

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held September 20, 2018

Commissioners Present:

Gladys M. Brown, Chairman
Andrew G. Place, Vice Chairman
Norman J. Kennard
David W. Sweet
John F. Coleman, Jr.

Application of Southern Light, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public as a Competitive Local Exchange Carrier in the Commonwealth of Pennsylvania in the Service Territories of: Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC

A-2018-3001076

Application of Southern Light, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public as a Detariffed Interexchange Carrier Reseller in the Commonwealth of Pennsylvania

A-2018-3001077

Application of Southern Light, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public as a Detariffed Facilities-based Interexchange Carrier in the Commonwealth of Pennsylvania

A-2018-3001078

Application of Southern Light, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public as a Competitive Access Provider in the Commonwealth of Pennsylvania

A-2018-3001079

ORDER

BY THE COMMISSION:

On April 11, 2018, Southern Light, LLC (Applicant or Southern Light) filed an Application seeking Certificates of Public Convenience under our orders issued pursuant to the Telecommunications Act of 1996, 47 U.S.C. §§ 201 *et seq.*, (TA-96)¹ and to Chapter 11 of the Public Utility Code (Code) (66 Pa. C.S. §§ 1101 *et seq.*) evidencing authority to provide the following telecommunication services to the public:

- (1) As a Competitive Local Exchange Carrier (CLEC) in the service territories of Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC;
- (2) As a detariffed Interexchange Carrier Reseller (IXC Reseller)² throughout the Commonwealth of Pennsylvania;
- (3) As a detariffed Facilities-based Interexchange Carrier (IXC) throughout the Commonwealth of Pennsylvania; and
- (4) As a Competitive Access Provider (CAP) throughout the Commonwealth of Pennsylvania

The Applicant was granted provisional authority pursuant to our Secretarial Letter of August 3, 2018, to provide the proposed IXC, IXC Reseller, CAP and CLEC services

¹ In light of the policy objectives of TA-96, market entry requirements for telecommunication service providers are set out in *In Re: Implementation of the Telecommunications Act of 1996*, Docket No. M-00960799 (Order entered June 3, 1996; Order on Reconsideration entered September 9, 1996) (*TA-96 Implementation Orders*).

² Section 3018(b)(2) of the Public Utility Code, 66 Pa. C.S. § 3018(b)(2) gives IXCs the option to; (1) file and maintain tariffs with the Commission; (2) file and maintain price lists with the Commission; or (3) detariff. Further, our regulation at 52 Pa. Code § 63.104 outlines the disclosure requirements for filing and maintaining tariffs or operating as a detariffed IXC. The Applicant has elected to operate as a detariffed IXC, subject to Pennsylvania state contract and consumer protection laws.

in the service territories of Verizon Pennsylvania LLC and Verizon North LLC pursuant to its proposed tariffs during the pendency of the application process.³

The Applicant complied with notice requirements set forth in our *TA-96 Implementation Orders* by serving a copy of its Application upon the aforementioned incumbent local exchange carriers, the Office of Consumer Advocate, the Office of Small Business Advocate and the Office of Attorney General. As required by 52 Pa. Code § 5.14, the Application also was published in the *Pennsylvania Bulletin*.⁴ The Applicant was granted a waiver concerning publishing notice of its Application in newspapers of general circulation. The protest period for this Application expired September 4, 2018. The assigned utility code is 3120861. No protests were filed. No hearings were held.

Information concerning the Applicant is as follows:

- The Applicant is an Alabama Corporation with its principal place of business at 107 St. Francis Street, Suite 1800, Mobile, Alabama 36602, telephone (251) 662-1170, facsimile (501) 537-0769.
- The Applicant complied with Pennsylvania law relating to a foreign limited liability company.
- The Applicant's registered office provider within Pennsylvania is CT Corporation System, 116 Pine St, Suite 320, Harrisburg, Pennsylvania 17101.

