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August 7, 2025

VIA ELECTRONIC FILING

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

Re: Application of Everstream Solutions, LLC for Approval of the Discontinuance of Competitive Access Services; Docket No. A-2025-3053757; **T-MOBILE USA, INC.'S PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Homsher:

Enclosed for filing you will find T-Mobile USA, Inc.'s Prehearing Conference Memorandum in the above-referenced proceedings. Copies have been served on all parties to this proceeding as indicated on the attached Certificate of Service.

If you have questions regarding this filing, please contact me.

Very truly yours,
/s/ Whitney E. Snyder

Whitney E. Snyder

Counsel for T-Mobile USA, Inc.

WES/das
Enclosure

cc: ALJ Steven T. Haas (sthaas@pa.gov)
ALJ Chad A. Allensworth (cassenswor@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Everstream Solutions, LLC :
for Approval of the Discontinuance of : Docket No. A-2025-3053757
Competitive Access Services :

PREHEARING CONFERENCE MEMORANDUM OF T-MOBILE USA, INC.

**TO: THE HONORABLE STEVEN K. HAAS AND
THE HONORABLE CHAD A. ALLENSWORTH:**

Pursuant to 52 Pa. Code § 5.224, T-Mobile USA, Inc. (“T-Mobile”), by and through its attorneys in this matter, HMS Legal LLP, submits this Prehearing Conference Memorandum.

I. STATUS OF SETTLEMENT NEGOTIATIONS.

T-Mobile has been actively negotiating settlement solutions with Everstream. As a result of those discussions, T-Mobile and Everstream agreed to the inclusion of language in the bankruptcy sale order that temporarily stops Everstream from terminating or abandoning the Pennsylvania sites. If the parties cannot resolve their disputes, Everstream will be required to file a supplemental notice with the Bankruptcy Court, informing T-Mobile of its intention with respect to the Pennsylvania sites, among other out-of-state sites. T-Mobile will then have an opportunity within seven days of the notice filing to object before the Bankruptcy Court. T-Mobile intends to continue such negotiations and hopes the parties are able to reach a mutually agreeable solution to all issues that Everstream’s proposed abandonment presents.

II. STATUS OF EVERSTREAM BANKRUPTCY.

On August 1, 2025, the Bankruptcy Court approved the sale of Everstream’s assets to Bluebird MidWest, LLC. The sale of such assets excludes the Pennsylvania operations and assets

of Everstream. As noted above, T-Mobile has negotiated for protective language to ensure that Pennsylvania sites will not be terminated or abandoned in the short term, while the parties engage in settlement discussion. While T-Mobile and Everstream engage in settlement discussions, Everstream will be attempting to close its sale transaction with Bluebird Midwest.

III. LITIGATION SCHEDULE.

T-Mobile is willing to work with the other parties to develop a mutually acceptable litigation schedule.

IV. DISCOVERY MODIFICATIONS.

T-Mobile does not propose any modifications to the Commission's discovery procedures or timelines.

V. WITNESSES.

T-Mobile may present Kim Curtis, Vice President of Critical Infrastructure Procurement as a witness regarding the impacts of Everstream's proposed abandonment. T-Mobile reserves its rights to present additional witnesses during the course of the proceeding.

VI. ISSUE.

The issue before this Commission is whether Everstream abandoning service is necessary or proper for the for the service, accommodation, convenience, or safety of the public. This issue is highly fact and situation dependent. As stated in T-Mobile's Protest, it is not in the public interest for Everstream to abandon service prior to T-Mobile having alternative service in place. Everstream abandoning service in such circumstances would be harmful to the public interest as described at length in T-Mobile's Protest. T-Mobile reserves its rights to raise and respond to additional issues during the course of the proceeding.

Respectfully submitted,

/s/ Whitney E. Snyder

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/s/ Michelle Painter Lama

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Date: August 7, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

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/s/ Whitney E. Snyder
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Dated this 7th day of August, 2025