#### The Public Utilities Commission of Ohio TELECOMMUNICATIONS APPLICATION FORM

(Effective: 10/01/2004)

PECEIVED-DOCKETING DIV (Pursuant to Case Nos. 99-998-TP-COI and 99-563-TP-COI) In the Matter of the Application of Verizon North Inc. To offer a promo on certain services Case No. Name of Registrant(s) Verizon North Inc. DBA(s) of Registrant(s) Verizon North Inc. Address of Registrant(s) 1300 Columbus-Sandusky Rd N. Marion, Ohio 43302 Company Web Address www.verizon.com Regulatory Contact Person(s) Cassandra Cole Phone 740-383-0490 Fax 740-383-0491 Regulatory Contact Person's Email Address Cassandra.cole@verizon.com Contact Person for Annual Report Cassandra Cole Phone 740-383-0490 Consumer Contact Information Phone 740-383-0490 Cassandra Cole February 22, 2007 TRF Docket No.\_\_ -\_ - CT-TRF or Motion for protective order included with filing? □ Yes ■ No. Moreon for waiver(s) filed affecting this case? □ Yes ■ No [Note: waiver(s) tolls any automatic timeframe] Company Type (check all applicable): □ CTS (IXC) ■ ILEC □ CLEC □ CMRS □ AOS □ Other (explain) NOTE. This form must accompany all applications filed by telecommunication service providers subject to the Commission's rules promulgated in Case No. 99-998-TP-COI, as well as by ILECs filing an ARB or NAG case pursuant to the guidelines established in Case No. 96-463-TP-UNC. It is preferable NOT to combine different types of filings, but if you do so, you must file under the process with the longest applicable review period. I. Please indicate the reason for submitting this form (check one) 0 1 (AAC) Application to Amend Certificate by a CLEC to modify Serving Area (0-day notice, 7 copies) 0 2 (ABN) Abandonment of all Services a. CLEC (90-day approval, 10 copies) b. CTS (14-day approval, 10 copies) c. ILEC (NOT automatic, 10 copies) New Operating Authority for providers other than CMRS (30-day approval, 7 copies); for CMRS, see item No.15 on this page. □ c. ILEC (NOT automatic, 10 copies) □ 3 (ACE) a. Switched Local b. Non-switched local c. CTS d. Local and CTS e. Other (explain) □ 4 (ACO) LEC Application to Change Ownership (30-day approval, 10 copies) □ 5 (ACN) LEC Application to Change Name (30-day approval, 10 copies) \*□ 6 (AEC) Carrier-to-Carrier Contract Amendment to an agreement approved in a NAG or ARB case (30-day approval, 7 copies) NOTE: see item 25 (CTR) on page two of this form for all other contract filings. □ 7 (AMT) LEC Merger (30-day approval, 10 copies) □ 8 (ARB) Application for Arbitration (see 96-463-TP-COI for applicable process, 10 copies) □ 9 (ATA) Application for Tariff Amendment for Tier 1 Services, Application to Reclassify Service Among Tiers, or Change to Non-Tier Services Dia. Tier 1 (and Carrier-to-Carrier tariff filings as set-forth in 95-845-TP-COI) Pre-filing submittal (30-day pre-filing submittal with Staff and OCC; Do Not Docket, 4 copies) □ ii. New End User Service which has been preceded by a 30-day pre-filing submittal with Staff for all submittals and also OCC for Tier 1 residential services (0-day filing, 10 copies) New End User Service (NOT preceded by a 30-day filing submittal, 30-day approval, 10 copies) New Carrier-to-Carrier Service which has been preceded by a 30-day pre-filing with Staff (0-day filing, 10 copie) □ iv. □ v. Change in Terms and Conditions, textual revision, correction of error, etc. (30-day approval, 10 copies) Grandfather service (30-day approval, 10 copies) □ vii. Initial Carrier-to-Carrier Services Tariff subsequent to ACE approval (60-day approval, 10 copies) □ viii. Withdrawal of Tier I service must be filed as an "ATW", not an "ATA" - see item 12, below □ b. Reclassification of Service Among Tiers (NOT automatic, 10 copies) C. Textual revision with no effect on rates for non-specific or non-tier service (30-day approval, 10 copies) □ 10(ATC) Application to Transfer Certificate (30-day approval, 7 copies) □ 11 (**ATR**) LEC Application to Conduct a Transaction Between Utilities (30-day approval, 10 copies) □ 12(ATW) Application to Withdraw a Tier 1 Service CLEC (60-day approval, 10 copies) □ b. ILEC (NOT automatic, 10 copies) □ 13 (**CIÓ**) Application for Change in Operations by Non-LEC Providers (0-day notice, 7 copies) □ 14 (NAG) Negotiated Interconnection Agreement Between Carriers (0-day effective, 90-day approval, 8 copies) □ 15 (**RCC**) For CMRS providers only to Register or to Notify of a Change in Operations (0-day notice, 7 copies) Self-complaint Application □ 16 (SLF) □ a. CLEC only •Tier 1 (60-day automatic, 10 copies) □ b. Introduce or increase maximum price range for Non-Specific Service Charge (60-day approval, 10 copies) □ 17(UNC) Unclassified (explain) \_\_ (NOT automatic, 15 copies) □ 18(ZTA) Tariff Notification Involving only Tier 2 Services NOTE: Notifications do not require or imply Commission Approval. □ a. New End User Service (0-day notice, 10 copies) □ b. Change in Terms and Conditions, textual revision, correction of error, etc. (0-day notice, 10 copies) ☐ c. Withdrawal of service (0-day notice, 10 copies) □ 19 Other (explain) \_ \_ (NOT automatic, 15 copies)

