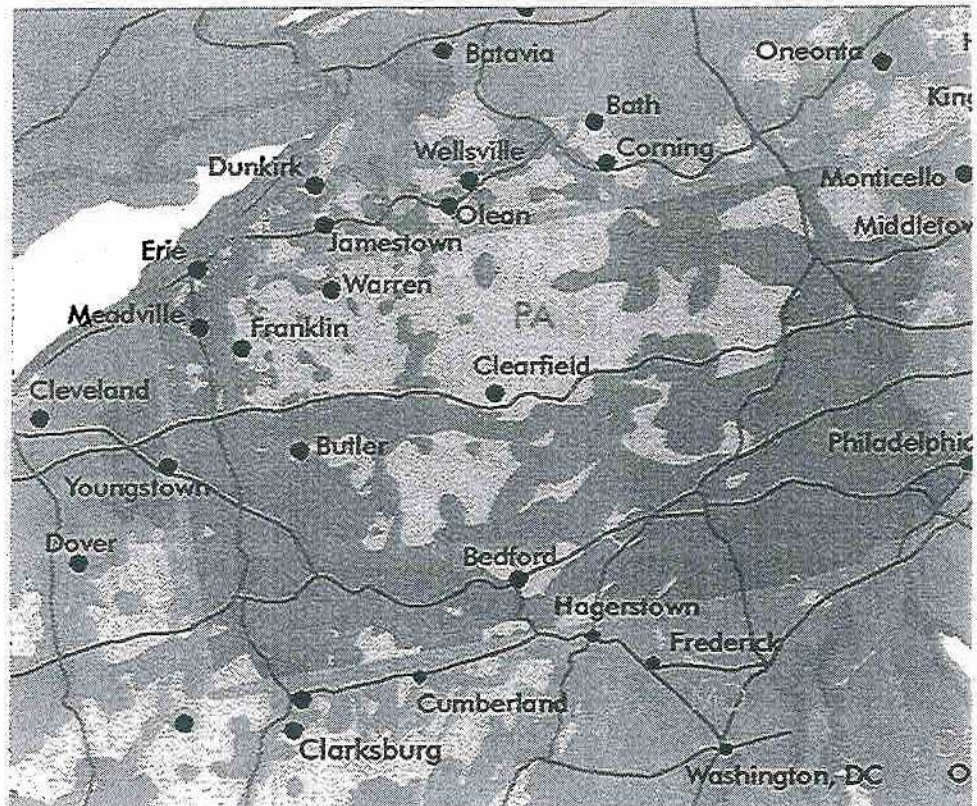
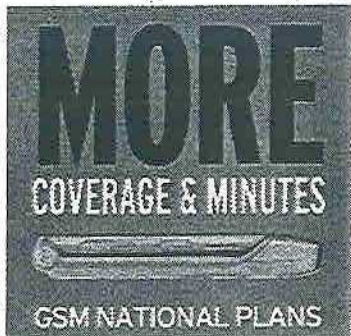
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Home Calling Area Roaming Area No Service Area

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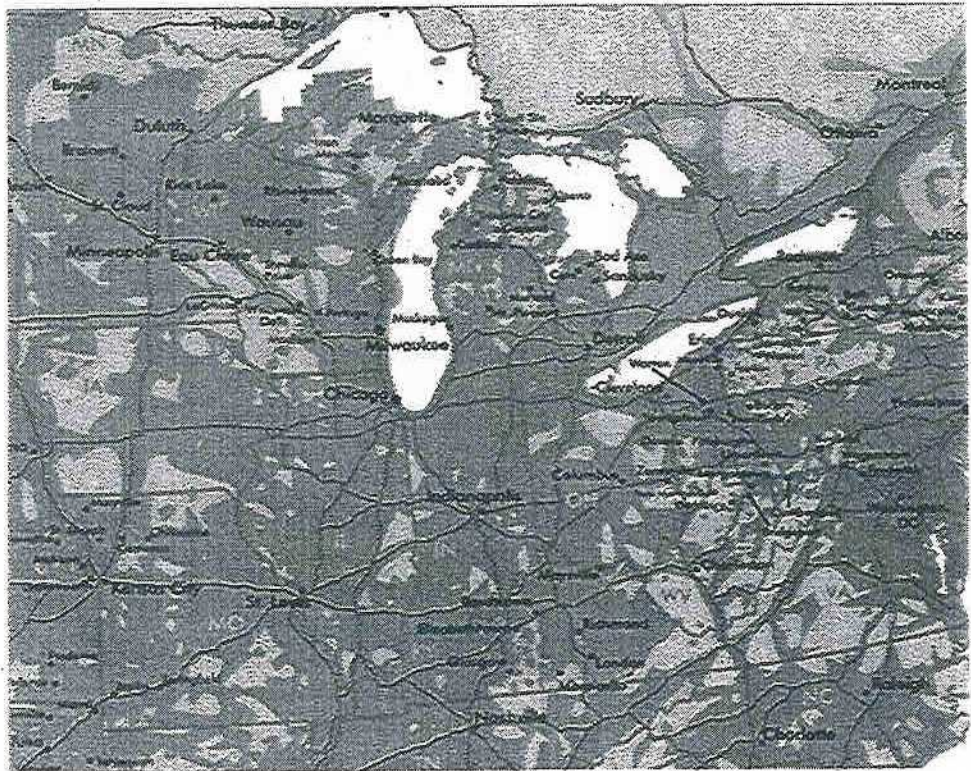
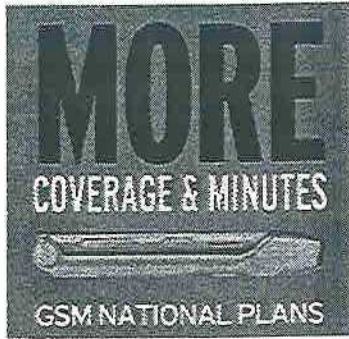
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## National GSM Plans

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Home Calling Area    No Service Area

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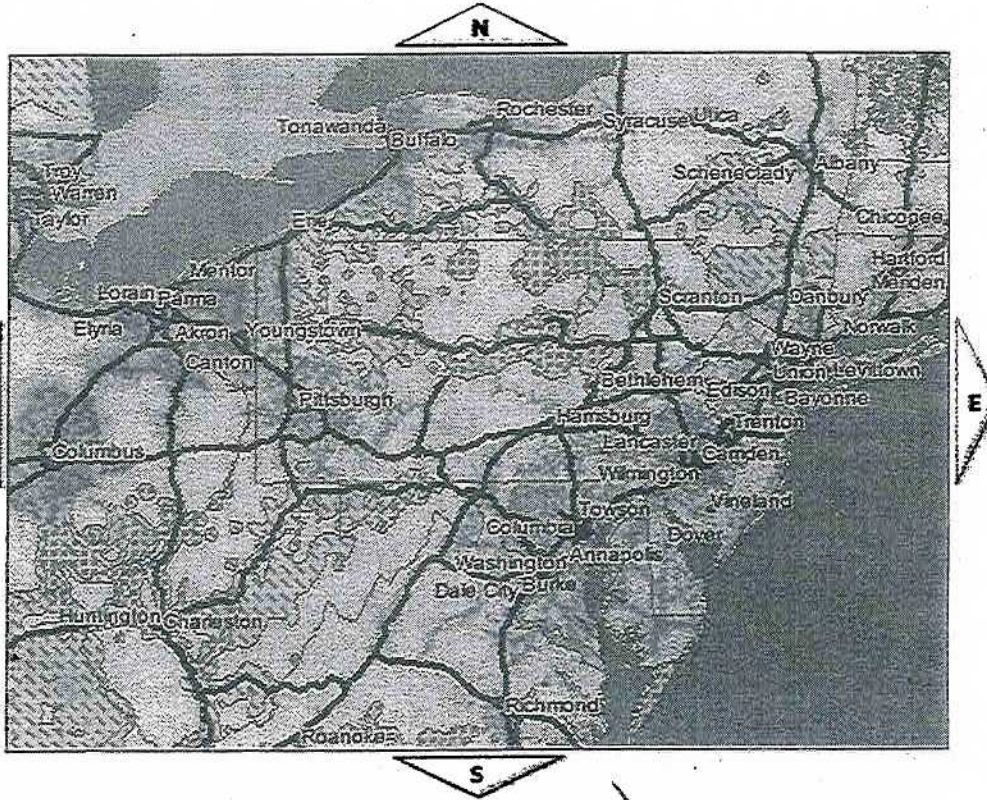
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Prepaid coverage map  
See international calling coverage  
Learn more about T-Mobile's expanded coverage

Zoom In



Zoom Out



Mobile-to-mobile minutes and data services are not available in certain roaming areas included on T-Mobile's coverage maps.

