



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

February 7, 2025

**Via Electronic Filing**

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

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Crown Castle Fiber LLC  
Docket No. C-2025-  
**I&E Formal Complaint (Damage Prevention)**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Formal Complaint of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', is written over a light blue horizontal line.

Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

GR/ac  
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-ENF (via email – [mwindler@pa.gov](mailto:mwindler@pa.gov))  
Robert Horensky, Manager, Safety Division (via email – [rhorensky@pa.gov](mailto:rhorensky@pa.gov))  
As per Certificate of Service

## NOTICE

A. You must file an Answer within twenty (20) days of the date of service of this Complaint. The date of service is the date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code § 1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified.

**In Addition to filing your Answer with the Commission’s Secretary, please electronically serve a copy on:**

Grant Rosul, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
[grosul@pa.gov](mailto:grosul@pa.gov)

B. If you fail to answer this Complaint within twenty (20) days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the administrative penalty and other requested relief.

C. You may elect not to contest this Complaint by paying the administrative penalty within twenty (20) days and performing the corrective actions, if any, set forth in the requested relief. A certified check, cashier’s check or money order should be payable to the “Commonwealth of Pennsylvania” and mailed to:

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

Your payment is an admission that you committed the alleged violations and an agreement to cease and desist from committing further violations. Upon receipt of your payment, the Complaint proceeding shall be closed.

D. If you file an Answer, which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the administrative penalty and granting the requested relief as set forth in the Complaint.

E. If you file an Answer which contests the Complaint, the matter will proceed before the assigned presiding Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission’s ADA Coordinator at (717) 787-8714.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Crown Castle Fiber LLC,	:	
Respondent	:	

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**FORMAL COMPLAINT**

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NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission, by its prosecuting attorneys, pursuant to Section 182 of the Underground Utility Line Protection Law (“UULPL” or “PA One Call Law”), Act of October 30, 2017, P.L. 806, No. 50, 73 P.S. § 182.8(c)(2), and files this Formal Complaint (“Complaint”) against Crown Castle Fiber LLC (“Crown Castle” or “Respondent”) alleging violations of the PA One Call Law in connection with a February 29, 2024, incident where an excavator struck and damaged a six-inch sewer line while working on behalf of UGI Utilities on Helen Avenue near McGrann Boulevard and Cameron Street, Manheim Township, Lancaster County, Pennsylvania. The violation alleged herein relates to Crown Castle’s failure to respond to a locate request placed by the designer. In support of its Complaint, I&E respectfully avers as follows:

## I. COMMISSION JURISDICTION AND AUTHORITY

1. The Pennsylvania Public Utility Commission (“Commission” or “PUC”), with a mailing address of Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate, *inter alia*, facility owners, within the Commonwealth pursuant to the PA One Call Law, Act of October 30, 2017, P.L. 806, No. 50, 73 P.S. §§ 176 *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement, which is the bureau established to take enforcement actions against public utilities and other entities subject to the Commission’s jurisdiction pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E).

3. Complainant’s prosecuting attorney is as follows:

Grant Rosul  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[grosul@pa.gov](mailto:grosul@pa.gov)  
(717) 783-5243

4. Respondent is Crown Castle Fiber LLC with a main mailing address of 1500 Corporate Drive, Canonsburg, PA 15317.

5. Crown Castle is a “facility owner,” as that term is defined in Section 176 of the PA One Call Law, 73 P.S. § 176.<sup>1</sup>

6. A fiber optic cable is a “facility” or “line,” as those terms are defined in Section 176 of the PA One Call Law, 73 P.S. § 176.<sup>2</sup>

7. Section 177 of the PA One Call Law, 73 P.S. § 177, imposes duties on facility owners.

8. Specifically, Section 177(4) of the PA One Call Law requires a facility owner to “initially respond to [a designer’s] request for information as to the position and type of the facility owner's lines at such work site based on the information currently in the facility owner's possession” and to do so “[n]ot more than ten business days after receipt of a request from a designer who identifies the work site of excavation or demolition work for which he is preparing a drawing....” 73 P.S. § 177(4).

9. Respondent, as a facility owner, is subject to the authority of this Commission pursuant to Section 182.10 of the PA One Call Law, 73 P.S. § 182.10, which requires facility owners to comply with the PA One Call Law. 73 P.S. § 182.10.

