

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE  
Interim Acting 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

February 19, 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, Set 6, in the above-referenced proceeding.

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.

Suzan D. Paiva, Esq.  
Nancy J. Victory, Esq.  
Michael B. Hazzard, Esq.  
February 19, 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)  
Administrative Law Judge Steven Haas (Cover Letter and Certificate of Service only)  
Administrative Law Judge Erin L. Gannon (Cover 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	:	A-2024-3051926
LLC, Commonwealth Telephone Company	:	A-2024-3051927
LLC d/b/a Frontier Communications	:	A-2024-3051929
Commonwealth Telephone Company,	:	A-2024-3051931
Frontier Communications of Breezewood,	:	A-2024-3051932
LLC, Frontier Communications of Canton,	:	A-2024-3051933
LLC, Frontier Communications of	:	A-2024-3051934
Lakewood, LLC, Frontier Communications	:	A-2024-3051935
of Oswayo River LLC, Frontier	:	A-2024-3051936
Communications of Pennsylvania, LLC,	:	
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,	:	
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.	:	
	:	

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 6, 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 19th day of February 2025.

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*

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  
*Counsel for BHLA*

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*

Czarina Powell  
Verizon  
1701 Gold Road, Tower 2, Suite 100  
Rolling Meadows, IL 60008  
czarina.powell@verizon.com  
*Counsel for Verizon*

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

Counsel for:  
Darryl Lawrence  
Interim Acting Consumer Advocate

Dated: February 19, 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