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September 19, 2011

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street - Filing Room
Harrisburg, PA 17120

RE: Richard Ryan v. Verizon Pennsylvania, Inc.; Docket No. C-2009-2135745
**RESPONSE OF VERIZON PENNSYLVANIA TO THE MOTION TO
COMPEL OF RICHARD RYAN**

Dear Ms. Chiavetta:

Enclosed for filing are an original and three copies of the Response of Verizon Pennsylvania Inc. to the Motion to Compel of Richard Ryan in the above captioned proceeding. This document has been served in accordance with the attached Certificate of Service.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,

William E. Lehman
Counsel for Verizon Pennsylvania Inc.

WEL/bes
Enclosures
cc: Per Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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RICHARD RYAN,

Complainant

v.

VERIZON PENNSYLVANIA INC.,

Respondent

Docket No. C-2009-2135745

**ANSWER OF VERIZON PENNSYLVANIA INC. TO
RICHARD RYAN'S MOTION TO COMPEL THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS**

Verizon Pennsylvania Inc. ("Verizon PA" or "Company"), by its attorneys in this proceeding, Hawke McKeon & Sniscak LLP, hereby responds to Richard Ryan's ("Mr. Ryan" or "Complainant") Motion to Compel Third Request for Production of Documents. In support thereof, Verizon PA represents as follows:

Introduction

On or about August 18, 2011, the Complainant served his Third Request for Production of Documents ("Request") on Verizon PA. The Request asks for "Respondent's entire record of calls and billing for the telephone number 215-266-0977, August 1, 2006 to end of Verizon service." After reasonable investigation, Verizon PA could find no record of telephone number 215-266-0977. Therefore, counsel for Verizon PA called Robert Cohen, counsel for the Complainant and told him that there was no record of the requested telephone number. Mr. Cohen informed Verizon PA's counsel that the telephone number requested was the Complainant's cell phone number. After informing Mr. Cohen that Verizon PA was a landline

telephone service provider and did not provide cellular service, and therefore, would not have the records requested, Mr. Cohen told counsel for Verizon to respond accordingly. On September 13, 2011, Verizon PA timely served an answer to the Complainant's request informing him that 215-266-0977 was not a Verizon PA number and, therefore, Verizon PA neither has nor can supply the information requested. On or about September 13, 2011, Complainant served the instant Motion to Compel.

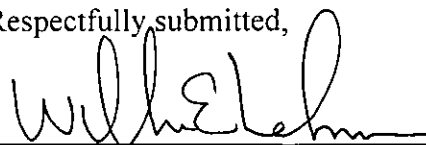
ANSWER TO MOTION TO COMPEL

Request for Production No. 1

As stated in Verizon PA's answer to Request No. 1, telephone number 215-266-0977 is not a number associated with Verizon PA. Verizon PA provides landline service to its customers in Pennsylvania. Verizon PA does not provide cellular service. To the extent that 215-266-0977 is the Complainant's cellular number, the Complainant must request these records from his cellular company.

WHEREFORE, for all of the reasons set forth above, the Complainant's Motion to Compel responses to his Request should be denied.

Respectfully submitted,



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Counsel for Verizon Pennsylvania Inc.

Dated: September 19, 2011

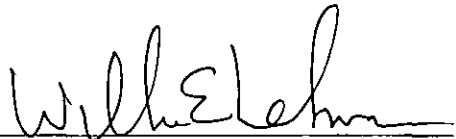
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service By First Class U.S. Mail

Robert C. Cohen, Esq.
740 Sandy St.
Norristown, PA 19401

Administrative Law Judge Cynthia W. Fordham
Pennsylvania Public Utility Commission
Suite 4063, 801 Market St.
Philadelphia, PA 19107



William E. Lehman

Dated this 19th day of September 2011.

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