

333 OAK LANE
BLOOMSBURG, PA 17815
SCOTT.J.RUBIN@GMAIL.COM

SCOTT J. RUBIN
ATTORNEY • CONSULTANT

TEL: (570) 387-1893
FAX: (570) 387-1894
CELL: (570) 850-9317

September 22, 2016

Joel Cheskis, Administrative Law Judge
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

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 ALJ Cheskis:

On March 8, 2016, the Communications Workers of America ("CWA") filed a Prehearing Memorandum in the above-referenced matter. In that Memorandum, CWA identified an expert witness that it has retained for this matter. In addition, CWA stated: "CWA anticipates that it may be necessary to have one or more additional witnesses who are officers or members of CWA who have experience with the actual implementation of Verizon's policies and procedures in non-FTTP areas of the Commonwealth. CWA has not yet identified the specific need for, or identity of, any CWA-member witnesses at this time. If it is determined that one or more such witnesses will be necessary, CWA will notify the Administrative Law Judge and parties as soon as the identities of any such witnesses are known."

CWA has now identified one additional witness it expects to call in this matter and for whom CWA expects to submit pre-filed direct testimony on September 29, 2016: James Gardler, President, CWA Local 13000, 2124 Race Street, Philadelphia, PA 19103

CWA expects Mr. Gardler to provide an overview of CWA's concerns in this matter and to provide additional information about Verizon's maintenance and repair practices.

Sincerely,



cc: Rosemary Chiavetta, Secretary
Per certificate of service

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this day a true copy of the foregoing document upon the parties listed below by electronic mail and U.S. mail, first-class, postage prepaid, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Bradley R. Gorter / Stephanie M. Wimer
Michael L. Swindler
Bureau of Investigation & Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
bgorter@pa.gov, stwimer@pa.gov,
mswindler@pa.gov

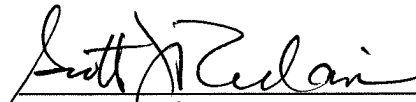
Darryl Lawrence / Lauren Burge
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org, lburge@paoca.org

Elizabeth Rose Triscari
Office of Small Business Advocate
300 North Second St., Suite 202
Harrisburg, PA 17101
etriscari@pa.gov

Suzan D. Paiva
Verizon
1717 Arch St., 3rd Floor
Philadelphia, PA 19103
Suzan.D.Paiva@verizon.com

Deanne O'Dell
Eckert Seamans Cherin & Mellott LLC
213 Market St., 8th Floor
Harrisburg, PA 17108-1248
dodell@eckertseamans.com

Dated: September 22, 2016



Scott J. Rubin
Counsel for
Communications Workers of America