10. Section 182.8(c)-(d) and Section 182.10 of the PA One Call Law, 73 P.S. §§ 182.8(c)-(d) and 182.10, authorize the Commission to, *inter alia*, hear and determine

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<sup>1</sup> “Facility Owner” is defined as “the public utility or agency, political subdivision, municipality, authority, rural electric cooperative or other person or entity who or which owns or operates a line.” 73 P.S. § 176.

<sup>2</sup> “Facility” or “line” is defined in relevant part as “an underground conductor or underground pipe or structure used in providing electric or communication service, or an underground pipe used in carrying, gathering, transporting or providing natural or artificial gas, petroleum, propane, oil or petroleum and production product, sewage, water or other service to one or more transportation carriers, consumers or customers of such service and the appurtenances thereto, regardless of whether such line or structure is located on land owned by a person or public agency or whether it is located within an easement or right-of-way.” 73 P.S. § 176.

complaints against facility owners for violations of the PA One Call Law and to enforce the provisions of the PA One Call Law. 73 P.S. §§ 182.8(c)-(d) and 182.10.

11. Section 182.8(c)(2) of the PA One Call Law, 73 P.S. § 182.8(c)(2), authorizes the Commission’s prosecutorial staff to bring a formal complaint against entities subject to the PA One Call Law. 73 P.S. § 182.8(c)(2).

12. Section 182.10 of the PA One Call Law, 73 P.S. § 182.10(b)(1)(i)-(ii), authorizes the Commission to impose administrative penalties on any person or corporation, subject to the PA One Call Law, who violates any provisions of the PA One Call Law or any regulation or order issued thereunder governing underground utility lines, of up to \$2,500 per violation or if the violation results in injury, death, or property damage of \$25,000 or more an administrative penalty not to exceed \$50,000. 73 P.S. § 182.10(b)(1)(i)-(ii).

13. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this Complaint and the actions of Respondent related thereto.

## **II. FACTUAL BACKGROUND**

14. On February 29, 2024, Kinsley Construction was excavating on Helen Avenue near McGrann Boulevard and Cameron Street in Manheim Township, Lancaster County, on behalf of UGI Utilities to install a gas line when it struck an unidentified sewer line.

15. During an investigation of this incident by the Commission’s Damage Prevention Section (“DPS”), Bureau of Investigation and Enforcement, it was discovered

by the Damage Prevention Investigator (“DPI”) that UGI Utilities had submitted a PA One Call locate request, also known as a Ticket, to the PA One Call System (“POCS”) on behalf of itself as a designer.

16. This Ticket, serial number 20231241558, was submitted to POCS on May 4, 2023, with a response due date of May 18, 2023. I&E Exhibit 1.

17. Notification of this Ticket was sent to Crown Castle on May 4, 2023, at approximately 11:06 AM. Id.

18. Crown Castle failed to provide a response to UGI Utilities’ design ticket.

19. On May 19, 2023, the day after the response due date for facility owners to respond to the Ticket through POCS, a “no response” designation was automatically input by POCS on behalf of Crown Castle.

20. Crown Castle was, at all times, a “facility owner” as that term is defined in the PA One Call Law and was obligated to respond to a designer’s request for information through POCS.

21. On October 17, 2024, a copy of the report prepared by the DPI from the Commission’s Bureau of Investigation and Enforcement, Damage Prevention Section, was mailed to Crown Castle at 1500 Corporate Drive, Canonsburg, PA 15317, informing Respondent that it was in violation of the PA One Call Law by failing to respond to a designer’s locate request. The letter further informed Crown Castle that it could either accept the findings in the DPI’s report or reject them and present its case to the Damage Prevention Committee (“DPC”).

22. Crown Castle never responded to the DPI Report to accept or reject the findings.

23. Nevertheless, on November 18, 2024, a notice of the DPC meeting was sent to Crown Castle, informing Respondent that it would be afforded an opportunity to present its case to the DPC at the December 10, 2024, meeting.

24. No one from Crown Castle appeared at the December 10, 2024, DPC hearing to present Respondent's case. The case was nevertheless discussed and voted upon by the DPC, which voted to accept the violations and administrative penalty recommended by the DPI.

