

Monday, April 18, 2016

Secretary Chiavetta
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, Pennsylvania 17105-3265

RE: Terry White v. Verizon Pennsylvania Docket Number: C-2016-2532236
OPPOSITION TO VERIZON'S REQUEST FOR EXTENSION OF TIME

Dear Secretary Chiavetta:

On April 13, 2016, Verizon filed a "**REQUEST FOR EXTENSION OF TIME**" in response to the above listed complaint, citing the strike that started on the same day. For the following reasons, this request is not reasonable, has inadequate facts and reasons in support of the request, and should be denied:

1. On April 5, 2016 at 9:55 am, Terry White spoke with Patty Mack, a Verizon legal representative about the status of this action;
2. Based on the fact that no satisfaction agreement was able to be reached, Ms. Mack stated that Verizon would be filing a responsive pleading to this matter;
3. On April 13, 2016, the above "**REQUEST FOR EXTENSION OF TIME**" was filed without notice to Mr. White or any additional consultation;
4. The strike notice was foreseeable and a Verizon should not be able to delay normal business operations for this foreseeable event;
5. It is unclear from Verizon's filing what "significant disruption" is causing it from being able to respond as required under the rules.

Under 52 Pa. Code Section 1.91, *Application for waiver of formal requirements*, the PUC has the authority to extend the normal 20-day answer deadline. Base on a joint recommendation from Verizon and Mr. White, this formal complaint has already been extended from the initial deadline of March 28, 2016. On the instant matter, there is no agreement an extension. Therefore, Mr. White actively opposes, based on the above facts, giving Verizon any additional time to respond to the formal complaint and would like the Commission to declare Verizon in default.

Thank you and I will await your response to this matter.

Sincerely,

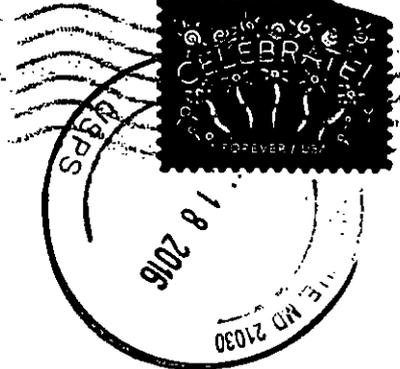

Terry White

cc: Suzan Paiva, Verizon Associate General Counsel

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SECRETARY'S BUREAU

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