



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 15, 2025

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
Get Wireless, Inc.
Docket No. C-2025-3056837
I&E Reply to New Matter

Dear Secretary Homsher:

Enclosed for electronic filing please find the Reply to New Matter of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', written over a light blue horizontal line.

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318204
(717) 783-5243
grosul@pa.gov

GR/nb
Enclosures

cc: Hon. Charece Z. Collins, Administrative Law Judge (*via email* – charcollin@pa.gov)
Allison C. Kaster, Director, I&E (*via email* – akaster@pa.gov)
Carrie B. Wright, Deputy Chief Prosecutor, I&E (*via email* – carwright@pa.gov)
As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3056837
	:	
Get Wireless, Inc.,	:	
Respondent	:	

**BUREAU OF INVESTIGATION AND ENFORCEMENT
REPLY TO NEW MATTER OF
GET WIRELESS, INC.**

NOW COMES the Pennsylvania Public Utility Commission’s (“Commission”), Bureau of Investigation and Enforcement (“I&E”), by its prosecuting attorney, and files this Reply to New Matter of Get Wireless, Inc. (“Respondent”), pursuant to 52 Pa. Code § 5.63(a). The purpose of New Matter in response to a Complaint is to “set forth ... another material fact which is not merely a denial of the averments of the preceding pleading” or to raise affirmative defenses. 52 Pa. Code § 5.62(b). In support of its Reply to New Matter, I&E avers as follows:

26. Denied. To the extent that Respondent attempts to incorporate any and all assertions made in paragraphs 1-25 of its Answer as “New Matter,” this is denied. Pursuant to 52 Pa. Code § 5.62(b), affirmative defenses must be set forth under the heading of “New Matter.” New Matter is limited to material facts that are not merely

denials of averments of the preceding pleadings. Respondent cannot simply incorporate by reference all paragraphs of its Answer as “New Matter.”

27. Denied. The averment that USF assessments are determined based on a carrier’s “intrastate end-user telecommunications retail revenues” is a legal conclusion to which no response is required. To the extent one is required, it is denied.

28. Admitted in part and Denied in part. I&E admits that Respondent filed a Petition on November 13, 2023, at Docket No. P-2023-3044290 and M-2022-3030277 and requested that it be permitted to revise its intrastate operating revenues to \$0 for the 2021 calendar year. It is denied insofar as the Respondent asserts that it primarily installs and provides wireless broadband internet service to apartment buildings and other multi-dwelling units. I&E is without sufficient knowledge to evaluate this assertion. Strict proof thereof is demanded.

29. Admitted. I&E admits that the Commission denied Respondent’s Petition at P-2023-3044290 and M-2022-3030277 and determined that Respondent had not justified its request to revise its USF assessment.

30. Denied. It is denied that the USF assessment invoices were issued by the Administrator, Rolka Loube Saltzer LLC, upon any basis other than the Commission’s regulations at 52 Pa. Code §§ 63.161 - 63.171.

31. I&E is without sufficient information to Admit or Deny this averment by Respondent. I&E does not know what evidence Respondent may or may not present regarding its intrastate end-user telecommunications retail revenues.

WHEREFORE, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that the Office of Administrative Law Judge and the Commission reject the New Matter raised by Get Wireless, Inc., dismiss Respondent's Answer, and sustain I&E's Complaint.

Respectfully submitted,



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
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Date: October 15, 2025

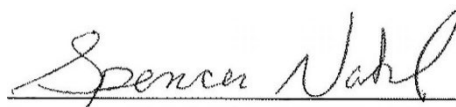
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
Complainant	:	
	:	
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	:	
Get Wireless, Inc.,	:	
Respondent	:	

VERIFICATION

I, Spencer Nahf, Fixed Utility Financial Analyst, Bureau of Technical Utility Services, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect that the Bureau of Investigation and Enforcement will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: October 15, 2025



Spencer Nahf, Fixed Utility Financial Analyst
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
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Complainant	:	
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Respondent	:	

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).

Service by Electronic Mail

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Counsel for Get Wireless, Inc.



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Dated: October 15, 2025