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April 13, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room (2 North)
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Terry White v. Verizon Pennsylvania LLC
Docket Number: C-2016-2532236
REQUEST FOR EXTENSION OF TIME

Dear Secretary Chiavetta:

On April 13, 2016, after nearly 10 months of trying to reach a contract with leaders of the Communications Workers of America (CWA) and the International Brotherhood of Electrical Workers (IBEW), a strike was announced and became effective at 6:00 am that day.

Pursuant to 52 Pa. Code Section 1.91, Verizon Pennsylvania is requesting an extension of time in which to file an answer in the above referenced complaint due to the significant disruption caused by the strike of CWA and IBEW personnel. To promote adequate and reasonably continuous service to its customers during the strike, Verizon management employees are assigned to take over duties in the field in place of their normal job duties. These management personnel are unavailable during the strike period, as they are assigned to job duties serving customers in place of those workers that are on strike.

Under 52 Pa. Code Section 1.91 *Applications for waiver of formal requirements*, the PUC has authority to extend the 20-day answer deadline of 52 Pa. Code Section 5.61 *Answers to complaints, petitions, motions and preliminary objections*. The purpose of this letter is to respectfully request that Verizon be granted an additional 60 days to respond to the above referenced formal complaint. At the conclusion of the strike, Verizon will expeditiously address this complaint.

Thank you for your consideration of this request to allow Verizon to focus on providing service to its customers during this time.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva/sam".

cc: Terry White