

COMMONWEALTH OF PENNSYLVANIA



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March 3, 2025

Via Electronic Mail Only

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Nancy J. Victory, Esq.
Michael B. Hazzard, Esq.
Morgan Schick, Esq.
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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 13, 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 13, 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.
Morgan Schick, 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
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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 13, 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 13 interrogatories***

SERVICE BY E-MAIL ONLY

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Dated: March 3, 2025

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