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June 13, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

**RE: Frank Bankowski v. Comcast Phone of Pennsylvania, LLC,
Docket No. C-2024-3049217
Motion For Extension of Time to Answer or Satisfy Complaint**

Dear Secretary Chiavetta:

This firm represents Comcast Phone of Pennsylvania, LLC (“Comcast”) in the above-captioned matter.

We are enclosing Comcast’s Motion for Extension of Time to Answer or Satisfy Complaint.

If you require additional information regarding this motion, please contact me.

Respectfully,

MATHIEU J. SHAPIRO

Enclosure

cc: Frank Bankowski (via First Class Mail and e-mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

FRANK BANKOWSKI,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3049217
	:	
COMCAST PHONE OF PENNSYLVANIA, LLC,	:	
	:	
Respondent.	:	
	:	

NOTICE TO PLEAD

To: Frank Bankowski
3151 Seneca Court
Gibsonia, PA 15044
bankhpi@consolidated.net

You are hereby notified that Comcast Phone of Pennsylvania, LLC (“Comcast”) has filed, pursuant to 52 Pa. Code § 5.103, a Motion for Extension of Time to Answer or Satisfy Complaint. You may submit a response to the motion within twenty (20) days pursuant to 52 Pa. Code § 5.103(b). If no response is submitted, the presiding officer may rule on the motion without a response from you, thereby, requiring no other proof. All pleadings, such as a response to the motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Comcast.

/s/ Mathieu J. Shapiro
Mathieu J. Shapiro (PA I.D. No. 76266)
Melissa M. Blanco (PA I.D. No. 327659)
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Counsel for Comcast Phone of Pennsylvania LLC

Date: June 13, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

FRANK BANKOWSKI,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3049217
	:	
COMCAST PHONE OF PENNSYLVANIA, LLC,	:	
	:	
Respondent.	:	

**MOTION OF COMCAST PHONE OF PENNSYLVANIA, LLC FOR
EXTENSION OF TIME TO ANSWER OR SATISFY COMPLAINT**

TO THE PENNSYLVANIA UTILITY COMMISSION:

In accordance with Section 1.15 of the Pennsylvania Rules of Administrative Practice and Procedure, Comcast Telephone Company of Pennsylvania, LLC (“Comcast”), by and through its counsel, Obermayer Rebmann Maxwell & Hippel LLP, files this Motion for Extension of Time to Answer or Satisfy Complaint. In connection with this Motion, Comcast avers as follows:

1. Comcast seeks a 30-day extension of time to either answer or satisfy the Formal Complaint in the above-captioned matter in light of its ongoing investigation and a possible non-judicial resolution.
2. On May 8, 2024, Complainant, Frank Bankowski, filed a Formal Complaint with the Pennsylvania Public Utility Commission (the “Commission”) against Consolidated Communications. He alleged that, in September of 2023, Consolidated/Fidium was installing a

new fiber internet cable into Bankowski's ground services when they severed his Comcast service cable.

3. Bankowski detailed that, over the past eight months, Consolidated failed to take responsibility for the severing and refused to replace or install the service line.

4. Bankowski requested, among other things, that his Comcast service cable be reinstalled to its original state before it was severed. He also demanded that an unclear "they" compensate him for "theft of service and the use of [his] property for the reinstallation."

5. Even though the Formal Complaint identified Consolidated/Fidium as the complained-of utility, Secretary Chiavetta ordered that the Formal Complaint be served on Comcast, according to a note in the Formal Complaint.

6. Since receiving Bankowski's Formal Complaint less than 30 days ago, Comcast has investigated both the cause of the problem and its potential ability to resolve the identified concerns.

7. Comcast now believes it may be able to resolve Bankowski's Formal Complaint but requires additional time to communicate with Bankowski, as well as to potentially dispatch Comcast employees to the site to reinstall the wire that Consolidated/Fidium severed.

8. In the interest of judicial economy, Comcast requests a 30-day extension of time to either respond to the Formal Complaint or file a certificate of satisfaction to allow time for Comcast to work with Bankowski to resolve the Formal Complaint.

WHEREFORE, Comcast respectfully requests that the Commission grant its Motion for Extension of Time to Answer or Satisfy the Complaint and permit it an additional 30 days to either respond to or satisfy the Complaint.

Respectfully submitted,

/s/ Mathieu J. Shapiro

Mathieu J. Shapiro (PA I.D. No. 76266)

Melissa M. Blanco (PA I.D. No. 327659)

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melissa.blanco@obermayer.com

Counsel for Comcast Phone of Pennsylvania, LLC

Dated: June 13, 2024

CERTIFICATE OF SERVICE

I, Mathieu J. Shapiro, hereby certify that I have served a true and correct copy of Comcast's Motion for Extension of Time to Answer or Satisfy Complaint or upon the following party via e-mail and First Class Mail:

Frank J. Bankowski
3151 Seneca Court
Gibsonia, PA 15044
bankhpi@consolidated.net

Date: June 13, 2024

/s/ Mathieu J. Shapiro
Mathieu J. Shapiro

*Counsel for Comcast
Phone of Pennsylvania, LLC*