

Law Offices  
**ROBERT C. COHEN**  
Attorney At Law  
740 Sandy St.  
Norristown, Pennsylvania 19401  
Ph: 610 212 6809 Fax: 610 279 9380

RECEIVED

SEP 16 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

---

September 16, 2011

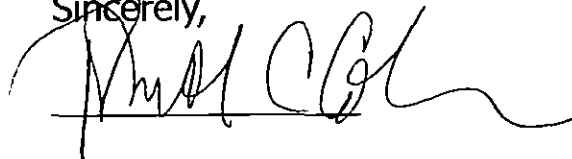
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission

RE: Richard Ryan v. Verizon Pennsylvania, Inc.;  
Docket No. C-2009-2135745

Dear Secretary Chiavetta,

I have enclosed for filing Complainant's Supplemental Motion to Compel **Third Request for Production of Documents** along with a Certificate of Service. Would you kindly file this on my behalf.

Sincerely,



Robert C. Cohen  
Attorney for Richard Ryan, Complainant

cc: William E. Lehman  
Cc: The Honorable Cynthia W. Fordham  
Administrative law Judge  
w/enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Richard Ryan,

v.

Docket No. C-2009-2135745

Verizon Pennsylvania, Inc.,

---

**COMPLAINANT'S SUPPLEMENTAL MOTION TO COMPEL  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

Robert C. Cohen, Esq. files Complainant's Supplemental Motion to Compel Third Request for Production of Documents. Attached hereto as Exhibit **A** is Complainant's Third Request for Production of Documents.

**A. Third Request for Production of Documents**

Request No. 1

Respondent's entire record of calls and billing for the telephone# 215 266 0977, August 1, 2006 to end of Verizon service.

**Argument**

**The request for billing documents of the telephone # 215 266 0977 was most certainly a Verizon telephone # for the period requested, August 1, 2006 to end of Verizon service in 2009. The assertion that it was not a Verizon telephone # is false, and another example of service abuse. See attached document received by Complainant, Richard Ryan on September 16, 2011.**

**According to Form 10-K filed by Verizon Communications Inc. on February 28, 2011 with the SEC, as required by law, ..... "We have two primary reportable segments, Domestic Wireless and Wireline, which we operate and manage as strategic business segments and organize by products and services." Certainly, Verizon PA and Verizon Wireless are brother/sister corporations to the Parent Verizon Communications Inc. The capability to produce the documents requested is obvious, obvious to any customer who has bundled services and billing. Currently customers can receive one bill for all of their Verizon services, Fios, Internet, wireless, landline, etc. Counsels' assertion that they can not provide the documents is a weak assertion. They are capable of providing the documents.**

**Respondent has failed to object in a timely manner and has failed to produce the record of calls and billing documents related to requests for service by Complainant and calls to Complainant by Verizon service personnel for the period August 2006 to November 2009 when Complainant's telephone # at 310 S. Juniper was 215 266 0977.**

All of Complainant's Third Request for Production of Documents is properly directed to the reasonable service issue referred to in Order #4.

Complainant's request does not expand the scope of the proceedings,

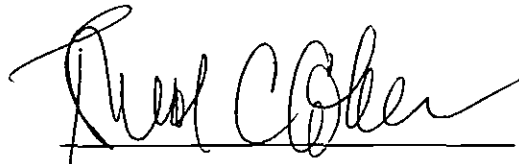
but rather carefully relates to the lack of reasonable service to

Complainant and these documents verify the Interrogatories requested of Complainant by Verizon. Reasonable service includes the discriminatory service to Complainant.

Thus, Complainant's discovery request is directed solely and exclusively to information related to reasonable service problems experienced by Complainant as follows:

1. Fraudulent and or misleading representations to Complainant by Verizon regarding the removal of the offending wires in question.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert C. Cohen", written over a horizontal line.

Robert C. Cohen, Esq.  
Attorney for Richard Ryan, Complainant

**VERIZON PENNSYLVANIA, INC.  
RESPONSES TO THIRD REQUEST FOR PRODUCTION  
OF DOCUMENTS OF RICHARD RYAN**

---

1. Respondent's entire record of calls and billing for the telephone # 215-266-0977, August 1, 2006 to end of Verizon service.

**Response:**

Telephone number 215-266-0977 is not a Verizon Pennsylvania Inc. number and, therefore, Verizon Pennsylvania Inc. neither has nor can supply the information requested.

**Answered by: Regina Ryan**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Richard Ryan,  
Complainant  
v.  
Verizon Pennsylvania, Inc.,  
Respondent

Docket No. C-2009-2135745

---

**CERTIFICATE OF SERVICE**

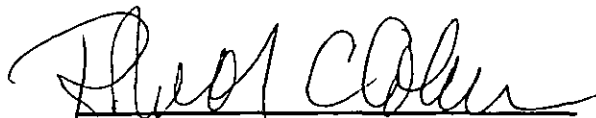
I, Robert C. Cohen, Esquire certify that I have this 16<sup>th</sup> day of September, 2011 served a true copy of the foregoing Supplemental Motion to Compel Third Request for Production of Documents upon Counsel for Respondent and others as listed below.

**SERVICE VIA FIRST CLASS MAIL**

The Honorable Cynthia W. Fordham  
Administrative law Judge  
Pennsylvania Public Utility Commission  
801 Market Street  
Suite 4063 Philadelphia, PA 19107

William E. Lehman, Esq.  
Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778

Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street - Filing Room (2 North)  
Harrisburg, PA 17120



Robert C. Cohen, Esq. (02727)  
740 Sandy St.

Norristown, PA 19401  
Attorney for Complainant, Richard Ryan

**Richard Ryan  
310 S. Juniper  
Philadelphia, PA 19107**

**RECEIVED**

SEP 16 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street - Filing Room (2 North)  
Harrisburg, PA 17120**

