

**Verrill**

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**RUTH A. MATTSON**  
Partner  
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Direct: 617-292-28961

Verrill Dana LLP  
1 Federal Street  
Boston, MA 02110  
Main 617-209-2600

June 13, 2022

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg PA 17120

Re: Docket R-2020-3016152, Frontier Communications Commonwealth Telephone Company PSI/SPI Filing for Year 2020;  
Docket C-2020-3018501 Office of Consumer Advocate v. Frontier Communications Commonwealth Telephone Company;  
Docket R-2019-3007237 Frontier Communications Commonwealth Telephone Company PSI/SPI Filing for Year 2019; and  
Docket C-2019-3007911, Office of Consumer Advocate v. Frontier Communications Commonwealth Telephone Company.

Dear Secretary Chiavetta

We are submitting for filing with this letter our Entry of Appearance in the above matters. Copies of the Notice are being served upon the persons and in the manner set forth on the Certificate of Service attached to it.

Please contact me if you have any questions concerning this matter.

Respectfully submitted,

DocuSigned by:



357B413F6EC54C9  
Ruth A. Mattson

Pennsylvania Bar No. 201193

Verrill Dana LLP

1 Federal Street

Boston MA 02110

[rmattson@verrill-law.com](mailto:rmattson@verrill-law.com)

*Counsel for Frontier Communications  
Commonwealth Telephone Company*

cc: Service List

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Frontier Communications Commonwealth	:	
Telephone Company	:	Docket No. R-2020-3016152
PSI/SPI Filing for Year 2020	:	
	:	
	:	
Office of Consumer Advocate	:	
v.	:	Docket No. C-2020-3018501
Frontier Communications Commonwealth	:	
Telephone Company	:	

**ENTRY OF APPEARANCE**

Pursuant to 52 Pa. Code § 1.24, please enter in the above-captioned matters the appearance of the following attorney as counsel of record for Frontier Communications Commonwealth Telephone Company (“Company”):

Ruth A. Mattson  
Verrill Dana LLP  
1 Federal Street  
Boston MA 02110  
Tel: 617-309-2600  
[rmattson@verrill-law.com](mailto:rmattson@verrill-law.com)

Respectfully submitted on June 13, 2022.

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Ruth A. Mattson  
Pennsylvania Bar No. 201193  
Verrill Dana LLP  
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*Counsel for Frontier Communications  
Commonwealth Telephone Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Frontier Communications Commonwealth	:	
Telephone Company	:	Docket No. R.-2019-3007237
PSI/SPI Filing for Year 2019	:	
	:	
Office of Consumer Advocate	:	
v.	:	Docket No. C-2019-3007911
Frontier Communications Commonwealth	:	
Telephone Company	:	
	:	
Frontier Communications Commonwealth	:	
Telephone Company	:	Docket No. R-2020-3016152
PSI/SPI Filing for Year 2020	:	
	:	
Office of Consumer Advocate	:	
v.	:	Docket No. C-2020-3018501
Frontier Communications Commonwealth	:	
Telephone Company	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the service of a true copy of the foregoing document upon the following parties by electronic mail:

Via Electronic Mail

Steven C. Gray, Esquire  
Office of Small Business Advocate  
[sgray@pa.gov](mailto:sgray@pa.gov)

Richard Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Barret C. Sheridan, Esquire  
Office of Consumer Advocate  
[bsheridan@paoca.org](mailto:bsheridan@paoca.org)

Respectfully submitted on June 13, 2022

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*/s/*  
Nick Magnani  
Verrill Dana, LLP  
One Federal Street, 20th Floor  
Boston, MA 02110  
[nmagnani@verrill-law.com](mailto:nmagnani@verrill-law.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Frontier Communications Commonwealth :  
Telephone Company : Docket No. R.-2019-3007237  
PSI/SPI Filing for Year 2019 :

Office of Consumer Advocate :  
v. : Docket No. C-2019-3007911  
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Telephone Company :

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Telephone Company : Docket No. R-2020-3016152  
PSI/SPI Filing for Year 2020 :

Office of Consumer Advocate :  
v. : Docket No. C-2020-3018501  
Frontier Communications Commonwealth :  
Telephone Company :

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**MOTION FOR ADMISSION *PRO HAC VICE***

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Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Rule 301(b) of the Pennsylvania Bar Admission Rules, Ruth A. Mattson, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admissions *pro hac vice* to Geoffrey G. Why and Hans C. Eysenbach as counsel for Frontier Communications Commonwealth Telephone Company (“Frontier”) for all purposes in relations to the above-captioned proceedings. In support of this Motion, the Movant, Ruth A. Mattson, avers as follows:

1. I am an active member of the Pennsylvania Bar (Attorney No. 201193). Pursuant to PUC Rule 1.24, I have entered my appearance as counsel of record for Frontier in these proceedings.

