

RCVD PUC SEC BUR  
SEP 4 2025 AM 11:04

: RAYMOND G. GEHRING

RAYMOND G. GEHRING : 1

v. :

VERIZON PENNSYLVANIA LLC: ~~HANDLINE~~ PHONE: ~~12-11-2023~~

~~DISCONNECTED~~  
~~12-11-2023~~

: PA P.U.C. DOCKET # F-2024-3048169

SEPTEMBER 2, 2025

~~AUGUST 30, 2025~~

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
HARRISBURG, PENNSYLVANIA

## MOTION FOR CONTINUANCE

A 15 DAY CONTINUANCE TO PERHAPS A 30 DAY CONTINUANCE IS RESPECTFULLY REQUESTED BY THE CLAIMANT RAYMOND G. GEHRING, FOR THE FOLLOWING REASONS:

- 1) THE INITIAL IN PERSON AND TELEPHONE EVIDENTIARY HEARING (HYBRID) WAS SCHEDULED FOR TUESDAY, SEPTEMBER 9, 2025 AT 10 AM.
- 2) AS OF 8-29-2025, AFTER SEVERAL ATTEMPTS MADE, CLAIMANT HAS YET BEEN ABLE TO REACH AND/OR COMMUNICATE WITH HIS WITNESS THAT HE IS HOPING AND PRAYING TO TESTIFY ON HIS BEHALF, WITH THIS CASE.

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2)(cont.) THIS ANTICIPATED WITNESS WAS WORKING AS A CASE WORKER IN THE READING, PA CALL CENTER; 1 OF 7 CALL CENTERS FOR THE STATE OF PA, WITH THE PA DEPARTMENT OF HUMAN SERVICES.

THE CLAIMANT SPOKE WITH HER LAST ON NOVEMBER 27, 2023; THE SAME DATE THAT THE CLAIMANT, WITH HIS LIFELINE® LANDLINE TELEPHONE FILED HIS INFORMAL COMPLAINT WITH THE PA P.U.C. AGAINST VERIZON.

CLAIMANT WAS INFORMED BY CASEWORKER THAT ACCORDING TO HER RECORDS 11-27-2023, VERIZON WAS LISTED AS A PARTICIPATING PROVIDER WITH THE AFFORDABLE CONNECTIVITY PROGRAM (A.C.P.) AND LISTED IF APPROVED FOR A.C.P. TO ACCEPT THE A.C.P. CREDIT NOT ONLY FOR THEIR INTERNET SUBSCRIBERS BUT FOR THEIR LANDLINE PHONE SUBSCRIBERS AS WELL.

THE CASEWORKER ALSO STATED TO THE CLAIMANT OVER THE PHONE ON 11-27-2023, THAT JUST THAT MORNING SHE REFERRED SOMEONE ELSE TO A.C.P. TO HELP PAY FOR THEIR LANDLINE.

SHORTLY AFTER THE PA P.U.C. FORMAL COMPLAINT WAS FILED BY CLAIMANT; AROUND

2) (cont.) THE TIME OF APRIL, 2024, CLAIMANT WAS INFORMED AND CONFIRMED THAT THE SAME CASEWORKER HE SPOKE WITH 11-27-2023, WAS STILL EMPLOYED WITH THE PA DEPARTMENT OF HUMAN SERVICES AS A CASE WORKER IN THE READING, PA CALL CENTER.

AS OF MAY 22, 2025 @ 5:00 PM, CLAIMANT CONFIRMED THAT THIS SAME ANTICIPATED WITNESS IS STILL EMPLOYED AS A CASEWORKER FOR THE PA DEPARTMENT OF HUMAN SERVICES. HOWEVER, CLAIMANT WAS UNABLE TO CONFIRM, PERHAPS TO BE BECAUSE OF HEIGHTENED SAFETY AND SECURITY REASONS, THAT SHE IS STILL EMPLOYED IN/WITH THE READING, PA CALL CENTER.

AS OF AUGUST 27, 2025, CLAIMANT WAS AGAIN, WITH THE HELP OF AN ELECTED PA STATE OFFICIALS' OFFICE AIDE/STAFF WORKER TRYING TO LOCATE THIS CASEWORKER TO HOPEFULLY HELP TO SECURE AND TO PERSUADE HER TO TESTIFY ON CLAIMANT'S BEHALF AND TO HELP BACKUP THE CREDABILITY AND THE MERITS AND PRIMARY SUBJECT OF THIS CASE/FORMAL COMPLAINT.

3) HOWEVER, AS A BACKUP PLAN TO THIS ANTICIPATED TESTIMONY, IF CLAIMANT IS UNABLE TO PROCURE THIS WITNESS, FOR WHATEVER REASON, THE CLAIMANT WITH THE HELP FROM THE PA STAT

3)(cont.) OFFICIALS' AIDE/STAFF IS ALSO TRYING TO SECURE AN ALTERNATE/CASEWORKER FROM THE PA DEPARTMENT OF HUMAN SERVICES TO HELP PROVIDE TESTIMONY AND/OR THE SAME INFORMATION TO THE PA P.U.C. THAT THE PA DEPARTMENT OF HUMAN SERVICES PROVIDED TO THE CLAIMANT OVER THE PHONE 11-27-2023.

