



Mathieu J. Shapiro
Direct Dial: (215) 665-3014
[E-mail: mathieu.shapiro@obermayer.com](mailto:mathieu.shapiro@obermayer.com)

200 Locust Street, Suite 400
Harrisburg, PA 17101
(t) (717) 234-9730
(f) (717) 236-2485
www.obermayer.com

June 11, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17105

RE: Michelle Hubbard v. Comcast Business Communications LLC
Docket No. C-2025-3055333
MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Dear Secretary Homsher:

This firm represents Comcast Business Communications LLC (“Comcast”) in the above-captioned matter.

We are enclosing Comcast’s Motion for Extension of Time to Respond to Complaint, in which Comcast seeks a 30-day extension of time to respond to Ms. Hubbard’s Formal Complaint in light of an anticipated non-judicial resolution.

If you require additional information regarding this request, please contact me.

Respectfully,

MATHIEU J. SHAPIRO

Enclosure

cc: Michelle Hubbard (via e-mail and First Class Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHELLE HUBBARD,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3055333
	:	
COMCAST BUSINESS	:	
COMMUNICATIONS LLC,	:	
	:	
Respondent.	:	
	:	

NOTICE TO PLEAD

To: Michelle Hubbard
715 Curtland Street
Rochester, PA 15074

You are hereby notified that Comcast Business Communications LLC (“Comcast”) has filed, pursuant to 52 Pa. Code § 5.103, a Motion for Extension of Time to Respond to Complaint. You may submit a response to the Motion within twenty (20) days pursuant to 52 Pa. Code § 5.103(b). If no response is submitted, the presiding officer may rule on the Motion without a response from you, thereby, requiring no other proof. All Pleadings, such as a response to the Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Comcast.

/s/ Mathieu J. Shapiro
Mathieu J. Shapiro (PA I.D. 76266)
Melissa M. Blanco (PA I.D. 327659)
OBERMAYER REBMANN
MAXWELL & HIPPEL LLP
200 Locust Street, Suite 400
Harrisburg, PA 17101
Tel: (717) 234-9730
Fax: (717) 236-2485
mathieu.shapiro@obermayer.com
melissa.blanco@obermayer.com
Counsel for Comcast Business Communications LLC

Date: June 11, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHELLE HUBBARD,

Complainant,

v.

**COMCAST BUSINESS
COMMUNICATIONS LLC,**

Respondent.

Docket No. C-2025-3055333

**MOTION OF COMCAST BUSINESS COMMUNICATIONS LLC FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

TO THE PENNSYLVANIA UTILITY COMMISSION:

In accordance with Section 1.15 of the Pennsylvania Rules of Administrative Practice and Procedure, Comcast Business Communications LLC (“Comcast”), by and through its counsel, Obermayer Rebmann Maxwell & Hippel LLP, files this Motion for Extension of Time to Respond to Complaint. In connection with this Motion, Comcast avers as follows:

1. Comcast seeks a 30-day extension of time to file an Answer to the Complaint in the above-captioned matter in light pending utility work from Verizon that would likely resolve the Formal Complaint.

2. On May 16, 2025, Complainant, Michelle Hubbard, filed a Formal Complaint with the Pennsylvania Public Utility Commission (the “Commission”) against Comcast, alleging that wires on her property belonging to both Comcast and Verizon were too low. She alleged that, despite her efforts to have either Comcast or Verizon fix the low lines, neither Comcast nor Verizon had yet done so.

3. The Commission served Ms. Hubbard’s Formal Complaint on Comcast on May 21, 2025.

4. Since receiving Ms. Hubbard's Formal Complaint, Comcast has completed repairs to its portion of the utility wires, which will enable Verizon to raise its own wires on Ms. Hubbard's property.

5. While Verizon has not yet raised its wires, Comcast expects it to do so soon.

6. Once Verizon lifts and repairs its wires, the Complainant's Formal Complaint likely will be satisfied.

7. In light of Verizon's anticipated action, and in the interest of judicial economy, Comcast requests a 30-day extension of time to respond to the Formal Complaint to allow time for the Formal Complaint to be resolved without judicial intervention.

WHEREFORE, Comcast respectfully requests that the Commission grant its Motion for Extension of Time to Respond to Complaint and permit it an additional 30 days to respond to the Complaint.

Respectfully submitted,

/s/ Mathieu J. Shapiro

Mathieu J. Shapiro (PA I.D. 76266)

Melissa M. Blanco (PA I.D. 327659)

OBERMAYER REBMANN

MAXWELL & HIPPEL LLP

200 Locust Street, Suite 400

Harrisburg, PA 17101

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melissa.blanco@obermayer.com

Counsel for Comcast Business Communications LLC

Date: June 11, 2025

CERTIFICATE OF SERVICE

I, Mathieu J. Shapiro, hereby certify that I have served a true and correct copy of Comcast's Motion for Extension of Time to Respond to Complaint upon the following party via e-mail and First Class Mail:

Michelle Hubbard
715 Curtland Street
Rochester, PA 15074
michelle.hubbard92@gmail.com

Date: June 11, 2025

/s/ Mathieu J. Shapiro

Mathieu J. Shapiro
*Counsel for Comcast Business
Communications LLC*