Page 1 of 4

# THE FOLLOWING ARE TRF FILINGS ONLY, NOT NEW CASES (0-day notice, 3 copies) X 20 Introduction or Extension of Promotional Offering □ 21 New Price List Rate for Existing Service □ a. Tier 1 □ b. Tier 2 □ 22 Designation of Registrant's Process Agent(s) □ 23 Update to Registrant's Maps □ 24 Annual Tariff Option For Tier 2 Services – indicate which option you intend to adopt to maintain the tariff. NOTE, changing options is only permitted once per calendar year. □ Paper Tariff □ Electronic Tariff. If electronic, provide the tariff's web address: □

#### THE FOLLOWING ARE CTR FILINGS ONLY, NOT NEW CASES (0-day notice, 7 copies)

Application to establish, revise, or cancel an end-user contract. (NOTE: see item 6 on page 1 of this form for carrier-to-carrier contract amendments)

CTR Docket No. \_\_\_\_\_\_\_ - TP - CTR (Use same CTR number throughout calendar year)

# II. Please indicate which of the following exhibits have been filed. The numbers (corresponding to the list on page (1) and above) indicate, at a minimum, the types of cases in which the exhibit is required:

	[all]	A copy of any motion for waiver of O.A.C. rule(s) associated with this filing. NOTE: the filing of a motion for waiver tolls				
	[3]	any automatic timeframe associated with this filing.  Completed Service Requirements Form.				
	[3, 9(vii)]	A copy of registrant's proposed tariffs. (Carrier-to-Carrier resale tariff also required if facilities-based)				
-	[3]					
Ľ		Evidence that the registrant has notified the Ohio Department of Taxation of its intent to conduct operations as a telephone utility in the State of Ohio.				
ū	[3]	Brief description of service(s) proposed.				
0	[3a-b,3d]	Explanation of whether applicant intends to provide resold services, facilities-based services, or both resold and facilities-based services.				
	[3a-b,3d]	Explanation as to whether CLEC currently offers CTS services under separate CTS authority, and whether it will be including those services within its CLEC filing, or maintaining such CTS services under a separate affiliate.				
	[3a-b,3d]	Explanation of how the proposed services in the proposed market area are in the public interest.				
-	[3a-b,3d]	Description of the proposed market area.				
	[3a-b,3d]					
	[3a-b,3d]	Description of the class of customers (e.g., residence, business) that the applicant intends to serve.				
"	[54-6450]	Documentation attesting to the applicant's financial viability, including the following:  1) An executive Summary describing the applicant's current financial condition, liquidity, and capital resources.				
		Describe internally generated sources of cash and external funds available to support the applicant's operations that				
		are the subject of this certification application.  2) Copy of financial statements (actual and pro forma income statement and a balance sheet). Indicate if financial				
		statements are based on a certain geographical area(s) or information in other jurisdictions				
1		3) Documentation to support the applicant's cash an funding sources.				
	[3a-d]	Documentation attesting to the applicant's technical and managerial expertise relative to the proposed service offering(s) and				
"	[58-6]	proposed service area.				
<u> </u>	[3a-d]	Documentation indicating the applicant's corporate structure and ownership.				
<del></del>	[3a-b,3d]					
	(54-5,54)	Information regarding any similar operations in other states. Also, if this company has been previously certified in the State of Ohio, include that certification number.				
		Verification that the applicant will maintain local telephony records separate and apart from any other accounting records in				
		accordance with the GAAP.				
	[3a-b,3d]	Verification of compliance with any affiliate transaction requirements.				
	[3a-b,3d]	Explanation as to whether rates are derived through (check all applicable):				
		□ interconnection agreement, □ retail tariffs, or □ resale tariffs.				
0	[1,3a-b,3d]	Explanation as to which service areas company currently has an approved interconnection or resale agreement.				
а	[3a-b,3d, 9a(i-iii)]	Explanation of whether applicant intends to provide Local Services which require payment in advance of				
		Customer receiving dial tone.				
0	[3a,3b,3d,	Tariff sheet(s) listing the services and associated charges that must be paid prior to customer receiving dial tone (if applicable).				
İ	9a,(i-iii)]	, and the second of the second				
<u> </u>	[3a-b,3d,8]	Letters requesting negotiation pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed				
		timeline for construction, interconnection, and offering of services to end users.				
O	[3-5,7,10-11,13]	Certification from Ohio Secretary of State as to party's proper standing (domestic or foreign corporation, authorized use of				
		fictitious name, etc.). In transfer of certificate cases, the transferee's good standing must be established.				
0	[3-4,7,10-11,13]	List of names, addresses, and phone numbers of officers and directors, or partners.				
0	[3]	A sample copy of the customer bill and disconnection notice the applicant plans to utilize.				
	[1,4,9,10-13,16-21]	Copy of superseded tariff sheet(s) & price list(s), if applicable, marked as Exhibit A.				
	[1,4,9,10-13,16-21]	Copy of revised tariff sheets & price lists, marked as Exhibit B.				
	[3]					
		Provide a copy of any customer application form required in order to establish residential service, if applicable.				
■ [1-2,4-7,9,12- Description of and rationale for proposed tariff changes, including a complete description of the service(s) proposed tariff changes, including a complete description of the service(s) proposed tariff changes, including a complete description of the service(s) proposed tariff changes, including a complete description of the service(s) proposed tariff changes, including a complete description of the service(s) proposed tariff changes, including a complete description of the service(s) proposed tariff changes.						
	13,16,18-23,25]	Specify for each service affected whether it is business; residence; or $\square$ both. Also indicate whether it is a $\square$ switched or $\square$				
L	L	dedicated service. Include this information in either the cover letter or Exhibit C.				