Map Legend

Great Good Fair None



X Address Location

- 850 MHz Roaming Coverage
- T-Mobile USA Roaming Coverage
- T-Mobile Canada Roaming Coverage
- T-Mobile Mexico Roaming Coverage

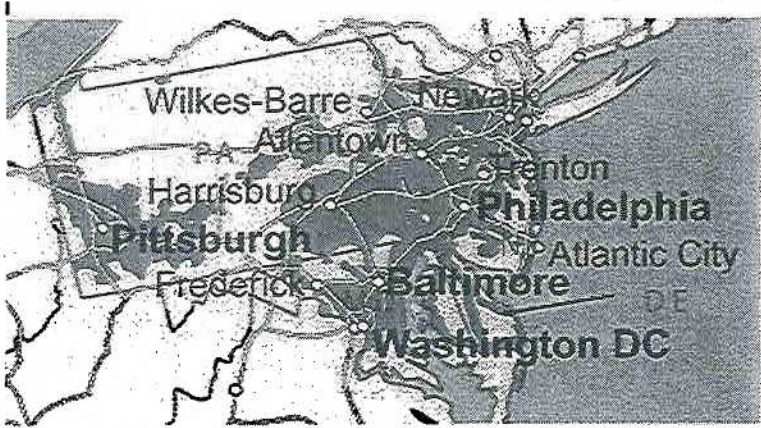
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This map predicts and approximates our wireless coverage area outdoors, which may vary from location to location and may change without notice. It may include locations with limited or no coverage. Our maps do not guarantee service availability. Even within a coverage area, there are several factors, such as: network changes, traffic volume, service outages, technical limitations, signal strength, your equipment, terrain, structures, foliage, weather, and other conditions that may interfere with actual service, quality, and availability, including the ability to make, receive, and maintain calls. Multi-band (850/1900 MHz) GSM/GPRS handset required for access to 850 Roaming Coverage. Ask a T-Mobile sales representative or visit [www.t-mobile.com/morecoverage](http://www.t-mobile.com/morecoverage) for more information regarding handset requirements and T-Mobile 850 MHz coverage. 850 MHz roaming is offered through our roaming partners; some features (e.g. picture messaging, mobile to mobile) may not be available while roaming. Learn more >

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NATIONAL COVERAGE MAP

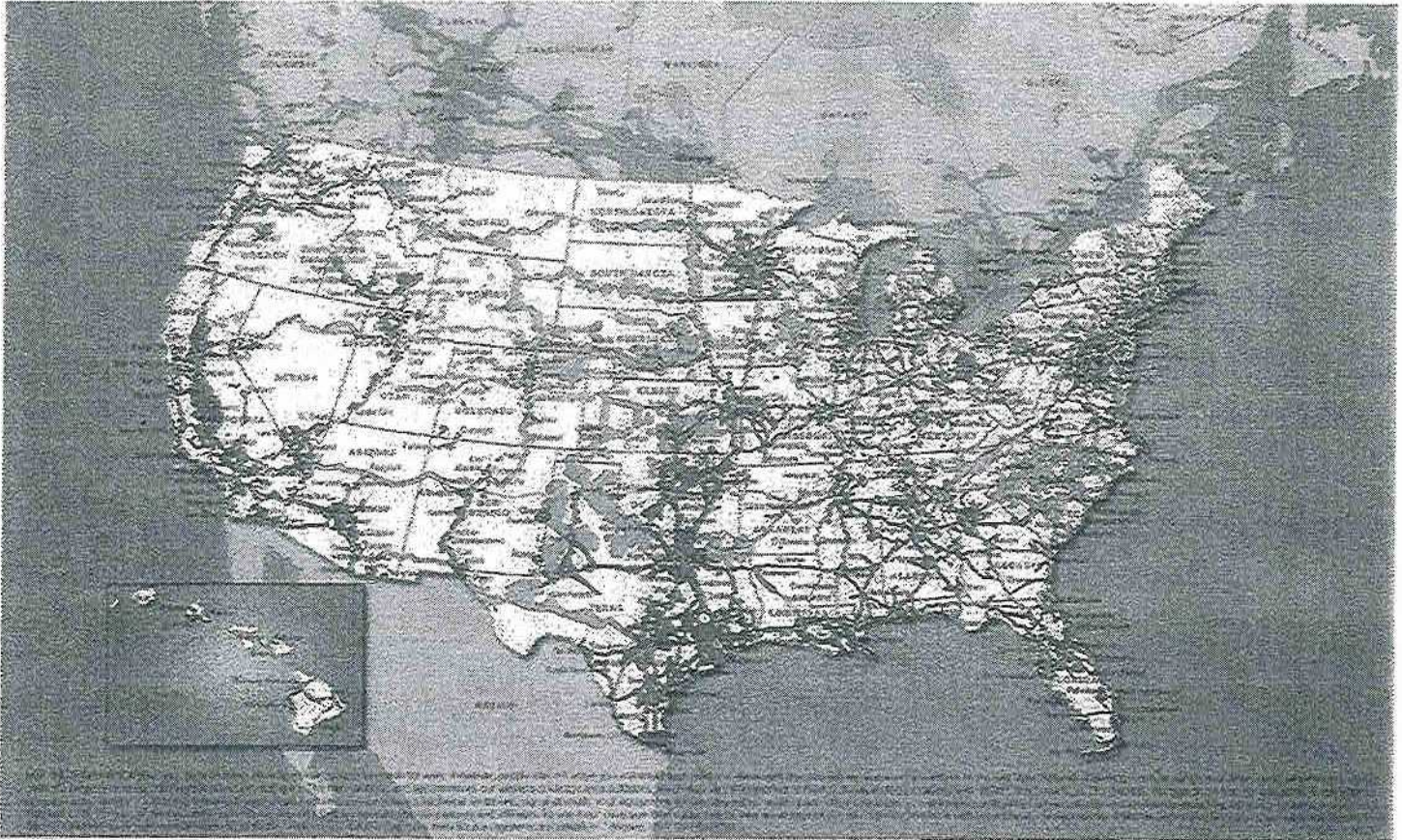
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**CANADIAN ROAMING DIGITAL COVERAGE**  
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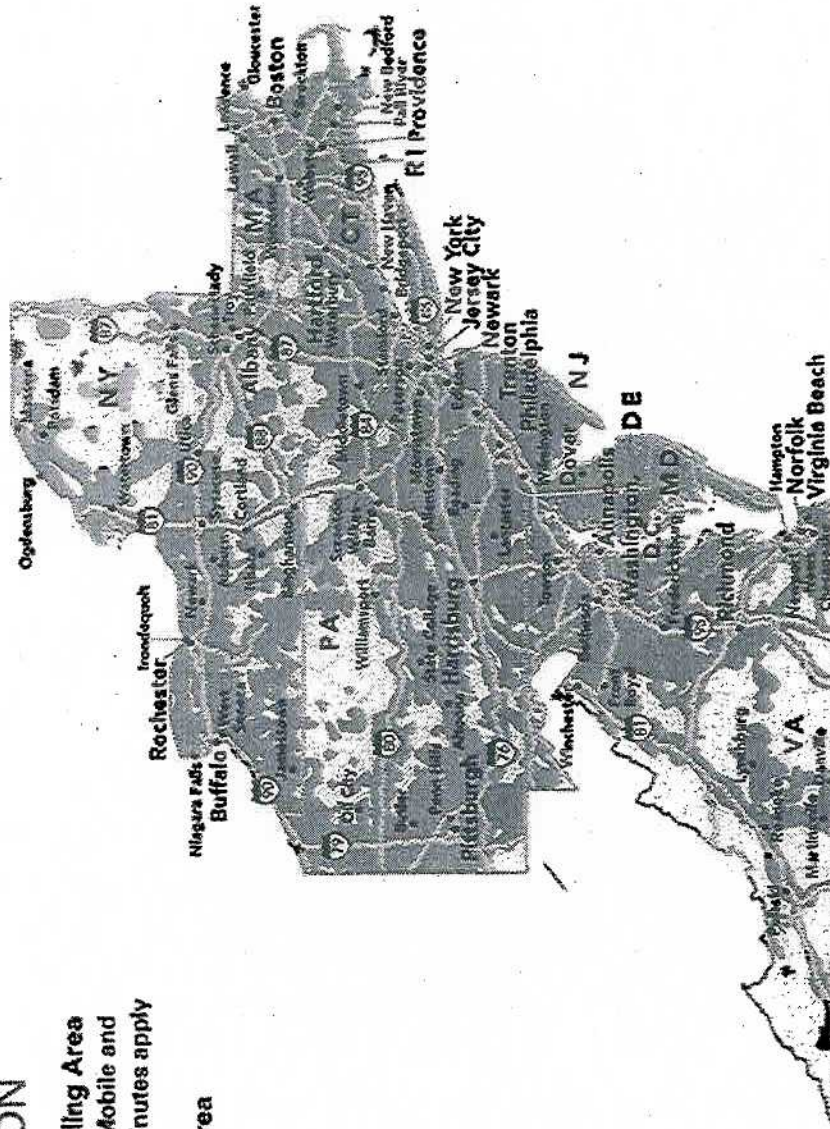
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-  Cingular Region Calling Area  
• Anytime, Mobile to Mobile and Night & Weekend Minutes apply
-  Future Coverage Area
-  No Service Area




