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January 24, 2017

**HAND-DELIVERY and
ELECTRONIC FILING**

Hon. Joel H. Cheskis
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Fl.
P. O. Box 3265
Harrisburg, PA 17105-3265

Re: **Tanya Turpin v. Comcast Phone of Pennsylvania LLC**
In re: C-2016-2563353

Dear Judge Cheskis:

This letter is intended to address a few points in Your Honor's January 3, 2017 Order entered in the above-referenced matter.

The Order states on page 8: "To the extent that Comcast believes that the wrong corporate entity was served the complaint, it is directed to identify counsel for that appropriate corporate entity within twenty days of the date of this order." (Order at 8). We respond below to this directive and will attempt to clarify a few related points.

As stated in Respondent's Answer filed on October 12, 2016, Respondent does not provide any retail telecommunications service to end-user consumers and never provided any telecommunications services to Ms. Turpin. Currently, Ms. Turpin is not a customer of any Comcast entity. At the time of its Answer, and as stated therein, Ms. Turpin was a customer of Respondent's affiliate, Comcast IP Phone, LLC, an entity that provides VoIP services (the "telephone" service described in the complaint), and also a customer of Respondent's affiliates Comcast of Philadelphia, LLC, and Comcast Philadelphia II, LLC, entities that provide cable television and internet services. Although Comcast has identified these affiliates as Ms. Turpin's

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former service providers, none of them provide services that are regulated by the Commission. As such, Comcast is not identifying them as the “appropriate” corporate entities that should have been served, but rather is simply attempting to clarify their relationship to Respondent.

In this proceeding, Pepper Hamilton LLP represents all of the various Comcast entities, including the entities providing retail services outside the Commission’s jurisdiction.

Also, the Order states at page 6 that Ms. Turpin’s service may have involved “rates, terms or conditions of protected services” over which the Commission maintains jurisdiction under the VoIP Act. To clarify, none of the services provided to Ms. Turpin are governed by tariffs or provided “under tariffs.” In sum, no retail services to consumers are provided under tariffs. Accordingly, Comcast respectfully submits that this exception does not apply. Since there are no applicable tariffs here, it is immaterial whether any services provided by Comcast could potentially be classified as “protected services.”

Furthermore, the “universal connectivity charge” referenced in the Order is the charge imposed for purposes of the Federal Universal Service Fund, a system of telecommunications subsidies and fees managed by the FCC intended to promote universal access to telecommunications services. This charge does not, as suggested by the Order, pertain to “universal service fund fees” as defined by the VoIP Act.

Despite the lack of regulated services as discussed above, Comcast, from a customer relations perspective, is attempting to work with Ms. Turpin to resolve to her satisfaction the issues raised in her complaint. We will advise Your Honor if we are able to reach Ms. Turpin and effectuate a settlement.

Respectfully,

/s/ Tucker R. Hull

Tucker R. Hull

cc: Tanya Turpin (via first class mail)
Andrew Fisher, Esquire, Comcast
Elizabeth Murray, Comcast
Marc Machlin, Esquire, Pepper Hamilton
Michelle Skjoldal, Esquire, Pepper Hamilton

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

TANYA TURPIN,	:	
Complainant	:	
	:	Complaint Docket
v.	:	No: C-2016-2563353
	:	Electronically Filed
COMCAST PHONE OF	:	
PENNSYLVANIA, LLC,	:	
Respondent.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first-class mail in accordance with the requirements of Section 1.54 of the Commission's rules, 52 Pa. Code §1.54:

Tanya Turpin
4907 West Girard
Philadelphia, PA 19131

Dated: January 24, 2017

/s/ Tucker R. Hull
Tucker R. Hull (PA 306426)