	[1,2,4,9a(v-vi),	Specify which notice procedure has been/will be utilized:   direct mail;   bill insert;   bill notation or   electronic mail.			
,	5,10,16,18(b-c),	NOTE:			
	21]	☐ Tier 1 price list increases must be within an approved range of rates.			
		☐ SLF Filings – Do NOT send customer notice until it has been reviewed and approved by Commission Staff			
	[2,4-5,9a(v),	Copy of real time notice which has been/will be provided to customers, marked as Exhibit D.			
	9b, 10,12-13,16,	NOTE: SLF Filings - Do NOT send customer notice until it has been reviewed and approved by Commission Staff			
	18(b-c),20-21]				
	[1,2,5,9a(v),11-13,	Affidavit attesting that customer notice has been provided, marked as Exhibit E.			
	18, 21 (increase				
	only)]				
□	[2,12]	Copy of Notice which has been provided to ILEC(s).			
	[2,12]	Listing of Assigned (NPA) NXX's where in the LECs (NPA) NXX's would be reassigned.			
0	[2,4,10,12-13,]	List of Ohio exchanges specifically involved or affected.			
0	[14]	The interconnection agreement adopted by negotiation or mediation.			
	[15]	For commercial mobile radio service providers, a statement affirming that registrant has obtained all necessary federal authority			
		to conduct operations being proposed, and that copies have been furnished by cellular, paging, and mobile companies to this			
		Commission of any Form 401, 463, and / or 489 which the applicant has filed with the Federal Communications Commission.			
	[15]	Exhibits must include company name, address, contact person, service description, and evidence of registration with the Ohio			
i		Secretary of State.			
	[24]	Affidavit that total price of contract exceeds total cost of all regulated services.			
	[5,13]	New title sheet with proposed new company name.			
	[1,3,13]	For CLECs, List of Ohio Exchanges the applicant intends to serve (Use spreadsheet from:			
		http://www.puc.state.oh.us/puco/forms/form.cfm?doc_id=357).			
	[1,3a-b,3d,7,	Maps depicting the proposed serving and calling areas of the applicant.			
į –	10,13, 23]	If Mirroring Large ILEC exchanges for both serving area and local calling areas: • Serving area must be clearly reflected			
-		on an Ohio map attached to tariffs and textually described in tariffs by noting that it is reflecting a particular large			
		ILEC/CLEC territory, and listing the involved exchanges. • Local calling areas must be clearly reflected on an Ohio map			
		attached to the tariffs, and/or clearly delineated in tariffs, including a complete listing of each exchange being served and all			
		exchanges to which local calls can be made from each of those exchanges.			
		If Self-defining serving area and/or local calling area as an area other than that of the established ILEC exchange(s):			
		Serving Area must be clearly reflected on an Ohio map attached to the tariffs, and textually described in tariffs by listing the			
0		involved exchanges. • Local Calling Areas must be described in the tariff through textual delineation and clear maps. Maps			
		for self-defined serving and local calling areas are required to be traced on United States Geological Survey topography			
