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June 20, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Ross E. Schell v PPL Electric Utilities Corporation
Docket No: C-2016-2578796

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are the Replies on behalf of PPL Electric Utilities Corporation, to Complainant's Exceptions.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/ejm
Enclosure

cc: Ross E. Schell. (w/ enc.)
Administrative Law Judge Jeffrey A. Watson (w/enc.); *via email only*
Patricia L. Moore (w/enc.) *via email only*
Kimberly R. Hanson (w/enc.) *via email only*
Holly M. Groth (w/enc.) *via email only*
Shelbie Frederick Bayda (w/enc.) *via email only*

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2578796

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES
TO EXCEPTIONS OF COMPLAINANT, ROSS SCHELL**

AND NOW, comes the Respondent, PPL Electric Utilities Corporation ("PPL Electric") by and through its attorney of record, Gross McGinley, LLP, and files the within Replies to Exceptions, alleging in support thereof as follows:

I. History and Background:

On or about December 5, 2016, Complainant, Ross E. Schell, filed a Formal Complaint against PPL Electric averring that PPL Electric was threatening to terminate his electric service, and challenged the reliability, safety, and quality of service provided. Further, Complainant Schell alleged "Other." PPL Electric denied all claims within its Answer filed on December 27, 2016. On January 18, 2017 Complainant Schell filed an Amended Complaint raising additional concerns. Due to service issues regarding the Amended Complaint, the hearing of February 28, 2017 was continued. On March 1, 2017, the ALJ issued an Order directing Complainant to properly effectuate service of the Amended Complaint on or before March 10, 2017. (A true and correct copy of the March 1, 2017 Order is attached hereto as Exhibit "A"). On the same date, Respondent PPL

Electric filed¹ an Answer to the Amended Complaint, as well as a Motion for More Specific Pleading. Complainant failed to respond to this Motion and on March 9, 2017, ALJ Watson issued an Interim Order directing Complainant to file a Second Amended Complaint on or before March 17, 2017. (A true and correct copy of the March 9, 2017 Order is attached hereto as Exhibit “B”). Complainant failed to file a Second Amended Complaint, and the record was closed April 26, 2017.

On June 13, 2017, Administrative Law Judge Watson issued an initial decision which denied the formal complaint file by Complainant, Ross E. Schell against PPL Electric Utilities Corporation. Complainant filed Exceptions on June 15, 2017. Complainant’s “Petition for Exceptions” is numbered one (1) through seven (7). Unfortunately, each numbered Exception does not cite to a Finding of Fact (“FOF”) or Conclusion of Law (“COL”), and in fact most of the “Exceptions” do not appear to correspond to the actual “Initial Decision” of ALJ Watson. Nonetheless, PPL Electric responds.

II. Replies to Complainant’s Exceptions:

1. No reply of PPL Electric is required as this Exception does not pertain to PPL Electric or the Initial Decision of the ALJ. By way of further reply, it should be noted that Complainant’s Complaint was dismissed for failure to comply with the March 9, 2017 Order which directed the filing of a Second Amended Complaint in order to set forth his allegations with the required specificity. (Initial Decision at pg. 10). Complainant makes no allegations that he filed or attempted to file a Second Amended Complaint on or before March 17, 2017 as directed.

¹ The Complainant’s Amended Complaint was available online, which permitted Respondent to file an Answer and Motion.

2. No reply of PPL Electric is required as this Exception does not pertain to PPL Electric. By way of further reply, it should be noted that Complainant's Complaint was dismissed for failure to comply with the March 9, 2017 Order which directed the filing of a Second Amended Complaint in order to set forth Complainant's allegations with the required specificity. (Initial Decision at pg. 10). Complainant's First Amended Complaint, whether signed or not, failed to set forth allegations with the required specificity. Accordingly, Complainant was granted the right to refile on or before March 17, 2017 in order to cure this deficiency. Complainant did not. Complainant makes no allegations that he filed or attempted to file a Second Amended Complaint on or before March 17, 2017 as directed, and accordingly his Exception is without merit.

