

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

March 3, 2025

Via Electronic Mail Only

Norman J. Kennard, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

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 Frontier Communications, Inc, Set 9, 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 9, 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.

Norman J. Kennard, Esq.
Bryce R. Beard, Esq.
March 3, 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 (Cover 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 Frontier, Set 9, 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 3rd day of March 2025.

****Receiving CONFIDENTIAL Set 9 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. *
Morgan Schick, Esq.
DLA Piper LLP (US)
500 Eighth Street NW
Washington, DC 20004
Nancy.Victory@us.dlapiper.com
Mike.Hazzard@us.dlapiper.com
Morgan.schick@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: March 3, 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