

**BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS & ENERGY
OF THE COMMONWEALTH OF MASSACHUSETTS**

_____)
Investigation by the Department of _____)
Telecommunications and Energy on its own _____)
Motion into the Appropriate Regulatory Plan _____)
to succeed Price Cap Regulation for Verizon _____)
New England, Inc. d/b/a Verizon Massachusetts' _____)
intrastate retail telecommunication services in _____)
the Commonwealth of Massachusetts _____)
_____)

Docket D.T.E. 01-31

**REPLY COMMENTS
OF THE
NEW ENGLAND PUBLIC COMMUNICATIONS COUNCIL, INC.
ON VERIZON-MASSACHUSETTS COMPLIANCE FILING**

COMES NOW, the NEW ENGLAND PUBLIC COMMUNICATIONS COUNCIL, INC. ("NEPCC"), acting through counsel and in accordance with the May 8, 2002 Order of the Department of Telecommunications & Energy ("DTE" or "Department") in this proceeding ("Phase I Order"), as extended on June 18, 2002, and hereby files its Reply Comments with respect to the June 5, 2002 Compliance Filing ("Filing") made by Verizon Massachusetts ("VM") pursuant to the Phase I Order.

1. The Attorney General comments that the VM Filing will "[r]educe Verizon's charges to payphone companies for public access lines (PAL)...services."¹ Yet VM's analysis represents that the PAL service most widely-used by VM's payphone service competitors (i.e., PAL Measured) will generate an addition \$445,287 per month in revenue for VM under the Filing proposal.²

¹ AG Initial Comments, at p. 5.

² Filing, Tab B, Attachment IV. VM estimates collecting \$396,128 in additional revenues per month from PAL services overall. Id.

2. VM does estimate a revenue reduction for the much less prevalent PAL Unlimited service, for which there is no separate, per-call, usage charge. However, any shift to use of the PAL Unlimited service would be restricted by the fact that this service offering is limited to certain geographic areas (i.e., it is not offered statewide). VM has thus sheltered itself against revenue losses from such a shift.

3. Again, as pointed out by the NEPCC in its Initial Comments filed June 25, the appropriate rates for PAL service must be determined in accordance with the Payphone Orders and the record established in Docket 97-88/97-18 Phase II. The NEPCC has suggested rates in that Docket that meet those standards and requirements.

Respectfully submitted,

**NEW ENGLAND PUBLIC
COMMUNICATIONS COUNCIL, INC.**

By: _____

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Date: July 16, 2002

CERTIFICATE OF SERVICE

I, Joellen M. Gibbons, a secretary with the Law Firm of Patton Boggs LLP, do hereby certify that on this 16th day of July 2002, I served by electronic mail and overnight courier or first-class U.S. mail, postage prepaid, the foregoing Reply Comments of the New England Public Communications Council, Inc. on the parties listed on the attached Service List.

Joellen M. Gibbons

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Regulatory Plan to Succeed Price Cap)	
Regulation for Verizon New England,)	D.T.E. 01-31
Inc. d/b/a Verizon Massachusetts’)	
Intrastate Retail Telecommunications)	
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