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Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
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Senate of Pennsylvania

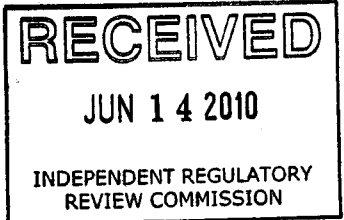
June 14, 2010

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EMERGENCY SERVICES LEGISLATIVE CAUCUS  
ADVISORY BOARD, DELAWARE VALLEY VETERANS HOME



Dear Chairman Coccodrilli:

This letter is to request the disapproval of Pennsylvania Public Utility Commission (PUC) Regulation 57-260, addressing "Abbreviated Procedures for Review of Transfer of Control and Affiliate Filings for Telecommunications Carriers."

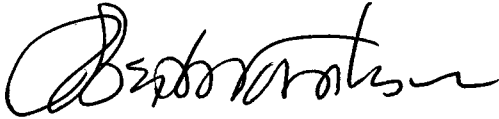
The General Assembly has been focused on streamlining and/or eliminating burdensome regulatory processes for telephone companies over the past several years. The General Assembly passed Act 129 of 2008 which called for a more efficient operating process, within the PUC, in an effort to reduce costs. Specifically regarding telecommunications companies, the Legislature passed Act 183 of 2004 which provided that one of the policies of the Commonwealth is to, "Recognize the regulatory obligations on incumbent local telephone companies should be reduced to levels more consistent with those imposed upon competing alternative service providers."

Regarding PUC regulation 57-260, I believe the PUC has failed to recognize an opportunity to achieve what the General Assembly has sought; a streamlined regulatory process for approving change of control applications for telecommunications carriers which recognizes due process for all parties without unduly burdening the companies.

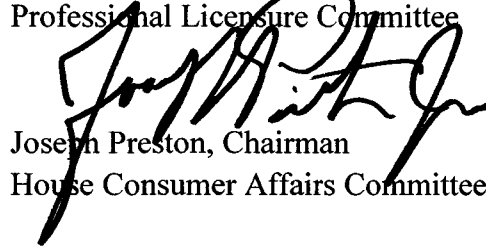
It is apparent to me that, while the final proposed regulations seek to establish time constraints on applications for change of control that are unopposed, the traditional no time limit process is retained and will continue to be utilized without restriction upon any filed protest, regardless of merit. In my opinion, the regulations in their current form are inconsistent with legislative intent and would be burdensome on a certain segment of the telecommunications industry while unregulated telecommunications providers continue to enjoy the ability to make corporate changes without filing anything with the PUC at all.

Thank you for your consideration.

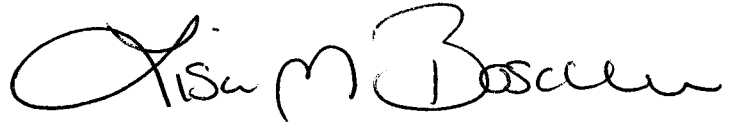
Sincerely,



Robert M. Tomlinson, Chairman  
Senate Consumer Protection and  
Professional Licensure Committee



Joseph Preston, Chairman  
House Consumer Affairs Committee



Lisa M. Boscola, Minority Chairman  
Senate Consumer Protection and  
Professional Licensure Committee



Robert W. Godshall, Minority Chairman  
House Consumer Affairs Committee