3. Denied as to PPL Electric. All documents filed by PPL Electric have been mailed to Complainant either by First Class mail or Federal Express. Respondent PPL Electric has filed Certificates of Service for each filing attesting to the same. While PPL Electric has no personal knowledge of service by the ALJ, all documents received from the ALJ by PPL Electric did contain certificates of service which evidenced service upon both Complainant and Respondent. Moreover, Complainant has failed to identify the documents/pleadings he believes were not served upon him and accordingly such Exception should be dismissed.

4. Denied that Complainant complied with the legal service requirements. By way of further response, PPL Electric filed a Motion for More Specific Answer to the First Amended Complaint. In response, the ALJ issued the March 9, 2017 Order directing Complainant to file a more specific Second Amended Complaint. Complainant did not, and this was the basis for the June 13, 2017 Initial Decision. Complainant's

Complaint was not dismissed for either failure to sign or failure to comply with the service requirements. Complainant rather failed to file a legally sufficient Complaint, was provided the opportunity to amend and rectify all deficiencies and elected not to so file. Moreover, Complainant admits that he was copied on all e-mail communications with the ALJ, and accordingly, there is no evidence of impropriety.

5. Denied as to PPL Electric. All letters² (documents) filed by PPL Electric have been mailed to Complainant either by First Class mail or Federal Express. Respondent PPL Electric has filed Certificates of Service for each filing attesting to the same. While PPL Electric has no personal knowledge of service by the ALJ, all communications received from the ALJ did contain certificates of service which evidenced service upon both Complainant and Respondent. Moreover, Complainant has failed to identify the documents/letters he believes were not served upon him and accordingly such Exception should be dismissed.

6. Complainant's Complaint was dismissed for failure to comply with the Court's March 9, 2017 which directed the filing of a more specific Second Amended Complaint. No evidence was rejected by the ALJ, as no hearing was conducted when evidence would have been submitted.

7. Complainant's Complaint was dismissed for failure to comply with the Court's March 9, 2017 which directed the filing of a more specific Second Amended Complaint. No evidence was rejected by the ALJ, as no hearing was conducted when evidence would have been submitted.

² The only letters by PPL have been cover letters for filings or proposed exhibits. The cover letters were mailed to Complainant with the filings, and certificates of service accompanied all filings. Moreover, any letters indicated a "CC" to Complainant.

III. Conclusion:

For the foregoing reasons, Respondent PPL Electric respectfully requests this Commission dismiss the Exceptions of Complainant and uphold the Initial Decision of ALJ Watson.

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE; ID # 83071
Attorney for Respondent
PPL Electric Utilities Corporation
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Ph. (610) 820-5450; Fx. (610) 820-6006

Date: June 20, 2017

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2578796

CERTIFICATE OF SERVICE

This is to certify that the Reply to Claimant's Exceptions on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondents by first class United States mail, postage on this the 20th day of June, 2017.

Administrative Law Judge Jeffrey A. Watson
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
VIA EMAIL ONLY

Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE
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EXHIBIT “A”

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ross Schell

v.

PPL Electric Utilities Corporation

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C-2016-2578796

**INTERIM ORDER
EXTENDING DEADLINE FOR COMPLAINANT TO SERVE AMENDED
COMPLAINT AND FOR RESPONDENT TO FILE ANY OBJECTIONS OR
RESPONSES**

Ross Schell (Complainant) filed a Formal Complaint (complaint or original complaint) dated December 5, 2016, with the Pennsylvania Public Utility Commission (Commission) against PPL Electric Utilities Corporation (Respondent or PPL) on December 7, 2016, alleging that Respondent was threatening to shut off his electric service or has shut off service, and the existence of reliability, safety or quality problems with his electric service, and checked the box on the formal complaint entitled “other”. As relief, Complainant requested a refund of payments made for the past 17 years. **The complaint was not signed by Complainant and did not include a written and signed verification.** On December 27, 2016, Respondent filed an answer essentially denying the material allegations set forth in the complaint. On January 18, 2017, Complainant filed what purports to be an amended complaint dated January 14, 2017, raising additional claims to those set forth in his original complaint. No responsive pleading was filed regarding the purported amended complaint.