³ By Secretarial Letter issued May 9, 2018, Commission staff advised the Applicant of deficiencies in its proposed tariffs. Specifically, staff advised that the rates in the proposed tariffs were almost exclusively "Individual Case Basis" or "ICB." As stated within the application form, the proposed tariff(s) must contain rates. While ICB arrangements are permitted, a designation of ICB is not a rate. The Applicant was requested to submit revised proposed tariff pages containing actual rates for the services described within each tariff. *See* 66 Pa. C.S. §§ 1302 – 1304; *see also* *Joint Petition of Nextlink Pennsylvania, Inc. et al.*, Docket Nos. P-00991648 and P 00991649 (Order entered September 30, 1999) at Section XVIII (All ICB contracts are required to be filed with the Commission.). Provisional authority was granted shortly after the deficiencies were cured.

⁴ *See* 48 Pa B. 5110 (August 18, 2018).

- The Applicant's Pennsylvania Emergency Management Agency contact is Gabe Watson, Vice President – Operations, 107 St. Francis Street, Suite 1800, Mobile, Alabama 36602, telephone (251) 662-1435, facsimile (501)537-0769.
- Correspondence to resolve complaints may be directed to Jeffrey R. Strenkowski, 10802 Executive Center Drive, Benton Building Suite 300, Little Rock, Arkansas 72211, telephone (301) 774-0461, facsimile (501) 537-0769.
- The Applicant will be using a fictitious name: Uniti Fiber PA LLC.
- The Applicant is operating as a public utility in other states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, and South Carolina.
- The Applicant has affiliates or predecessors within Pennsylvania: PEG Bandwidth PA, LLC, a CAP (Docket No. A-2012-2301870); and Talk America Services, LLC, an IXC (Docket No. A-2014-2441956) and CLEC (Docket No. A-2014-2441958).
- The Applicant has affiliates or predecessors rendering public utility service outside Pennsylvania: Contact Network, LLC d/b/a InLine; PEG Bandwidth DC, LLC; PEG Bandwidth DE, LLC; PEG Bandwidth IA, LLC; PEG Bandwidth IL, LLC; PEG Bandwidth LA, LLC; PEG Bandwidth MA, LLC; PEG Bandwidth MD, LLC; PEG Bandwidth MS, LLC; PEG Bandwidth NJ, LLC; PEG Bandwidth NY, LLC; PEG Bandwidth TX, LLC; PEG Bandwidth VA, LLC; Uniti Fiber LLC; Talk America Services, LLC; Hunt Telecommunications, LLC; Nexus Systems, LLC and Tower Cloud, Inc.

The Applicant understands that if it plans to cease doing business within the Commonwealth of Pennsylvania, it is under a duty to request authority from the Commission for permission prior to ceasing such operations.

The Applicant proposes to provide facilities-based and resold competitive local exchange services, including ethernet services, wavelength services, switched access

services, access to emergency services, access to operator services, access to interexchange services, access to directory assistance and other ancillary services. The Applicant also proposes to provide facilities-based and resold interexchange telecommunications services and competitive access provider services that may include private line transmission services.

The Applicant states that it will utilize its own facilities and lease facilities from other certificated carriers in Pennsylvania to provide services. Further, the Applicant asserts that its services will be marketed only to business, enterprise and wholesale customers.

Issues affecting CLECs have been addressed in a number of Commission proceedings.⁵ A CLEC applicant is expected to adhere to the requirements relative to universal service programs, as initially set forth or as subsequently enlarged or modified.⁶ Also, per federal rules, CLECs are required to ensure the efficient usage of their numbering resources and are required to semi-annually report their utilization and forecast data to the North American Numbering Plan Administrator. *See* 47 C.F.R. §§ 52.5 *et seq.* Any CLEC failing to comply with state and/or federal orders related to numbering may be subject to the reclamation of their numbering resources as well as fines pursuant to Section 3301 of the Public Utility Code, 66 Pa. C.S. § 3301. *See Implementation of Numbering Conservation Measures Granted to Pennsylvania by the Federal Communications Commission in its Order released March 31, 2000 – NXX Code Reclamation*, Docket No. M-00001373 (Order entered August 22, 2000), 30 *Pa.B.* 4701 (Commission established process for reclaiming NXX codes from carriers that have

⁵ *See, e.g., MFS Intelenet et al.* Docket Nos. A-310203F0002 *et al.*, (Orders entered October 4, 1995; July 31, 1996; and August 7, 1997); *Pa. PUC v. Bell*, Docket No. R-00963578 (Order entered February 6, 1997); *Pa. PUC v. GTE*, Docket No. R-00963666 (Order entered May 9, 2002); *Joint Petition of Nextlink Pennsylvania, Inc. et al.*, Docket Nos. P-00991648 and P-00991649 (Order entered September 30, 1999), *aff'd sub nom. Bell Atlantic-Pennsylvania, Inc. v. Pa. PUC*, 763 A.2d 440 (Pa. Cmwlth 2000), *vacated in part sub nom. MCI Worldcom Inc. v. Pa. PUC*, 844 A.2d 1239 (Pa. 2004) (state court lacked jurisdiction to review unbundled network elements) (*Global Order*); as well as other proceedings.

