

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923
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FAX (717) 783-7152
consumer@paoca.org

August 16, 2016

Suzan D. Paiva, Esquire
Verizon Pennsylvania, LLC
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103

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

Dear Counsel:

Enclosed you will find two copies of Data Requests of the Office of Consumer Advocate, Set I, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these data requests as soon as possible.

We also request that you send a copy of the answers directly to our consultants, as listed below:

Dr. Robert Loube
Vice President
Rolka Loube Associates
10601 Cavalier Drive
Silver Spring, MD 20901
Tel. (301) 681-0338
bobloube@earthlink.net

Mr. Rowland Curry
1509 Mearns Meadow Blvd.
Austin, TX 78758
rcurry@austin.rr.com

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If you have any questions, please call us. By copy of this letter, copies of these data requests have been served upon all parties. A certificate of service showing service of these data requests on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

/s/ Barrett C. Sheridan
Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)
Certificate of Service

*224966

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories and Requests for Productions of Documents to Verizon Pennsylvania, LLC – Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 16th day of August 2016.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Bradley R. Gorter, Prosecutor
Stephanie M. Wimer, Prosecutor
Michael L. Swindler, Deputy Chief Prosecutor
Bureau of Investigations and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815-2036

Elizabeth R. Triscari, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Susan D. Paiva, Esquire
Verizon Pennsylvania, LLC
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103

Deanne M. O'Dell, Esquire
Sarah Stoner, Esquire
Eckert, Seamans, Cherin & Mellott
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Harrisburg, PA 17101

/s/ Barrett C. Sheridan
Darryl Lawrence
Senior Assistant Consumer Advocate
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