1		1 mans. These mans are the Standard Topographic Quadrangle mans, 7.5 minute 1:24,000.			
		maps. These maps are the Standard Topographic Quadrangle maps, 7.5 minute 1:24,000.			
0		Other information requested by the Commission staff.			
0	[3]	Other information requested by the Commission staff.  Initial certification that includes Tier 2 Services, indicate which option you intend to adopt to maintain the tariff:			
	[3]	Other information requested by the Commission staff.			

III. Registrant hereby attests to its compliance with the following requirements in the Service Requirements Form, as well as all pertinent entries and orders issued by the Commission with respect to these issues. Further, registrant hereby affirms that it will maintain with its TRF docket an up-to-date, properly marked, copy of the Service Requirements Form available for public inspection.

#### MANDATORY REQUIREMENTS FOR ALL BASIC LOCAL EXCHANGE AND CTS PROVIDERS:

- [x] Sales tax
- [x] Minimum Telephone Service Standards (MTSS)
- [x] Surcharges

#### MANDATORY REQUIREMENTS FOR ALL BASIC LOCAL EXCHANGE PROVIDERS:

[x] 1+ IntraLATA Presubscription

#### SERVICE REQUIREMENTS FOR PROVISION OF CERTAIN SERVICES (CHECK ALL APPLICABLE):

- Discounts for Persons with Communication Disabilities and the Telecommunication Relay Service [Required if toll service provided]
- ☐ Emergency Services Calling Plan [Required if toll service provided]
- ☐ Alternative Operator Service (AOS) requirements [Required for all providing AOS (including inmate services) service]
- D Limitation of Liability Language [Required for all who have tariff language that may limit their liability]
- □ Termination Liability Language [Required for all who have early termination liability language in their tariffs]
- ☐ Service Connection Assistance (SCA) [Required for all LECs]
- □ Local Number Portability and Number Pooling [Required for facilities-based LECs]
- □ Package Language [Required for tariffs containing packages or service bundles containing both local and toll and/or non-regulated services]

IV. List names, titles, phone numbers, and addresses of those persons authorized to respond to inquiries from the Consumer Services Department on behalf of the applicant regarding end-user complaints:

Cassandra Cole, Manager - Verizon North Inc., 740-383-0490, 1300 Columbus-Sandusky Rd N, Marion, Ohio 43302

V. List names, titles, phone numbers, and addresses of those persons authorized to make and/or affirm or verify filings at the Commission on behalf of the applicant:

Todd Colquitt, President - Verizon North Inc., 740-383-0566, 1300 Columbus-Sandusky Rd N, Marion, Ohio 43302 Cassandra Cole, Manager - Verizon North Inc., 740-383-0490, 1300 Columbus-Sandusky Rd N, Marion, Ohio 43302

<u>NOTE</u>: An annual report is required to be filed with the Commission by each company on an annual basis. The annual report form will be sent for completion to the address and individual(s) identified in this Section unless another address or individual is so indicated.