⁶ *See Universal Service Investigation*, Docket No. I-00940035 (Order entered January 28, 1997).

failed to activate them within six months of their availability for assignment to customers).

Further, Section 253(b) of TA-96 permits a state Commission to impose, on a competitively-neutral basis and consistent with universal service provisions, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services, and safeguard the rights of consumers. In response, we articulated explicit concerns relative to an applicant's financial fitness, tariff compliance, and rates.⁷ In this case, the Applicant has provided financial information to support its Application. We conclude that the Applicant has demonstrated that it is financially capable of providing telecommunications services as a CLEC, an IXC Reseller, a CAP, and as a Facilities-based IXC.

The Commission requires that applicants seeking to provide local telecommunications services in Pennsylvania take steps to protect the public safety of consumers. One means of ensuring the public safety of consumers in the increasingly competitive telecommunications marketplace is to ensure that new entrants provide their consumers with access to a seamless communications infrastructure for emergency services, such as 911. Therefore, in accordance with the notarized affidavit (item #22 in the Application), the Applicant avers that it has contacted by certified letter each county or municipal authority where it intends to provide CLEC telecommunications services and made the necessary arrangements for the provisioning of emergency 911 service.

We conclude that the Applicant has met the requirements for certification as a CLEC, an IXC Reseller, a CAP, and as a Facilities-based IXC, consistent with this Order. Premised upon our review of the Application and the proposed tariffs, and consistent with our Orders, the Code, our regulations and TA-96, we conclude that the Applicant's

⁷ See *Application of Blue Ribbon Rentals II, Inc., d/b/a Talk One America, for Authority to Begin to Offer, Render, Furnish, or Supply Competitive Local Exchange Telecommunication Services to the Public in the Commonwealth of Pennsylvania*, Docket No. A-310442 (Orders entered April 25 and August 4, 1997).

proposed services do not raise concerns at this time regarding safety, adequacy, reliability, or privacy. We note, however, further deficiencies in the proposed tariffs.

We shall direct the Applicant to revise the proposed tariffs in accordance with the changes noted in Appendix A of this Order.⁸ The Applicant shall thereafter file its Initial Tariffs reflecting the requested changes on or before sixty days from the date of entry of this Order. The Applicant may file its Initial Tariffs electronically, consistent with Commission rules.⁹ Copies of the Initial Tariffs shall also be served upon the same entities receiving service of the original Application, including the incumbent local exchange carriers. If the time required for such resolution and filing exceeds sixty days, the Applicant may request an extension of an additional sixty days with the Commission's Secretary. Thus, if the Initial Tariffs are not filed within sixty days (120 days including the extension) of the entry of this Order, the Application will be dismissed and the authority granted herein will be revoked without further Commission Order.

We note that the Commission will only approve tariff provisions regarding limitation of liability consistent with law. Any tariff provisions contained in the Initial Tariffs regarding limitation of liability inconsistent with any applicable laws, rules and regulations will be deemed inoperative and superseded.

To the extent that the proposed tariffs contains rates, the Initial Tariffs may become effective on one day's notice from the date upon which they are filed and served.

Further, the Commission makes no determination whether the Applicant's switched access rates are in compliance with Chapter 30 of the Code, 66 Pa. C.S. § 3017(c).

⁸ Regardless of the review process, any tariff provision(s) inconsistent with the provisions of the Code, TA-96, our regulations, or Orders will be deemed inoperative and superseded.

⁹ See *Final Rulemaking to Permit Electronic Filing*, Docket No. L-00070187 (Order entered May 23, 2008).

