

# Kennard Law Offices LLC

Attorneys At Law

116 Pine Street, 5<sup>th</sup> Floor, Harrisburg PA 17101

Tel: (717) 635-2320 Fax: (717) 238-2390

Email: [njk@kennard-law.com](mailto:njk@kennard-law.com)

**Norman J. Kennard**  
Direct Dial: (717) 635-7372

**2649**

January 16, 2008

**RECEIVED**

JAN 16 2008

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Re: Proposed Rulemaking to Permit Electronic Filing  
Docket No. L-00070187

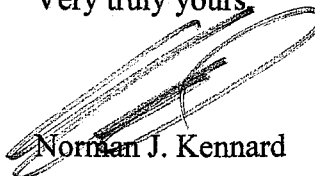
**COPY**

Dear Secretary McNulty:

Enclosed for filing with the Commission are the original and fifteen (15) copies of the Pennsylvania Telephone Association's Comments in the above-captioned matter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Norman J. Kennard

NJK:tl  
Enclosures

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2008 JAN 24 AM 9:13

**RECEIVED**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Proposed Rulemaking to Permit** : **Docket No. h-00070187**  
**Electronic Filing** :

**RECEIVED**  
JAN 16 2008  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

---

**COMMENTS OF  
THE PENNSYLVANIA TELEPHONE ASSOCIATION**

---

The Pennsylvania Telephone Association (“PTA”)<sup>1</sup> respectfully submit these Comments in response to the Pennsylvania Public Utility Commission’s (“Commission”) Order adopted August 30, 2007 in the above-captioned proceeding. PTA submits these Comments in support of its member companies.

**INTRODUCTION AND SUMMARY**

The PTA very much appreciates the Commission’s efforts to move ahead with the first phase of its electronic filing proposal as published November 17, 2007 at 37 Pa. B. 6112. The PTA and its member companies are very supportive of the concept of electronic filing and will cooperate to realize the benefits envisioned.

The PTA has not identified any specific concern with what has been proposed by the Commission, however, the PTA does have a few questions. Those concerns regard tariff changes, the definition of filing users and the current Bureau of Consumer Services (“BCS”) electronic transfer system for informal complaints.

---

<sup>1</sup> The Pennsylvania Telephone Association is the state's oldest trade organization for the local exchange carrier industry. PTA represents more than 30 telecommunications companies that provide a full array of services over wire line networks. PTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities. As referenced herein, PTA represents its member companies that have not filed comments individually on this topic.

## **DISCUSSION**

### **I. Tariff Changes**

One of the most common filings made by utilities is tariff changes. There are no specific references to tariff filings in the order, which refers to 'qualified documents:

*Qualified Document* – A document that is listed in the categories of documents that are permitted to be filed electronically in accordance with the instructions on the Commission's website at <http://www.puc.state.pa.us/>.

The PTA, therefore, asks whether tariff filings fit into the proposed electronic filing requirements and when electronic tariff filings may be expected to begin. It would save time and money if an electronic tariff filing could replace today's multiple paper copy tariff filings and, therefore, the PTA encourages the Commission to include tariff filings.

### **II. Definition of Filing Users**

The order discusses the definition of filing users but does not address how many filing users a company may register. While the order suggests that a company attorney may allow their legal assistant to be an authorized user of their filing code, it does not clarify if anyone else in the company may be considered an authorized user.

The PTA, therefore, asks how many people can use the same filing user code with permission of the registered filing user and will there be a limit on the number of users that a company may register? It would greatly limit the utility's flexibility to use the system if each utility is given a restricted number of registered filing users and each filing user can only allow a limited number of authorized parties to use their filing registration. Larger utilities need to have multiple authorized users of one company registered filing code or the ability to register multiple users from each company.

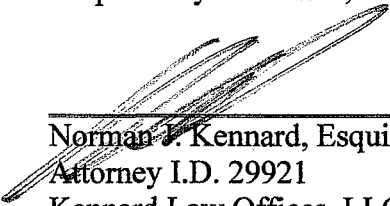
### III. BCS Electronic Transfer System

Currently many of the Pennsylvania utilities have an electronic transmission system set up with the BCS to receive and answer informal Commission complaints. How will this new electronic filing system affect the BCS electronic system currently in place? We do not know if the current BCS system will or will not be migrated into the InfoMAP system, but some utilities maintain dedicated modems and yearly maintenance contracts to operate the current BCS electronic transfer system. If the old system is replaced with InfoMAP that expense can be eliminated.

### CONCLUSION

The PTA appreciates the opportunity to file questions and comments on the proposed order.

Respectfully submitted,



---

Norman J. Kennard, Esquire  
Attorney I.D. 29921  
Kennard Law Offices, LLC  
116 Pine Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
(717) 635-2320

Attorneys for the  
Pennsylvania Telephone Association

Date: January 16, 2008