

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

@pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

January 28, 2025

Via Electronic Mail Only

Suzan D. Paiva, Esq.
Verizon
900 Race Street, 6th Floor
Philadelphia, PA 19107

Nancy J. Victory, Esq.
Michael B. Hazzard, Esq.
DLA Piper LLP (US)
500 Eighth Street NW
Washington, DC 20004

Re: Joint Application of Frontier
Communications, Verizon Communications,
et al; Docket Nos. A-2024-3051925,
A-2024-3051926, A-2024-3051927,
A-2024-3051929, A-2024-3051931,
A-2024-3051932, A-2024-3051933,
A-2024-3051934, A-2024-3051935,
A-2024-3051936

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, to Verizon Communications, Inc, Set 4, in the above-referenced proceeding. Being submitted is a **CONFIDENTIAL** and redacted, Public version of the interrogatories. Please note that the **CONFIDENTIAL** version of OCA's Interrogatories, Set 4, will only be sent to the parties that have executed the non-disclosure agreement as indicated on the Certificate of Service.

In accordance with the discovery modifications in this case, we request that the Company provide verified answers to these inquiries within twelve (12) calendar 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.

Nancy J. Victory, Esq.
Michael B. Hazzard, Esq.
January 27, 2025
Page 2

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).

Respectfully submitted,

/s/ Barrett C. Sheridan
Barrett C. Sheridan, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 61138
BSheridan@paoca.org

Enclosures

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service only)
Certificate of Service

CERTIFICATE OF SERVICE

Joint Application of Frontier Communications Parent, Inc.,	:	Docket Nos.	A-2024-3051925
Commonwealth Telephone Enterprises LLC, Commonwealth Telephone Company LLC d/b/a Frontier Communications	:		A-2024-3051926
Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, Frontier Communications of Lakewood, LLC, Frontier Communications of Oswayo River LLC, Frontier Communications of Pennsylvania, LLC,	:		A-2024-3051927
Citizens Telecommunications Company of New York, Inc., CTSI, LLC d/b/a Frontier Communications CTSI, LLC, CTE Telecom, LLC, d/b/a Frontier Communications CTE Telecom Company,	:		A-2024-3051929
Frontier Communications of America, Inc. And Verizon Communications Inc., France Merger Sub Inc., For any Approvals Required Under the Public Utility Code for a Transfer of Control of Frontier Communications Parent, Inc. and its Pennsylvania subsidiaries to Verizon Communications Inc.	:		A-2024-3051931
	:		A-2024-3051932
	:		A-2024-3051933
	:		A-2024-3051934
	:		A-2024-3051935
	:		A-2024-3051936

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following Office of Consumer Advocate's Interrogatories towards Verizon, Set 4, 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 28th day of January 2025.

****Receiving CONFIDENTIAL Set 4 interrogatories***

SERVICE BY E-MAIL ONLY

NazAarah Sabree
Steven Gray *
Commonwealth of Pennsylvania
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov
sgray@pa.gov
Counsel for OSBA

Nancy J. Victory, Esq. *
Michael B. Hazzard, Esq. *
DLA Piper LLP (US)
500 Eighth Street NW
Washington, DC 20004
Nancy.Victory@us.dlapiper.com
Mike.Hazzard@us.dlapiper.com
Counsel for Verizon

Norman J. Kennard, Esq. *
Bryce R. Beard, Esq. *
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
nkennard@eckertseamans.com
bbeard@eckertseamans.com
Counsel for Frontier

Frederick A Thomas *
Joyce Carwin
Frontier Communications
2 Washington Street
Norwalk, CT 06854
FT7230@FTR.com
joyce.carwin@FTR.com
Counsel for Frontier

Allison Kaster, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov
Counsel for I&E

Suzan D. Paiva, Esq. *
Verizon
900 Race Street, 6th Floor
Philadelphia, PA 19107
Suzan.d.paiva@verizon.com
Counsel for Verizon

Thomas J. Sniscak, Esq. *
HMS legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
tjsniscak@hmslegal.com

Kevin Saville *
Frontier Communications
1919 McKinney Ave
Dallas TX 75201
KS9458@FTR.com
Counsel for Frontier

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Frontier

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Counsel for:
Patrick M. Cicero
Consumer Advocate

Dated: January 28, 2025

/s/ Barrett C. Sheridan
Barrett C. Sheridan, Esq.
Assistant Consumer Advocate
Pa. Attorney I.D. # 61138
BSheridan@paoca.org

Ryan Morden, Esq.
Assistant Consumer Advocate
Pa. Attorney I.D. # 335679
RMorden@paoca.org

Katie Kennedy
Assistant Consumer Advocate
Pa. Attorney I.D. # 317237
KKennedy@paoca.org