

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: VERIZON RHODE ISLAND : Docket No. 3692
 ALTERNATE FORM OF :
 REGULATION PLAN :

MOTION OF THE GEORGE WILEY CENTER TO
CONTINUE HEARING SCHEDULED FOR DECEMBER 6,
2005

The George Wiley Center (Wiley Center or Center) moves that the Public Utilities Commission (Commission) continue the hearing in this action, currently scheduled for Tuesday, December 6, 2005, on the following grounds:

1. The Wiley Center did not receive notice of this action until last week, when the Center's counsel was contacted by counsel for the Attorney General.
2. Upon information and belief, public notice of this action was not given until November 25, 2005.
3. Both the public and the Wiley Center have important interests at stake in relation to Verizon's plan.
4. The Wiley Center's low-income constituents are uniquely affected by Verizon's proposal substantially to increase fees charged to Lifeline customers.
5. Verizon's plan proposes to reduce Lifeline subsidies for low-income customers by \$900,000 in the next two years. *See, Testimony of Theresa L. O'Brien at p 9.*
6. This proposal will adversely affect the health and safety of Lifeline customers.
7. This program cannot and should not be reduced without permitting affected members of the public and the Wiley Center to address Verizon's proposal and to investigate it prior to any Commission hearing.

8. Neither the public nor the Center has had time since receiving notice of this proposal to conduct discovery or to develop and present appropriate testimony.

WHEREFORE, the George Wiley Center asks that the Commission continue the hearing in this action presently scheduled for December 6, 2005.

Respectfully submitted,
The George Wiley Center
By its attorney,

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CERTIFICATE OF SERVICE

I certify that on the 1st day of December, 2005, I caused a copy of this document to be e-mailed to each of the following:

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