## Cingular Wireless GSM handset required on Cingular Region plans.

Your phone's display does not indicate the rate you will be charged. Please review your coverage map for areas included in and out of plan. Map depicts an approximation of outdoor coverage. Map may include areas served by unaffiliated carriers and may depict their licensed area rather than an approximation of the coverage there. Actual coverage area may differ substantially from map graphics, and coverage may be affected by such things as terrain, weather, foliage, buildings and other construction, signal strength, customer equipment and other factors. Cingular does not guarantee coverage. Charges will be based on the location of the site receiving and transmitting the call, not the location of the subscriber. Future Coverage, if depicted above, is based on current planning assumptions but is subject to change and may not be relied upon.

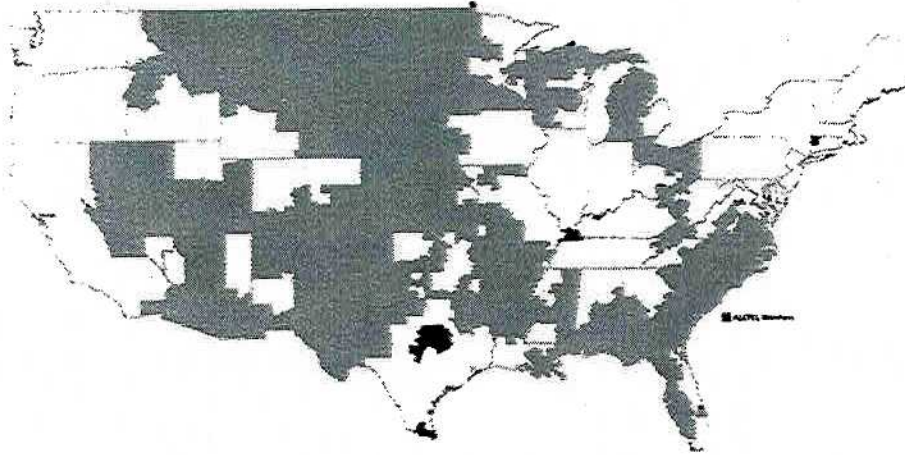
[Home](#) | [Corporate](#) | [About](#) | [Coverage](#)

## Alltel Coverage

Select a coverage map

Select a Coverage Map  > GO

## Coverage Maps



[Click for larger map](#)

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# APPENDIX B



"Northeast PA Cellular"

[Advanced Search](#)  
[Preferences](#)

## Web

Tip: Try removing quotes from your search to get more results.

### Sponsored Links

**US Cellular**  
Unlimited Call Me® Minutes.  
No Charges on Incoming Calls  
[www.uscellular.com](http://www.uscellular.com)

Your search - **"Northeast PA Cellular"** - did not match any documents.

### Suggestions:

- Make sure all words are spelled correctly.
- Try different keywords.
- Try more general keywords.

[Google Home](#) - [Advertising Programs](#) - [Business Solutions](#) - [About Google](#)

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# DEAD CELL ZONES

Wireless Coverage Complaint Database

## Search Result

1 - 28 of 28    Go back

Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Sprint/PCS	13th street	cecil b moore	Philadelphia	temple university	
Sprint/PCS	20th	Locust	Philadelphia	Philadelphia, PA 19103	
Sprint/PCS	20th Street	Olney Ave	Philadelphia	Low to no signal on parts of La Salle's Campus.	
Sprint/PCS	3600 red lion road	knights road	Philadelphia	signal is very poor in this area.	
Sprint/PCS	6th	Godfrey	Philadelphia	Philadelphia, pa 10126	
Sprint/PCS	98 oak street		Philadelphia	lindenwold	
Sprint/PCS	broad st	cecil b moore	Philadelphia	large portion of Temple U. main campus	
Sprint/PCS	Cheltenham Ave	Fifth St	Philadelphia	Most of the Cheltenham side of Chelt. Ave	
Sprint/PCS	Fellowship Road	Rt. 100	Philadelphia	Coverage in Chester Springs is very weak	
Sprint/PCS	Glen Riddle Road	Middletown Road	Philadelphia	Media, PA - little to no coverage	
Sprint/PCS	Hansell Rd	Mongomery	Philadelphia		
Sprint/PCS	hilltown pike	Diamond street	Philadelphia	about 1/2 mille prior to dia. st and cont /2 mi	
Sprint/PCS	Interstate 76 East	Gladwynne	Philadelphia	after the Gladwynne exit on 76	
Sprint/PCS	oak way	between manoa & glendale	Philadelphia	spotty at best around havertown	
Sprint/PCS	Old Carriage Road	at Russell Knight School	Philadelphia	Cherry Hill, NJ	
Sprint/PCS	Paper Mill Rd	Swade Rd	Philadelphia	Very weak to non-existent signal	
Sprint/PCS	peck road	uwchlan ave	Philadelphia	downingtown	
Sprint/PCS	R5 Train Line	From Wayne Station	Philadelphia	through Paoli Berwyn Stations	
Sprint/PCS	S Olden Ave	Haminton	Philadelphia		
Sprint/PCS	Salem Church Road	Chapman Rd	Philadelphia	Newark Delaware	
Sprint/PCS	Spurce Court	Cedar Farms	Philadelphia	Newark, DE 19702	
Sprint/PCS	summerdale	cottman	Philadelphia	once a while a drop because of mini tower	
Sprint/PCS	Taylor Ave	Wanamaker Ave	Philadelphia	The Lagoon Hotel & Nightclub in Essington, PA	

Sprint/PCS	UHG	610 Office Center Drive	Philadelphia	Fort Washington, PA	
Sprint/PCS	Walton	Township Line	Philadelphia	1777 Sentry Park West	
Sprint/PCS	Walton Rd	Township Line Rd	Philadelphia	Blue Bell, PA - Sentry Park West office park	
Sprint/PCS	Walton Road	Township Line Road	Philadelphia	Blue Bell, Montgomery County	
Sprint/PCS	West Springfield Road	State Road	Philadelphia	Springfield	

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Database Powered by eCriteria





## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Sprint/PCS	Center Ave	West View	Pittsburgh	From the bridge over 279 to Perry Hwy	
Sprint/PCS	Harts Run Road	Clearview	Pittsburgh	Allison Park	
Sprint/PCS	Interstate 279	Interstate 79	Pittsburgh	Right where I-79 and I-279 meet near Wexford	
Sprint/PCS	Lebanon Manor Drive	Dennison Drive	Pittsburgh	15122	
Sprint/PCS	Mt. Troy Rd.	Kinkura Dr.	Pittsburgh	spotty along most of Mt. Troy Rd/Reserve Township	
Sprint/PCS	New Cumberland	WV	Pittsburgh	Coverage between Chester and Weirton is sparse.	
Sprint/PCS	Park Avenue	Franklin Farms Road	Pittsburgh	Washington, PA North Franklin Township/15301	
Sprint/PCS	Rt 22 In Murrysville	Between Murrysville Shops And 3 Miles East	Pittsburgh	From Shop & Save East To Delmont	
Sprint/PCS	Squaw Run Rd.		Pittsburgh	Most of Fox Chapel area spotty	
Sprint/PCS	Verona Road	Nadine Road	Pittsburgh	From Nadine Road to Bonus Tire, No Carriers work	
Sprint/PCS	Wierton/Main Street	RTE 22 East	Pittsburgh	RT 22 E from Wierton for 25 miles east	

