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December 18, 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'S UNOPPOSED MOTION FOR INDEFINITE STAY OF PROCEEDINGS IN FURTHERANCE OF SETTLEMENT AND REQUEST TO WAIVE ANSWER PERIOD**

Dear Secretary Homsher:

Enclosed for filing you will find T-Mobile's Unopposed Motion for Indefinite Stay of Proceedings in Furtherance of Settlement and Request to Waive Answer Period 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

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Thomas J. Sniscak
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Counsel for T-Mobile USA, Inc.

WES/das
Enclosure

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**UNOPPOSED MOTION FOR INDEFINITE STAY OF PROCEEDINGS
IN FURTHERANCE OF SETTLEMENT
AND REQUEST TO WAIVE ANSWER PERIOD**

Pursuant to 52 Pa. Code § 5.103, T-Mobile USA, Inc. (“T-Mobile”) submits this Unopposed Motion for Indefinite Stay of Proceedings to allow the parties to this proceeding to resolve their differences without the need for litigation. Counsel for T-Mobile has permission to represent that the other parties to this proceeding, Everstream Solutions, LLC (“Everstream”) and Zito Media Communications (“Zito”), do not oppose the relief requested herein. Accordingly, T-Mobile respectfully requests the answering period to this motion to be waived and the order attached hereto as Appendix A be entered expeditiously.

I. BACKGROUND

1. On March 5, 2025, Everstream filed an Application to abandon public utility service with the Pennsylvania Public Utility Commission (“Commission” or “PUC”). The Commission issued a Secretarial Letter on that same day acknowledging receipt of Everstream’s Application, noting that the matter will receive the attention of the Commission.
2. On March 24, 2025, Zito Media Communications filed a Protest to the Abandonment Application.
3. On April 10, 2025, T-Mobile filed a Protest to the Abandonment Application.
4. On August 8, 2025 a prehearing conference was held in this matter. At the prehearing conference, the parties were unable to reach agreement on a procedural schedule.

5. On August 18, 2025, Everstream filed a Motion for Summary Judgment.

6. Since approximately September 1, 2025, the Parties have mutually and informally sought extensions for answers to Everstream’s Motion for Summary Judgment in furtherance of settlement, which the Administrative Law Judges have granted via email.

7. The answer period has been extended since September to allow Parties to settle this matter.

8. Answers to Everstream’s Motion for Summary Judgment are currently due on January 9, 2026.

II. MOTION TO STAY PROCEEDINGS

9. At this time, T-Mobile and Everstream have reached a settlement in principle that provides for the stay of these proceedings until the settlement is terminated, at which time the ALJs will be notified. The intent of the settlement is to allow T-Mobile time to find replacement services while Everstream continues to provide service in the interim. T-Mobile and Everstream intend that T-Mobile will find replacements for the services Everstream provides and no longer require service from Everstream. If the intent of the settlement comes to fruition, T-Mobile will no longer oppose the Application.

10. There is no statutory or regulatory time frame in which the PUC is bound to decide this proceeding.

11. “It is the policy of the Commission to encourage settlements.” 52 Pa. Code § 5.231

12. Allowing additional time for settlement negotiations is intended to render litigation unnecessary, saving the time and resources of the Commission, Your Honors, and the Parties.

III. REQUEST FOR WAIVER OF ANSWER PERIOD

13. Given all Parties to this proceeding do not oppose the relief herein and answers to Everstream’s Motion for Summary Judgment are due December 8, 2025, T-Mobile also requests that the 20-day answer period to this motion be waived and the form order in Appendix A be entered expeditiously.

IV. CONCLUSION

WHEREFORE, T-Mobile respectfully requests Your Honor’s issue the attached order staying proceedings and requiring status reports every 60 days.

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Respectfully submitted,
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Dated: December 18, 2025

APPENDIX A

ORDER GRANTING INDEFINITE STAY OF PROCEEDING

THEREFORE,

IT IS ORDERED:

1. that the Unopposed Motion For Indefinite Stay Of Proceedings In Furtherance Of Settlement And Request To Waive Answer Period is granted.
2. that the proceeding at Docket No. 2025-3053757 is hereby stayed pending further order.
3. that the parties shall file status updates at 60 day intervals beginning 60 days after the date of entry of this Order.

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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Dated this 18th day of December, 2025