

May 12, 2015

**Re: Proposed Agreement Could Remove Verizon's Service Quality Standards  
Deadline to Comment is May 15**

Dear Mayor:

On May 6th Verizon New Jersey (Verizon) entered into a proposed stipulation agreement with the staff of the Board of Public Utilities (BPU). This proposed agreement stems from a proceeding dating back to 2011. See IMO Board's Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as Competitive-Phase II, Docket No. TX 11090570 (11/30/11). If approved by the BPU's commissioners, this agreement could have long lasting and permanent effects on municipalities currently served by Verizon, particularly those municipalities in areas of the state which are served only by landline telephone service and not FIOS.

This agreement proposed two changes. **First**, it would deregulate four areas of rate regulated service: 1) residential basic exchange service; 2) single line business basic exchange service; 3) residence service connection and installation; and 4) residential directory assistance services. **Second**, section 20 of the proposed agreement purports to remove "*all service quality standards [which would apply] to residential basic local exchange service and single line business service*" three or five years after the proposed stipulation agreement is approved. The proposed agreement may be found at: <http://nj-njslom.civiplus.com/DocumentCenter/View/6506>

The League is most concerned with the second change regarding service quality standards. Many New Jersey towns have poor landline telephone service, particularly in those towns which lack FIOS services. When it rains, or when the air is humid, these telephone lines do not work. This deteriorating infrastructure is a security, health and safety hazard. Over the last few years some towns have been able to get some infrastructure improvements by raising service quality issues. These towns were successful in arguing that Verizon ought to be held to the BPU's standards.

The language regarding service quality is troubling. The proposed stipulation agreement could provide a pathway to sunset existing service quality standards. In doing so, it would remove any basis for towns to insist that their landline service be maintained.

**We ask that you submit comments regarding this proposed stipulation agreement by May 15, 2015 under the heading:**

IMO Board's Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as Competitive-Phase II Docket No. TX11090570

**Comment Period Closed.**

If you have any questions regarding this notice please contact Ed Purcell Esq. at (609) 695-3481 x. 137 or [epurcell@njslom.org](mailto:epurcell@njslom.org).

Very truly yours,

Brian C. Wahler, President, League of Municipalities  
Mayor, Piscataway Township

William G. Dressel, Jr.  
Executive Director