

1717 Arch Street, 3 East Philadelphia, PA 19103

Tel: (215) 466-4755 Fax: (215) 563-2658

Suzan.D.Paiva@Verizon.com

September 12, 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 Responses to the Set II Interrogatories and Requests for Production of Documents of the Communications Workers of America in the above named matter.

Please note that certain of the responses are Proprietary, and their distribution and subsequent handling is subject to the terms of the Protective Order.

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

Syn V. Pawayses

SDP/slb

cc:

Secretary Rosemary Chiavetta (cover letter and certificate only)

Attached Certificate of Service

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true copy of Verizon's Responses to the Set II discovery requests of the CWA, 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).

Dated at Philadelphia, Pennsylvania, this 12th day of September, 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

Sarah M. Stoner, Esq Deanne M. O'Dell, Esq. Eckert, Seamans, Cherin & Mellot, LLC 213 Market Street, 8<sup>th</sup> Floor Harrisburg, PA 17101 Barrett C. Sheridan, Esq. Lauren M. Burge, Esq. Darryl A. Lawrence, Esq. Office of Consumer Advocate 555 Walnut Street, 5<sup>th</sup> Floor Harrisburg, PA 17101

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

Susan M. Baldwin PO Box 392 Newburyport, MA 01950

Suzan D. Paiva

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

? Pawagas

Attorney for Verizon