2. Geoffrey G. Why is an attorney employed by Verrill Dana, LLP, at One Federal Street, 20<sup>th</sup> Floor, Boston, MA 02110. He is a graduate of the Boston College School of Law. He was admitted to practice law in the State of Massachusetts in 1998 and is currently registered and in good standing (Attorney No. 641267). Mr. Why served as General Counsel and Commissioner of the Massachusetts Department of Telecom and Cable from 2007 to 2014 and has extensive experience with proceedings before state utility commissions in California, Connecticut, Massachusetts, New York, Oklahoma, and Vermont as well as in proceedings before the Federal Communications Commission (“FCC”). Mr. Why has never been suspended, disbarred or been the subject of disciplinary proceedings in Pennsylvania or any other state.

1. Hans C. Eysenbach is an attorney employed by Verrill Dana, LLP, at One Portland Square, 10<sup>th</sup> Floor, Portland, Maine 04101. Mr. Eysenbach is a graduate of the Vermont Law School and was admitted to practice in the State of Maine in 2017. He is currently registered and in good standing with the Maine Bar Association (Attorney No. 006015). Mr. Eysenbach has experience with proceedings before state utility commissions in California, Maine, Massachusetts, New York, Vermont, and Oklahoma, as well as matters before the FCC. Mr. Eysenbach has never been suspended disbarred or been the subject of disciplinary proceedings in Pennsylvania or any other state.

2. Mr. Why and Mr. Eysenbach agree to be bound by and comply with applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of Professional Conduct and the Rules of this Commission. Mr. Dunbar agrees to submit to

the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in these matters.

3. Mr. Why and Mr. Eysenbach have consented to the appointment of Ruth A Mattson as their sponsor, who has filed her notice of appearance in these matters and who will remain counsel of record on behalf of Frontier.

WHEREFORE, Ruth A Mattson, Movant, respectfully moves for the admissions of Geoffrey G. Why and Hans C. Eysenbach to appear in this matter *pro hac vice* for Frontier for all permissible purposes in relation to these proceedings.

Respectfully submitted on June 13, 2022.

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Verrill Dana, LLP  
One Federal Street, 20th Floor  
Boston, MA 02110  
(617) 292-6861  
rmattson@verrill-law.com

*Counsel for Frontier Communications  
Commonwealth Telephone Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Frontier Communications Commonwealth :  
Telephone Company : Docket No. R.-2019-3007237  
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v. : Docket No. C-2019-3007911  
Frontier Communications Commonwealth :  
Telephone Company :

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Telephone Company : Docket No. R-2020-3016152  
PSI/SPI Filing for Year 2020 :

Office of Consumer Advocate :  
v. : Docket No. C-2020-3018501  
Frontier Communications Commonwealth :  
Telephone Company :

**VERIFIED STATEMENT IN SUPPORT OF MOTION FOR ADMISSION  
*PRO HAC VICE***

I, Ruth A. Mattson, state the following:

1. After reasonable investigation, I reasonably believe that Geoffrey G. Why and Hans C. Eysenbach are responsible and competent attorneys. Accordingly, I am in a position to recommend their admissions *pro hac vice* in the above-captioned matters.

2. Any proceeds from the settlement of a cause of action in which the candidates are granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

3. I have entered my appearance as the attorney of record for these cases, as required by the Rules of Civil Procedures.

4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).

