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January 31, 2011

Honorable Jaclyn A. Brillling
Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

***Re: Case 09-M-0544 – In the Matter of the Rules and Regulations of the
Public Service Commission, etc. – Electronic Filing and Service***

Dear Secretary Brillling:

I am writing on behalf of Verizon New York Inc. (“Verizon”) to comment on the Notice of Proposed Rulemaking in this proceeding, dated November 30, 2010. The proposed rules amend the Commission’s regulations to make electronic filing and service the preferred methods of filing and service of documents in Commission proceedings. As a general proposition, Verizon supports the proposed rules and the Commission’s objectives in implementing these changes.

We do have one specific suggestion that we hope will improve the rules as proposed. The definition of “electronic service” in section 1.2(m) should be amended to limit the use of notices of web posting to documents transmitted by the Commission. Under proposed revised sections 2.1(b)(3) and 3.2(b), parties to Commission proceedings may consent to electronic service of Commission documents. Under proposed rule 3.5(e)(2), parties to Commission proceedings are required to serve documents by electronic means, unless the parties agree otherwise or the Secretary authorizes the use of a different method.

As written, the proposed rules would appear to authorize a party to complete service of a pleading by posting it to *that party’s web site* and sending a notice of web posting, with the web address of the document being served. We do not believe that the Commission intended this result. Parties in Commission proceedings should not be obligated to go to the web sites of every other party to access other parties’ pleadings. If a party’s web site is experiencing technical difficulties or other issues, parties may be

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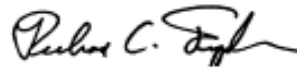
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significantly delayed in securing access to another party's pleading. The use of web posting notices should be limited to the service of documents by the Commission. In order to address this issue, we propose that section 1.2(m)(1) be amended to read as follows:

(1) in the case of service of documents by the Commission, a notice of web posting providing a web address linking directly to the document being served; or

Thank you for considering Verizon's comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard C. Fipphen". The signature is written in a cursive style with a prominent loop at the end.

Richard C. Fipphen