

Suzan DeBusk Paiva  
Assistant General Counsel



1717 Arch Street, 3 East  
Philadelphia, PA 19103

Tel: (215) 466-4755  
Fax: (215) 563-2658  
[Suzan.D.Paiva@Verizon.com](mailto:Suzan.D.Paiva@Verizon.com)

March 14, 2016

**Via E-Mail and First Class U.S. Mail**

Scott J. Rubin, Esq.  
Law Office of Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036

Re: Petition of Communications Workers of America for a Public,  
On-the-Record Commission Investigation of Safety, Adequacy and  
Reasonableness of Service Provided by Verizon Pennsylvania LLC  
Docket No. P-2015-2509336

Dear Mr. Rubin:

Enclosed please find Verizon's Objections to the CWA's First Set of Interrogatories and Requests for Production of Documents, being served on behalf of Verizon Pennsylvania LLC in the above captioned matter.

If you have any questions, please feel free to contact me.

Very truly yours,

  
Suzan D. Paiva

SDP/slb

**Via Electronic Filing**  
cc: Rosemary Chiavetta, PUC Secretary (Cover Letter and CoS Only)

**Via E-Mail and First Class U.S. Mail**  
cc: The Honorable Joel H. Cheskis (Cover Letter and CoS Only)  
Attached Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true copy of Verizon's Verizon's Objections to the CWA's First Set of Interrogatories and Requests for Production of Documents, upon the parties listed below, in accordance with the requirements of §1.54 (relating to service by a party) and §1,55 (related to service upon attorneys).

Sated at Philadelphia, Pennsylvania, this 14<sup>th</sup> day of March, 2016.

**Via E-Mail and First Class Mail**

Scott J. Rubin, Esq.  
Law Office of Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036

Elizabeth Rose Triscari, Esq.  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Commerce Building  
Harrisburg, PA 17101

Deanne M. O'Dell, Esq.  
Eckert, Seamans, Cherin & Mellot, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

Darryl A. Lawrence, Esq.  
Lauren M. Burge, Esq.  
Barrett C. Sheridan, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101

Bradley R. Gorter, Esq  
Stephanie M. Wimer, Esq.  
Michael L. Swindler, Esq.  
PA Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street  
Harrisburg, PA 17120



Susan D. Paiva  
Pennsylvania Bar ID No. 53853  
1717 Arch Street, 3<sup>rd</sup> Floor  
Philadelphia, PA 19103  
215-466-4755

Attorney for Verizon