



## Public Utility Law Project of New York, Inc.

---

### FIRST CLASS AND ELECTRONIC MAIL

April 18, 2016

Vice-President Leecia Eve  
New York, New Jersey & Connecticut Regions  
Verizon Communications  
140 West Street  
New York, NY 10007

Re: Update on Town of Lexington Verizon Landline Telephone Issues

Dear Vice-President Eve:

On November 23, 2015, the Public Utility Law Project of New York (Utility Project or PULP) sent you a letter concerning alleged long-term landline telephone service quality and restoration issues in the Town of Lexington (“Lexington”) and particularly, in the West Kill Hamlet of Spruceton Valley, Lexington (November letter). In the November letter, we requested Verizon to formulate a plan to restore and/or repair the landline service problems identified by Lexington’s residents and attached a document showing a representative sample of the known landline service problems residents were having in Lexington at that time.

By response letter dated December 21, 2015, you stated that you discussed the landline issues with the management team responsible for service matters in Lexington and that “they have begun field inspection of these customer lines to determine if there is a systematic issue that we can resolve.” Your letter also indicated that the operations team would be calling customers directly to discuss their service experience.

Attached to this letter is a spreadsheet listing all the names of the customers that were experiencing service issues as of November 2015 as indicated in the representative sample provided by PULP to Verizon in the November letter, and an update as to whether the company contacted the customer since its December 2015 letter. Of the 26 customers listed in the representative sample provided to Verizon last year, only three people indicated that they have had direct communication with Verizon and that their service issues have been resolved, or lessened. Additionally, we had added three additional complaints that we have become aware of since our last communication. All these outstanding issues must be addressed, as Verizon promised to do.

As we indicated to Verizon in the November letter, many of the Lexington residents experiencing significant and long-term service problems are elderly customers who rely on Lifeline for telephone service. As such, many residents in Lexington fit within the definition of “core” customers (i.e., residential customers without wireline competitive alternatives and those on Lifeline or characterized as having special needs) in Verizon’s Service Quality Improvement

Plan (SQIP) in effect since December 2010.<sup>1</sup>

The Utility Project continues to be concerned that Verizon may not be meeting the SQIP standards with respect to timeliness of repair performance and/or that Verizon might have also fallen short of the threshold levels defined in the telephone service quality standards provided for in 16 NYCRR 600 et seq. Among other reasons for such concern is the fact that most of the Town of Lexington's customer service issues reported almost six months ago have not been resolved since your response letter of five months ago promising a field inspection and direct customer engagement.<sup>2</sup>

Therefore, we respectfully request a conference call to occur no later than May 1<sup>st</sup> so that we can discuss what Verizon will specifically do in order to restore and/or repair landline service to its Town of Lexington customers experiencing outstanding service issues, and eventually, to the entire town.<sup>3</sup> Additionally, we would like to discuss how or whether Verizon will institute a deliverables-based project plan sufficient to promulgate and track the inspection and customer engagement efforts the company undertakes as it works on the service restorations necessary to provide adequate service to the Lexington community.

Thank you in advance for giving this matter its due attention. Please feel free to contact me directly to schedule a call to discuss these matters. If you have any questions or concerns, please do not hesitate to contact me by email, or by telephone to (518) 308-8208.

Sincerely,



Lisabeth Jorgensen

Staff Attorney

(518) 308-8208

[Ljorgensen@utilityproject.org](mailto:Ljorgensen@utilityproject.org)

cc: Senator George Amedore  
Assemblymember Pete Lopez  
Lexington Town Supervisor Dixie Baldrey  
Michael Corso, Chief Consumer Advocate of NYS Public Service Commission

---

<sup>1</sup> Case 10-C-0202, Verizon Service Quality Improvement Plan, Order Adopting Verizon New York Inc.'s Revised Service Quality Improvement Plan with Modifications (issued December 17, 2010). The Commission's Order established certain standards for evaluating Verizon's performance in repairing service to "core" customers and subjects Verizon to penalty actions under Public Service Law §25 if the company fails to comply.

<sup>2</sup> 16 NYCRR Part 603(3) and Public Service Law (PSL) §94(2). Also, even if Verizon could demonstrate it is meeting its "core" performance standards across its five geographical areas, this does not necessarily demonstrate that Verizon is furnishing just and adequate service to Lexington's residents as required under PSL §91.

<sup>3</sup> PULP understands that the CWA work stoppage may delay Verizon's ability to schedule such a conference call, and will be flexible during the pendency of the strike.