

# Public Utility Law Project of New York, Inc.

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May 15, 2013

The Honorable Jeffrey Cohen  
Acting Secretary  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, New York 12223

RE: Case 13-C-0197, (Verizon Tariff Filing for Substitution of Wireless for Landline Service)

Dear Secretary Cohen:

PULP supports the position of the Attorney General that summary action approving Verizon's proposed tariff revision to allow substitution of wireless for landline service without further proceedings to review the merits. The impact of the proposed action on customers and customer protection should be assessed before final action is taken.

In the event the Commission entertains the proposal, PULP suggests that any action allowing substitution of wireless for wireline service be narrowly limited in geographic scope and that it be designated as temporary, pending further scrutiny. Thus, the proposed tariff might be modified as follows:

PSC NY No. 1—COMMUNICATIONS  
Section 1  
1<sup>st</sup> Revised Page 60  
Original Page 60.1

The purpose of these revisions is to add language to the tariff setting forth the circumstances under which Verizon temporarily could discontinue its current wireline service offerings ~~in a specified area~~ and instead temporarily offer a wireless service as its sole service offering in ~~the area~~. ~~Additionally, the western portion of Fire Island is identified as a location where Verizon would be authorized to provide a wireless service as its sole offering.~~

Thank you for your consideration.

Sincerely,



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