25. On December 11, 2024, a copy of the DPC's Informal Determination accepting the DPI's report and proposed penalty was mailed to Crown Castle, informing Respondent that it could either accept the DPC's Informal Determination or reject it in writing within thirty (30) days of the date of the notification letter, and that if the Informal Determination is rejected the case may be sent to I&E prosecutory staff for issuance of a formal complaint.

26. On December 13, 2024, Respondent informed the DPI via e-mail that it would reject the DPC's Informal Determination.

### **III. VIOLATIONS**

27. Paragraphs 1-26 are incorporated herein as if stated in their entirety.

#### **Count 1**

28. Respondent failed to respond to a locate request from a designer.

If proven, this is a violation of Section 177(4) of the PA One Call Law, 73 P.S. § 177(4). As a facility owner, Respondent was required to “respond to [a designer’s] request for information as to the position and type of the facility owner's lines at such work site based on the information currently in the facility owner's possession” and to do so “[n]ot more than ten business days after receipt of a request from a designer who identifies the work site of excavation or demolition work for which he is preparing a drawing....” This requirement is a duty of every facility owner who receives such a request for information through a Ticket submitted to POCS, irrespective of whether a later incident at the work site involves its facilities.

Here, Respondent was obligated to provide a response to UGI Utilities’ Design Ticket by May 18, 2024. Respondent never provided a response.

The Bureau of Investigation and Enforcement’s proposed administrative penalty for this violation is \$2,000.

**WHEREFORE**, for all the foregoing reasons, the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement respectfully requests that the Commission:

- (1) Find Crown Castle Fiber LLC to be in violation of the PA One Call Law at § 177(4).
- (2) Impose an administrative penalty upon Crown Castle Fiber LLC in the amount of \$2,000.
- (3) Order Crown Castle Fiber LLC to attend Online Compliance Training through the Pennsylvania One Call System for facility owners and provide proof of compliance to the Commission within 30 days of the entry of a Final Commission Order; and

- (4) Order such other remedies as the Commission may deem appropriate.
- (5) If payment of the administrative penalty is not made, the Bureau of Investigation and Enforcement requests that this matter be referred to the Pennsylvania Office of the Attorney General for appropriate action.

Respectfully submitted,



Grant Rosul  
Prosecutor  
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Date: February 7, 2025

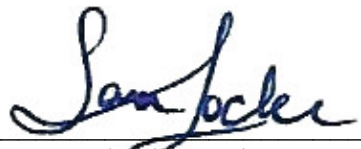
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Crown Castle Fiber LLC,	:	
Respondent	:	

**VERIFICATION**

I, Sara Andrade-Locke, Damage Prevention Supervisor, Damage Prevention Section, Bureau of Investigation and Enforcement, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect that the Bureau of Investigation and Enforcement will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: February 7, 2025

  
\_\_\_\_\_  
Sara Andrade-Locke  
Damage Prevention Supervisor  
Damage Prevention Section  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

# **I&E Exhibit 1**

CDC 00000 POCS MM/DD/YY TT:TT:TT 20231241558-000 NEW XCAV DSGN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST=====

Serial Number--[20231241558]-[000] Channel#--[1104AWEB][0133][2019-08]  
Message Type--[NEW][EXCAVATION][FINAL DESIGN]

County--[LANCASTER] Municipality--[MANHEIM TWP]

Work Site--[HELEN AVE]

Nearest Intersection--[MCGRAW BLVD]

Second Intersection--[PLEASURE RD]

At Intersection--[N] Between Intersections--[Y]

Subdivision--[ ]

Location Information--

[ ]

Caller Lat/Lon--[ ]

Mapped Type--[C] Mapped Lat/Lon--

[ ]

Attachments--[http://www.pa811.org/attachments/20231241558]

Type of Work--[REPLACING GAS MAINS AND SERVICES] Depth--[3 FT MIN]

Extent of Excavation--[VARIES] Method of Excavation--[TRENCHING]

Equip Type--[BACKHOE]

Street--[X] Sidewalk--[X] Pub Prop--[X] Pvt Prop--[X] Other--[ ]

Private Front--[X] Rear--[ ] Left--[ ] Right--[ ]