Carriers are required to provide telecommunications service to customers in Pennsylvania within one year of certification.¹⁰

In accordance with the affidavit that accompanied the application for a Certificate of Public Convenience, the Applicant has agreed to abide by all applicable federal and state laws and regulations and by the decisions of the Commission. We remind the Applicant that, in accordance with our *TA-96 Implementation Orders*, a public utility that seeks Commission certification or that is certificated in Pennsylvania to provide telecommunications service, as defined by state and federal law, must provide the service in full compliance with all applicable provisions of Pennsylvania and federal law. This includes compliance with Section 1511 of Pennsylvania's Business Corporation Law, 15 Pa. C.S. § 1511,¹¹ when siting facilities/equipment in public rights-of-way. Failure to comply with applicable law may result in fines being imposed against a public utility or in the suspension or revocation of the utility's Certificate of Public Convenience, consistent with due process.

We remind the Applicant that certificated public utilities in Pennsylvania are required to file with the Commission an accurate annual financial report and an accurate separate statement of gross intrastate revenues for fiscal assessment purposes, as received from operations conducted pursuant to the authority granted by the Commission's certification order.¹² Additional reporting of intrastate retail revenues is also required for the purpose of Pennsylvania Universal Service Fund contribution assessments. Failure to

¹⁰ For complete details regarding this requirement, including consequences for non-compliance, see *Final Order Regarding the Commission's Plan to Implement a One-Year Timeframe for Inactive Telecommunication Carriers to Provide Service on an Annual Basis within the Commonwealth of Pennsylvania*, Docket No. M-2011-2273119 (Order entered July 19, 2012).

¹¹ 15 Pa. C.S. § 1511(e) provides as follows: "A public utility corporation shall have the right to enter upon and occupy streets, highways, waters and other public ways and places for one or more of the principal purposes specified in subsection (a) and ancillary purposes reasonably necessary or appropriate for the accomplishment of the principal purposes, including the placement, maintenance and removal of aerial, surface and subsurface public utility facilities thereon or therein. Before entering upon any street, highway or other public way, the public utility corporation shall obtain such permits as may be required by law and shall comply with the lawful and reasonable regulations of the governmental authority having responsibility for the maintenance thereof."

¹² See 66 Pa. C.S. § 510(b); see also 52 Pa. Code §§ 63.31 *et seq.* We note that flexibility for the Applicant's system of accounts is provided by our own annual reporting regulations for competitive local exchange carriers that the Applicant may also utilize. See generally 52 Pa. Code §§ 63.31(3) and 63.32(c).

comply with applicable reporting requirements may result in billing for back payments due and the imposition of fines and/or other lawful remedies, including revocation of certification, consistent with due process.

Conclusion

Accordingly, we shall grant the Application and issue Certificates of Public Convenience to provide detariffed IXC Reseller and detariffed facilities-based IXC services in the Commonwealth of Pennsylvania. Upon the approval of the Initial Tariffs, Certificates of Public Convenience shall be issued evidencing the Applicant's authority to provide services as a CAP in the Commonwealth of Pennsylvania and as a CLEC in the service territories Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC, consistent with this Order, our decisions cited herein, and such other proceedings; **THEREFORE,**

IT IS ORDERED:

1. That the Application of Southern Light, LLC at Docket No. A-2018-3001077, for authority to operate as a detariffed Interexchange Carrier Reseller throughout the Commonwealth of Pennsylvania is granted, consistent with this Order, and that a Certificate of Public Convenience be issued evidencing such approval.

2. That the Application of Southern Light, LLC at Docket No. A-2018-3001078, for authority to operate as a detariffed Facilities-based Interexchange Carrier throughout the Commonwealth of Pennsylvania, is granted, consistent with this Order and that a Certificate of Public Convenience be issued evidencing such approval.

3. That the Application of Southern Light, LLC at Docket No. A-2018-3001079, for authority to operate as a Competitive Access Provider throughout the Commonwealth of Pennsylvania, is granted, consistent with this Order.

4. That the Application of Southern Light, LLC at Docket No. A-2018-3001076, for authority to operate as a Competitive Local Exchange Carrier within the service territories of Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC is granted, consistent with this Order.

