



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

REVISED

November 18, 2025

Docket No. M-2024-3052148

Utility Code: 3111949

PELICIA HALL
VIAPATH TECHNOLOGIES
3120 FAIRVIEW PARK DRIVE SUITE 300
FALLS CHURCH VA 22042

Re: DSI-ITI, LLC (Company)
2024 Pennsylvania Universal Service Fund (Pa. USF) Carrier Compliance Review
Report

Dear Ms. Hall:

Pursuant to the Pennsylvania Public Utility Commission's (Commission) *2023 Pa. USF Annual Rate Adjustment Order*,¹ the Pa. USF Administrator, Rolka Loube Saltzer, LLC (Rolka Loube) conducted a carrier compliance review of the Company to ensure that the Company's Pa. USF filings were compliant with Commission regulations. Commission Staff has reviewed the Carrier Review Report (Report) for the Company, which was submitted to the Commission by Rolka Loube on July 29, 2025. In the Report, Rolka Loube finds that the Company did not include any intrastate retail Miscellaneous revenues in its reporting for Pa. USF purposes, thereby underreporting its intrastate retail revenues on its Development of Assessment Data Request for calendar year 2023 by \$1,590,742.77. Rolka Loube recommends that the Company amend its 2023 Pa. USF Development of Assessment Data Request to include this non-reported intrastate retail revenue and remit the incremental Pa. USF contribution assessment payment of \$45,541.73 associated with the previously non-reported revenue.

Rolka Loube also notes that the Company reported revenues in its 2023 Annual Financial Report to the Commission that do not appear to be Pennsylvania-specific. Thus, Rolka Loube recommends that the Company modify its reporting practices to ensure correct reporting going forward. Moreover, Rolka Loube's Report made observations related to multiple fees that the Company collects and claims are ancillary that cover costs associated with various billing and related services, not telecommunications services.² Rolka Loube states that the Company has indicated that it collects paper billing fees from end-user customers in multiple states including Pennsylvania. Rolka Loube notes that the Commission's regulations prohibit the imposition of "a supplemental fee, charge or other rate for furnishing a paper bill or invoice for the services provided by the public utility."

The Company disagrees with most of the factual findings of the Report. . However, regarding Single Call Fees, one of the Miscellaneous retail revenue fees that the Company collects, the Company agreed to a Pa. USF assessment on these fees because they are indirectly related to telecommunications services,.

¹ See Pennsylvania Universal Service Fund Annual Rate Adjustment, Docket Number M-00001337 (Order entered December 7, 2023) (*2023 PaUSF Annual Rate Adjustment Order*).

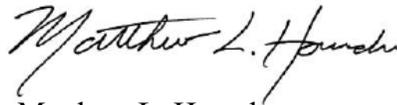
² The four fees in question are Paper Billing Statement Fees, Single Call Fees, Third Party Money Transmitter Fees, and Automated Payment Fees.

After review of the report, the Commission agrees with Rolka Loube's recommendations. If the Company has not done so already, it is directed to stop charging customers a paper billing fee pursuant to 52 Pa Code § 53.85 (A public utility may not impose a supplemental fee, charge or other rate for furnishing a paper bill or invoice for the services provided by the public utility.). The three other miscellaneous retail revenue amounts are end-user revenue defined at 52 Pa Code § 63.162.

In accordance with the *2023 Pa. USF Annual Rate Adjustment Order* and applicable Commission regulations, the Report is approved. Accordingly, if it has not done so already, the Company is directed to submit a revised 2023 Pa. USF Development of Assessment Data Request reflecting the previously non-reported \$1,590,742.77 intrastate retail revenue amount and to coordinate payment of the additional contribution assessment amount of \$45,541.73 with the Pa. USF Administrator. Additionally, the Company is directed to review its operating revenue reporting model process and implement any necessary changes in order to prevent similar misstatements on future Pa. USF Development of Assessment Data Requests. The Company shall file confirmation of the foregoing items with the Commission at the above docket within 30 days of the date of this letter. Upon the Company's filing of confirmation with the Commission, this docket will be closed.

If you are dissatisfied with the resolution of this matter, you may, as set forth in 52 Pa. Code § 5.44, file a petition with the Commission within 20 days of the date of this letter. If you have any questions in this matter, please contact Ryan Kravitz, Telco Section, Bureau of Technical Utility Services at (717) 783-5941 or rykravitz@pa.gov.

Sincerely,



Matthew L. Homsher
Secretary

cc: David Kennerly, Rolka Loube Saltzer, LLC