1 - 11 of 11    [Go back](#)

Database Powered by eCriteria





## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
T-Mobile			Philadelphia	Amtrak northeast corridor between Baltimore and Wilmington, DE - LOUSY!	
T-Mobile	1343 Stonegate Drive	Romig Road	Philadelphia	Downigtown, Stonegate Development, off Romig Road along 322 S	
T-Mobile	220 S. 33rd Street	Walnut	Philadelphia	University	
T-Mobile	229 south 18 street	20th Floorrittenhouse square	Philadelphia	signal weak and drops	
T-Mobile	309	norristown road	Philadelphia	enter exact city, county, landmark, etc.	
T-Mobile	33rd St	Spruce St	Philadelphia	Near U Penn Medical Center, calls usually drop	
T-Mobile	400 Kirkland Ave	Pottstown Pike	Philadelphia	400 Kirkland Ave West Chester, PA 19380-3966	
T-Mobile	4001 Centerville Rd	Hillside Rd	Philadelphia	Greenville, Delaware, 19807	
T-Mobile	450 Lancaster Avenue	Booth Ln	Philadelphia	in front of or in the Haverford school	
T-Mobile	Big Oak Road	Township Line Road	Philadelphia	At RR crossing, calls usually drop.	
T-Mobile	Bryn Mawr Avenue	Woodbine Avenue	Philadelphia	from the bottom of General Lafayette Road all along Bryn Mawr Avenue	
T-Mobile	Camp Roosevelt	Daretown NJ	Philadelphia	No calls	
T-Mobile	Coldwell Banker	600 E. Main Street Lansdale	Philadelphia	other cellular companies get coverage here!	
T-Mobile	Conchester Rd	Foulk Rd	Philadelphia	Marcus Hook, PA 19061	
T-Mobile	Conshohocken State Rd. (Rt. 23)	Colton Rd.	Philadelphia	between Spring Mill Rd & Lafayette Rd.	
T-Mobile	Cowpath Road	Kingsfield Drive	Philadelphia	Franconia Township, Montgomery County	
T-		between 611 and York			

Mobile	Edison Furlong Road	Rd	Philadelphia	Doylstown Township	
T-Mobile	fairhill	66th ave	Philadelphia	Entire 6500 block of Fairhill st has no coverage	
T-Mobile	faunce street	whittaker ave	Philadelphia	near cottman avenue	
T-Mobile	Haverford Avenue		Philadelphia	Narberth, Pa, Montgomery County	
T-Mobile	hill rd @	green hill rd	Philadelphia	douglass twp, montgomery county, PA	
T-Mobile	Interstate 76	Schulkill Expressway	Philadelphia	Belmont curve	
T-Mobile	Interstate 95	Schukylf River	Philadelphia	Service drop on Girard Points Bridge	
T-Mobile	King of Prussia Road	Lancaster Avenue	Philadelphia	Service dies in Radnor High School	
T-Mobile	King of Prussia Road	Lancaster Avenue	Philadelphia	Does not work at all in area near high school	
T-Mobile	Lea Blvd	Colony Blvd	Philadelphia	Near Colony North and Las Casas--Signal VERY weak	
T-Mobile	liberty wireless	2200 michener st	Philadelphia	19115	
T-Mobile	Limestone Road	Stoney Batter Road in delaware 19808	Philadelphia	Limestone Hills Area In wilmington De. 19808	
T-Mobile	Loretto Ave.	Glendale	Philadelphia	Near Northeast High School. Signal drops.	
T-Mobile	Main Street	Highland Ave	Philadelphia	Coldwell Banker Office	
T-Mobile	manor ave / village at lancaster greens	judie lane	Philadelphia	zero service, between tower ranges	
T-Mobile	Marshall	Godfrey/Spencer	Philadelphia	Any of the 6100 blocks of Fairhill, Franklin, Marshall, 6th, 7th, Sts	
T-Mobile	Montgomery Avenue	Spring Hill Road	Philadelphia	Signal dies at intersection in Villanova	
T-Mobile	Morris Ave.	Old Gulph Rd.	Philadelphia	in Bryn Mawr, PA	
T-Mobile	Old Gulph Rd.	Mill Creek Rd.	Philadelphia	in Gladwyne, PA	
T-Mobile	Old Orchard Road	Rosetree	Philadelphia	Media, PA 19063 - extremely low to no coverage	
T-Mobile	Oxford Circle	Allentown Road	Philadelphia	Lansdale	
T-Mobile	Oxford Circle	Allentown Road	Philadelphia	no coverage here at all!	
T-Mobile	PA Turnpike	mile marker 67	Philadelphia	mile marker 67 on PA Turnpike	
T-Mobile	Park Road		Philadelphia	Elverson, State Park	
T-		130 King of Prussia		Radnor High School. All	



Mobile	Radnor High School	Road Radnor PA 19087	Philadelphia	other carriers get signal.	
T-Mobile	Rhawn and dungan Rd		Philadelphia	does not work past algon ave	
T-Mobile	Route 413	Business Route 1	Philadelphia	Penndel.	
T-Mobile	route 611		Philadelphia	northern bucks county. no t-mobile coverage north of revere rt. 611	
T-Mobile	route 611 north of route 412 to northampton county	route 32 dead zone north of new to end at 611	Philadelphia	no coverage northern bucks county	
T-Mobile	rt. 501	Owl Hill Road	Philadelphia	lititz 17543	
T-Mobile	RT. 55 N & S		Philadelphia	Btw exit for Richwood to end@rt47	
T-Mobile	Suite 7	2091 Springdale Road, Cherry Hill, NJ	Philadelphia	Cherry Hill, NJ	
T-Mobile	Swamp Road		Philadelphia	Near quarry/railroad track in Rushland	
T-Mobile	Swamp Road	Village of Rushland	Philadelphia	Buckingham and Wrightstown Townships	
T-Mobile	Swamp Rod	Village of Rushland	Philadelphia	Buckingham and Wrightstown Townships	
T-Mobile	Trindle Road	Middlesex Road	Philadelphia	Carlisle, PA	
T-Mobile	US Route 1 (Township Line Rd)	Burmout Rd	Philadelphia	Piazza Honda, gas station, St. Dorothy Church, Pat's	
T-Mobile	Washington Lane	Cheltenham Ave	Philadelphia	near Roosevelt Mall	
T-Mobile	Washington In	Between Anderson and Chew ave	Philadelphia	Calls usually drops	
T-Mobile	Windsor Green Shp Ctr, 3495 US Rt. 1 S., Princeton	Faber Road	Philadelphia	bet. Pathmark Sprmkt & Marshalls	

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Database Powered by eCriteria



### Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
T-Mobile	124 Morgan Hill Road		Pittsburgh	South West of Pittsburgh	
T-Mobile	Carson Street	26th street	Pittsburgh	South Side	
T-Mobile	Forbes Ave	Morewood Ave	Pittsburgh	Carnegie Mellon University campus	
T-Mobile	Galleria	Rt. 19 & Connor Road	Pittsburgh		
T-Mobile	McDonald's Restaurant	1730 Route 228	Pittsburgh	Cranberry Twp., PA 16066	
T-Mobile	Midland Avenue	5th Street	Pittsburgh	Midland, Beaver County, NW of Pittsburgh ( NO COVERAGE)	
T-Mobile	Midland Beaver Road	Engle Road	Pittsburgh	Industry, Beaver County, Main road between Midland & Beaver PA	
T-Mobile	Pennsylvania Turnpike	Between Breezewood and Donegal Exits	Pittsburgh	Intermittent service	
T-Mobile	Rowan Road	Rte. 19	Pittsburgh	End of Rowan, about .5 mi from 19	
T-Mobile	Rte. 228		Pittsburgh	McDonalds	
T-Mobile	Smith Township State Rd.	Route 18	Pittsburgh	Burgettstown	
T-Mobile	Thompson Run Road	Seibert Road	Pittsburgh	Close to Ross Park Mall	