5. That Southern Light, LLC shall either eFile or submit an original copy of its Initial Tariffs consistent with the requisite changes noted in Appendix A of this Order within sixty (60) days (120 days including an approved extension) after the date of entry of this Order. **Southern Light, LLC is directed to identify any changes made to the proposed Initial Tariffs that are in addition to the changes noted in Appendix A.** Southern Light, LLC shall serve copies of its Initial Tariffs on each entity receiving a copy of the original Application. The Initial Tariffs may become effective on or after one (1) day's notice from the date upon which they are filed and served.

6. That an Initial Tariff shall be labeled on its face according to the respective authority: "Competitive Local Exchange Carrier Tariff," "Competitive Local Exchange Carrier Switched Access Tariff," and "Competitive Access Provider Tariff."

7. That Southern Light, LLC shall comply with all the provisions of the Public Utility Code, as now exist or as may be hereafter amended, and with all pertinent rules, regulations, and Orders of this Commission, now in effect or as may be prescribed by this Commission, including those identified in this Order.

8. That if Southern Light, LLC should desire to expand its service territory to that of additional incumbent local exchange carriers, Southern Light, LLC shall file an Application to amend its Certificate of Public Convenience and comply with all the requirements of the Application, including the completion of the affidavit and requirements thereto concerning Emergency 911 service.

9. That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to Southern Light, LLC, shall not be construed as conferring more than one operating right to Southern Light, LLC.

10. That Southern Light, LLC shall maintain accurate accounting records that properly classify and segment its Interexchange Carrier Reseller, Competitive Local Exchange Carrier, Competitive Access Provider, and Facilities-based Interexchange Carrier revenues from its operations within the Commonwealth and file with the Commission an accurate annual financial report and an accurate separate statement of gross intrastate revenues for fiscal assessment purposes.

11. That Southern Light, LLC shall maintain accurate accounting records that properly classify and segment its gross retail intrastate revenues for purposes of the Pennsylvania Universal Service Fund contribution assessment report.

12. That in accordance with Commission Orders entered on October 5, 2005, at Docket No. M-00041857 and on August 21, 2006, at Docket No. L-00050176, Southern Light, LLC shall follow the reporting requirements outlined at the following website: www.puc.pa.gov/telecom/docs/Reporting_Requirements.docx.

13. That Southern Light, LLC shall file such affiliated interest agreements as may be necessary relative to any transactions with affiliates within thirty (30) days of entry of this Order.

14. That Southern Light, LLC shall make 711 abbreviated dialing available to access Telecommunications Relay Service and to arrange its switching equipment to

translate these calls to the assigned toll-free number, (888) 895-1197, in order to route calls to the Telecommunications Relay Service Provider, in accordance with the Commission's Order entered on February 4, 2000, at Docket No. M-00900239.

15. That in the event that Southern Light, LLC has not, on or before sixty (60) days (120 days including an approved extension) from the date of entry of this Order, complied with the requirements set forth herein, the Application at Docket Nos. A-2018-3001076, A-2018-3001077, A-2018-3001078, and A-2018-3001079 shall be dismissed and the authority granted herein revoked without further Commission Order.

16. That upon the approval of the Initial Tariffs, Certificates of Public Convenience shall be issued authorizing the Southern Light, LLC to furnish services as a Competitive Local Exchange Carrier within the service territories of Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC and as a Competitive Access Provider, consistent with this Order.

17. That changes and/or additions made to an approved, filed tariff shall be made in the form of supplements, consecutively numbered in the order of their filing dates, and the tariff designation shall be in the following manner: Supplement No. __ to Tariff Telephone Pa. P.U.C. No.____.

18. That Southern Light, LLC shall add its Pennsylvania tariffs to its website within thirty (30) days of the filing of its Initial Tariffs and mark them "Pending." Within thirty (30) days of receipt of its Certificate of Public Convenience, Southern Light, LLC shall make any required modifications to the tariffs on its website and remove the "Pending" notation. Thereafter, Southern Light, LLC will continually update the

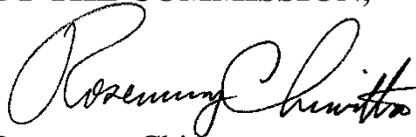
website whenever any supplemental revisions to the tariffs are approved by the Commission such that the website tariff is a true and accurate representation of its tariff on file with the Commission.

