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February 3, 2020

**Via ECFS**

Marlene J. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street SW  
Washington, DC 20554

**Re: Metropolitan Edison Company, Pennsylvania Electric Company, and  
Penn Power Company's First Set of Interrogatories to Verizon  
Pennsylvania LLC and Verizon North LLC (Proceeding Number 19-354;  
Bureau ID Number EB-19-MD-008)**

Ms. Dortch:

Please find attached Metropolitan Edison Company, Pennsylvania Electric Company, and Penn Power Company's First Set of Interrogatories to Verizon Pennsylvania LLC and Verizon North LLC in Proceeding Number 19-354; Bureau ID Number EB-19-MD-008.

Sincerely,



Timothy A. Doughty  
Attorney for Metropolitan Edison Company,  
Pennsylvania Electric Company, and Penn Power  
Company

Enclosures

cc: Rosemary McEnery, Enforcement Bureau  
Anthony DeLaurentis, Enforcement Bureau

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

_____	)	
	)	
<b>Verizon Pennsylvania LLC and</b>	)	
<b>Verizon North LLC,</b>	)	
	)	
<i>Complainants,</i>	)	
	)	<b>Proceeding Number 19-354</b>
	)	
v.	)	<b>Bureau ID Number EB-19-MD-008</b>
	)	
<b>Metropolitan Edison Company,</b>	)	
<b>Pennsylvania Electric Company, and</b>	)	
<b>Penn Power Company,</b>	)	
	)	
<i>Defendants</i>	)	
_____	)	

**METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY,  
AND PENN POWER COMPANY’S FIRST SET OF INTERROGATORIES TO  
VERIZON PENNSYLVANIA LLC AND VERIZON NORTH LLC**

Defendants Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), and Pennsylvania Power Company (“Penn Power”) (collectively, “FirstEnergy”), Pursuant to the Notice of Formal Complaint issued on November 26, 2019 by the FCC Enforcement Bureau in this proceeding, the FCC Enforcement Bureau’s Letter Ruling on December 9, 2019, and pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submits this First Set of Interrogatories to Complainants Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”). FirstEnergy hereby requests that Verizon respond to the following First Set of Interrogatories fully, in writing, and that said written responses be signed and served upon counsel for FirstEnergy by March 11, 2020, pursuant to the FCC Enforcement Bureau’s December 9, 2019 Letter Ruling. Consistent with Rule 1.730(b), all of the information requested

herein pertains to FirstEnergy's Answer to Verizon's complaint. As set forth in the instructions, FirstEnergy is not seeking information that is available from any source other than Verizon.

These interrogatories are governed by the following definitions and instructions:

## DEFINITIONS

1. The terms “you,” or “your,” as used herein, means the Complainants Verizon Pennsylvania LLC and Verizon North LLC and any and all employees, members, agents, and any other persons acting on your behalf or under your direction or control.
2. The terms “Defendant” and “FirstEnergy” mean and refer to Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company.
3. The terms “Complainant” and “Verizon” mean and refer to Verizon Pennsylvania LLC and Verizon North LLC. “Complainant” and “Verizon” include any persons associated with it, including, but not limited to, officers, directors, employees, agents, representatives, predecessors, successors, assigns, attorneys, and/or any of them.
4. “Complaint” means and refers to Verizon Pennsylvania LLC and Verizon North LLC’s Complaint filed in this proceeding with the FCC on November 20, 2019, and any subsequent amendments thereto.
5. “Communication” includes any form of intended, attempted, or actual oral, written, graphic, electronic, or other representation or articulation Complainant received or sent, or attempted to receive or send.
6. The words “relate,” “relating,” “pertain,” “pertaining,” “reference,” “referencing,” “refer,” “referring,” and/or derivatives thereof, whether followed by a preposition or not, have the broadest meaning that may be accorded to them and include, but are not limited to, the following: directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, setting forth, discussing, commenting upon, analyzing, supporting, contradicting, proving, disproving, referring to, constituting, concerning, and/or connected, or reflecting in any way upon the stated subject matter of a given request.