A hearing notice was issued and served upon the parties by the Commission on January 13, 2017, scheduling the initial telephone hearing for Tuesday, February 28, 2017. A prehearing order was entered and served upon the parties by the Commission on January 18, 2017, which provided procedural rules and guidelines for the proceeding.

The hearing was convened as scheduled on Tuesday, February 28, 2017 at 10:00 a.m. Complainant appeared *pro se*. Respondent was represented by Kimberly G. Krupka, Esquire. Prior to taking testimony, Complainant acknowledge that he filed an amended complaint but did not effectuate service of the purported amended complaint upon Respondent or the undersigned presiding officer.¹ Complainant stated that he mailed a copy of the purported amended complaint by certified mail to the undersigned presiding officer however the mailing was refused or undelivered by the United States Postal Service to the Office of Administrative Law Judge in Pittsburgh. Complainant stated that he has retained the documentation from the undelivered mailing to the undersigned presiding officer.

At the hearing, Respondent objected various procedural issues including the filing of the purported amended complaint and the lack of service of the purported amended complaint upon Respondent. Respondent could not be expected to proceed with presenting a defense to the purported amended complaint without having been served with the pleading prior to the hearing. Under the circumstances, the hearing was continued.

THEREFORE,

IT IS ORDERED:

1. That Complainant shall serve his amended complaint dated January 14, 2017 upon counsel for Respondent and the undersigned presiding officer and comply with the service and filing requirements on or before March 10, 2017.

2. That Respondent shall file any responsive pleadings, objections or other petitions or motions within 20 days of receipt of the amended complaint served by Complainant.

Date: March 1, 2017

Jeffrey A. Watson
Administrative Law Judge

¹ See 52 Pa.Code §§ 1.54 – 1.59.

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EXHIBIT “B”

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ross E. Schell

v.

PPL Electric Utilities Corporation

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C-2016-2578796

**INTERIM ORDER
GRANTING RESPONDENT’S MOTION FOR MORE SPECIFIC (AMENDED)
COMPLAINT**

Ross E. Schell (Complainant) filed a Formal Complaint (complaint or original complaint) dated December 5, 2016, with the Pennsylvania Public Utility Commission (Commission) against PPL Electric Utilities Corporation (Respondent or PPL) on December 7, 2016, alleging that Respondent was threatening to shut off his electric service or has shut off service, and the existence of reliability, safety or quality problems with his electric service, and checked the box on the formal complaint entitled “other”. As relief, Complainant requested a refund of payments made for the past 17 years. The complaint was not signed by Complainant and did not include a written and signed verification. On December 27, 2016, Respondent filed an answer essentially denying the material allegations set forth in the complaint. On January 18, 2017, Complainant filed what purports to be an amended complaint dated January 14, 2017, raising additional claims to those set forth in his original complaint. No responsive pleading was filed regarding the purported amended complaint.

A hearing notice was issued and served upon the parties by the Commission on January 13, 2017, scheduling the initial telephone hearing for Tuesday, February 28, 2017. A prehearing order was entered and served upon the parties by the Commission on January 18, 2017, which provided procedural rules and guidelines for the proceeding.

