

From: terry.scobie@verizon.com
Sent: Friday, April 09, 2004 2:18 PM
To: Filings@psc.state.fl.us
Cc: Richard Chapkis; David Christian; demetria.c.watts@verizon.com
Subject: Verizon Florida Inc. - Petition for Rule Waiver

040317-TL



VZ FL LPIC rule
waiver petitio...

The attached filing is submitted by

Teresa A. Scobie
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
(813) 483-2610
terry.scobie@verizon.com

on behalf of Verizon Florida Inc.

The attached .pdf document contains a transmittal letter (1 page), Petition for Rule Waiver (3 pages), Exhibit A-sample customer letter (1 page) and Exhibit B-notice filed with FCC (7 pages).

(See attached file: VZ FL LPIC rule waiver petition.pdf)

Terry Scobie
Executive Adm. Asst.
813-483-2610
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terry.scobie@verizon.com

Richard A. Chapkis
Vice President & General Counsel, Southeast Region
Legal Department



FLTC0007
201 North Franklin Street (33602)
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Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 204-8870
richard.chapkis@verizon.com

April 9, 2004 – **VIA ELECTRONIC MAIL**

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No.
Petition for Waiver of Rule 25-4.118, Florida Administrative Code, regarding the
requirements for authorization and verification of local toll provider selection

Dear Ms. Bayo:

The above-referenced Petition is attached for filing on behalf of Verizon Florida Inc. If
there are any questions regarding this Petition, please contact me at 813-483-1256.

Sincerely,

s/ Richard A. Chapkis

Richard A. Chapkis

RAC:tas

c: Staff Counsel

DOCUMENT NUMBER-DATE

04432 APR-9 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Rule 25-4.118,) Docket No.
Florida Administrative Code, regarding the) Filed: April 9, 2004
requirements for authorization and verification)
of local toll provider selection)
_____)

VERIZON FLORIDA INC.'S PETITION FOR RULE WAIVER

Pursuant to Section 120.542, Florida Statutes, and Rule 28-104.004, Florida Administrative Code, Verizon Florida Inc. (Verizon Florida) petitions the Commission to waive Rule 25-4.118, Florida Administrative Code, regarding the requirements for authorization and verification of local toll provider selection.

1. Rule 25-4.118 provides that, before submitting a preferred carrier change, a carrier must verify the subscriber's authorization of the change through one of the methods prescribed in the Rule.

2. Verizon Florida seeks a waiver of Rule 25-4.118 to provide intraLATA toll services to certain Verizon Florida customers. These customers are currently presubscribed to Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance) for local toll service and also to local packages from Verizon Florida that offer unlimited local toll services (i.e., Verizon Freedom¹, Verizon Freedom Extra, Verizon Regional Package Extra (formerly Local Package Plus), Verizon Regional Package (formerly Local Package Basic), or Local and Toll Package). Because the local packages offer

¹ Verizon Freedom is a combination of a local and a long distance offering and consists of: (1) Verizon Florida's Regional Package (formerly Local Package Basic) plan that includes basic local exchange service, unlimited direct-dialed intraLATA toll service and a choice of up to five calling features; and (2) Verizon Long Distance's unlimited direct-dialed domestic long distance service. Verizon Freedom Extra is composed of Verizon Florida's Regional Package Extra (formerly Local Package Plus) and the same Verizon Long Distance plan that is offered in the Verizon Freedom package.

DOCUMENT NUMBER-DATE

04432 APR-9 3

FPSC-COMMISSION CLERK

unlimited local toll services at no additional cost, it is in the customer's best interest to presubscribe to Verizon Florida for local toll services.

3. Verizon Florida recently discovered that approximately 26,500 subscribers to the above-mentioned packages are receiving intraLATA toll services from Verizon Long Distance, even though they subscribe to Verizon Florida calling plans that offer unlimited regional toll services from the LEC.

It would be in the best interest of these customers to receive intraLATA toll services from Verizon Florida. Accordingly, Verizon Florida proposes to send these customers a letter notifying them that their intraLATA toll provider will be changed from Verizon Long Distance to Verizon Florida. The letter will explain:

- The carrier change will not cause any service interruption or require the customer to take any action.

The customer will not be assessed any carrier change charges as a result of the transfer.
- The local toll service that Verizon Florida will provide will be included in the package to which the customer currently subscribes at no additional charge.
- The customer is under no obligation to take service from Verizon Florida and is free to select another carrier.

