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January 22, 2009

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **DOCKET NO. 080701-TP:** Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.

Dear Ms. Cole:

Enclosed for electronic filing, please find Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC's Opposition to Verizon's Motions to Dismiss and/or For Summary Final Order.

Thank you for your assistance in this matter. Please do not hesitate to contact me if you

have any questions whatsoever.

Sincerely,

Beth Keating

Beth Keating
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Enclosures

cc: Thomas Wilson
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by of Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC.**	Docket No. 080701-TP Filed: January 22, 2009

OPPOSITION TO VERIZON'S MOTIONS TO DISMISS AND/OR FOR SUMMARY FINAL ORDER

Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC, (jointly referred to herein as "Bright House"), through its attorneys, hereby responds in opposition to the Motion to Dismiss Complaint and Petition ("Complaint") or in the Alternative for Summary Final Order ("Motion") filed by Verizon Florida LLC ("Verizon").

INTRODUCTION

One thing stands out in Verizon's answer. It never actually answers the question. Nowhere does Verizon *deny* that a substantial number of Verizon customers have been left ungrounded, nor does Verizon affirmatively state that it is in compliance with the National Electric Code (NEC). Verizon simply ignores the substance of the complaint in the hope that it will all go away. Nor does Verizon offer a solution to the problem. Instead, Verizon pretends that its telephone customers are somehow unaffected by its actions and downplays the safety issue that underpins the rules. Verizon's response should give the Commission little comfort that it takes these violations seriously. Short of the Commission acting on behalf of the public, there is no reason to believe that Verizon will investigate and correct the safety violations on its own.

The Commission should look past Verizon's efforts to distract the Commission and apply the recognized legal standards for a Motion to Dismiss and a Motion for Summary Final Order. In so doing, Bright House is confident that the Commission will find that Verizon's Motion to Dismiss and its alternative request for Summary Final Order must be rejected for the following reasons: (1) the Commission does have jurisdiction to address safety issues related to the installation of telephone service by a local exchange company, even if that telephone service is bundled with other unregulated products; (2) Bright House does have standing to pursue this complaint, because Verizon interferes with Bright House facilities while installing its own facilities, thereby creating an unsafe situation at the customer's home for both the customer and Bright House employees; (3) regardless of the standing assertion, this is a public interest/safety matter that could be brought by any affected customer or could be prosecuted by the Commission on its own initiative; and (4) a summary final order is not appropriate, because pertinent facts are clearly in dispute, or are subject to significant interpretation. Finally, Verizon's repeated attempts to change the subject by "shooting the messenger" have no legal bearing on either motion before the Commission.

LEGAL STANDARDS

A. Dismissal

In accordance with the well-recognized standard of review for a Motion to Dismiss in Florida, dismissal is only appropriate if, accepting all allegations in the petition as facially correct, the petition still fails to state a cause of action for which relief can be granted.[1] In considering

[1] *See* Varnes v. Dawkins, 624 So. 2d 349, 350 (Fla.1st DCA 1993); Flye v. Jeffords, 106 So. 2d 229 (Fla. 1st DCA 1958), overruled on other grounds, 153 So. 2d 759, 765 (Fla. 1st DCA 1963); Rule 1.130, Florida Rules of Civil Procedure (the Commission should confine itself to the petition and documents incorporated therein, and the grounds asserted in the motion to dismiss).

Verizon's motion to dismiss, all "material allegations" of Bright House's Petition "must be construed against" Verizon's request for dismissal.[2]

B. Standing

With regard to the Commission's consideration of Bright House's standing to pursue its complaint before the Commission, the Commission has, time and again, applied the seminal test for standing set forth in Agrico Chemical Company v. Department of Environmental Regulation, 406 So.2d 478, 482 (Fla. 2nd DCA 1981). According to the Agrico test, "Before one can be considered to have a substantial interest in the outcome of the proceeding he must show: 1) that he will suffer injury in fact which is of sufficient immediacy to entitle him to a section 120.57 hearing, and 2) that this substantial injury is of a type or nature which the proceeding is designed to protect. The first aspect of the test deals with the degree of injury. The second deals with the nature of the injury." Agrico, 406 So. 2d at 482. The "injury in fact" must be both real and immediate, and cannot be speculative or conjectural. International Jai-Alai Players Assn. v. Florida Pari-Mutuel Commission, 561 So. 2d 1224, 1225-26 (Fla. 3rd DCA 1990).[3]

C. Summary Final Order

In accordance with Section 120.57(1)(h), Florida Statutes, a summary final order may only be granted if it is determined from the pleadings, depositions, answers to interrogatories, and admissions on file, together with affidavits, if any, that: (1) no genuine issue as to any material fact