7. “Person” and “persons” mean any individual, corporation, firm, company, partnership, joint venture, association, unincorporated association, governmental or public agency, and/or all other legal entities.
8. The terms “each” and “every” include the term “each and every.” “Any” shall include the term “any and all.”
9. The singular of words includes the plural and the plural includes the singular.
10. Masculine, feminine, or neuter pronouns include the other gender(s).
11. The words “and” and “or” have either a disjunctive or conjunctive meaning so as to bring within the scope of these document requests all information that might otherwise be construed to be outside their scope by use of a more restrictive meaning.
12. The words “and” and “or” have either a disjunctive or conjunctive meaning so as to bring within the scope of these document requests all information that might otherwise be construed to be outside their scope by use of a more restrictive meaning.
13. References to the name of a company or the designation of a party include the company or corporation, as the case may be, or the party, and its employees, agents, directors, officers, stockholders, principals, partners, representatives, attorneys, investigators, consultants, and subcontractors.

## **INSTRUCTIONS**

1. These interrogatories are continuing in nature. If you obtain additional information, a supplemental response shall be promptly furnished.
2. If any response to any request contains any objection, please state with specificity the grounds for each such objection and the part of the request to which the objection is made, but respond to such request fully insofar as it is not deemed objectionable or to the extent that it may be responded to subject to such objection.
3. Should you claim a privilege in connection with any of your responses, you shall identify the privilege claimed and produce an index identifying any document(s) or response(s) withheld under a claim of privilege. You shall state all facts that demonstrate why the information or the document(s) or response(s) sought by any of the following requests are entitled to the privilege asserted. Failure to produce the required index or to state the facts supporting the claim of privilege shall be a waiver of any privilege as to the information or document(s) or response(s) withheld.
4. Per FCC Rule 1.730(b), FirstEnergy is not seeking information that is available from any source other than Verizon.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1:**

Identify the joint use rates paid in 2018 pursuant to Verizon's joint use agreements with other electric utilities.

### **INTERROGATORY NO. 2:**

Identify which FirstEnergy poles have Verizon attachments that have been overlashed.

### **INTERROGATORY NO. 3:**

Identify the number of customers Verizon serves using Verizon's overlashing of its attachments to FirstEnergy poles.

### **INTERROGATORY NO. 4:**

For the FirstEnergy poles to which Verizon has attached fiber optic facilities, identify every FirstEnergy pole with Verizon fiber capacity to which Verizon has granted leasing or other rights to another entity.

### **INTERROGATORY NO. 5:**

Identify Verizon's cost per mile to overlash its attachments to FirstEnergy's poles.

### **INTERROGATORY NO. 6:**

Identify Verizon's cost per mile to lease fiber optic capacity on Verizon attachments to FirstEnergy's poles.

### **INTERROGATORY NO. 7:**

Identify each pole referred to by Steve Mills in his affidavit at paragraphs 60 and 61 (VZ00026-VZ00028).

**INTERROGATORY NO. 8:**

Identify every FirstEnergy pole to which Verizon has copper facilities attached, the service over which Verizon has announced publicly or to its customers it has abandoned or will abandon.

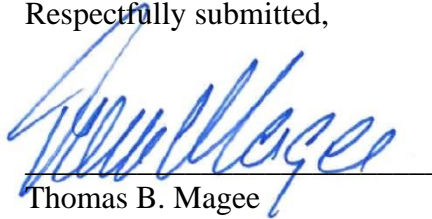
**INTERROGATORY NO. 9:**

Identify the gross intrastate operating revenues and the de facto gross intrastate operating revenues as reported on latest Section 510 Assessment Filing(s) submitted on behalf of Verizon to the Pennsylvania Public Utility Commission as required by Section 510 of the Pennsylvania Code, 66 Pa.C.S. § 510, Computation of Section 510 Assessments for Jurisdictionally-Mixed Telecommunications Services-Statement Policy. If Verizon did not make that submission, then provide such gross revenues for Verizon that are inputs to such latest Section 510 Assessment Filing(s).

**INTERROGATORY NO. 10:**

Identify the collective revenue generated by Verizon's services (i.e., interstate (including international services) and intrastate telecommunications services, interconnected VoIP services, and fixed broadband services), which revenue was inputted to the 2018 FCC Forms 499-A that Verizon submitted. If Verizon did not make that submission, then provide such collective revenue generated by Verizon that are inputs to the 2018 FCC Forms 499-A that any Verizon affiliate submitted.

Respectfully submitted,



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*Attorneys for Metropolitan Edison Company,  
Pennsylvania Electric Company, and Pennsylvania  
Power Company*

February 3, 2020

## CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 3<sup>rd</sup> day of February 2020, a true and authorized copy of Metropolitan Edison Company, Pennsylvania Electric Company, and Penn Power Company's First Set of Interrogatories to Verizon Pennsylvania LLC and Verizon North LLC was served on the parties listed below via electronic mail and was filed with the Commission via ECFS.

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