

**Public Service Commission Testimony
on the proposed sale of Verizon land lines to Frontier
by Gary Zuckett,
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The WV Citizen Action Group (WV-CAG) agrees with the PSC Consumer Advocates office in opposing the proposal now before the Commission to approve the sale of Verizon's WV land line telephone service to Frontier. WV-CAG feels strongly that this proposal will not provide better service to the customers now being served by Verizon and has a very high potential to harm both these and present Frontier customers.

There are several reasons we have taken this position:

#1. Years of diminishing investment by Verizon in its physical operations and cuts in service personnel has left its lines and other equipment in disrepair and as such providing poor service to its customers as documented in prior proceedings before this Commission. This proposed purchase will leave Frontier deep in debt. Where will they obtain the resources to make the needed repairs and upgrades in order to provide adequate service to both its new and present customers?

#2. Other Verizon deals structured similarly to this one such as the sales to FairPoint in New England and TelCom in Hawaii have resulted in these utilities filing for bankruptcy protection. However, there was no protection for the customers of these failing telephone companies who "bit off more than they could chew" and whose customers experienced service outages, billing issues, call center problems, and 911 emergency system failures.

#3. In this deal Frontier will be attempting to instantly quadruple its size in WV. The "Smooth Transitions" that were promised in the other deals mentioned did not occur. We feel that the Frontier deal is also at risk of ending up like FairPoint and TelCom and where will that leave WV consumers?

#4. Many rural WV telephone customers are totally dependent on land lines for access to the outside world because they live in remote areas that are not serviced by cable or wireless services. They are the ones most at risk when telephone service is interrupted for long periods and must be protected from such outages. I have a personal stake in this issue since I live in rural Ritchie County where my cell phone is useless. If my phone service goes out, I'm stuck with driving miles to find a business or neighbor who hopefully has service. In an emergency this situation could be deadly.

#5. This deal is structured so that any additional transitional costs incurred by Verizon, even those that might be required by this Commission to make the transition workable, would be reimbursed by Frontier – further draining the resources of the receiving company and making the deal even riskier for WV consumers. Compare this to the sale of a house. Normally the seller is required to make repairs or modifications at their expense when deficiencies are found. This Verizon Deal is backwards in this regard. Please make Verizon fix up its house before its sold and make sure that Frontier doesn't end up with the bill.

In closing I'd like to state that although its apparent that Verizon has no desire to properly service its land line customers and would like to be rid of them, if this proposal is approved by the Commission, then West Virginia consumers stand to receive even worse service from an overly ambitious company seeking to grow through broad acquisition of existing customers with out an adequate financial or employee base to take such a "big bite." If Frontier "chokes" on this deal all of West Virginia will suffer and we can't afford to let that happen.