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[2] *Id.*

[3] See also Ameristeel Corp. v. Clark, 691 So. 2d 473 (Fla. 1997)(threatened viability of plant and possible relocation do not constitute injury in fact of sufficient immediacy to warrant a Section 120.57, Florida Statutes hearing); citing Florida Society of Ophthalmology v. State Bd. Of Optometry, 532 So. 2d 1279, 1285 (Fla. 1st DCA 1988)(some degree of loss due to economic competition is not of sufficient immediacy to establish standing) and Village Park Mobile Home Assn., Inc. v. State Dept. of Business Regulation, 506 So. 2d 426, 434 (Fla. 1st DCA 1987)(speculation on the possible occurrence of injurious events is too remote);.

exists, and (2) that the moving party is entitled as a matter of law to the entry of a final summary order. Rule 28-106.204(4), Florida Administrative Code, further provides that "[a]ny party may move for summary final order whenever there is no genuine issue as to any material fact."[4] The Commission has recognized in previous cases that "The party moving for summary judgment is required to conclusively demonstrate the nonexistence of an issue of material fact," and every possible inference must be drawn in favor of the party against whom a summary judgment is sought.[5] Moreover, the burden is on the movant to demonstrate that the opposing party cannot prevail.[6] "A summary judgment should not be granted unless the facts are so crystallized that nothing remains but questions of law."[7] "Even where the facts are undisputed, issues as to the interpretation of such facts may be such as to preclude the award of summary judgment."[8] Summary judgment is improper if any issue of material fact exists, even the possibility of an issue, and likewise improper if there is even a doubt that an issue might exist.[9]

RESPONSE

I. MOTION TO DISMISS

A. Jurisdiction

Verizon contends that the facilities at issue are not telecommunications facilities, and thus, are not subject to the Commission's jurisdiction. Verizon alleges the facilities are coaxial cable used to provide broadband and cable television service. Verizon further contends that it uses only

[4] Order No. PSC-07-0972-PCO-WS, issued December 7, 2007, in Docket No. 070109-WS.

[5] Green v. CSX Transportation, Inc., 626 So. 2d 974 (Fla. 1st DCA 1993).

[6] Christian v. Overstreet Paving Co., 679 So. 2d 839 (Fla. 2nd DCA 1996).

[7] Moore v. Morris, 475 So. 2d 666, 668 (Fla. 1985). See also McCraney v. Barberi, 677 So. 2d 355 (Fla. 1st DCA 1996) (finding that summary judgment should be cautiously granted, and that if the evidence will permit different reasonable inferences, it should be submitted to the jury as a question of fact).

[8] Franklin County v. Leisure Properties, Ltd., 430 So. 2d 475, 479 (Fla. 1st DCA 1983).

[9] Albelo v. Southern Bell, 682 So. 2d 1126 (Fla. 4th DCA 1996).

copper wire to provide voice, telecommunications service, and that this wire is installed separately from the coaxial cable used to provide broadband and video service. Likewise, Verizon contends that the Bright House facilities at issue are unregulated coaxial cable used for the provision of broadband, cable television service, and VoIP-based voice services. Thus, Verizon concludes that the Commission must dismiss the complaint for lack of jurisdiction, because the crux of this Complaint involves the disconnection of Bright House's coaxial cable and the installation of Verizon's data/video coaxial cable.

Verizon's reliance upon the specific facilities at issue for its jurisdictional argument is, however, misplaced. Bright House contends that the Commission has jurisdiction over Verizon's installation practices, and more specifically, the safety, or lack thereof, of those practices. The Commission's safety and plant design rules clearly provide that the Commission has authority to remedy NEC violations created by a utility subject to these rules.

Specifically, the plain wording of Rule 25-4.036 provides that the utility's "plant and facilities," (notably, without limitation), must be "designed, constructed, installed, maintained, and operated" in accordance with the 2007 NESC and the 2005 NEC provisions applicable to the construction of telecommunications facilities. The rule also provides that compliance with the safety codes, as well as "accepted good practice," is necessary. Rule 25-4.038 provides, in even broader terms, that the "utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities." This sentence is clear—as a company subject to the Commission's safety jurisdiction, Verizon is required, in all instances, to make sure that it warns and protects employees, customers, and the

public from danger associated with any of its facilities. Thus, these rules were designed to address precisely the kinds of installation practices brought to light in Bright House's complaint.

