

The Law Office of Vincent Trivelli, PLLC

178 Chancery Row
Morgantown, West Virginia 26505
Phone (304) 291-5223 • Toll Free 1-866-266-5948
Fax (304) 291-2240 • E-mail: vmtriv@westco.net

June 9, 2015

Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Re: Delaware FOIA Request

RECEIVED
2015 JUN 15 AM 11 45
DELAWARE P.S.C.

Dear Sir or Madam:

On behalf of the Communications Workers of America, AFL-CIO, I am requesting an opportunity to obtain copies, pursuant to the Delaware Freedom of Information Act (Title 29, Chapter 100 § 10001 *et seq.* of the Code of Delaware), the following documents and information:

1. Any and all information and documents received from or related in any way to Verizon Delaware LLC., including any related or successor or similarly named entity (hereinafter "Verizon") concerning 26 *Del. C.* 4003 – Regulations Governing the Minimum Service Requirements For the Provision of Telephone Service for Public Use Within the State of Delaware January 1, 2012 through May 15, 2015.
2. A copy of any and all documents received from or related to in any way for the time period January 1, 2012 and May 15, 2015 from any source categorized as a consumer complaint regarding repair, maintenance, installation of Verizon landline service, which includes but is not limited to new service, repairs, installations, out-of-service and/or outage circumstances; telephone not working circumstances; service not available; presence of static; proposals for use of Voice Link as an alternative to service; telephone line, pole, and/or landline matters; worker and/ or technician dispatch; dial tone matters; and/or troubleshooter matters. These documents may be redacted to conceal the name and address number of any complainant, provided the complainant's street and municipality are identifiable. "Consumer" means any residential or business user of Verizon wireline services.
3. A copy of any and all documents in the PSCs possession categorized or generated as a response to any consumer complaint identified in Paragraph 2 generated or received between January 1, 2012 and May 15, 2015.
4. A copy of any and all documents covering the period between January 1, 2012 and May 15, 2015, prepared by the PSC or PSC staff, or provided to the PSC, that summarize or

compile reports on Verizon's: 1) service interruptions; 2) service quality; and/or 3) consumer complaints, as defined 4 above.

5. For each of the years 2012-2015, a copy of all documents in the PSCs possession that set forth information, discussion or analysis of Verizon landline monthly, quarterly, and or financial conditions.
6. For each of the years 2012-2015, a copy of all documents in the PSC's possession that the PSC considered Verizon monthly, quarterly, and/or annual reports regarding depreciation, plant additions, plant retirements, expenditures on plants in service, actual projected spending for capital, system maintenance, and service expansion.

If any of the requested writings or information is withheld by your office, please provide a detailed description of the writings which you claim are exempt from disclosure and provide an itemized explanation specifying and indexing the exemption or exemptions of the Virginia Freedom of Information Act your office maintains are the basis for exempting each writing or information from disclosure with the description of the writing or information withheld.

If any of the writings or information I am requesting do not exist, please specifically indicate in letter form which documents or information is not in existence.

If any of the writings or information I am requesting are not available through your organization, please designate where the requested writings or information may be obtained.

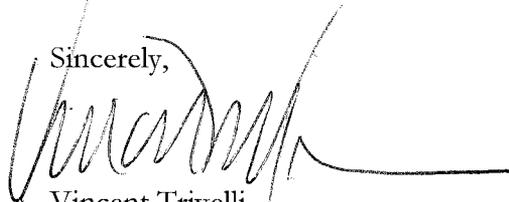
I ask that you make available any and all writings or information as you collect them and not to wait until all the writings and information have been collected to make such writings and information available. If such writings are voluminous, I am willing to make arrangements for a file review in order that I might select the appropriate documents.

If you are not able to address this request in a timely manner for any reason, I am requesting that the task be delegated to another person within your organization who can complete the request in a timely manner.

I look forward to hearing from you in the near future concerning the documents and information I have requested.

Thank you for your attention to this matter. If there are any questions, please call.

Sincerely,



Vincent Trivelli