A copy of the letter is attached as Exhibit A.²

² On April 9, 2004, Verizon Florida Inc. (along with GTE Southwest, Incorporated (d/b/a Verizon Southwest), Verizon Maryland Inc., Verizon South Inc., and Verizon Virginia Inc.) filed with the Federal Communication Commission ("FCC") notice of their intention to acquire certain intraLATA toll customers (i.e., customers who subscribe to a LEC plan that includes unlimited regional toll) from Verizon Long Distance. This notice complies with the rules set forth in 47 C.F.R. Section 64.1120(e). A copy of the notice is attached as Exhibit B.

4. Verizon Florida requests that the Commission accept the mailing of the attached letter to affected customers in lieu of the verification procedures set forth in Section 25-4.118. Moving these customers to Verizon Florida for intraLATA toll service ensures that customers get the benefit of the unlimited regional toll service that is included in the package to which they already subscribe. The Commission's verification rules would not be served by obtaining authorization and verification prior to switching the affected customers to Verizon Florida.

5. Verizon Florida requests expedited action on this waiver petition so that customers may be transitioned as soon as possible.

6. In light of the foregoing, Verizon Florida respectfully requests that the Commission grant its request for expedited waiver of the Commission's verification rules set forth in Section 25-4.118, Florida Administrative Code.

Respectfully submitted on April 9, 2004.

By: s/ Richard A. Chapkis
Richard A. Chapkis
201 N. Franklin Street, FLTC0007
P. O. Box 110 (33601)
Tampa, FL 33602

Attorney for Verizon Florida Inc.

EXHIBIT A

April 6, 2004

John Q. Sample
123 Main St.
Anytown, FL 12345
xxx-xxx-xxxx



Dear []:

We are contacting you to inform you that effective as of the later of May 16, 2004 or the date that Verizon receives approval from the Florida Public Service Commission (the "transfer date"), the Verizon entity that will be providing you local toll service will be changed from Verizon Long Distance to Verizon Florida (hereinafter Verizon Florida will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The local toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, or Verizon Regional Package², as applicable). If Verizon changes the rates, terms, and conditions of the local toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different local toll service provider, you may do so by contacting that carrier. The selection of a different local toll service provider may, however, affect the rates you pay for local toll service. If you do not select a different local toll carrier before the transfer date, you will automatically be switched to Verizon for local toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the local toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at 800-483-4000, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8 a.m. to 6 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 805-278-9103.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

² Formerly Local Package Basic.

EXHIBIT B

Joseph DiBella
Assistant General Counsel-Regulatory



1515 North Courthouse Road
Suite 500
Arlington, VA 22201-2909
Phone 703 351-3037
Fax 703 351-3662
joseph.dibella@verizon.com

April 9, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: CC Docket No. 00-257, Section 64.1120(e) Application of Verizon Florida Inc., GTE Southwest Incorporated (d/b/a Verizon Southwest), Verizon Maryland Inc., Verizon South Inc., and Verizon Virginia Inc. for Authority to Acquire Certain IntraLATA Toll Customers from Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance) Without Authorization and Verification in Accordance with Section 64.1120(c)

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.1120(e), Verizon Florida Inc., GTE Southwest Incorporated (d/b/a Verizon Southwest), Verizon Maryland Inc., Verizon South Inc., and Verizon Virginia Inc. provide notice that they plan to acquire certain intraLATA toll customers of Verizon Communications Inc. affiliate Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance) without subscriber authorization and verification. Specifically, the Verizon local telephone companies identified above seek to acquire customers currently receiving intraLATA toll services from Verizon Long Distance who subscribe to Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra (formerly Local Package Plus), Verizon Regional Package (formerly Local Package Basic) and Local and Toll Package. Accordingly, we are filing this notice.

The date of the transfer of affected customers is May 16, 2004 or, for customers in Florida, the later of May 16, 2004 or when the Florida Public Service Commission approves the application of Verizon Florida Inc. to acquire these customers.

Verizon Florida Inc., GTE Southwest Incorporated (d/b/a Verizon Southwest), Verizon Maryland Inc., Verizon South Inc., and Verizon Virginia Inc. hereby certify compliance with the requirement to provide advance subscriber notice in accordance with section 64.1120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to the streamlined process set forth in section 64.1120(e)(3). Copies of the notices are provided with this submission.

Please do not hesitate to contact me if you have any questions.

Yours truly,



Joseph DiBella

Attachments

April 6, 2004

John Q. Sample
123 Main St.
Anytown, FL 12345
XXX-XXX-XXXX



Dear []:

We are contacting you to inform you that effective as of the later of May 16, 2004 or the date that Verizon receives approval from the Florida Public Service Commission (the "transfer date"), the Verizon entity that will be providing you local toll service will be changed from Verizon Long Distance to Verizon Florida (hereinafter Verizon Florida will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The local toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, or Verizon Regional Package², as applicable). If Verizon changes the rates, terms, and conditions of the local toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different local toll service provider, you may do so by contacting that carrier. The selection of a different local toll service provider may, however, affect the rates you pay for local toll service. If you do not select a different local toll carrier before the transfer date, you will automatically be switched to Verizon for local toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the local toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at 800-483-4000, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8 a.m. to 6 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 805-278-9103.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

² Formerly Local Package Basic.