Moreover, Verizon's contention that the facilities at issue are not used to provide "telecommunications service" is misleading. In many, if not most, instances in which technicians are installing FiOS after Verizon has won the customer from BHN, the technician is reinitiating voice service to that customer as part of the service installation, or modifying the voice service to move it to the FiOS equipment.[10] Thus, the installation of Verizon's service, at least in some cases, involves a change in the provision of a telecommunications service over a telecommunications facility within the meanings contemplated by Section 364.02, Florida Statutes.

Furthermore, at pages 5 and 6 of its Motion, Verizon contends that when it installs FiOS to customers' premises, it runs the fiber optic drop to the Verizon ONT, at which point the broadband and cable signal is sent through the data/video port, and the voice signal is sent through the voice port. The data/video signal is then fed to the customer's inside coaxial cable at the demarcation point in the wall box. The voice signal then travels on a separate copper wire from the ONT to the Verizon NID, which is the demarcation point for the customer's inside wire. Verizon's explanation is important, because it indicates that the voice signal has either: (1) been converted to a traditional TDM signal, i.e. traditional, two-way voice telecommunications signal, *before* it hits the demarcation point and enters the customer's house; or (2) the signal was *already* a TDM signal and not a packet-switched IP signal. Consequently, the voice product provided to the customer as a component of the FiOS bundle (1) uses ordinary customer premises equipment (CPE) with no enhanced functionality; (2) originates and terminates on the public switched telephone network

[10] Verizon's practice is unclear in view of statements on its website, and included in Exhibit 3 to the Complaint, regarding its practice of *migrating* any voice telecommunications services to the FiOS equipment upon installation.

(PSTN); and (3) undergoes no net protocol conversion and provides no enhanced functionality to end users due to the provider's use of IP technology.[11] Thus, applying the FCC's analysis of AT&T's Petition for Declaratory Ruling regarding AT&T's Phone-to-Phone IP Telephony Services, Verizon is *concurrently* installing a separate "telecommunications facility" used in the provision of a telecommunications service when it installs the FiOS facilities used to provision video and broadband service. [12] Consequently, the installation activity addressed in the Bright House complaint includes the installation of a "telecommunications facility" for the provision of telecommunications service as defined in Section 364.02, Florida Statutes.[13]

For all these reasons, the Commission has jurisdiction to move forward with this case. Bright House has, therefore, stated a cause of action upon which the Commission can, and should, grant relief.

B. Standing

The question of standing is a red herring that should not distract the Commission from the clear fact that the Complaint before the Commission presents concerns regarding Verizon's unsafe service installation practices, which present a very real danger to homeowners, the public, and Bright House employees. These are issues that the Commission could take up based upon its own

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[11] *Id. at ¶ 1*. To be clear, the FCC emphasized in its Order on AT&T's Petition for a Declaratory Statement that its decision was limited to the facts set forth in AT&T's petition. However, the criteria addressed therein share significant similarities with the provisioning arrangement outlined by Verizon in its Motion.

[12] The FCC has indicated that certain phone-to-phone IP telephony bears the characteristics of telecommunications service, rather than an information service. (*Order, issued April 21, 2004, in WC Docket NO. 02-361) See also Stevens Report*, 13 FCC Rcd at 11543-44, para. 88.

[13] *See also* Order No. PSC-05-1234-FOF-TP, issued December 19, 2005, in Docket No. 041144-TP, wherein the Commission determined that ". . . the technology used to deliver the call, whether circuit-switching or IP telephony, should have no bearing on whether reciprocal compensation or access charges should apply."

investigation, or at the request of any member of the public under its broad public interest authority.[14]

Moreover, Bright House does have standing to pursue its Complaint. The fact that Verizon's installation practices impair Bright House's facilities, in addition to presenting a direct and immediate harm to Bright House employees and the public, certainly provides Bright House with standing to bring this complaint. The test for standing as set forth in Agrico provides only that Bright House be able to demonstrate that 1) that it will suffer injury in fact which is of sufficient immediacy to entitle it to a section 120.57 hearing, and 2) that this substantial injury is of a type or nature which the proceeding is designed to protect. Bright House has, and will continue, to experience an injury in fact if Verizon is not directed to address and remedy these safety violations. Bright House employees in the field are, and will continue to be, placed at significant risk of physical injury from electrocution as a result of these grounding violations.

Furthermore, as explained previously herein, Rules 25-4.036 and 25-4.038, Florida Administrative Code, were designed to address precisely this type of problem. Rule 25-4.036 requires that Verizon install its facilities in compliance with the NEC, and Rule 25-4.038 states, in broad terms, that the "utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities." Standing to bring a complaint under the referenced rules does not require that all of the affected facilities, or the complainant, be subject to the Commission's jurisdiction.