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Database Powered by eCriteria





# DEAD CELL ZONES

Wireless Coverage Complaint Database

## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Cingular			Philadelphia	Philadelphia to New York City Amtrak route	
Cingular	113	Peck Rd	Philadelphia	On the stretch that runs between Calvery Church and the 30 Bypass	
Cingular	8603 Hull Drive	Claridge Road	Philadelphia	Town-Wyndmoor, Montgomery county	
Cingular	Academy, Newark, DE	UD Campus	Philadelphia	Univ of Del Perkins Student Center	
Cingular	Barry Court	Rt. 45	Philadelphia	Mantua, NJ	
Cingular	Bryn Mawr Ave (Rte 320)	Malin Rd.	Philadelphia	Zone runs 1/2 mile on each side of Malin.	
Cingular	Cedar Crest Blvd	Trexler Park	Philadelphia	Allentown -- coverage is spotty near park. Verizon isn't much better.	
Cingular	centerville road	nolt road	Philadelphia	Lancaster, PA 17601	
Cingular	Cheltenham Ave	Ogontz Ave	Philadelphia	inside Shop Rite Supermarket.	
Cingular	City Avenue	76th Street	Philadelphia	City Line Center strip shopping mall	
Cingular	colgate avenue	pacific avenue	Philadelphia	longport new jersey	
Cingular	concord rd.	bridgewater rd.	Philadelphia	aston pa del. county near northley middle school	
Cingular	cottman	rovevalt boulevard	Philadelphia	near krispy kreme	
Cingular	countyline rd	york rd	Philadelphia		
Cingular	DE Rte 40	US Rte 13	Philadelphia	Walmart in New Castle, DE	
Cingular	Decatur st	Frankford ave	Philadelphia	19136 is horrible , constan drop calls	
Cingular	Deweese Street	Welsh Road	Philadelphia	Northeast PHiladelphia, PA	
Cingular	Egg Harbor Road	White Horse Road	Philadelphia	Berlin Township, Camden County, New Jersey	
Cingular	farnsworth ave	walnut street	Philadelphia	bordentown city - no to 1 bar	
Cingular	Glenside	Marshallton-Thorndale	Philadelphia	West Bradford - signal too weak to make calls	
Cingular	Hartford rd.	Conrow rd.	Philadelphia	Delran, NJ	
Cingular	hellerman street	large	Philadelphia		
Cingular	Hercules Rd	entire length from 41 to 48	Philadelphia	Wilmington, DE, by Delaware Nat'l Golf Club	



Cingular	Highland Street	441	Philadelphia	Swatara Township, Harrisburg, Pa	
Cingular	I-476	Route 1 (Media Bypass)	Philadelphia	Just north of intersection (GSM only)	
Cingular	I-476	Villanova, St Davids exit	Philadelphia	North of interchange, (GSM)	
Cingular	I-476	West Chester Pike (3)	Philadelphia	Broomall/Newtown Square Interchange w/GSM	
Cingular	I-476 (Blue Route)	Bryn Mawr Ave	Philadelphia	On I-476 overpass, GSM band only	
Cingular	I-95	Claymont SEPTA Station Pedestrian overpass	Philadelphia	Just south of state line	
Cingular	I-95	Harvey Rd.	Philadelphia	Wilmington, DE just south of intersection (GSM)	
Cingular	I-95	North I-495 split (PA/DE) state line	Philadelphia	Delaware side, just south of state line,	
Cingular	indian town road	london tract road	Philadelphia	landenberg, PA 19350	
Cingular	Julie Lane	Allison Lane	Philadelphia	Newark, DE	
Cingular	lower end of Meadowbrook Lane	None	Philadelphia	Brookhaven, Delaware County, PA	
Cingular	Merrill Lynch Hopewell Campus	Inside all Buildings	Philadelphia	Pennington, NJ 08534	
Cingular	mildred lane	bunting lane	Philadelphia	aston pa delaware county	
Cingular	Montgomery ave. (rt 320)	Arden Rd	Philadelphia	From Arden rd to Gulph rd	
Cingular	Morris Road and Conrad Rd	West Point Pike	Philadelphia	This is usually a 1 bar reception area	
Cingular	Norsam Drive	Rugby Drive	Philadelphia	Langhorne, PA	
Cingular	North Highland Road	Overhill Road	Philadelphia	Springfield, Del. County	
Cingular	north hills avenue	fitzwatertown road	Philadelphia	ardsley queen of peace school	
Cingular	Old Baltimore Pike	Preakness Run	Philadelphia	Newark, Delaware	
Cingular	Paper Mill Road	Bethlehem Pike	Philadelphia	Covers most of Erdenheim/Flourtown	
Cingular	paper mill road	between ridge avenue and bethlehem pike	Philadelphia	no service thru entire valley	
Cingular	Perkiomenville Rd	Hauck Rd	Philadelphia	many dead pockets within about 3 miles.	
Cingular	Providence Road	Bishop Hollow Road	Philadelphia	Upper Providence, Delaware County, Ridley Creek State Park	
Cingular	Retreat Road	Big Hill Road	Philadelphia	Southampton, Burlington county, NJ.	
Cingular	Richards Ave.	Rt. 542	Philadelphia	Mullica Township, Atlantic County, NJ	
Cingular	ridge pike	trooper road (363)	Philadelphia	by the mobile gas station	
Cingular	righters mill rd	hagys ford rd	Philadelphia		



Cingular	Rising Sun Place	Rising Sun Avenue	Philadelphia	between Krewstown Rd & Bloomfield Ave.
Cingular	Route 601 between Mt. Airy and Harborton	601 and 579	Philadelphia	all of route 601 S from Mt. Airy to Harborton thn 579 S to W. Trenton
Cingular	route 76	Conshohocken Curve	Philadelphia	
Cingular	Rt 29	Between Lambertville and West Trenton	Philadelphia	8 mile stretch of heavily travelled road
Cingular	Rt 1 (Media Bypass)	Ridley Creek Rd.	Philadelphia	Dead on last few miles of the west end
Cingular	Seisholtzville Road	Five Points Road	Philadelphia	Entire stretch between Hereford and Bear Creek Ski Area
Cingular	seward lane	garden lane	Philadelphia	aston pa delaware county
Cingular	Skyline Drive	New Linden Hill Road	Philadelphia	Pike Creek Valley, Wilmington, DE
Cingular	Snyder	10th	Philadelphia	north of 7-11 and blockbuster
Cingular	South College Avenue	Chestnut Hill Road	Philadelphia	Newark, DE
Cingular	South Pennsylvania Avenue	Philadelphia Avenue	Philadelphia	Morrisville, PA
Cingular	Springdale rd.	Evesham Rd.	Philadelphia	Cherry Hill, New Jersey. Whole area bad coverage
Cingular	Street Road	Jacksonville Road	Philadelphia	Problems with all of Warminster, PA
Cingular	Street Road	Newtown Road	Philadelphia	Warminster, PA
Cingular	Sumneytown Pike	Route 113	Philadelphia	Walmart and the 1/2 mile radius of this area
Cingular	Terwood Rd	Edgehill Rd and beyond	Philadelphia	Complete Dead Zone and Drop Call Zone
Cingular	Timber lane	sentry lane	Philadelphia	Devon
Cingular	Township Line Rd	Potshop Rd	Philadelphia	area between Germantown Pk & Twp Line Rd from Potshop to Sunset
Cingular	valley road	susquehanna	Philadelphia	between welsh road and old york road
Cingular	virginia lane	schoolhouse lane	Philadelphia	aston pa delaware county
Cingular	walt whitman bridge		Philadelphia	
Cingular	Woodbourne Road	Wood Lane	Philadelphia	Calls usually drop at the intersection
Cingular	York Rd	Street Rd	Philadelphia	Warminster the entire area

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Database Powered by eCriteria



# DEAD CELL ZONES CMI

Wireless Coverage Complaint Database

## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Cingular	212 Orange Lane		Pittsburgh	Greensburg, Westmorland, Hillview Est.	
Cingular	22	66	Pittsburgh	between Murrysville and Delmont just before Watson Chevrolet going E.	
Cingular	Camp Home Road	Route 65	Pittsburgh		
Cingular	Greengate Road	Route 130	Pittsburgh	between Rt. 30 and Rt. 130	
Cingular	Harry Road		Pittsburgh	Cambria County.	
Cingular	Highland Rd	between Sloop Rd & Louisville Pl	Pittsburgh	Drop calls or bad coverage - McCandless Twp	
Cingular	Interstate Route 80		Pittsburgh	from Bellefonte on ramp and west toward Pittsburgh, dropped calls	
Cingular	Pine Creek Rd	Between Brandt School Rd & Route 19	Pittsburgh	Franklin Park/Wexford	
Cingular	Rochester Rd	Sloop Rd & Sewickley-Oakmont Rd	Pittsburgh	Ross Twp	
Cingular	Rt 51	Coraopolis area	Pittsburgh	Dropped calls	
Cingular	Rt. 481	Taylor Run Rd.	Pittsburgh	Monongahela Area	
Cingular	Sleepy Hollow Road	enter intersecting street name	Pittsburgh	enter exact city, county, landmark, etc.	

