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May 24, 2021

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

Re: Rulemaking to Comply with the Competitive  
Classification of Telecommunication Retail  
Services Under 66 Pa. C.S § 3016(a); General  
Review of Regulations 52 Pa. Code, Chapters 53,  
63 and 64, Docket No. L-2018-3001391

Dear Secretary Chiavetta:

Please be advised that the Communications Workers of America (“CWA”) is not submitting comments in response to the Notice of Proposed Rulemaking published in the *Pennsylvania Bulletin* on April 10, 2021, in the above-referenced docket.

CWA commends the Commission for conducting a thorough and careful review and update of Pennsylvania’s telecommunications regulations. In particular, CWA agrees with the Commission’s determination “not to adopt the concept of a two-tiered regulatory structure setting forth competitive and noncompetitive regulations. Instead, we propose to retain a unified set of regulations that will apply uniformly to all geographic areas ... whether they have been determined to be ‘competitive’ ... or remain noncompetitive ....” 51 Pa. Bulletin at 2008.

Finally, CWA would encourage the Commission to open a proceeding designed to answer several of the questions posed by Chairperson Dutrieuille in her statement accompanying the Notice. While CWA strongly supports service-quality standards, reporting requirements, and penalties for non-compliance, CWA does not believe there is any publicly available data on which the Commission could base a reasoned decision on these issues. CWA would urge the Commission to conduct a public proceeding to obtain the information needed to support the development of such standards, requirements, and penalties.

The document was filed electronically with the Commission on this date.

Sincerely,



Cc: Per certificate of service

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CERTIFICATE OF SERVICE

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I hereby certify that I have this 24<sup>th</sup> day of May, 2021, served a true copy of foregoing document upon the following parties by electronic mail. Service by first-class mail will be provided to any party that requests such service.

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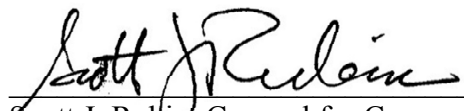
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