

# Morgan Lewis

**Catherine G. Vasudevan**

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April 30, 2025

## **VIA E-FILING**

Matt Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Second Floor - Room N201  
Harrisburg, PA 17120

**Re: Docket No. A-2025-3053757  
Response by Everstream Solutions LLC to Protest by T-Mobile USA, Inc.**

Dear Secretary Homsher:

Everstream Solutions LLC ("Everstream") submits this response to the protest of T-Mobile USA, Inc. ("T-Mobile") filed on April 10, 2025. In its Protest, T-Mobile indicated uncertainty when its response might be due since T-Mobile could not locate legal notice of the Everstream Application in the Pennsylvania Bulletin. In the event there are any issues with the timeliness of T-Mobile's Protest, Everstream has no objection to T-Mobile's involvement in this docket and welcomes its participation.

Since filing its applications to discontinue service with the PAPUC and the Federal Communications Commission<sup>1</sup>, Everstream has been in commercial discussions with its customers to plan and implement timely migrations off the Everstream network. As a result, Everstream has extended the network deadline to December 31, 2025, and provided notice to the PAPUC and FCC.

Everstream disagrees with how T-Mobile characterizes some of the factual issues and legal analysis in this proceeding. But in light of the stay, Everstream believes that the best use of resources is to focus on a network migration plan. As a result, Everstream reserves the right to address and fully brief those issues later in this proceeding.

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<sup>1</sup>Section 63.71 Application of Everstream Solutions LLC, Federal Communications Commission, WC Docket No. 25-100 (filed Feb. 13, 2025).

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Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please contact me or my colleague Danielle Burt at 202-739-3000.

Respectfully submitted,

/s/ Catherine G. Vasudevan

Catherine G. Vasudevan (PA I.D. No. 210254)

*Counsel to Everstream Solutions LLC*

cc: See Certificate of Service

## CERTIFICATE OF SERVICE

I, Danielle Burt, certify that I served a copy of the foregoing Response by Everstream Solutions LLC to Protest by T-Mobile USA, Inc. on April 30, 2025 as follows:

### **Via E-Mail**

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/s/ Danielle Burt

Danielle Burt