19. That within thirty (30) days of receipt of its Certificate of Public Convenience, Southern Light, LLC shall contact Cyndi Page ((717) 787-5722; cypage@pa.gov) of the Commission's Office of Communications to create a link from the Commission's website to Southern Light, LLC's website.

20. That if Southern Light, LLC plans to cease doing business within the Commonwealth of Pennsylvania, it shall request authority from the Commission for permission prior to ceasing.

21. That a copy of this Order be served on the Pennsylvania Department of Revenue, Bureau of Corporation Tax and the Pennsylvania Emergency Management Agency Bureau of 9-1-1 Programs.

BY THE COMMISSION,



Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: September 20, 2018

ORDER ENTERED: September 20, 2018

Southern Light, LLC d/b/a Uniti Fiber PA LLC

Docket Nos. A-2018-3001076; A-2018-3001077; A-2018-3001078; A-2018-3001079
Proposed Competitive Local Exchange Carrier and Competitive Access Provider tariffs.

The proposed tariffs contain certain deficiencies that must be addressed by the Applicant before the tariffs can be approved and the Certificates of Public Convenience issued.

The Applicant must submit a copy of this Appendix with its revised compliance tariffs. On that copy, please note the page/sheet of the compliance tariffs where the required revision is located for each item below.

Tariff deficiencies noted – CLEC Local Tariff (A-2018-3001076), Tariff No. 1

1. Correct the Title to read:

Southern Light, LLC
d/b/a Uniti Fiber PA LLC

BUSINESS CUSTOMERS ONLY

COMPETITIVE LOCAL EXCHANGE CARRIER
Regulations and Schedule of Charges

2. All Pages: Enter issued and effective dates as per ordering paragraph.
3. Various Pages: Remove any sections marked “RESERVED FOR FUTURE USE” and renumber tariff sections accordingly.
4. Various Pages: Correct incumbent local exchange carrier names to reflect the current legal names: Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC
5. Missing: The Company did not include any provision for Call Blocking. In accordance with PA 66 Pa C.S. § 2906, see our website for standard text at: https://www.puc.pa.gov/telecom/docs/Caller_ID_Sample_Language.DOC
6. Missing: Definitions Section - All technical terms and abbreviations used in the tariff, the meanings of which are not common knowledge and cannot be gathered exactly

from the context in which used, must be defined. Refer to Definitions Section in Tariff No. 2.

7. Add to the tariff descriptions of the following terms and/or services: Pre-Engineering, Post-Engineering, DS-0, DS-1, DS-3, OC-3, OC-12, OC-48, Fast E 10Meg, Fast E 100Meg, Gige 150, Gige 600, Gige 1000, Local Distribution Channel and Add/Drop Multiplexing.
8. Original Page 1: Explanation of Notes - Pursuant to 52 Pa. Code § 53.22, only the following symbols are acceptable:

Increase	(I)
Decrease	(D)
Change	(C)

9. Section 1, Page 1: Add the names of all the incumbent local exchange carriers in whose service territories the company will be offering services.
10. Section 2, Page 2, Section 2.1.2: Remove any portions of this section that do not fit within the scope of 52 Pa. Code § 69.87 and the Commission order at docket number M-00981209. In addition, the company should include a company-specific dollar amount for the proposed limitation and work papers to substantiate the dollar amount. <http://www.pabulletin.com/secure/data/vol29/29-17/659.html>
11. Section 2, Pages 3-5: Remove or revise these Sections as the tariff does not contain any rates for directory listings.
12. Section 2, Page 8, Section 2.3.2: In accordance with 52 Pa Code § 53.82, please specify deposit limitations and return procedures. Specifically, deposits are to be returned to the depositor when they pay undisputed bills for service over a period of 12 consecutive months.
13. Section 2, Page 9, Section 2.3.3: Reword this section. Per 52 Pa. Code § 53.84, it should clearly specify whether, if bills are paid by mail, the date of the postmark will be considered the date of payment.
14. Section 2, Page 10, Section 2.3.6: State actual late payment charges and remove all language referring to “the highest rate allowed by law.”
15. Section 2, Page 10, Sections 2.3.4. and 2.3.5: There are no charges listed for returned checks or returned payments in Section 9. Those charges must be specified.
16. Section 2, Page 13, Section 2.6: Revise the Commission’s address to 400 North Street, Harrisburg, Pennsylvania 17120.