Respectfully submitted on June 13, 2022

DocuSigned by:  
  
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Ruth A. Mattson  
Verrill Dana, LLP  
One Federal Street, 20th Floor  
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*Counsel for Frontier Communications  
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PSI/SPI Filing for Year 2020 :

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v. : Docket No. C-2020-3018501  
Frontier Communications Commonwealth :  
Telephone Company :

**VERIFIED STATEMENT OF GEOFFREY G. WHY  
FOR ADMISSION PRO HAC VICE**

Pursuant to 52 Pa. Code §§1.22(b) and 5.103 and Pa. Rule of Civil Procedure 1012.1, Ruth A. Matson, a member of the bar of the Commonwealth of Pennsylvania (Pa. Attorney ID No. 201193), is moving for my admission *pro hac vice* in the above-captioned proceedings. In support of said sponsor's motion, I, the first candidate, Geoffrey G. Why, submit this verified statement:

1. I, Geoffrey G. Why am admitted to practice in and am a member in good standing of the bar of Massachusetts (Attorney No. 641267), having been admitted in 1998. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

2. I have not previously sought permission to appear *pro hac vice* in the courts of the Commonwealth of Pennsylvania or the Pennsylvania Public Utility Commission.
3. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.
4. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.
5. I consent to the appointment of the sponsoring attorney, Ruth A. Mattson, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.
6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).

Respectfully submitted on June 13, 2022.

DocuSigned by:  
  
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Geoffrey G. Why  
Verrill Dana, LLP  
One Federal Street, 20th Floor  
Boston, MA 02110  
(617) 292-2854  
gwhy@verrill-law.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Telephone Company : Docket No. R.-2019-3007237  
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Office of Consumer Advocate :  
v. : Docket No. C-2020-3018501  
Frontier Communications Commonwealth :  
Telephone Company :

**VERIFIED STATEMENT OF HANS C. EYSENBACH  
FOR ADMISSION PRO HAC VICE**

Pursuant to 52 Pa. Code §§1.22(b) and 5.103 and Pa. Rule of Civil Procedure 1012.1, Ruth A. Matson, a member of the bar of the Commonwealth of Pennsylvania (Pa. Attorney ID No. 201193), is moving for my admission *pro hac vice* in the above-captioned proceedings. In support of said sponsor's motion, I, the second candidate, Hans C. Eysenbach, submit this verified statement:

1. I, Hans C. Eysenbach am admitted to practice in and am a member in good standing of the bar of Maine (Attorney No. 006105), having been admitted in 2017. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

2. I have not previously sought permission to appear *pro hac vice* in the courts of the Commonwealth of Pennsylvania or the Pennsylvania Public Utility Commission.

3. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

4. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matters for which admission *pro hac vice* is being sought.

5. I consent to the appointment of the sponsoring attorney, Ruth A. Mattson, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matters for which admission *pro hac vice* is sought.

6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).

Respectfully submitted on June 13, 2022.

DocuSigned by:  
  
ADB05730450D45C...  
Hans C. Eysenbach  
Verrill Dana, LLP  
One Portland Square, 9th Floor  
Portland, ME 04101  
(207) 253-4722  
heysenbach@verrill-law.com

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the service of a true copy of the foregoing document upon the following parties by electronic mail:

Via Electronic Mail

Steven C. Gray, Esquire  
Office of Small Business Advocate  
[sgray@pa.gov](mailto:sgray@pa.gov)

Richard Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Barret C. Sheridan, Esquire  
Office of Consumer Advocate  
[bsheridan@paoca.org](mailto:bsheridan@paoca.org)

Respectfully submitted on June 13, 2022

\_\_\_\_\_  
/s/  
Nick Magnani  
Verrill Dana, LLP  
One Federal Street, 20th Floor  
Boston, MA 02110  
[nmagnani@verrill-law.com](mailto:nmagnani@verrill-law.com)

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**RUTH A. MATTSON**  
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Harrisburg PA 17120

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Dear Secretary Chiavetta

We are submitting for filing with this letter our Entry of Appearance in the above matters. Copies of the Notice are being served upon the persons and in the manner set forth on the Certificate of Service attached to it.

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cc: Service List

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**ENTRY OF APPEARANCE**

Pursuant to 52 Pa. Code § 1.24, please enter in the above-captioned matters the appearance of the following attorney as counsel of record for Frontier Communications Commonwealth Telephone Company (“Company”):

Ruth A. Mattson  
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Tel: 617-309-2600  
[rmattson@verrill-law.com](mailto:rmattson@verrill-law.com)

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Motion for Admissions *Pro Hac Vice* for Geoffrey G. Why and Hans C. Eysenbach.

Dear Secretary Chiavetta

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admissions *Pro Hac Vice* for Mr. Why and Mr. Eysenbach in the above-referenced proceedings. An electronic copy of this filing will be provided to those listed on the Certificate of Service.

Please contact me if you have any questions concerning this matter.

DocuSigned by:



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Pennsylvania Bar No. 201193

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HCE/lgn