Contrary to Verizon's assertions, Bright House has demonstrated it will experience an injury of sufficient immediacy to warrant action by the Commission. In fact, Bright House has *already*

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incurred harm as contemplated by Agrico. The rules at issue are designed to prevent and protect against precisely the type of danger and harm alleged.[15] As such, Bright House should be deemed to have standing to pursue this case.

II. SUMMARY FINAL ORDER

Verizon's alternative Motion for Summary Final Order must also fail. Verizon has not, and cannot, demonstrate conclusively that no genuine issue of material fact exists. As should be clear from this response, there are significant factual disputes, among them: 1) has Verizon improperly installed its facilities at customers' homes; 2) are Verizon installations safe and in compliance with the NEC; and 3) are all of the installation problems discovered by Bright House, in fact, caused by Verizon technicians. These are issues that must be determined by the Commission. Until these facts are decided, it is impossible to meet the second criteria for a summary final order, which requires a finding that, based upon the undisputed facts, the movant is entitled to judgment as a matter of law. Furthermore, Verizon has not presented competent evidence to support its motion; rather, it merely disputes the interpretation of the facts as presented by Bright House, which is wholly insufficient to support a summary final order.[16]

Moreover, as the Commission has recognized in prior cases, a decision to grant summary final order should not be taken lightly, particularly when the public interest is involved. The

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[15] Even if the Commission believes that these rules require that the installation practices at issue must specifically deal with "telecommunications facilities," Bright House suggests, as set forth herein, that the facilities in question are a combination of facilities that includes facilities used to provide "telecommunication service." In its complaint, Bright House included references to the relevant sections of the NEC. Thus, the Commission should move forward to with this case.

[16] Verizon contends that Bright House has made "inaccurate allegations" in an attempt to "exploit regulation for its own marketing advantage." Motion at p. 2. Certainly, Verizon may have a different view of the facts and the law than does Bright House. Whether the facts are, in fact, as Bright House believes them to be is, however, a matter for the Commission to determine through the Section 120.57, Florida Statutes, hearing process. As for "exploiting" a marketing advantage, Bright House notes that it did not, and has not, issued any press release regarding this matter. This particular "defense" is preposterous and irrelevant.

Commission has also recognized that there are additional policy and public interest considerations when addressing a Motion for Summary Final Order. For instance, in Order No. PSC-98-1538-PCO-WS,[17] the Commission stated:

> We are also aware that a decision on a motion for summary judgment is also necessarily imbued with certain policy considerations, which are even more pronounced when the decision also must take into account the public interest. Because of this Commission's duty to regulate in the public interest, the rights of not only the parties must be considered, but also the rights of the Citizens of the State of Florida are necessarily implicated, and the decision cannot be made in a vacuum. Indeed, even without the interests of the Citizens involved, the courts have recognized that [t]he granting of a summary judgment, in most instances, brings a sudden and drastic conclusion to a lawsuit, thus foreclosing the litigant from the benefit of and right to a trial on the merits of his or her claim. . . . It is for this very reason that caution must be exercised in the granting of summary judgment, and the procedural strictures inherent in the Florida Rules of Civil Procedure governing summary judgment must be observed. . . . The procedural strictures are designed to protect the constitutional right of the litigant to a trial on the merits of his or her claim. They are not merely procedural niceties nor technicalities. [*emphasis added*]

In this case, the issues raised by Bright House concern public safety, as well as the safety of Bright House employees. The concern relates to the facilities installation practices of a utility subject to the Public Service Commission's safety jurisdiction.

Undoubtedly, safety is an overarching public interest concern. If *any* of Verizon's installations do not comply with the NEC, there is a safety hazard that creates a very real, imminent danger to the customer, employees, and the public. Notably, Verizon has declined to answer the question at hand ---- whether it has left a substantial number of homes ungrounded. Instead, Verizon provides selective information from its own audit without sharing the full results of the

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[17] Issued November 20, 1998, in Docket Nos. 970657-WS and 980261-WS, In Re: Application for Certificates to Operate a Water and Wastewater Utility in Charlotte and Desoto Counties by Lake Suzy Utilities, Inc., and In Re: Application for Amendment of Certificates Nos. 570-W and 496-S to add Territory in Charlotte County by Florida Water Services Corporation, respectively.

audit or providing any support for its "findings," in essence, asking the Commission to trust Verizon's word in its effort to downplay the gravity of the situation.[18]

From what Verizon does provide, however, it is clear that very real safety issues exist. Of the approximately 372 homes where the Bright House audit identified a problem, Verizon claims that it found no problem whatsoever in only 50. Even if one assumes that there never was a problem at those locations (which would be incorrect), that still leaves 322 homes with grounding problems, or 16% of the homes included in the audit. This, of course, only accounts for those homes included in the audit. The total number of homes that are currently ungrounded escalates into the thousands when the non-compliance rate is applied to the entire pool of homes potentially affected by Verizon's installation practices.