17. Section 2, Page 20, Section 2.8.1(c): Correct the line break between “Company’s” and “control.”
18. Section 3, Page 2: Revise this section. Section 1 of the tariff does not include any mention of suspension, termination or restoral of service.
19. Section 4: Revise this section. The tariff does not include any calling features, feature packages or Custom Local Area Signaling Services (CLASS).
20. Section 6, Page 3, Section 6.1.3: Rates must be specified for local flat rate and local measured service or this language must be removed.
21. Section 6, Page 5: Revise language to accurately reflect Pennsylvania Act 12 of 2015 including the uniform 911 surcharge fee of \$1.65.
22. Section 9: Add to the tariff an explanation of the Administrative Charge, when it would apply and exactly what it includes.

Tariff deficiencies noted – CLEC Switched Access (A-2018-3001076), Tariff No. 2

1. Correct the Title to read:

Southern Light, LLC
d/b/a Uniti Fiber PA LLC

COMPETITIVE LOCAL EXCHANGE CARRIER
SWITCHED ACCESS TARIFF
Regulations and Schedule of Charges

2. All Pages: Enter issued and effective dates as per ordering paragraph.
3. Various Pages: Correct incumbent local exchange carrier names to reflect the current legal names: Verizon Pennsylvania LLC; Verizon North LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; Frontier Communications of Pennsylvania, LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC and Frontier Communications of Oswayo River, LLC
4. Page 1: Explanation of Symbols: Pursuant to 52 Pa. Code § 53.22, only the following symbols are acceptable:

Increase	(I)
Decrease	(D)
Change	(C)

5. Section 2, Page 9, Section 2.1.2: Remove any portions of this section that do not fit within the scope of 52 Pa. Code § 69.87 and the Commission order at docket number M-00981209. In addition, the company should include a company-specific dollar amount for the proposed limitation and work papers to substantiate the dollar amount. <http://www.pabulletin.com/secure/data/vol29/29-17/659.html>
6. Section 2, Page 11: State actual late payment charges and remove all language referring to “the highest rate allowed by law.”
7. Section 2, Page 12: Specify the rate of interest for deposits.
8. Section 2, Page 13: Revise the Commission’s address to 400 North Street, Harrisburg, Pennsylvania 17120.

Tariff deficiencies noted – CAP (A-2018-3001079) Tariff No. 3

1. Correct the Title to read:

Southern Light, LLC
d/b/a Uniti Fiber PA LLC

COMPETITIVE ACCESS PROVIDER CARRIER
Regulations and Schedule of Charges

1. All Pages: Enter issued and effective dates as per ordering paragraph.
2. Original page 1: Explanation of Symbols: pursuant to 52 Pa. Code § 53.22, only the following symbols are acceptable:

Increase	(I)
Decrease	(D)
Change	(C)

3. Section 2, Page 9: Section 2.1.2 Remove any portions of this section that do not fit within the scope of 52 Pa. Code § 69.87 and the Commission order under docket number M-00981209. In addition, the company should include a company-specific dollar amount for the proposed limitation and work papers to substantiate the dollar amount. <http://www.pabulletin.com/secure/data/vol29/29-17/659.html>
4. Add to the tariff descriptions of the following terms and/or services: Pre-Engineering, Post-Engineering, DS-0, DS-1, DS-3, OC-3, OC-12, OC-48, Fast E 10Meg, Fast E 100Meg, Gige 150, Gige 600, Gige 1000, Hub, Add/Drop Multiplexing and End Link
5. Section 2, Page 11: Remove all language referring to “the highest rate allowed by law.” In addition, delete all portions of this that pertain to “collection fees” or “attorney’s fees” as the Commission does not empower parties to collect their legal fees from other parties. This matter must be dealt with in court proceedings or negotiations between the parties.
6. Section 2, Page 12: Specify the rate of interest for deposits.
7. Section 2, Page 13: Revise the Commission’s address to 400 North Street, Harrisburg, Pennsylvania 17120.
8. Section 4, Page 26: Correct “NonRecurring” to read “Non-Recurring.”
9. Add to the tariff an explanation of the Administrative Charge, when it would apply and exactly what it includes.