The hearing was convened as scheduled on Tuesday, February 28, 2017 at 10:00 a.m. Complainant appeared *pro se*. Respondent was represented by Kimberly G. Krupka, Esquire. Prior to taking testimony, Complainant acknowledged that he filed an amended complaint but did not effectuate service of the purported amended complaint upon Respondent or the undersigned presiding officer.¹ Complainant stated that he mailed a copy of the purported amended complaint by certified mail to the undersigned presiding officer however the mailing was refused or undelivered by the United States Postal Service to the Office of Administrative Law Judge in Pittsburgh. Complainant stated that he has retained the documentation from the undelivered mailing to the undersigned presiding officer.

At the hearing, Respondent objected to various procedural issues including the filing of the purported amended complaint and the lack of service of the purported amended complaint upon Respondent. Respondent could not be expected to proceed with presenting a defense to the purported amended complaint without having been served with the pleading prior to the hearing. Under the circumstances, the hearing was continued.

On March 1, 2017, an interim order was entered that required Complainant to serve his amended complaint dated January 14, 2017 upon counsel for Respondent and the undersigned presiding officer and comply with the service and filing requirements on or before March 10, 2017. In addition, it was ordered that Respondent shall file any responsive pleadings, objections or other petitions or motions within 20 days of receipt of the amended complaint served by Complainant.

On March 1, 2017, Respondent filed an answer to Complainant's amended complaint and a Motion of PPL Electric Utilities Corporation For More Specific (Amended) Complaint (motion). The motion included a certificate of service stating that Complainant was served with a copy of the motion on March 1, 2017. In its motion, Respondent avers that Complainant filed an amended complaint that avers as follows:

¹ See 52 Pa.Code §§ 1.54-1.59.

- (a) “Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if they have it/them.”
- “Service contrary to stated [sic] in laws”
- (b) “I am having reliability, safety, or quality problems with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.”
- “Poser [sic] keeps going off and on for 17 years”
- (c) “Other (explain)”
- “See enclosed sheets”

Respondent points out that the only documents attached to Complainant’s amended complaint are a copy of 66 Pa.C.S. §§ 1501-1505, PPL’s nine month feeder history for various lines and Complainant’s outage history. Respondent further avers that Complainant failed to identify any specific outages about which he complains and that his “other” concerns are unexplained. Respondent avers that without Complainant identifying the specific charges about which he complains, PPL cannot appropriately respond to Complainant’s complaint and cannot adequately investigate and prepare a defense. Accordingly, Respondent requests that Complainant be directed to refile his amended complaint stating the specific charges about which he complains and identifying the specific outages about which he complains and explaining his “other” concerns.

No specific response to the motion addressing the averments raised by Respondent in the motion was filed by Complainant. Respondent’s motion will be treated as preliminary objections in the nature of a motion for a more specific pleading.

The Commission's Rules of Practice and Procedure permit parties to file preliminary objections. The grounds for preliminary objections are limited to those set forth in 52 Pa.Code § 5.101(a) as follows:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

Commission preliminary objection practice is analogous to Pennsylvania civil practice regarding preliminary objections. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, 1994 Pa. PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994) Preliminary objections in civil practice requesting dismissal of a pleading will be granted only where the right to relief is clearly warranted and free from doubt. *Interstate Traveller Services, Inc. v. Pa. Dept. of Environment Resources*, 406 A.2d 1020 (Pa. 1979); *Rivera v. Philadelphia Theological Seminary of St. Charles Borromeo, Inc.*, 595 A.2d 172 (Pa. Super. 1991). The Commission follows this standard. *Montague v. Philadelphia Electric Company*, 66 Pa. PUC 24 (1988).

The Commission may not rely upon the factual assertions of the moving party but must accept as true for purposes of disposing of the motion all well pleaded, material facts of the nonmoving party, as well as every inference from those facts. *County of Allegheny v. Commonwealth of Pennsylvania*, 490 A. 2d 402 (Pa. 1985); *Commonwealth of Pennsylvania v.*

Bell Telephone Co. of Pa., 551 A.2d 602 (Pa.Cmwth. 1988). The Commission must view the complaint in this case in the light most favorable to the complainant and should dismiss the complaint only if it appears that the complainant would not be entitled to relief under any circumstances as a matter of law. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, 1994 Pa. PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994).