Bright House does not doubt that Verizon has extensive M&Ps for FiOS, as set forth in Mr. Reelfs' affidavit, and, likewise, has no reason to doubt that Verizon has developed a training program for FiOS technicians. Yet, Verizon never says how it intends to investigate and fix the grounding problems that *currently* exist in its system. The 1,963 homes included in the Bright House audit were merely a sampling of customers that had disconnected from Bright House to return to Verizon. It is likely that many more Verizon customers have the same unsafe grounding problems at their homes.

As Bright House explained in the Complaint, Verizon has never indicated that it has any plan to investigate and address the outstanding safety violations on its own initiative. Bright House first discovered these problems when its technicians went to re-install service to customers that

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[18] For instance, Verizon contends that in over one hundred of those homes, Verizon's own technicians found that there was no ground wire connecting the Bright House facilities to the ground. Verizon therefore assumes that Bright House did not ground its own facilities, which is simply wrong. Moreover, Bright House noted in the audit results that it too had found instances where the Bright House ground wire was missing. Bright House technicians could see evidence, however, that the wire had been cut and removed. Thus, the facilities had been grounded upon installation.

Bright House had won from Verizon for a second time. These were customers that had switched from Verizon to Bright House, then back to Verizon, then back again to Bright House. Bright House then decided to conduct an audit using a sampling of customers that had disconnected from Bright House to return to Verizon, because the grounding problems seemed to be created when Verizon technicians installed service. Bright House notified Verizon that it would be conducting the audit to check for additional problems. Shortly thereafter, but before Bright House filed its complaint, Bright House manager Chris Feathers inquired as to whether Verizon intended to check previous installations for these problems. Verizon never responded, leaving Bright House to wonder whether Verizon intended to investigate and remediate any of the existing safety violations caused by Verizon's own installation technicians.[19] Bright House determined at that point that the best and most expeditious course of action would be to seek assistance from the Commission, asking the Commission to direct Verizon to take action. That still seems to be the case.

In spite of much protestation and vitriol in its Motion, not once does Verizon explain whether, how, or when it intends to fix these problems. Thus, applying the standard for summary final order, as well as these significant public policy considerations, the Commission should reject Verizon's alternative request for summary final order and move this case forward to hearing to allow a full airing of the issues.

CONCLUSION

The Commission should reject Verizon's Motion to Dismiss, as well as its alternative request for Summary Final Order. The Commission has jurisdiction to address the concerns raised in Bright House's complaint, and Bright House has standing to bring the complaint. Moreover, the Commission can move forward to investigate the issues raised by Bright House whether or not it

[19] *See* Exhibit 2 to Bright House's Complaint.

finds that Bright House has standing. The concerns raised by Bright House are serious, public safety concerns that should not be downplayed. If this Commission does not act, the existing problems may not be investigated and corrected, and Verizon technicians may continue to engage in unsafe installation practices. The Commission has more than a "colorable claim" that it has the authority to act.[20] Furthermore, "[b]y giving the Commission exclusive jurisdiction over telecommunications services, the Legislature has provided the Commission with broad authority to regulate telephone companies," particularly in situations such as this.[21] Thus, at the very minimum, the Commission should move this complaint forward to hearing, so that discovery can be conducted, and evidence can be presented for the Commission's consideration.

For these reasons, Bright House respectfully asks the Commission to deny Verizon's Motion to Dismiss Complaint and Petition or in the Alternative for Summary Final Order. Bright House notes that it does not oppose Verizon's separate Request for Oral Argument on this important issue.

Respectfully submitted this 22nd day of January, 2009,

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Attorneys for Bright House

[20] Florida Public Service Commission v. Bryson, 569 So. 2d 1253 (Fla. 1990).

[21] See FIXCA v. Beard, 624 So. 2d 248 (Fla. 1993).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via US Mail and Electronic Mail* to the persons listed below this 22nd day of January, 2009:

Dulaney L. O'Roark, III, VP/General Counsel* Verizon Florida, LLC P.O. Box 110, MC FLTC 0007 Tampa, FL 33601 de.oroark@verizon.com	David Christian* Verizon Florida, Inc. 106 East College Ave. Tallahassee, FL 32301-7748 David.christian@verizon.com
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