1 - 12 of 12    Go back

Database Powered by eCriteria





# DEAD CELL ZONES CTM

Wireless Coverage Complaint Database

## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
AT&T	14th Avenue	Prospect Ave.	Philadelphia	Bethlehem, Holy Family Manor Area	
AT&T	1521 W. Union Street	15th street	Philadelphia	allentown, lehigh county, pennsylvania, 18102	
AT&T	Blossom Court	Prince Drive	Philadelphia	Cherry Hill, NJ	
AT&T	Boot Rd	Quarry Rd	Philadelphia	From the tunnels to the top of the hill	
AT&T	Brookhaven Road	between Rt. 252 & Rose Valley Road	Philadelphia	around Strathaven H.S.	
AT&T	Century 21 Alliance	19 South Main Street	Philadelphia	Yardley, PA	
AT&T	Edison-FurlongRd	Pebble Hill Rd	Philadelphia	Doylestown	
AT&T	Forest Road	North Chester Road (Rte. 352)	Philadelphia	East Goshen Twp. & within a several mile radius	
AT&T	glenwyth rd	west valley	Philadelphia	Any where near valley forge park is bad.	
AT&T	Harmony Road		Philadelphia	In/around Highland Park section of Levittown	
AT&T	Hopewell rd.	Taunton rd	Philadelphia	Medford	
AT&T	June Meadow Drive	Grape Bay Drive	Philadelphia	Doylestown, PA	
AT&T	King of Prussia Road	Berwind Road	Philadelphia	Radnor, PA	
AT&T	Kipling Drive Warminster	Cloverly Drive Warminster	Philadelphia	In 200 Block of Kipling	
AT&T	Lancaster Ave	Mt. Penn	Philadelphia	Btw Lancaster Ave & Mt Exits, Rt 422 Reading	
AT&T	Lancaster Ave	Winchester Ave	Philadelphia	Margate City, NJ	
AT&T	Little Baltimore Rd	North Star Rd	Philadelphia	Newark, DE - Little Baltimore Rd is dead zone	
AT&T	Ilanwellyn	knoles	Philadelphia	glenolden	
AT&T	Main St. in Williamstown	Berlin-Cross Keys Road	Philadelphia	from the AC Expway across to Main Street	
AT&T	Mantua Pike	NJ Turnpike	Philadelphia	Woodbury Heights, NJ	
AT&T	Moorestown Mount Laurel	Union Mill	Philadelphia	Mount Laurel, NJ 08054	
AT&T	Newcomen RD	Worthington RD	Philadelphia	Uwchlan TWP/Charlestown Border to Ship Rd	



AT&T	PA Route 401	PA Route 113	Philadelphia	Chester Springs key intersection	
AT&T	Paoli Pike	Airport Road	Philadelphia	West Chester, East Goshen Township	
AT&T	Papermill Rd	Corner Ketch Rd	Philadelphia	near Whiteman's garage on Rt 72	
AT&T	Patridge Lane		Philadelphia	North of Villanova Univ	
AT&T	Queen Lane Station	Queen St. and Wisshickon St	Philadelphia	The Train Station Area.	
AT&T	Route 40		Philadelphia	poor coverage in Salem County, NJ on rt 40	
AT&T	Route 476 (Blue Route)	Multiple - From 95 to Lansdale Exit - 4 drops	Philadelphia	Multiple - From 95 to Lansdale Exit - 4 drops	
AT&T	Rt 113	Eagle PA	Philadelphia	cell tower located behind overpass	
AT&T	Rte 3 - West Chester Pike	Rte 352	Philadelphia	Wlistown - Chester County	
AT&T	Rydal Park	The Fairway	Philadelphia	Rydal	
AT&T	Rydal Rd.	Susquhanna Rd.	Philadelphia	Jenkintown, PA	
AT&T	Salem-church road	Chapman road	Philadelphia	Newark, DE by the Wawa - completely drops briefly	
AT&T	Springdale Rd.	Eversham Rd.	Philadelphia	Voorhees, New Jersey	
AT&T	Springdale Rd.	Evesham Rd.	Philadelphia	Cherry Hill, NJ	
AT&T	Springdale Rd.	Lark Lane	Philadelphia	Cherry Hill, New Jersey. The entire area.	
AT&T	Spruce College House	310 S. 36th St.	Philadelphia	dorm	
AT&T	State Hwy 70	I-295	Philadelphia	Dropped/blocked calls regularly	
AT&T	Strassburgh	Rt352	Philadelphia	No service on Strassburg from Rt352 to Rt252	
AT&T	Sugartown Road	Waterloo Road	Philadelphia	Near Devon	
AT&T	Sugartown Road	Waterloo Road	Philadelphia	Near Devon Elem. School all the way to Rt. 252	
AT&T	Summit Road	Carol Lane	Philadelphia	Malvern, Chester County, E. Whiteland Twnshp	
AT&T	Taylor Ave	Wanamaker Ave	Philadelphia	The Lagoon Hotel & Nightclub- Essington, PA	
AT&T	The Fairway	Susquhanna Road	Philadelphia	Baederwood	
AT&T	Theadore Rd	Ebenezer Church Rd	Philadelphia	Cecil Com. College To Red Toad Rd	
AT&T	Township line Road	Unisys Way	Philadelphia	No Coverage at Unisys World HQ	
AT&T	Twin Bridge Dr.	Hollow Road	Philadelphia	Radnor	
AT&T	Unisys Way		Philadelphia	Blue Bell	
AT&T	Uwchlan Ave/Route 113	Peck Road	Philadelphia	Uwchlan Hills Elementary	
AT&T	Walnut	36th	Philadelphia	Various areas in and around Univ. of Pa. campus	





## Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
AT&T	becks run rd	all	Pittsburgh	half way up the hill. Dropped call every timr	
AT&T	Becks Run Road	Wagner to East Carson	Pittsburgh		
AT&T	Blackadore Avenue	Mason Street	Pittsburgh	Penn Hills	
AT&T	Foxwood Road	Urick Lane	Pittsburgh	Monroeville area	
AT&T	Frey Rd/Thompson Run Rd	Penn Hills	Pittsburgh	Frey Rd Industrial Park	
AT&T	Grant Ave	Jefferson St	Pittsburgh	Grant Ave Between Ohio River Blvd and Lincoln Ave	
AT&T	Greenleaf Street		Pittsburgh	At the top of Greenleaf heading down to West End	
AT&T	Hilltop Plaza		Pittsburgh	Kittanning Pa - whole town no coverage	
AT&T	Hunt Road	Buckingham	Pittsburgh	Fox Chapel	
AT&T	Interstate 79	Bridgeville Exit area	Pittsburgh	Happens every time I drive through that area	
AT&T	Johnstown PA	Johnstown PA	Pittsburgh	Anywhere in Johnstown Esp. Tanneryville & West End	
AT&T	Lesnett Road	McLaughline Road	Pittsburgh	the phone is useless in most of this township	
AT&T	McLaughlin Run Road	Morrow Rd. and Rt. 19	Pittsburgh	we cannot get any service in this area.	
AT&T	McMurray Road	Peters Twp	Pittsburgh	In front of Rolling Hills Country Club	
AT&T	Mt Nebo Road	Arndt Road	Pittsburgh	bottom of the hill at the traffic light	
AT&T	New Brighton Rd	Fredrick St	Pittsburgh	Near Avalon Park	
AT&T	Oakhurst Road		Pittsburgh	O'Hara Township	
AT&T	Old Post Road	Stolz Road	Pittsburgh	South Park, PA	
AT&T	PA Route 160	PA Route 756	Pittsburgh	About a 2 mile radius around this intersection	
AT&T	Parkview Drive	Minno	Pittsburgh	Johnstown, Pa. calls constantly dropped.	
AT&T	pond rd	cooper ave	Pittsburgh	anywhere in tanneryville, and the west end	
	roberto clemente			Mervis Hall University of	