VI. List Name(s), DBA(s) and PUCO Certification Number(s) of any affiliates you have operating in Ohio under PUCO authority, whether Telecommunication or other. (If needed, use a separate sheet and check here: D)

Verizon North Incorporated, 90-5023; Verizon Wireless 90-5334; Verizon Long Distance, 90-5721; Verizon Avenue Corp. 90-9149

#### **AFFIDAVIT**

Compliance with Commission Rules and Service Standards

our primite o	2000 0000000000000000000000000000000000		
I am an officer of the applicant corporation,V		, and am authorized to make this statement	
on its behalf. I attest that these tariffs comply with a	(Name of Company) all applicable rules, include	ding the Minimum Telephone Service Standards (	MTSS) for the state of
Ohio. I understand that tariff notification filings of	lo not imply Commissio	n approval and that the Commission's rules, in	cluding the Minimum
Telephone Service Standards, as modified and clarifi	ed from time to time, sur	persede any contradictory provisions in our tariff.	We will fully comply
with the rules of the state of Ohio and understand th	nat noncompliance can re	esult in various penalties, including the suspension	on of our certificate to
operate within the state of Ohio.			
I declare under penalty of perjury that the foregoing is	s true and correct.		
Executed on at 1300 Co	olumbus-Sandusky Rd I (Location)	N, Marion, Ohio 43302	
* This affidavit is required for every tarij authorized agent of the applicant.	*(Si	gnature and Title) (Date) may be signed by counsel or an officer of the	e applicant, or an
	VERIFICA	TION	
l, Todd Colquitt, verify that I have utilized, verbat	im, the Commission's T	elecommunications Application Form and that	all of the information
submitted here, and all additional information submitt	Too	s case, is true and correct to the best of my knowled Colquell Pold (Date)	xdge. 3/33/07
*Verification is required for every filing. the applicant.	. It may be signed by c	counsel or an officer of the applicant, or an	authorized agent of

Send your completed Application Form, including all required attachments as well as the required number of copies, to:

**Public Utilities Commission of Ohio** 

Attention: Docketing Division (or to the Telecommunications Division Chief if a prefiting submittal)
180 East Broad Street, Columbus, OH 43215-3793

# EXHIBIT A

# **CURRENT TARIFF SHEETS**

Tariff P.U.C.O. No. 7 Section 1 Sheet No. Original sheet No. 49F

#### PRICING LIST GENERAL EXCHANGE TARIFF P.U.C.O. No. 7

SECTION 1 Original Sheet No. 49F

Verizon North Inc.

#### GENERAL REGULATIONS

#### 9. SPECIAL PROMOTIONS

9.10. The Company will offer the following promotion starting February 1, 2007 and ending no later than May 1, 2007.

(N)

The Company will offer a Welcome Back Savings promotion for residential customers. Qualifying customers are residential customers who change their existing local service from another local service provider to Verizon as a result of Verizon's direct mail campaign and/or telemarketing.

Qualifying customers who agree to purchase one of Verizon's voice services, e.g., Verizon Local Package, Verizon Local Package Extra, Verizon Regional Package, Verizon Regional Package Extra, Regional Essentials, Regional Value or Residence 1-Party service will receive a \$10.00 credit on their Verizon telephone bill for a period of six months.

This promotional offer cannot be combined with any other discount or promotion except as authorized by Verizon.

Qualifying customers are limited to one promotional offer during the promotional period.

(N)

9.11. The Company will offer the following promotion starting February 1, 2007 and ending no later than May 1, 2007.

(N)

The Company will offer a Welcome Savings promotion for residential customers. Customers who are new residential customers who currently do not receive local service from Verizon and agree to change their existing local service from another local service provider to Verizon during this promotional period will be eligible for the following offers.

Qualifying customers who agree to purchase Regional Essentials bundled with an unlimited domestic long distance calling plan plus one of the following: Verizon Online Broadband (Up to 3 Mbps package), Verizon Wireless One-Bill, or DirecTV through Verizon (Total Choice or Higher) will receive a \$5.00 credit on their Verizon telephone bill for a period of three months.

