



THE  
LANZA  
FIRM

*Experience & Value*

April 23, 2015

*Via regular and/or electronic mail*

Hon. Mark M. Hoyer  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 5th Avenue - Suite 220  
Pittsburgh, PA 15222

**Re: Vernon Robinson v. Global Tel\*Link Corporation**  
**Docket No. C-2013-2343289**  
**Answer to Motion for Amendment of Record**

Your Honor:

Please accept the following as the Answer of Global Tel\*Link Corporation (GTL) to the Motion for Amendment of Record (Motion) filed on or about April 13, 2015 by Complainant pursuant to Section 1.81 of the Commission's regulations. 52 Pa. Code § 1.81.

First, GTL respectfully submits that the Motion seeks to amend and supplement the Respondent's Brief and not to amend the record in this matter. As such, Your Honor should use his discretion to deny the Motion in its entirety. If the Complainant desires to add to his arguments, he can do so as part of his Reply Brief in this matter.

Should Your Honor wish to consider the Motion, GTL respectfully requests that, at a minimum, the Motion be denied in part. Of the four (4) amendments offered by Complainant, two are wholly inappropriate and should be rejected. Amendment 1 seeks to add a whole new paragraph to the Complainant's Brief, and such a blatant attempt to supplement the Brief should not be allowed without leave from the Presiding Officer. Similarly, Amendment 3 seeks to add extensive language to an existing paragraph and also would result in a supplement to the Brief. These two amendments should be rejected.

Amendments 2 and 4 are in the nature of a correction of typographical errors which is less objectionable. Respondent does not object to these amendments to the Complainant's Brief if the Presiding Officer decides to exercise his discretion to consider the Motion.

Very truly yours,



Edward G. Lanza, Esq.  
THE LANZA FIRM, LLC

cc: Vernon Robinson (via regular mail)  
Claudia Regen, Esq. (via email)  
Kevin Lefton, Esq. (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Vernon Robinson CB-3895 :  
v. : Docket No. C-2013-2343289  
Global Tel\* Link Corporation :

**CERTIFICATE OF SERVICE**

I, Edward G. Lanza, certify that on this date, I served true and correct copies of Respondent Global Tel\*Link Corporation's Answer to Motion to Amend upon the parties named below in accordance with 52 Pa. Code § 1.54:

Via regular mail:

Vernon Robinson CB-3895  
P.O. Box 244  
Graterford, PA 19426

Via regular and/or electronic mail:

Hon. Mark A. Hoyer  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Suite 220, Piatt Place  
301 Fifth Avenue  
Pittsburgh, PA. 15222  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Kevin B. Lefton, Esq.  
Senior Counsel  
Global Tel\*Link Corporation  
12021 Sunset Hill Road, Suite 100  
Reston, VA 20190  
[Kevin.Lefton@gtl.net](mailto:Kevin.Lefton@gtl.net)



Edward G. Lanza, Esq.  
Attorney for Respondent

Dated: April 23, 2015