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July 17, 2020

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

VIA ELECTRONIC FILING

RE: Application of Tri-Co Connections, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public in the Commonwealth of Pennsylvania as a Competitive Local Exchange Carrier in the Service Territories of: Verizon Pennsylvania LLC; Verizon North LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Canton, LLC; Frontier Communications of Oswayo River, LLC; North Penn Telephone Company; and Windstream Pennsylvania, LLC; Docket No. A-2018-3005309

Application of Tri-Co Connections, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public in the Commonwealth of Pennsylvania as a Detariffed Facilities-Based Interexchange Carrier; Docket No. A-2018-3005312

Dear Secretary Chiavetta:

In accordance with the directions contained in the *Application to Provide Telecommunications Services*, Tri-Co Connections, LLC ("Tri-Co"), hereby submits the following notice to the Pennsylvania Public Utility Commission ("PUC" or "Commission") of changes to various statements and representations made in the Application seeking Certificates of Public Convenience submitted on September 27, 2018, in the above-referenced dockets.

QUESTION 9: PROPOSED OPERATIONS: Tri-Co's response should be modified to change its detariffed interexchange service from facilities-based to reseller:

- Interexchange Toll Reseller, InterLATA and/or IntraLATA, (e.g., MTS, 1+, 800, WATS, Travel and Debit Cards)
- Interexchange Toll Facilities-based carrier, InterLATA and/or IntraLATA, (e.g., MTS, 1+, 800, WATS, Travel and Debit Cards)
- Competitive Access Provider (dedicated point-to-point or multipoint service; voice or data)
- Competitive Local Exchange Carrier.
- Incumbent Local Exchange Carrier
- Other (Identify).

QUESTION 10: PROPOSED SERVICES: Describe in detail the services which the Applicant proposes to offer. If proposing to provide more than one category in Item #9, clearly and separately delineate the services within each proposed operation. Provide a brief description of the facilities the Company will use to provide services. Specify whether those facilities are Company-owned or obtained from other companies as UNEs or on a resold basis.

Tri-Co's response should be modified to read as follows:

REVISED APPLICATION LANGUAGE:

Tri-Co will use facilities that are company-owned and facilities of a third-party to provide residential and business voice services. Tri-Co's facilities are fiber-based and include Optical Network Terminals ("ONTs") at the customers' premises. Tri-Co will enter into an agreement with a third-party gateway provider to convert the IP-based communications initiated by Tri-Co's end users to the TDM or related protocols to connect to the Public Switched Telephone Network. The gateway provider will handle all traffic exchange for communications originated by or terminated to the Tri-Co end users.

QUESTION 13: PROPOSED TARIFFS: Consistent with the revised form of operation stated above, Tri-Co will be abandoning its Switched Access Provider Tariff. All traffic exchange will be handled by Tri-Co's gateway provider, which currently is Momentum Telecom, Inc. (PA Utility Code 3110196).

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. We are also filing this document electronically. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

If you have any questions regarding the document, please feel free to contact the undersigned. Thank you.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Pamela C. Polacek

Counsel to Tri-Co Connections, LLC

PCP/leh

- c: David Screven, Deputy Chief Counsel, Law Bureau (via E-Mail)
 - Erin Laudenslager, Bureau of Technical Utility Services (via E-Mail)
 - Melissa Derr, Bureau of Technical Utility Services (via E-Mail)
- Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

Frontier Communications of Canton, LLC
100 CTE Drive
Dallas, PA 18612

Frontier Communications of Oswayo River, LLC
100 CTE Drive
Dallas, PA 18612

Office of Attorney General
Office of Consumer Protection
Strawberry Square
Harrisburg, PA 17120

North Penn Telephone Company
4145 Route 549
Mansfield, PA 16933-9621

Commonwealth Telephone Company
d/b/a Frontier Communications Commonwealth
Telephone Company
100 CTE Drive
Dallas, PA 18612

Windstream Pennsylvania, Inc.
4001 Rodney Parham Road
Little Rock, AR 72212

Verizon Pennsylvania, Inc.
417 Walnut Street, 1st Floor
Harrisburg, PA 17101

Verizon North, LLC
417 Walnut Street, 1st Floor
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VIA E-MAIL

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Dated this 17th day of July, 2020, at Harrisburg, Pennsylvania.