The Commission regulation at 52 Pa.Code § 5.21(a) states that a person may file a formal complaint claiming violation of a statute that the Commission has jurisdiction to administer. The regulation at 52 Pa.Code § 5.21(d) authorizes the Commission to dismiss a complaint if a hearing is not necessary and authorizes preliminary objections to be filed in response to a complaint. This provision serves judicial economy by avoiding a hearing where no factual dispute exists. If no factual issue pertinent to the resolution of a case exists, a hearing is unnecessary. 66 Pa.C.S. § 703(a); *Lehigh Valley Power Committee v. Pa. Pub. Util. Comm'n*, 563 A.2d 557 (Pa.Cmwth. 1989); *Lehigh Valley Power Committee v. Pa. Pub. Util. Comm'n*, 563 A.2d 548 (Pa.Cmwth. 1989); *S.M.E. Bessemer Cement, Inc. v. Pa. Pub. Util. Comm'n*, 540 A.2d 1006 (Pa.Cmwth. 1988).

Viewing the complaint in this proceeding in the light most favorable to Complainant, Mr. Schell averred incorrect charges on his bill, the existence of reliability, safety or quality problems with his service and “other”. He provided no further explanation for the filing of his complaint. The additional pages attached to his complaint are simply provisions from the Pennsylvania Code and other documents without any factual averments alleging any specific details of his alleged problem.

Insufficient Specificity of Pleading – 52 Pa.Code § 5.101(a)(3)

Complainant avers incorrect charges on his bill, that he has a reliability, safety, quality or other problems with his electric service and “other” and attached copies of what appears to be several sections of the Public Utility Code and various other documents to his complaint. However, Complainant presented no specific factual explanation of his alleged

problem. Respondent argues that the complaint, as filed, is insufficiently specific and prevents Respondent from investigating and defending the complaint.

A formal complaint must set forth “the act or thing done or omitted to be done” by a public utility “in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.” 66 Pa.C.S. § 701; 52 Pa.Code § 5.22(a)(4). The Commission’s regulations require that a complaint contain a clear statement of the relief sought. 52 Pa.Code § 5.22(a)(5). A complaint should contain information specific enough to allow the respondent to understand the allegations against it, in order to conduct a meaningful investigation of the allegations and to prepare a coherent response or defense. Because the instant complaint, as it stands, is insufficiently specific, Respondent cannot properly investigate and defend the complaint.

In addition, a pleading cannot be legally insufficient. See 52 Pa.Code § 5.101(a)(4). Although, as set forth above, Complainant has made general averments in his amended complaint, he provided no factual explanation of his alleged problem.

Respondent argues that the amended complaint, as filed, is legally insufficient to provide it with notice of the alleged facts and issues to be litigated. To allow the amended complaint to go forward, would be a denial of Respondent’s due process rights.

Accepting as true all of the facts alleged in the instant amended complaint, the amended complaint does not set forth any facts that could be construed as a violation of a Commission regulation, statute or order by the Respondent. Sustaining Respondent’s motion in the form of preliminary objections is appropriate under the circumstances. Accordingly, Respondent’s request to require Complainant to amend his amended complaint will be granted.

THEREFORE,

IT IS ORDERED:

1. That Complainant shall file with the Commission's Secretary a second amended complaint at the above docket number stating the specific allegations about which he complains and identifying the specific outages about which he complains and explaining his "other" concerns, as required by applicable law.

2. That Complainant shall file and serve his second amended complaint upon counsel for Respondent and the undersigned presiding officer and comply with the Commission's service and filing requirements on or before March 17, 2017.

3. That Respondent shall file any responsive pleadings, objections or other petitions or motions within 20 days of receipt of the second amended complaint served by Complainant.

Date: March 9, 2017

Jeffrey A. Watson
Administrative Law Judge

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