


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa\_oca

 /pennoca

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

November 29, 2021

**Via Electronic Mail Only**

Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)

Re: Joint Application of The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; CenturyTel Broadband Services, LLC; Connect Holding LLC; and Lumen Technologies, Inc. for All Approvals of a General Rule Transfer of Control and Registration of Securities  
Docket Nos. A-2021-3028668  
A-2021-3028669

Dear Ms. Stoner:

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

In accordance with the Commission's Rules of Practice and Procedure, as modified by agreement of the parties, we request that the Company provide verified answers to these inquiries within ten (10) 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:

Trevor R. Roycroft, Ph.D.  
Roycroft Consulting  
51 Sea Meadow Lane  
Brewster, MA 02631  
[trevor@roycroftconsulting.org](mailto:trevor@roycroftconsulting.org)

Sarah C. Stoner, Esquire  
November 29, 2021  
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 Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service

\*320346

CERTIFICATE OF SERVICE

Re: Joint Application of The United Telephone :  
Company of Pennsylvania LLC d/b/a :  
CenturyLink; CenturyTel Broadband Services, : Docket Nos. A-2021-3028668  
LLC; Connect Holding LLC; and Lumen : A-2021-3028669  
Technologies, Inc. for All Approvals of a :  
General Rule Transfer of Control and Registration :  
of Securities :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; CenturyTel Broadband Services, LLC; Connect Holding LLC; and Lumen Technologies, Inc., Set III, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29<sup>th</sup> day of November 2021.

**SERVICE BY E-MAIL ONLY**

Steven C. Gray, Esquire  
Teresa Wagner  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)

Howard J. Symons  
John L. Flynn  
Jenner & Block LLP  
1099 New York Avenue, NW  
Suite 900  
Washington, DC 20001-4412  
[hsymons@jenner.com](mailto:hsymons@jenner.com)  
[jflynn@jenner.com](mailto:jflynn@jenner.com)

Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)

Sue Benedek, Esquire  
Associate General Counsel  
240 N. Third Street  
Suite 300  
Harrisburg, PA 17101  
[sue.benedek@lumen.com](mailto:sue.benedek@lumen.com)

/s/ Barrett C. Sheridan  
Barrett C. Sheridan  
Assistant Consumer Advocate  
PA Attorney I.D. # 61138  
E-Mail: [BSheridan@paoca.org](mailto:BSheridan@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: November 29, 2021  
\*320345