

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

FAX (717) 783-7152  
consumer@paoca.org

February 25, 2019

Susan D. Paiva, Esquire  
Verizon  
900 Race Street, 6<sup>th</sup> Floor  
Philadelphia, PA 19107

Re: Verizon North LLC's 2019 PCO Filing  
Docket No. R-2018-3005793

Office of Consumer Advocate v. Verizon  
North LLC  
Docket No. C-2018-3005977

Office of Small Business Advocate v.  
Verizon North LLC  
Docket No. C-2018-3006040

Dear Ms. Paiva:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceeding.

In accordance with the Company's Amended Chapter 30 Plan, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Dr. Robert Loubé  
Rolka, Loubé Associates  
10601 Cavalier Drive  
Silver Spring, MD 20901  
[bobloubé@earthlink.net](mailto:bobloubé@earthlink.net)

Susan D. Paiva, Esquire  
February 25, 2019  
Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

/s/ Barrett C. Sheridan

Barrett C. Sheridan

Assistant Consumer Advocate

PA Attorney I.D. # 61138

E-Mail: [BSheridan@paoca.org](mailto:BSheridan@paoca.org)

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*265101

CERTIFICATE OF SERVICE

Re: Verizon North LLC's 2019 PCO : Docket No. R-2018-3005793  
Filing :  
Office of Consumer Advocate v. : Docket No. C-2018-3005977  
Verizon North LLC :  
Office of Small Business Advocate : Docket No. C-2018-3006040  
v. Verizon North LLC :

I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate's Interrogatories, Set I to Verizon North LLC, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 25<sup>th</sup> day of February 2019.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL, POSTAGE PREPAID

Philip J. Wood, Jr.  
Stephanie A. Ulrich  
Verizon  
417 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Steven C. Gray, Esquire  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

Susan D. Paiva, Esquire  
Verizon  
900 Race Street, 6<sup>th</sup> Floor  
Philadelphia, PA 19107

/s/ Barrett C. Sheridan  
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\*262826

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