4) DUE TO THE LABOR DAY HOLIDAY, AMONG OTHER THINGS AND VACATIONS PLANNED BY STAFF AND NOT RETURNING TO THE OFFICE UNTIL MONDAY, SEPTEMBER 8, 2025; LOGIC IS SUGGESTING AND IT IS FELT THAT WE MAY NOT HAVE ENOUGH TIME TO ADEQUATELY PROCURE THIS ANTICIPATED TESTIMONY AND/OR INFORMATION TO AGAIN HELP BACKUP THE MERITS AND CREDABILITY AND PRIMARY SUBJECT ARGUED OF THE CASE.

5) AS CLAIMANT INDICATED IN HIS LETTER OF AUGUST 30, 2024 SENT BY FIRST CLASS MAIL TO: SECRETARY ROSEMARY CHIAVETTA AND MEDIATOR TERI-LEE RHODES PENNSYLVANIA PUBLIC UTILITY COMMISSION AND ALSO REPEATED IN CLAIMANT'S 5-28-2025 RESPONSE TO INTERIM ORDER OF APRIL 14, 2025 BY ALJ ERIN L. GANN DIRECTING STATUS REPORT (ON P. 4, PARAGRAPH 4

5) (cont.) CONTINUING WITH THIS SAME PARAGRAPH TO P. 5 AND P. 5 PARAGRAPH 1; AND P. 9) SENT BY FIRST CLASS MAIL; IT WAS RESPECTFULLY REQUESTED BY CLAIMANT IF POSSIBLE TO HAVE HIS HEARING IN PERSON AND TO BE HELD AT THE CLOSEST STATE OFFICE BUILDING TO HIM. THIS WOULD BE AT:

625 CHERRY STREET

READING, PENNSYLVANIA 19602

THIS LOCATION IS ABOUT 1 MILE AWAY FROM CLAIMANT'S ADDRESS.

CLAIMANT ALSO INDICATED THAT "IT WOULD BE AN EXTREME HARDSHIP FOR ME TO ATTEMPT TO DO THIS OTHERWISE." (CLAIMANT'S STATUS REPORT OF 5-28-2025 P. 5 PARAGRAPH 1.)

THAT 'EXTREME HARDSHIP' WOULD STILL EXIST IF CLAIMANT AND/OR PERHAPS CLAIMANT AND HIS ANTICIPATED WITNESS WOULD NEED TO TRAVEL TO HARRISBURG, PA; OR APPROXIMATELY 60 MILES AWAY FROM THE STATE OFFICE BUILDING IN READING,

THIS REQUEST, IS BELIEVED BY CLAIMANT, AS A REASONABLE REQUEST AND IT SEEMS TO HAVE BEEN OVERLOOKED IN HIS RESPONSE LETTERS TO THE PA P.U.C. OR POSSIBLY BELIEVED TO BE UNFAIRLY IGNORED, SINCE THIS REQUEST WAS NOT ADDRESSED IN THE INTERIM ORDERS AND SCHEDULING OF THE HEAR

WHEREAS, FOR THE REASONS SUBMITTED,  
CLAIMANT WILL ASK AND PRAY FOR THIS  
15 DAY CONTINUANCE TO PERHAPS 30 DAY  
CONTINUANCE REQUESTED TO BE PRAYERFULLY  
CONSIDERED AND WITH GOD'S HELP HOPEFULLY  
GRANTED.

RESPECTFULLY SUBMITTED  
SEPTEMBER 2, 2025  
~~AUGUST 30, 2025~~

*Raymond G. Gehring*

BY RAYMOND G. GEHRING - CLAIMANT

PA P.U.C. DOCKET # F-2024-3048169

RAYMOND G. GEHRING

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RAYMOND G. GEHRING

V.

VERIZON PENNSYLVANIA, LLC

PROOF OF SERVICE

COPY OF THIS

MOTION FOR CONTINUANCE

SENT BY FIRST CLASS MAIL <sup>SEPTEMBER 2, 2025</sup> ~~AUGUST 30, 2025~~ TO:

1) SECRETARY ROSEMARY CHIAVETTA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, COMMONWEALTH KEYSTONE BLDG  
HARRISBURG, PENNSYLVANIA 17120

2) ADMINISTRATIVE LAW JUDGE ERIN L. GANNON  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, COMMONWEALTH KEYSTONE BLD  
HARRISBURG, PENNSYLVANIA 17120

3) SUZAN D. PAIVA, ESQUIRE  
VERIZON  
900 RACE STREET, 6TH FLOOR  
PHILADELPHIA, PENNSYLVANIA 19107

RAYMOND G. GEHRING

HARRISBURG PA

2 SEP 2025 PM



SECRETARY ROSEMARY CHIAVETTA  
 PENNSYLVANIA PUBLIC UTILITY COMMISSION  
 400 NORTH STREET, COMMONWEALTH KEYSTONE BUILDING  
 HARRISBURG, PENNSYLVANIA 17120

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