Project Dates--[ ] thru [ ] Response Due Date--[18-May-23]

Scheduled Excavation Date--[DESIGN]

Caller--[DENISE YOST]

Caller Phone--[717-255-4344]

Excavator--[UGI UTILITIES INC]

Address--[1301 AIP DRIVE]

City--[MIDDLETOWN]

State--[PA] Zip--[17057]

FAX--[ ]

Caller Type--[B]

Email--[DYOST@UGI.COM]

Work For--[UGI UTILITIES INC]

Project Contact--[ALEX MYERS]

Project Contact Phone--[717-208-1620]

Best Time to Call--[0800-1700]

Project Contact Email--[AMYERS@UGI.COM]

CPA Project ID--[3873305]

Prepared--[04-May-23] at [1106] by [DYOST]

Remarks--

[ ]

AH 0 AH =WINDSTREAM ASL0 ASL=CROWN CASTLE DT10 DT1=COMCAST CABLE  
DX 0 DX =MANHEIM TMA HC 0 HC =VERIZON PA HRBG KX 0 KX =LNCSTR AREA SA  
LCE0 LCE=LANCASTER CITY LCW0 LCW=LANCASTER CITY LU 0 LU =LANCASTER CITY  
PLL0 PLL=ZAYO/PPL/ABVNET PQD0 PQD=PPL ELEC DESIGN SCY0 SCY=SHENTEL COMM  
UH 0 UH =UGI LANCASTER

Serial Number--[20231241558]-[000]

===== Copyright (c) 2023 by Pennsylvania One Call System, Inc. =====

RESPONSES for S/N: 20231241558:

Ver	CDC	Name	Response	Time	Respondent
0	UH	UGI UTILITIES INC	UH-FIELD MARKED	5/4/2023 11:08:27 AM	ATS-WEBSVC
0	SCY	SHENTEL COMMUNICATIONS LLC	SCY-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	5/9/2023 9:43:58 AM	CLS-WEBSVC
0	PQD	PPL ELECTRIC UTILITIES CORPORATION	PQD-ENGINEERING COMPLETED	5/9/2023 10:03:11 AM	CLS-WEBSVC
0	PLL	ZAYO BANDWIDTH FORMERLY PPL TELCOM LLC	PLL-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	5/8/2023 5:55:36 AM	AAA-WEBSVC
0	LU	LANCASTER CITY OF WATER	LU-ENGINEERING COMPLETED	5/15/2023 10:55:12 AM	BH-WEB
0	ASL	CROWN CASTLE	ASL-NO RESPONSE	5/19/2023 12:02:38 AM	Auto-KARL
0	AH	WINDSTREAM	AH-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	5/4/2023 11:14:30 AM	LZI-WEBSVC
0	LCW	LANCASTER CITY OF SEWER	LCW-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	5/4/2023 12:41:45 PM	DH-WEB
0	DT1	COMCAST CABLE COMMUNICATIONS INC	DT1-ENGINEERING COMPLETED	5/9/2023 10:03:06 AM	CLS-WEBSVC
0	DX	MANHEIM TOWNSHIP GENERAL MUNI AUTH	DX-CONFLICT. DCTF BY FO	5/17/2023 2:44:00 PM	MS-WEB
0	HC	VERIZON PENNSYLVANIA LLC	HC-NO RESPONSE	5/19/2023 12:02:38 AM	Auto-KARL
0	HC	VERIZON PENNSYLVANIA LLC	HC-CONFLICT. DCTF BY FO	7/3/2023 4:02:10 PM	AAA-WEBSVC
0	KX	LANCASTER AREA SEWER AUTHORITY	KX-ENGINEERING COMPLETED	5/5/2023 7:48:46 AM	JS-WEB
0	LCE	LANCASTER CITY ELEC/TRAFFIC	LCE-CLEAR. NO FACILITIES OR FACIL NOT INVOLVED	5/5/2023 7:53:59 AM	DH-WEB

DELIVERIES for S/N: 20231241558:

