

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE RULES FOR THE)	
PROVISION OF TELECOMMUNICATIONS)	
SERVICES)	
(REG. DKT 10 OPENED MAY 1, 1984;)	PSC REGULATION DOCKET
REG. DKT 45 OPENED NOVEMBER 21, 1995;)	NOS. 10 AND 45
JOINTLY REOPENED NOVEMBER 17, 1998;)	
JULY 24, 2001; AUGUST 9, 2005;)	
NOVEMBER 5, 2013; MAY 13, 2014;)	
AUGUST 19, 2014 AND DECEMBER 5, 2019))	
IN THE MATTER OF THE REGULATIONS)	
FOR THE IMPLEMENTATION OF THE)	PSC REGULATION DOCKET
TELECOMMUNICATIONS TECHNOLOGY)	NO. 41
INVESTMENT ACT)	
(OPENED JULY 20, 1993; REOPENED)	
DECEMBER 5, 2019))	

VERIZON’S COMMENTS ON PROPOSED REGULATIONS

By Order 9506, entered December 5, 2019, as amended by Order 9532, entered January 8, 2020, the Commission proposed to revise its telecommunications regulations to conform to recent legislative changes made through Senate Bill 18, which took effect April 17, 2019, and to otherwise clarify and simplify the rules. The Verizon companies support the Commission’s proposed changes.¹

In 2013, the Delaware Legislature significantly altered the scope of the Commission’s oversight of telecommunications carriers through HB 96 of 2013, adopting one of the most modern

¹ These comments are filed on behalf of Verizon Delaware LLC (“Verizon DE”) and its competitive local exchange carrier affiliates, MCIMetro Access Transmission Services Corp. and XO Communications Services, LLC (together “Verizon”).

and forward looking legislative frameworks in the nation. This Commission appropriately updated its telecommunications rules at that time to reflect the changes in law.²

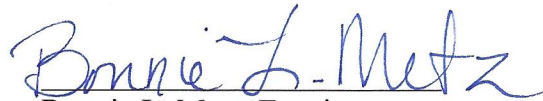
Senate Bill 18 of 2019 made additional legislative changes that necessitate corresponding changes in this Commission’s telecommunications regulations. The 2019 statutory changes now permit telecommunications carriers to undergo transfers of control and to issue securities without Commission approval. The changes also narrowed the definition of “basic services” under the Telecommunications Technology Investment Act (“TTIA”) to only switched access services and allowed carriers to change their rates for switched access service without Commission approval, while requiring those rates to be established according to prevailing federal jurisdiction and to be capped at the level of Verizon DE’s switched access rates.

The Commission’s proposed changes eliminate those portions of its telecommunications rules that are now inconsistent with current law, while also appropriately clarifying and reorganizing the structure of the rules to correspond with their more limited scope. The regulations will continue to address areas where the Legislature retained Commission authority, such as important provisions related to the Commission’s oversight of new carriers entering into service in Delaware.

² Order 8695.

Verizon fully supports the regulatory changes proposed by Orders 9506 and 9532 and urges prompt approval of the new regulations so that the Commission's rules may be kept current and consistent with existing law.

Date: February 4, 2020

A handwritten signature in blue ink that reads "Bonnie L. Metz". The signature is written in a cursive style with a horizontal line underneath the name.

Bonnie L. Metz, Esquire
DE Bar I.D. #2954
Verizon Delaware LLC
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VERIFICATION

I, BONNIE L. METZ hereby attest that the information contained in the attached letter, report, filing or application as provided to the Delaware Public Service Commission is true and correct to the best of my information and belief.

Attested on this date: Feb. 4, 2020

Bonnie Metz
Signature
Bonnie Metz
Name
Secretary
Title

Sworn to and subscribed before me this 4th date of February 2020

Rita M. Carnevale

RITA M. CARNEVALE
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires December 12, 2020

