

Morgan Lewis

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April 25, 2025

Via E-Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Docket No. A-2024-3050480
Application for Approval of the Discontinuance and Abandonment of
Telecommunications Services to the Public in the Commonwealth of
Pennsylvania

Response to Staff Inquiries

Dear Secretary Chiavetta:

On behalf of ANPI Business, LLC ("ANPI Business"), enclosed for filing with the Pennsylvania Public Utility Commission is the Response of the ANPI Business to the Staff Inquiries issued on April 11, 2025.

Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please contact me or Patricia Cave at patricia.cave@morganlewis.com.

Respectfully submitted,

/s/ Catherine G. Vasudevan

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Counsel for ANPI Business, LLC

cc: Spencer Nahf, Telco Section, Bureau of Technical Utility Services (via email)
Certificate of Service

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DOCKET NO. A-2024-3050480
RESPONSE OF ANPI BUSINESS, LLC
to
Data Request - Set I

1. Provide a revised abandonment date for ANPI to discontinue service?

RESPONSE: May 31, 2025

2. Provide the current number of remaining customers served? If no customers are currently on these services provide the last date served.

RESPONSE: There are currently two (2) remaining customers served.

VERIFICATION

I, Richard L. Monto, hereby state that I am General Counsel of ANPI Business, LLC (the “Company”); that the facts above set forth are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a 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 un-sworn falsification to authorities).

Executed this 25th day of April 2025.



Richard L. Monto
General Counsel
ANPI Business, LLC

CERTIFICATE OF SERVICE

I, M. Renee Britt, hereby certify that on this 25th day of April 2025, a true copy of the foregoing Response of ANPI Business, LLC to Data Request - Set I was served by first class, prepaid postage mail or email upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
ra-oca@paoca.org

Office of Small Business Advocate
555 Walnut Street
First Floor, Forum Place
Harrisburg, PA 17101
ra-sba@pa.gov

Office of Attorney General
Bureau of Consumer Protection
16th Floor, Strawberry Square
Harrisburg, PA 17120
info@attorneygeneral.gov

Alliston Kaster, Esq.
Bureau of Investigations & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

Dated this 25th day of April, 2025

/s/M. Renee Britt