Ver	CDC	Name	To	Time	Seq	Type
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	5/4/2023 11:07:07 AM	0	MAIL
0	WEBCFM	WEB CONFIRMATION QUEUE	WEBCFM	5/4/2023 11:07:07 AM	0	MAIL
0	UH	UGI UTILITIES INC	UH	5/4/2023 11:07:06 AM	86	MAIL
0	SCY	SHENTEL COMMUNICATIONS LLC	SCY	5/4/2023 11:07:04 AM	4	MAIL
0	PQD	PPL ELECTRIC UTILITIES CORPORATION	PQD	5/4/2023 11:07:04 AM	1	MAIL
0	PLL	ZAYO BANDWIDTH FORMERLY PPL TELCOM LLC	PLL	5/4/2023 11:06:59 AM	65	MAIL
0	LU	LANCASTER CITY OF WATER	LU	5/4/2023 11:07:20 AM	36	MAIL
0	ASL	CROWN CASTLE	ASL	5/4/2023 11:06:59 AM	59	MAIL
0	AH	WINDSTREAM	AH	5/4/2023 11:07:06 AM	96	MAIL
0	LCW	LANCASTER CITY OF SEWER	LCW	5/4/2023 11:07:18 AM	7	MAIL
0	DT1	COMCAST CABLE COMMUNICATIONS INC	DT1	5/4/2023 11:07:04 AM	72	MAIL
0	DX	MANHEIM TOWNSHIP GENERAL MUNI AUTH	DX	5/4/2023 11:07:08 AM	14	MAIL
0	HC	VERIZON PENNSYLVANIA LLC	HC	5/4/2023 11:07:01 AM	78	MAIL
0	KX	LANCASTER AREA SEWER AUTHORITY	KX	5/4/2023 11:07:17 AM	28	MAIL
0	LCE	LANCASTER CITY ELEC/TRAFFIC	LCE	5/4/2023 11:07:18 AM	6	MAIL

NOTIFICATIONS for S/N: 20231241558:

Ver	CDC	To	Dlvr	Show	Place+	Rule+	Renot+	InAct-	Map-	Rule-	OOG-	Renot-	Forced+
0	ZMM		0	0	1	0	0	0	1	0	0	0	0
0	WEBCFM	WEBCFM	1	1	0	0	0	0	0	0	0	0	0
0	UH	UH	1	1	1	0	0	0	0	0	0	0	0
0	UFD		0	0	1	0	0	0	1	0	0	0	0
0	TX		0	0	1	0	0	0	1	0	0	0	0
0	SPJ		0	0	1	0	0	0	1	0	0	0	0
0	SCY	SCY	1	1	1	0	0	0	0	0	0	0	0
0	RB		0	0	1	0	0	0	1	0	0	0	0
0	PZ4		0	0	0	0	0	0	0	0	0	0	0
0	PQD	PQD	1	1	0	1	0	0	0	0	0	0	0
0	PQ	PQ	0	0	1	0	0	0	0	1	0	0	0
0	PLL	PLL	1	1	1	0	0	0	0	0	0	0	0
0	PE		0	0	1	0	0	0	1	0	0	0	0
0	MI		0	0	1	0	0	0	1	0	0	0	0
0	LKC		0	0	1	0	0	0	1	0	0	0	0
0	LU	LU	1	1	1	0	0	0	0	0	0	0	0
0	ASL	ASL	1	1	1	0	0	0	0	0	0	0	0
0	AH	AH	1	1	1	0	0	0	0	0	0	0	0
0	LCW	LCW	1	1	1	0	0	0	0	0	0	0	0
0	DT1	DT1	1	1	1	0	0	0	0	0	0	0	0
0	DX	DX	1	1	1	0	0	0	0	0	0	0	0
0	CD		0	0	1	0	0	0	1	0	0	0	0
0	HC	HC	1	1	1	0	0	0	0	0	0	0	0
0	IA		0	0	1	0	0	0	1	0	0	0	0
0	KX	KX	1	1	1	0	0	0	0	0	0	0	0
0	LCE	LCE	1	1	1	0	0	0	0	0	0	0	0
0	ET		0	0	1	0	0	0	1	0	0	0	0

ATTACHMENT for S/N: 20231241558 (20231241558-0.gif):



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-
	:	
Crown Castle Fiber LLC,	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Service by Certified Mail**

Crown Castle Fiber LLC  
Attn: Denis Flanagan  
1500 Corporate Drive  
Canonsburg, PA 15317



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Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Dated: February 7, 2025