April 6, 2004

John Q. Sample
123 Main Street
Anytown, TX 12345
xxx-xxx-xxxx



Dear []:

We are contacting you to inform you that effective May 16, 2004, the Verizon entity that will be providing you local toll service will be changed from Verizon Long Distance to Verizon Southwest (hereinafter Verizon Southwest will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The local toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, Verizon Regional Package², or Local and Toll Package, as applicable). If Verizon changes the rates, terms, and conditions of the local toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different local toll service provider, you may do so by contacting that carrier. The selection of a different local toll service provider may, however, affect the rates you pay for local toll service. If you do not select a different local toll carrier before the transfer date, you will automatically be switched to Verizon for local toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the local toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at 800-483-4000, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8 a.m. to 6 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 805-278-9103.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

² Formerly Local Package Basic.

April 6, 2004

John Q. Sample
123 Main St.
Anytown, MD 12345
xxx-xxx-xxxx



Dear []:

We are contacting you to inform you that effective May 16, 2004, the Verizon entity that will be providing you regional toll service will be changed from Verizon Long Distance to Verizon Maryland (hereinafter Verizon Maryland will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The regional toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, Verizon Regional Package², or Local and Toll Package, as applicable). If Verizon changes the rates, terms, and conditions of the regional toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different regional toll service provider, you may do so by contacting that carrier. The selection of a different regional toll service provider may, however, affect the rates you pay for regional toll service. If you do not select a different regional toll carrier before the transfer date, you will automatically be switched to Verizon for regional toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the regional toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at [XXX]-954-6260, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8:30 a.m. to 5:00 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 508-624-7645.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

² Formerly Local Package Basic.

April 6, 2004

John Q. Sample
123 Main St.
Anytown, VA 12345
xxx-xxx-xxxx



Dear []:

We are contacting you to inform you that effective May 16, 2004, the Verizon entity that will be providing you regional toll service will be changed from Verizon Long Distance to Verizon Virginia (hereinafter Verizon Virginia will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The regional toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, Verizon Regional Package², or Local and Toll Package, as applicable). If Verizon changes the rates, terms, and conditions of the regional toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different regional toll service provider, you may do so by contacting that carrier. The selection of a different regional toll service provider may, however, affect the rates you pay for regional toll service. If you do not select a different regional toll carrier before the transfer date, you will automatically be switched to Verizon for regional toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the regional toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at [XXX]-954-6222, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8:30 a.m. to 5:00 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 508-624-7645.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

² Formerly Local Package Basic.

April 6, 2004

John Q. Sample
123 Main St.
Anytown, VA 12345
xxx-xxx-xxxx



Dear []:

We are contacting you to inform you that effective May 16, 2004, the Verizon entity that will be providing you local toll service will be changed from Verizon Long Distance to Verizon South Inc. (hereinafter Verizon South Inc. will be referred to as "Verizon"). This carrier change should not cause any service interruption and does not require you to take any action. You will not be assessed any carrier change charges as a result of this transfer. The local toll service that Verizon will provide you will be included in the package to which you currently subscribe, at no additional charge (i.e., Verizon Freedom, Verizon Freedom Extra, Verizon Regional Package Extra¹, Verizon Regional Package², or Local and Toll Package, as applicable). If Verizon changes the rates, terms, and conditions of the local toll service that it provides you, Verizon will provide you notice of the changes either through a bill message or a bill insert prior to the effective date of the changes.

If for any reason you want to select a different local toll service provider, you may do so by contacting that carrier. The selection of a different local toll service provider may, however, affect the rates you pay for local toll service. If you do not select a different local toll carrier before the transfer date, you will automatically be switched to Verizon for local toll service – even if you have a carrier freeze request on your account. If you want to arrange a new freeze after the transfer, you will need to contact Verizon. After the transfer date, Verizon will be responsible for resolving any outstanding complaints you may have had about the local toll services that Verizon Long Distance provided to you.

If you have any questions about this notice, please contact Verizon at 800-483-4000, Monday to Friday from 8 a.m. to 6 p.m. Verizon Center for Customers with Disabilities is 800-974-6006 (V/TTY) from 8:30 a.m. to 5:00 p.m. Monday to Friday. Verizon Center for Customers with Disabilities fax number is 508-624-7645.

Sincerely,

Eileen Cassidy
Eileen Cassidy
Executive Director – Verizon Consumer Marketing

¹ Formerly Local Package Plus.

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