AT&T	dr	an	Pittsburgh	Pittsburgh	
AT&T	Rt. 481		Pittsburgh	Monongahela, between Cox Market and Fry Station	
AT&T	south park elementary center	2001 eagle pride lane	Pittsburgh	att does not get reception throughout the entire	
AT&T	State Route 151	Brodhead Rd.	Pittsburgh	All along State Route 151 in Beaver County	
AT&T	Sunset Drive	Spang road	Pittsburgh	Marshall twsp, Allegheny county, PA	
AT&T	Universal Road	between Unity Trestle and Saltsburg Rds	Pittsburgh	City of Pgh, Plum/Penn Hills area	

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### Search Result

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Verizon			Philadelphia	greenville,de	
Verizon	11000 Roosevelt Blvd	Red Lion	Philadelphia	Best Buy, Staples, Sports Authority Inside	
Verizon	155 Rock Road West	Corsalo Road	Philadelphia	Lambertville, NJ Hunterdon County West Amwell	
Verizon	155 Rock Road West	Route 518	Philadelphia	Lambertville, NJ Hunterdon County	
Verizon	2nd Street Station	To 59th Street Station	Philadelphia	On the EL (Blue Line) in the Tunell, need coverage	
Verizon	3100 Shamilar Court	Bensalem	Philadelphia	Little/no service between Hummleville/Bensalem	
Verizon	318 Miller Road	West Ridge Road	Philadelphia	PA, Lancaster county, West Donegal Twp., Elizabethtown	
Verizon	4710 Durham Road	Route 412 North	Philadelphia	Kintnersville, Pa 18930	
Verizon	700thru300 Blocks Chester Ave	Maple	Philadelphia	Moorestown,NJ08057	
Verizon	9200 Ridge Pike	Bells Mills	Philadelphia	no signal or dropped calls	
Verizon	Amaryllis Blvd.	Cascade Drive Norh	Philadelphia	Mount Laurel, NJ	
Verizon	Baeder Rd	Old York Rd	Philadelphia	From Old York Rd to Glenside	
Verizon	Bells Mills Road In Chestnut Hill	as it crosses the running path and river	Philadelphia	Always drops calls or cannot dial out until you go up hill	
Verizon	Berkley Road	Route 45	Philadelphia	Mantua Kmart	
Verizon	Blue Route crossing the Schukyll River	More than half the time calls drop...it's a joke!	Philadelphia	This is a major road, but consistently drops	
Verizon	Boardwalk (Atlantic City NJ)	between hotels & ocean	Philadelphia	longtime deadspot, CDMA defaults to AMPS	
Verizon	Brookhaven Road	between Rt. 252 & Rose Valley Road	Philadelphia	around Strathhaven H.S.	
Verizon	Bryn Mawr Avenue	Rte 320	Philadelphia	All of Bryn Mawr Ave between Rte 320 and County Line Rd.	
Verizon	Buck Rd Northampton Township	Elaine Drive	Philadelphia	AT Holland Preserve Condominium and approaches	
Verizon	Buck Road	Old Bristol Road	Philadelphia	Holland, PA	



Verizon	Buck Road	Bristol Road	Philadelphia	
Verizon	Burrows Run Road	Kennett Pike	Philadelphia	near Mendenhall Inn
Verizon	Byberry & Bustleton	none	Philadelphia	Goldstein Apartments inside
Verizon	Cheltenham Road	Darby Road	Philadelphia	Havertown, most of Havertown IS a dead zone!!
Verizon	Chesterbrook Blvd	Heyward Rd	Philadelphia	Wayne PA 19087
Verizon	Chesterbrook Development		Philadelphia	Chesterbrook, PA 19087
Verizon	Churchville Road	Bristol Road	Philadelphia	Southampton
Verizon	Churchville Road	Manor Lane	Philadelphia	Southampton, Bucks County Pennsylvania
Verizon	Churchville road	Strathman road	Philadelphia	Southampton, Bucks County, Pennsylvania
Verizon	Cold Soil Road	Registry Drive	Philadelphia	Lawrenceville, NJ
Verizon	Coral Tree Court	gordon avenue	Philadelphia	Lawrenceville NJ, no service
Verizon	County Rd.549 Fischer Blvd.	Entire length	Philadelphia	Toms River N.J. Dropped calls especially in summer
Verizon	Crispin Street	Kirkwood Rd	Philadelphia	no service at all.
Verizon	darby-paoli road	saw mill road	Philadelphia	newtown square/radnor, delaware county, The Willows is landmark, etc.
Verizon	Dehaven Ave	HighlandAve	Philadelphia	Penndel - Bucks county -very weak signal sometimes no service
Verizon	Del Route 54 (Mason-Dixon line)	Sand Cove Rd (Road 394)	Philadelphia	taper between DC system & Phila system
Verizon	delaware court, newtown	millpond road, newtown	Philadelphia	
Verizon	Delsea Drive	Mays Landing Road	Philadelphia	All roads
Verizon	Eagle Road	Darby Road	Philadelphia	Havertown, PA, service is horrible throughout
Verizon	EAST ATLANTIC AVE	CHESTNUT ST	Philadelphia	AUDUBON NJ CAMDEN COUNTY
Verizon	Eastwood Street & Knorr Street		Philadelphia	No Service
Verizon	Elephant Road	Route 113	Philadelphia	Center of Dublin
Verizon	Exeter Rd.	Drew Lane	Philadelphia	
Verizon	Falcon Drive and Elaine Road	Buck Road	Philadelphia	Holland, PA
Verizon	Farm View Drive	Waterway Road	Philadelphia	Oxford
Verizon	Gillam Ave.	Hulmeville Ave.	Philadelphia	Langhorne, Hulmeville Ave Bridge over US Rt. 1
Verizon	Glen Riddle Road	Middletown Road	Philadelphia	Media, PA - little to no signal.
Verizon	Haines Mill Road,	Tenby Chase Drive,	Philadelphia	Delran, NJ 08075

Verizon	Rt 40	1 mile west of Rt 896	Philadelphia	Glasgow, Delaware	
Verizon	Rt 41	Rt30	Philadelphia	atglen, pa	
Verizon	rt 42	Blackbird Forest Road	Philadelphia	Clayton Delaware..terrible area..can't call or rec	
Verizon	Rt 42	Blackbird Forest Road	Philadelphia	this area is totally without service..need a tower	
Verizon	Rt 611	Stump Road	Philadelphia	Pipersville PA	
Verizon	Rt. 1		Philadelphia	i can get service everywhere BUT along Rt.1 and pennel	
Verizon	Rt. 1	all	Philadelphia	Can NEVER get cell service in the entire town of Pennel	
Verizon	Rt. 539	Rt. 70	Philadelphia	Between 539 and 70 in Lacey Township in Ocean County	
Verizon	RT.1	Neshaminy St	Philadelphia	Pennel, Bucks County , Pennel Lanes/ 7-11 store	
Verizon	Rte 841	Rte 896	Philadelphia	Kemblesville, PA at Rte 841 and Gypsy Hill Road,	
Verizon	Rte. 232	Susquehana Road	Philadelphia	Susquehana Road to Philmont Ave. (Rte.63)	
Verizon	S Third Street	Hodgson	Philadelphia	Oxford	
Verizon	Sawmill Rd	Marshallton - Thorndale Rd	Philadelphia	Downingtown, Chester County	
Verizon	Seneca Court	Crosspoint Drive	Philadelphia	Bucks County, Buckingham Township	
Verizon	Shiplly Rd.	From Silverside Rd. to past Foulk Rd.	Philadelphia	No signal at all, the whole length of Shiplly Rd.	
Verizon	Spring St	12th Street	Philadelphia	Bethlehem	
Verizon	SR487	Main	Philadelphia	Benton PA, anything less than bagphone has no sig.	
Verizon	STACY HAINES ROAD	ARC ROAD	Philadelphia	SOUTH JERSEY AIRPORT MAIN BUILDING	
Verizon	STACY HAINES ROAD	ARC ROAD	Philadelphia	SOUTH JERSEY AIRPORT MAIN BUILDING NO SIGNAL	
Verizon	State	Broad	Philadelphia	Downtown Kennett Square and surrounding areas	
Verizon	state st.	veteran sq.	Philadelphia	media	
Verizon	State Street		Philadelphia	Alburtis Pa	
Verizon	Stoneham Drive	Quincy Place	Philadelphia	Willistown Woods Community between West Chester & Newtown Square, PA	
Verizon	Stony Hill Road	Big Oak Road	Philadelphia	at the intersection calls lost	
Verizon	Suburban Station	1617 JFK Blvd.	Philadelphia	Completely Dead throughout - Fuggedaboudid!	
Verizon	suburban station	17th & JFK Blvd.	Philadelphia	So I see this is on the database - why doesn't Verizon correct this	
				Burlington Township, New	



