



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

CHARLES E. THOMAS, III
Direct Dial: 717.255.7611
cet3@tntlawfirm.com

December 20, 2017

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Filing Room (2nd Floor)
Harrisburg, PA 17120

Re: Armstrong Telecommunications Inc. v. Verizon Pennsylvania Inc., Verizon North LLC, MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services and MCI Communications Services Inc., Docket Nos. C-2010-2216205, C-2010-2216311, C-2010-2216325 and C-2010-2216293

Dear Secretary Chiavetta:

Enclosed for filing is a Joint Stipulation Regarding Admission of Testimony and Waiver of Hearing in the above-referenced matter. Copies of the Joint Stipulation are being served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter, and please contact me should you have any questions.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Enclosure

cc: Certificate of Service
David Jamieson, Esq. (via email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Armstrong Telecommunications, Inc.	:	
	:	
Complainant,	:	
	:	
v.	:	Docket Nos. C-2010-2216205
	:	C-2010-2216311
Verizon Pennsylvania Inc., Verizon North LLC,	:	C-2010-2216325
MCImetro Access Transmission Services LLC	:	C-2010-2216293
d/b/a Verizon Access Transmission Services and	:	
MCI Communications Services Inc.,	:	
	:	
Respondents.	:	

**JOINT STIPULATION REGARDING ADMISSION OF
TESTIMONY AND WAIVER OF HEARING**

Verizon Pennsylvania LLC, Verizon North LLC, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and MCI Communications Services Inc. (together, “Verizon”) and Armstrong Telecommunications, Inc. (“Armstrong”), by and through their respective attorneys, hereby stipulate as follows:

1. The Parties stipulate to the authenticity and admission into the record of the following pre-filed, written testimony and exhibits, which were previously served upon all Parties and the presiding Administrative Law Judge, and acknowledge and agree that they waive cross-examination of the witnesses and the need for further evidentiary hearing:
 - a. Verizon Statement No. 2.0, the Supplemental Direct Testimony of Leslie L. Freet dated December 1, 2015, including Exhibits A through F thereto.
 - b. Armstrong Statement No. 3, the Supplemental Rebuttal Testimony of Michael Starkey dated January 8, 2016, including Exhibits A through D thereto (subject to the stipulation in Paragraph 3 below regarding revisions to page 12 of the testimony and the first page of Exhibit D), in Proprietary and Public versions.

2. On or before January 25, 2018, each Party will separately file with the Secretary of the Public Utility Commission: (i) a signed Verification from its witness supporting the witness's above-listed testimony and exhibits; and (ii) a copy of its above-listed testimony and exhibits in accordance with 52 Pa. Code § 5.412a.

3. The Parties further stipulate that Armstrong Statement No. 3 and accompanying Proprietary Exhibit D are revised to account for the portion of the traffic that was VoIP-PSTN traffic because it was originated by Verizon in IP format. As a result of this revision, the figure on line 6 of page 12 of Armstrong Statement No. 3 is changed from \$1,139,611 to \$996,584 and the first page of Proprietary Exhibit D to Armstrong Statement No. 3 is revised accordingly to reflect this updated figure. This figure is exclusive of any interest that might apply (Verizon is not conceding that interest applies), and the Parties reserve the right to address the application of interest in their supplemental briefs. Armstrong will reflect the above changes to its testimony and Exhibit D when it files the testimony and exhibits with the Secretary pursuant to Paragraph 2 of this Joint Stipulation.

4. On or before January 25, 2018, each Party will file a supplemental brief limited to 20 pages. There will be no reply briefs. The record will close following the filing of the supplemental briefs.

5. Pursuant to the foregoing, the Parties move for admission into the evidentiary record the testimony and exhibits identified in Paragraph 1 above.

Respectfully submitted,



Suzan D. Paiva (Atty ID No. 53853)

Verizon

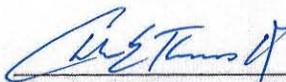
900 Race St., 6th Floor

Philadelphia, PA 19107

267-768-6184

Suzan.D.Paiva@verizon.com

Counsel for Verizon



Charles E. Thomas, III (Atty ID No. 201014)

THOMAS, NIESEN & THOMAS, LLC

212 Locust Street, Suite 302

Harrisburg, PA 17101

717-255-7611

Cet3@tntlawfirm.com

Counsel for Armstrong Telecommunications, Inc.

Dated: December 20, 2017

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of December, 2017, served a true and correct copy of the foregoing document upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA EMAIL AND FIRST CLASS MAIL

Honorable Dennis J. Buckley
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
debuckley@pa.gov

Suzan D. Paiva, Esquire
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Suzan.D.Paiva@Verizon.com



Charles E. Thomas, III (PA ID # 201014)