Qualifying customers who agree to purchase Regional Essentials bundled with an unlimited domestic long distance calling plan and Verizon Online Broadband (Up to 3 Mbps package) and either or both, Verizon Wireless One-Bill or DirecTV through Verizon (Total Choice or Higher) will receive a \$10.00 credit on their Verizon telephone bill for a period of three months.

The applicable discount will expire three months from the date it is implemented on a customer's account. Discontinuance of any one of the services listed above will result in immediate termination of the discount.

Qualifying unlimited domestic long distance calling plans must be consistent with the Plan O Service – Unlimited as found in the Domestic Bell Atlantic Communications, Inc. d/b/a Verizon long Distance Posted Rates, Terms and Conditions.

This promotional offer cannot be combined with any other discount or promotion except as authorized by Verizon.

Qualifying customers are limited to one promotional offer during the promotional period.

(N)

Issued: January 31, 2007

Effective: February 1, 2007

# **EXHIBIT B**

# PROPOSED TARIFF SHEETS

Tariff P.U.C.O. No. 7 Section 1 Sheet No.

1st revised sheet No. 49f

#### PRICING LIST GENERAL EXCHANGE TARIFF P.U.C.O. No. 7

Verizon North Inc.

SECTION 1 1st Revised Sheet No. 49F Cancels Original Sheet No. 49F

#### **GENERAL REGULATIONS**

#### SPECIAL PROMOTIONS

9.10. The Company will offer the following promotion starting February 1, 2007 and ending no later than May 1, 2007.

The Company will offer a Welcome Back Savings promotion for residential customers. Qualifying customers are residential customers who change their existing local service from another local service provider to Verizon as a result of Verizon's direct mail campaign and/or telemarketing.

Qualifying customers who agree to purchase one of Verizon's voice services, e.g., Verizon Local Package, Verizon Local Package Extra, Verizon Regional Package, Verizon Regional Package Extra, Regional Essentials, Regional Value or Residence 1-Party service will receive a \$10.00 credit on their Verizon telephone bill for a period of six months.

This promotional offer cannot be combined with any other discount or promotion except as authorized by Verizon.

Qualifying customers are limited to one promotional offer during the promotional period.

9.11. The Company will offer the following promotion starting February 1, 2007 and ending no later than February 28, 2007. (C)

The Company will offer a Welcome Savings promotion for residential customers. Customers who are new residential customers who currently do not receive local service from Verizon and agree to change their existing local service from another local service provider to Verizon during this promotional period will be eligible for the following offers.

Qualifying customers who agree to purchase Regional Essentials bundled with an unlimited domestic long distance calling plan plus one of the following: Verizon Online Broadband (Up to 3 Mbps package), Verizon Wireless One-Bill, or DirecTV through Verizon (Total Choice or Higher) will receive a \$5.00 credit on their Verizon telephone bill for a period of three months.

Qualifying customers who agree to purchase Regional Essentials bundled with an unlimited domestic long distance calling plan and Verizon Online Broadband (Up to 3 Mbps package) and either or both, Verizon Wireless One-Bill or DirecTV through Verizon (Total Choice or Higher) will receive a \$10.00 credit on their Verizon telephone bill for a period of three months.

The applicable discount will expire three months from the date it is implemented on a customer's account. Discontinuance of any one of the services listed above will result in immediate termination of the discount.

Qualifying unlimited domestic long distance calling plans must be consistent with the Plan O Service – Unlimited as found in the Domestic Bell Atlantic Communications, Inc. d/b/a Verizon long Distance Posted Rates, Terms and Conditions.

This promotional offer cannot be combined with any other discount or promotion except as authorized by Verizon.

Qualifying customers are limited to one promotional offer during the promotional period.

Issued: February 22, 2007

Effective: February 28, 2007

#### **EXHIBIT C**

#### **RATIONALE FOR CHANGE**

Verizon North Inc. proposes to revise its General Exchange Tariff, P.U.C.O. No. 7, to change the date of an existing promo for residential customers. The previous promotion was set to run from February 1, 2007 through May 1, 2007. The promo is now ending February 28, 2007. A new promo is being implemented effective March 1, 2007 to offer higher discounts that will be available to the customers with the same eligibility as the previous promotion. Prior customer notification for promotions is not required.