Verizon	Sunset Road	Salem Road	Philadelphia	Jersey 08016	
Verizon	Swamp Pike	Between Ridge Pike and Route 663	Philadelphia	Upper Hanover, some areas where signal gets lost	
Verizon	teddington way		Philadelphia	mount laurel, nj	
Verizon	US Route 1/Lincoln Highway in Borough Pennel	All of them	Philadelphia	Little or no service, which has been ongoing for at least 2 years	
Verizon	W Locust Street	Penn Oak	Philadelphia	Oxford	
Verizon	West Chester Pike / Rt. 3	Blue Route, Malin Rd, etc.	Philadelphia	Broomall, PA - Most of West Chester Pike is dead!	
Verizon	West Chester Pike between West Chester and Philad	Westtown Road to Philadelphia	Philadelphia	Most of West Chester Pike	
Verizon	West Chester Pike Rt. 3	Manly Rd.	Philadelphia	West Town Township, Summit House	
Verizon	West Chester Pike, PA Rt 3	Between PA 926 and PA 352	Philadelphia	Hunters Run development off West Chester Pike, Willistown Township	
Verizon	Westbrite Ct. / Ebright Road		Philadelphia	Wilmington, DE	
Verizon	white horse pike	pine st	Philadelphia	audubon nj gleaner law offices	
Verizon	Wilton	Highland Blvd.	Philadelphia	New Castle, DE -- Hard to hear, often cut off	
Verizon	Wilton	Highland Blvd.	Philadelphia	Scotch Hills Apts. -- Hard to hear, often cut off	
Verizon	Wiltshire Drive	Dutch Neck road	Philadelphia	East Windsor, NJ	

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Carrier	Cross Street / Building	Cross Street / Address	City	Notes	Carrier Comments
Verizon			Pittsburgh	Inside Walmart @ Waterworks mall	
Verizon	308	Stoney Run Road	Pittsburgh	No Service North of Clearview Mall in Butler	
Verizon	308 (West Sunbury Road)	Holy Oak	Pittsburgh	No Service after Holy Oak Road Traveling North	
Verizon	422 East	Bonnie Brook Road	Pittsburgh	East Butler.	
Verizon	68 East	just before Connoquenessing	Pittsburgh	Evans City	
Verizon	6th ave	Andrew lane.	Pittsburgh	Sutersville, PA	
Verizon	Arlington Avenue	Knox Avenue	Pittsburgh	Service cuts out within 100m of this intersection.	
Verizon	Beach	Lake Road	Pittsburgh	Espyville	
Verizon	Church Road	Burns Road	Pittsburgh	Dropped calls South of Espyville PA	
Verizon	Espyville	Jamestown	Pittsburgh	Pymatuning	
Verizon	Hurlbert Road	East Lake Road	Pittsburgh	Westford, PA	
Verizon	intersection of rt 18 and rt 60		Pittsburgh		
Verizon	Jamisonville Road	Unionville Road	Pittsburgh	North Butler	
Verizon	Meridan St.	Pawnee St.	Pittsburgh	Whittier Elm. School	
Verizon	n.charles st	wilson ave	Pittsburgh	pennsylvania	
Verizon	Noblestown Rd	Crafton Blvd	Pittsburgh	Nobleston dead between Obey & Crafton Blvd	
Verizon	Old Route 22	Export, Westmorland County	Pittsburgh	Old route 22 going through the town of Export	
Verizon	Old Rt 22	Anywhere in Export poor coverage	Pittsburgh	Lincoln Avenue up on hill	
Verizon	PA Turnpike (Route 76)		Pittsburgh	approaching OH/PA state line from either direction	
Verizon	Park Ave.	Thorne Dr.	Pittsburgh	N. Franklin Twp., Near Washington Cemetery	
Verizon	Proctor, WV	New Martinsville, WV	Pittsburgh	Roseland ranch vicinity (south of Wheeling)	
Verizon	Puckety church rd	Leechburg rd	Pittsburgh	Burrell High school	
Verizon	Route 19 North	3 Degree Road	Pittsburgh	Near the BP Station	



Verizon	Route 19 South	McClaine Farms	Pittsburgh	From S. ...tz north toward & including Glencannon homes
Verizon	route 26	26 corridor from state college to huntingdon	Pittsburgh	bad service from top of mountain to huntingdon
Verizon	Route 286 Golden Mile Highway	Old Frankstown Rd	Pittsburgh	Old Frankstown Rd off Rt 286
Verizon	Route 40 East and West		Pittsburgh	Beallesville to Richeyville
Verizon	route 45	whitehall rd	Pittsburgh	bad coverage on all of rt 45 and whitehall rd
Verizon	Route 8	Route 528	Pittsburgh	Poor coverage between Slippery Rock and Prospect.
Verizon	Route 8	Staff Road	Pittsburgh	Butler / Slippery Rock area. Poor coverage. Add a tower!
Verizon	Route 8 North	North of Clearview Mall	Pittsburgh	Center Twp Butler
Verizon	RT 130		Pittsburgh	Turtle Creek, PA
Verizon	rt 26	whole corridor	Pittsburgh	whole corridor rt 26 from state college to huntingdon is horrible
Verizon	rt 45 16801, 16865	tadpole rd	Pittsburgh	horrible coverage even though lots of traffic!!!!
Verizon	Rt 780		Pittsburgh	around Penn State New Kensington Campus
Verizon	Saw Mill Run Blvd. (Rt. 51)	Greenlee Road	Pittsburgh	Entire intersection in front of Sunoco is dead.
Verizon	US Route 30		Pittsburgh	Eastbound lanes between Colonial Manor Rd. and Buttermilk Hollow Rd.
Verizon	Washington Road - Route 19	McMcLaughlin Run	Pittsburgh	Across from USC High School - drops almost every time
Verizon	Westford Rd	East lake Rd	Pittsburgh	Westford, Pymatuning, Jamestown, Poor Service Dropped calls
Verizon	White School Road	Saw Mill Rd to Margurite Rd	Pittsburgh	Greensburg Mt View area between Rt 30 & 130
Verizon	whitehall rd	tadpole rd	Pittsburgh	2 churches large crowds no coverage. Rt 45 and Whithall rd no coverag

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CERTIFICATE OF SERVICE

Re: Proposed Revision to Commission Regulations Governing Extended Area Service (EAS) 52  
Pa. Code §§ 63.71-77  
Docket No. L-00050173

I hereby certify that I have this day served a true copy of the foregoing document, Comments of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 6th day of June, 2006.

SERVICE BY ELECTRONIC MAIL & INTER-OFFICE MAIL

Cyndi Page  
Communications Office  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Joseph K. Witmer  
Law Bureau  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Anthony J. Rametta  
Bureau of Fixed Utility Services  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

SERVICE BY INTER-OFFICE MAIL

Office of Trial Staff  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Pennsylvania Telephone Association  
30 North Third Street  
Suite 300  
P. O. Box 1169  
Harrisburg, PA 17101

Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101



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