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Writer's Direct Access
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February 10, 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 Second Set of Responses to Complainants' First
Set of Interrogatories (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 Second Set of Responses to the Complainants' First Set of
Interrogatories 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

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

**METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
AND PENN POWER COMPANY’S SECOND SET OF RESPONSES
TO COMPLAINANT’S FIRST SET OF INTERROGATORIES**

Defendants Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), and Pennsylvania Power Company (“Penn Power”) (collectively, “FirstEnergy”), pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submit the following Second Set of Responses to the First Set of Interrogatories of Complainants Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”) to FirstEnergy.

INTERROGATORIES

INTERROGATORY NO. 3:

Beginning with the 2011 rental year, identify all entities that have had a Joint Use Agreement or License Agreement with FirstEnergy and state whether the entity is an incumbent local exchange carrier, CLEC, cable company, wireless provider, or other entity.

RESPONSE: Consistent with and without waiving FirstEnergy's objections, and pursuant to the January 27, 2020 Protective Agreement entered into by the parties, FirstEnergy will provide to Verizon's counsel a confidential list of entities which have a wireline CLEC or cable company pole attachment agreement with FirstEnergy.

INTERROGATORY NO. 4:

Beginning with the 2011 rental year, state the annual pole attachment rental rate that FirstEnergy charged each entity identified in response to Interrogatory 3, the number of poles or attachments for which the pole attachment rental rate was charged, and whether the entity uses FirstEnergy's poles pursuant to a License Agreement or a Joint Use Agreement. Include in your response the formula, calculations, inputs, assumptions, and source data used to calculate each pole attachment rental rate charged and state whether the rate was charged on a per-pole, per-attachment, or other basis and whether the rate was paid.

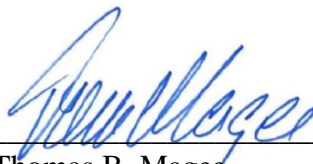
RESPONSE: Consistent with and without waiving FirstEnergy's objections, and pursuant to the January 27, 2020 Protective Agreement entered into by the parties, FirstEnergy will provide to Verizon's counsel a confidential list of the annual pole attachment rental rates charged the entities identified by FirstEnergy in response to Interrogatory No. 3.

INTERROGATORY NO. 5:

State the rates, terms, and conditions of all Joint Use Agreements and License Agreements with FirstEnergy that were in effect at any time from the 2011 rental year forward. Include in your response the name of the entity that is a party to the Joint Use Agreement or License Agreement with FirstEnergy and the dates on which the Joint Use Agreement or License Agreement with FirstEnergy was in effect. In lieu of stating the rates, terms, and conditions of all Joint Use Agreements and License Agreements, FirstEnergy may produce copies of each such Joint Use Agreement and License Agreement.

RESPONSE: Consistent with and without waiving FirstEnergy's objections, and pursuant to the January 27, 2020 Protective Agreement entered into by the parties, FirstEnergy provided Verizon's counsel a confidential copy of its agreements with those entities identified by FirstEnergy in response to Interrogatory No. 3.

Respectfully submitted,



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

February 10, 2020

**AFFIRMATION
OF
ROBERT M. ENDRIS,
FIRSTENERGY CORPORATION**

I, Robert M. Endris, do affirm as follows:

1. My name is Robert M. Endris. I serve as an Attorney at FirstEnergy Corporation (“FirstEnergy”); and
2. I attest that the information identified in FirstEnergy’s Second Set of Responses to Complainants Verizon Pennsylvania LLC and Verizon North LLC’s First Set of Interrogatories was gathered under my supervision.

Executed on February 10, 2020

/s/ _____

Robert M. Endris
Attorney
FirstEnergy Corporation

CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 10th day of February 2020, a true and authorized copy of Metropolitan Edison Company, Pennsylvania Electric Company, and Penn Power Company's Second Set of Responses to the Complainants' First Set of Interrogatories was served on the parties listed below via electronic mail and was filed with the Commission via ECFS.

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/s/

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