

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
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June 16, 2023

**Via Electronic Mail Only**

Norman J. Kennard, Esquire  
Bryce R. Beard, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
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Lauren M. Burge, Esquire  
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600 Grant Street  
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Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Re: Office of Consumer Advocate and Office of  
Small Business Advocate

v.

Commonwealth Telephone Company,  
LLC d/b/a Frontier Communications  
Commonwealth Telephone Company  
Docket No. C-2023-3037574

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set IV, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) 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:

Susan M. Baldwin  
SMBaldwin Consulting  
45 Acorn Path  
Groton, MA 01450  
E-Mail: [smbaldwinconsulting@gmail.com](mailto:smbaldwinconsulting@gmail.com)

Norman J. Kennard, Esquire  
Bryce R. Beard, Esquire  
Lauren M. Burge, Esquire  
June 16, 2023  
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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

\*347870

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Frontier Communications Commonwealth Telephone Company, Set IV, 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 16<sup>th</sup> day of June 2023.

**SERVICE BY E-MAIL ONLY**

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*Counsel for “Frontier Commonwealth”*

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*Counsel for OSBA*

**SERVICE BY E-MAIL ONLY (continued)**

Frederick Thomas, Esquire  
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US Counsel for Commercial Sales, &  
East Region Operations Counsel  
Frontier Communication Parent, Inc.  
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*Counsel for "Frontier Commonwealth"*

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