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May 15, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**RE: Robert Buehl c/o Smart Communications v. Global Tel\*Link Corporation;  
Docket No. C-2025-3054526**

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Motion to Extend Answer Deadline on behalf of Global Tel\*Link Corporation, in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Susan E. Bruce'.

Susan E. Bruce  
MCNEES WALLACE & NURICK LLC

Counsel to Global Tel\*Link Corporation

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via e-mail)  
Teri-Lee Rhoades, Office of Administrative Law Judge (via e-mail)  
Angela F. Collins, Esq., Cahill Gordon & Reindel LLP (via e-mail)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Roger Buehl C/O Smart Communications	:	
	:	
v.	:	Docket No. C-2025-3054526
	:	
Global Tel*Link Corporation d/b/a ViaPath	:	
Technologies	:	

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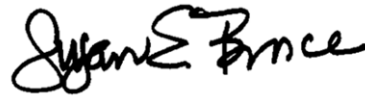
**NOTICE TO PLEAD**

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To: Roger Buehl C/O Smart Communications

PER 52 PA. CODE § 5.103(C), YOU ARE HEREBY NOTIFIED TO FILE A WRITTEN RESPONSE TO THE ENCLOSED MOTION WITHIN TWENTY (20) DAYS OF THE DATE OF SERVICE HEREOF.

Respectfully submitted,



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Susan E. Bruce (I.D. No. 80146)  
Kenneth R. Stark (I.D. No. 312945)  
Rebecca Kimmel (I.D. No. 335097)  
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Counsel to Global Tel\*Link Corporation  
d/b/a ViaPath Technologies

Dated: May 15, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Roger Buehl C/O Smart Communications	:	
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v.	:	Docket No. C-2025-3054526
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Global Tel*Link Corporation d/b/a ViaPath	:	
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**GLOBAL TEL\*LINK CORPORATION’S  
MOTION TO EXTEND TIME TO ANSWER COMPLAINT  
UNTIL JUNE 4, 2025**

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**TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Global Tel\*Link Corporation (“Respondent”) hereby files, pursuant to the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations at 52 Pa. Code § 5.103, this motion to extend the deadline for Respondent to answer the complaint (“Complaint”) of Roger Buehl C/O Smart Communications (“Mr. Buehl”), filed in the above-referenced docket, until June 4, 2025. In support thereof, Respondent states as follows:

**I. BACKGROUND**

1. On April 7, 2025, Mr. Buehl filed a formal complaint against Respondent alleging entitlement to a refund in the amount of \$28.43 associated with lost songs downloaded by Mr. Buehl via dedicated kiosks provided by Respondent through a contract with the Pennsylvania Department of Corrections. Mr. Buehl requested that the Commission require the Respondent to provide a complete accounting of Mr. Buehl’s “link unit credit history” utilizing the kiosks provided by the Respondent. Alternatively, Mr. Buehl requested that the Commission require the Respondent to refund Mr. Buehl in the amount of \$28.43 for the lost songs.

2. On May 9, 2025, the Respondent first became aware of the Complaint due to outreach by Commission staff to the Respondent's representatives. The Respondent immediately requested that the Commission provide a copy of the Complaint to the Respondent, given that the Complaint was not publicly docketed on the Commission's website in Docket No. C-2025-3054526. Respondent also initiated correspondence and outreach to Respondent's local PUC counsel.

3. On May 14, 2025, the Respondent filed notices of appearance for local PUC counsel and requested a copy of the Complaint. The Commission also provided the Respondent with a copy of the Complaint on May 14, 2025.

## **II. MOTION TO EXTEND DEADLINE TO FILE ANSWER TO COMPLAINT**

4. The Commission's docket indicates that the Complaint was filed on April 7, 2025, triggering an answer due 20 days thereafter on April 28, 2025. Accordingly, the deadline for filing an answer to the complaint has formally passed. However, good cause supports extending the deadline to answer the Complaint 20 days from today – until June 4, 2025 – because Respondent's business and legal representatives did not receive a copy of the Complaint until May 14, 2025. Respondent needs more time to review and investigate the allegations and information requests raised in the Complaint and evaluate whether the Complaint is even PUC-jurisdictional, given that the Complaint concerns music and content services and not voice or telephone services.

5. Respondent respectfully submits that it did not receive direct service of the Complaint. Respondent is reviewing its internal procedures and contact information to ascertain why Respondent did not receive service of the Complaint from the Commission.

6. Importantly, resolution of the allegations and relief requested in the Complaint is not time-sensitive. Accordingly, Respondent submits that the complainant would not be unduly

prejudiced through a grant of this motion, allowing 20 days until June 4, 2025, to file an answer to the Complaint.

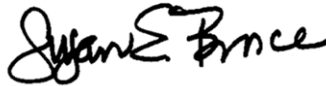
7. Upon initial review of the Complaint, the Complaint appears to be squarely focused on music and content services, and not voice services or services related to Respondent's PUC-jurisdictional interexchange carrier reseller license. The Commission has previously dismissed a complaint concerning the Respondent's use of internet-based kiosk services at the Pennsylvania Department of Corrections due to a lack of jurisdiction.<sup>1</sup>

### III. CONCLUSION

**WHEREFORE**, Global Tel\*Link Corporation respectfully requests that the Commission extend the time to answer the Complaint in the above-referenced proceeding until June 4, 2025.

Respectfully submitted,

McNEES WALLACE & NURICK LLC



By \_\_\_\_\_

Susan E. Bruce (I.D. No. 80146)  
Kenneth R. Stark (I.D. No. 312945)  
Rebecca Kimmel (I.D. No. 335097)  
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*Counsel to Global Tel\*Link Corporation d/b/a ViaPath Technologies*

Dated: May 15, 2025

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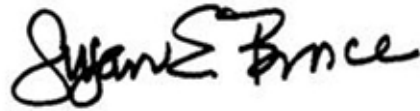
<sup>1</sup> See *Kenneth Andre Dade EA-6297 v. Global Tel\*Link Corp.*, Docket No. C-2017-2609451 (ALJ Decision issued Sep. 26, 2017). On November 22, 2017, the Commission issued a Final Order making the September 26, 2017 ALJ decision become effective by operation of law and dismissing the complaint with prejudice due to a lack of jurisdiction.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

Roger Buehl  
c/o Smart Communications/PADOC  
PO Box 33028  
St. Petersburg, FL 33733



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Susan E. Bruce

Counsel to Global Tel\*Link Corporation

Dated this 15<sup>th</sup> day of May, 2025, in Harrisburg, Pennsylvania.