

RUTH A. MATTSON
Partner
rmattson@verrill-law.com
Direct: 617-292-28961

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

January 26, 2023

Via Electronic Filing

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

Re: Docket No. C-2023-3037574, Entry of Appearance for Commonwealth Telephone, LLC

Dear Secretary Chiavetta,

We are submitting for filing with this letter our Entry of Appearance and Motion for Pro Hac Vice 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,



Ruth A. Mattson
Pennsylvania Bar #201193
Verrill Dana LLP
1 Federal Street
Boston MA 02110
rmattson@verrill-law.com

cc: Service List

Counsel for Commonwealth Telephone, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Consumer Advocate and the Office
of Small Business Advocate

v.

Docket No. C-2023-3037574

Commonwealth Telephone Company LLC
d/b/a Frontier Communications Telephone
Company

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission (“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 Commonwealth Telephone Company LLC (“Frontier”) for all purposes in relation to the above-captioned proceeding. 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 this proceeding.

2. Geoffrey G. Why is an attorney employed by Verrill Dana, LLP, at One Federal Street, 20th 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 Mr. Why has been admitted pro hac vice to represent Frontier and its affiliated sister companies in Pennsylvania before this Commission in docket numbers R-2020-3016152, C-2020-3018501, R-2020-3016157, C-2020-3018498, C-2020-3016502, C-2020-3018509, C-2020-3018512, C-2020-3018516, R-2019-3007237, C-2019-3007911, R-2019-3007239, C-2019-3007906, C-2019-3007907, C-2019-3007912, C-2019-3007913, and C-2019-3007916.

1. Hans C. Eysenbach is an attorney employed by Verrill Dana, LLP, at One Portland Square, 10th 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. Mr. Eysenbach has been admitted pro hac vice to represent Frontier and its affiliated sister companies in Pennsylvania before this Commission in docket numbers R-2020-3016152, C-

¹ In the interest of complete disclosure, Mr. Why’s D.C. bar admission was briefly subject to an administrative suspension from September 2016 – February 2017 due to an outstanding continuing legal education (“CLE”) credit. Mr. Why completed the required CLE on January 10, 2017, and the suspension was lifted. Mr. Why is a member in good standing of the D.C. bar association.

2020-3018501, R-2020-3016157, C-2020-3018498, C-2020-3016502, C-2020-3018509, C-2020-3018512, C-2020-3018516, R-2019-3007237, C-2019-3007911, R-2019-3007239, C-2019-3007906, C-2019-3007907, C-2019-3007912, C-2019-3007913, and C-2019-3007916.

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. Why and Mr. Eysenbach agree to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during their appearance in this matter.

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 this proceeding.

Respectfully submitted on January 26, 2022.



Ruth A. Mattson
Pennsylvania Bar #201193
Verrill Dana, LLP
One Federal Street, 20th Floor
Boston, MA 02110
(617) 292-6861
rmattson@verrill-law.com

Counsel for Frontier

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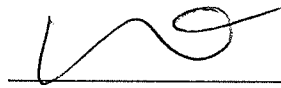
**VERIFIED STATEMENT IN SUPPORT OF MOTION FOR ADMISSION
*PRO HAC VICE***

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 January 26, 2023



Ruth A. Mattson
Pennsylvania Bar #201193
Verrill Dana, LLP
One Federal Street, 20th Floor
Boston, MA 02110
(617) 292-6861
rmattson@verrill-law.com

Counsel for Frontier

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**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 proceeding. 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

2. I have previously sought and been granted permission to appear *pro hac vice* in the Pennsylvania Public Utility Commission on behalf of Frontier and its affiliated sister companies in docket numbers R-2020-3016152, C-2020-3018501, R-2020-3016157, C-2020-3018498, C-

² In the interest of complete disclosure, Mr. Why's D.C. bar admission was briefly subject to an administrative suspension from September 2016 – February 2017 due to an outstanding continuing legal education ("CLE") credit. Mr. Why completed the required CLE on January 10, 2017, and the suspension was lifted. Mr. Why is a member in good standing of the D.C. bar association.

2020-3016502, C-2020-3018509, C-2020-3018512, C-2020-3018516, R-2019-3007237, C-2019-3007911, R-2019-3007239, C-2019-3007906, C-2019-3007907, C-2019-3007912, C-2019-3007913, and C-2019-3007916. I have not appeared *pro hac vice* in the courts of the Commonwealth of Pennsylvania.

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 January 26, 2023.

DocuSigned by:

Geoffrey Why

232D04034050477...

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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v.

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Commonwealth Telephone Company LLC
d/b/a Frontier Communications 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 proceeding. 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 previously sought and been granted permission to appear *pro hac vice* in the Pennsylvania Public Utility Commission on behalf of Frontier and its affiliated sister companies in docket numbers R-2020-3016152, C-2020-3018501, R-2020-3016157, C-2020-3018498, C-2020-3016502, C-2020-3018509, C-2020-3018512, C-2020-3018516, R-2019-3007237, C-2019-3007911, R-2019-3007239, C-2019-3007906, C-2019-3007907, C-2019-3007912, C-2019-

3007913, and C-2019-3007916. I have not appeared *pro hac vice* in the courts of the Commonwealth of Pennsylvania.


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 January 26, 2023.

DocuSigned by:

ADB86730158D45C...
Hans C. Eysenbach
Verrill Dana, LLP
One Portland Square, 10th Floor
Portland, ME 04101
(207) 253-4722
heysenbach@verrill-law.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Consumer Advocate and	:	
The Office of Small Business Advocate,	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2023-3037574
	:	
Commonwealth Telephone Company	:	
LLC d/b/a Frontier Communications	:	
Telephone Company,	:	
Respondent.	:	

ENTRY OF APPEARANCE

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

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

Respectfully submitted on January 26, 2023.



Ruth A. Mattson
Pennsylvania Bar #201193
Verrill Dana LLP
1 Federal Street
Boston MA 02110
rmattson@verrill-law.com
*Counsel for Commonwealth Telephone
Company LLC*

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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:

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
rkanaskie@pa.gov
Counsel for I&E

NazAarah Sabree, Small Business Advocate
Sharon E. Webb, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
swebb@pa.gov
Counsel for OSBA

Barrett C. Sheridan
Assistant Consumer Advocate
BSheridan@paoca.org

Counsel for Office of Consumer Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 7832-5048
Fax: (717)783-1752

Aron J. Beatty
Senior Assistant Consumer Advocate
ABeatty@paoca.org

Respectfully submitted on January 26, 2023

A handwritten signature in blue ink, appearing to read "Nick Magnani", is written over a horizontal line.

Nick Magnani

Verrill Dana, LLP

One Federal Street, 20th Floor

Boston, MA 02110

nmagnani@verrill-law.com