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March 1, 2022

**Via Electronic Filing**

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

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 Secretary Chiavetta:

Enclosed for electronic filing please find the Joint Stipulation of the United Telephone Company of Pennsylvania, LLC, CenturyTel Broadband Services, LLC, Connect Holding LLC, and Lumen Technologies, Inc. (“Joint Applicants”), the Office of Consumer Advocate (“OCA”) and the Office of Small Business Advocate (“OSBA”) with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Sarah C. Stoner*

Sarah C. Stoner

Enclosure

cc: Hon. Marta Guhl w/enc.  
Shalea Delvillar w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the **Joint Stipulation** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email**

Barrett Sheridan, Esq.  
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Lumen Technologies  
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[Sue.benedek@lumen.com](mailto:Sue.benedek@lumen.com)

Dated: March 1, 2022

*Sarah C. Stoner*  
\_\_\_\_\_  
Sarah C. Stoner, Esq.

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of The United Telephone :  
Company of Pennsylvania LLC d/b/a :  
CenturyLink; CenturyTel Broadband : Docket No. A-2021-3028668  
Services, LLC; Connect Holding LLC; and : Docket No. A-2021-3028669  
Lumen Technologies, Inc. for All Approvals :  
of a General Rule Transfer of Control and :  
Registration of Securities :

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**JOINT STIPULATION OF**

**THE JOINT APPLICANTS, OFFICE OF CONSUMER ADVOCATE AND OFFICE OF  
SMALL BUSINESS ADVOCATE**

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The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink (“United Telephone”); CenturyTel Broadband Services, LLC (“CTBS”); Connect Holding LLC (“Connect Holding”); and Lumen Technologies, Inc. (“Lumen”) (collectively “Joint Applicants”); the Office of Consumer Advocate (“OCA”); and the Office of Small Business Advocate (“OSBA”) (with Joint Applicants, collectively “Stipulating Parties”) by their respective counsel, hereby enter into a Joint Stipulation with regard to the captioned proceeding as follows:

1. The Stipulating Parties agree to the entry of the prepared written testimony and exhibits of each party as identified below into the record and each agrees to waive cross examination of the other party’s witness(es).
  - a. Joint Applicants’ Statement No. 1 – Direct Testimony of Thomas Maguire
  - b. Joint Applicants’ Statement No. 1-R – Rebuttal Testimony of Thomas Maguire (Public and Highly Confidential Versions)
  - c. Joint Applicants’ Statement No. 2 – Direct Testimony of Aaron Sobel and Exhibit AS-1
  - d. Joint Applicants’ Statement No. 3 – Direct Testimony of Michael J. Balhoff
  - e. Joint Applicants’ Statement No. 3-R – Rebuttal Testimony of Michael J. Balhoff

(Public and Highly Confidential Versions)

- f. Joint Applicants' Statement No. 4-R – Rebuttal Testimony of Joshua Motzer and Exhibits JSM-4-R-1 and JSM-4-R-2 (Public and Proprietary Versions)
  - g. OSBA Statement No. 1 – Direct Testimony of Joseph Gillan and Exhibit JPG-1
  - h. OCA Statement No. 1 – Direct Testimony of Trevor R. Roycroft, Roycroft Direct Exhibit 1, Roycroft Direct Exhibit 2, and Dr. Roycroft's Verification (Public, Proprietary, and Highly Confidential Versions)
2. Verified Statements of the Joint Applicants' witnesses and of OSBA witness Gillan are attached as Appendix A, as additions to the respective testimonies.

**WHEREFORE**, the Stipulating Parties, by their respective counsel, respectfully request that the Honorable Administrative Law Judge Marta Guhl admit the foregoing testimony, exhibits and interrogatory responses into the record in this proceeding.

Respectfully Submitted,

*Counsel for Joint Applicants*

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*Counsel for the Office of Small Business Advocate*

/s/ Steven C. Gray

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Assistant Small Business Advocate  
Commonwealth of Pennsylvania  
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# APPENDIX A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIFICATION**

I, Joseph Gillan, hereby state that the facts set forth in my Direct Testimony, labelled OSBA Statement No. 1 , are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 19 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 2/28/22

  
\_\_\_\_\_  
Joseph Gillan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

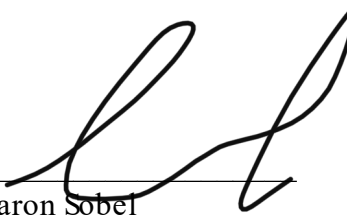
Joint Application of The United Telephone :  
Company of Pennsylvania LLC d/b/a :  
CenturyLink; CenturyTel Broadband : Docket No. A-2021-3028668  
Services, LLC; Connect Holding LLC; and : Docket No. A-2021-3028669  
Lumen Technologies, Inc. for All Approvals :  
of a General Rule Transfer of Control and :  
Registration of Securities :

**VERIFIED STATEMENT**

I, Aaron Sobel, hereby state that the facts set forth below are true and correct to the best of my knowledge, information and belief and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

1. I have submitted testimony in this proceeding on behalf of Connect Holding LLC and am authorized to make this statement on its behalf.
2. I prepared Joint Applicants' St. No. 2 which includes Exhibit AS-1 and was served on the parties in this proceeding on November 5, 2021.
3. I do not have any corrections to any of this testimony.
4. If I were asked the same questions set forth in the above-referenced statement today, my answers would be the same.

Date: February 28, 2022

  
\_\_\_\_\_  
Aaron Sobel

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of The United Telephone :  
Company of Pennsylvania LLC d/b/a :  
CenturyLink; CenturyTel Broadband : Docket No. A-2021-3028668  
Services, LLC; Connect Holding LLC; and : Docket No. A-2021-3028669  
Lumen Technologies, Inc. for All Approvals :  
of a General Rule Transfer of Control and :  
Registration of Securities :

**VERIFIED STATEMENT**

I, Thomas Maguire, hereby state that the facts set forth below are true and correct to the best of my knowledge, information and belief and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

1. I have submitted testimony in this proceeding on behalf of Connect Holding LLC and am authorized to make this statement on its behalf.
2. I prepared Joint Applicants' St. No. 1 that was served on the parties in this proceeding on November 5, 2021.
3. I prepared Joint Applicants' St. No. 1-R that was served on the parties in this proceeding on January 18, 2022.
4. I do not have any corrections to any of this testimony.
5. If I were asked the same questions set forth in each of these statements today, my answers would be the same.

Date: February 28, 2022

  
\_\_\_\_\_  
Thomas Maguire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of The United Telephone :  
Company of Pennsylvania LLC d/b/a :  
CenturyLink; CenturyTel Broadband : Docket No. A-2021-3028668  
Services, LLC; Connect Holding LLC; and : Docket No. A-2021-3028669  
Lumen Technologies, Inc. for All Approvals :  
of a General Rule Transfer of Control and :  
Registration of Securities :

**VERIFIED STATEMENT**

I, Joshua Motzer, hereby state that the facts set forth below are true and correct to the best of my knowledge, information and belief and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

1. I have submitted testimony in this proceeding on behalf of the Joint Applicants and am authorized to make this statement on their behalf.
2. I prepared Joint Applicants' St. No. 4-R which includes Exhibits JSM-4-R-1 and JSM-4-R-2 and was served on the parties in this proceeding on January 18, 2022.
3. I do not have any corrections to any of this testimony.
4. If I were asked the same questions set forth in the above-referenced statement today, my answers would be the same.



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Joshua Motzer

Date: March 1, 2022

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

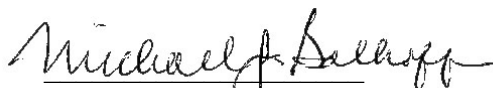
Joint Application of The United Telephone :  
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Lumen Technologies, Inc. for All Approvals :  
of a General Rule Transfer of Control and :  
Registration of Securities :

**VERIFIED STATEMENT**

I, Michael J. Balhoff, hereby state that the facts set forth below are true and correct to the best of my knowledge, information and belief and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

1. I have submitted testimony in this proceeding on behalf of Connect Holding LLC and Lumen Technologies, Inc. and am authorized to make this statement on their behalf.
2. I prepared Joint Applicants' St. No. 3 that was served on the parties in this proceeding on November 5, 2021.
3. I prepared Joint Applicants' St. No. 3-R that was served on the parties in this proceeding on January 18, 2022.
4. I do not have any corrections to any of this testimony.
5. If I were asked the same questions set forth in each of these statements today, my answers would be the same.

Date: February 28, 2022

  
Michael J. Balhoff