



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 7, 2026

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 Prehearing Conference Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's ("I&E")
Prehearing Conference Memorandum in the above-referenced matter.

Copies have been served on the parties of record in accordance with the attached
Certificate of Service. If you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', is 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: Administrative Law Judge Charece Z. Collins (via email – charcollin@pa.gov)
Stephanie M. Wimer, Deputy Chief Prosecutor, I&E-Enf (via email – stwimer@pa.gov)
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	:	

**PREHEARING CONFERENCE MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

TO ADMINISTRATIVE LAW JUDGE CHARECE Z. COLLINS:

The Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”) files this Prehearing Conference Memorandum in accordance with 52 Pa. Code § 5.222(d) and the direction of Administrative Law Judge (“ALJ”) Charece Z. Collins in an email to the parties dated March 18, 2026.

I. HISTORY OF THE PROCEEDING

On August 13, 2025, I&E filed a Complaint against Get Wireless, Inc. (utility code 3121169) (“Get Wireless” or “Respondent”) alleging that it had an outstanding and past due Universal Service Fund (“USF”) assessment balance of \$120,990.26 plus \$8,645.78 in accrued late fees, and requesting that a civil penalty of \$30,248 be imposed upon Respondent for failing to timely pay its USF assessment, for a total of \$159,884.04.

On September 25, 2025, an Initial Telephonic Hearing Notice was issued in this matter, initially setting a hearing for November 3, 2025.

On September 26, 2025, Respondent filed its Answer and New Matter.

Also on September 26, 2025, a Corrected Initial Telephonic Hearing Notice was issued in this matter.

On October 29, 2025, a Prehearing Order for Telephonic Hearing was issued in this matter.

On October 15, 2025, I&E filed its Reply to New Matter.

Also on October 15, 2025, a Hearing Cancellation Notice was issued in this matter, setting aside the November 3, 2025, Initial Telephonic Hearing that had been scheduled in this matter.

Between October 2025 and February 2026, I&E and Respondent, through its counsel, attempted to resolve the matter and reach a mutually acceptable settlement. However, the parties were not able to reach a settlement.

On March 16, 2026, I&E emailed ALJ Collins informing her that the parties were unable to reach a settlement and requested a prehearing conference to discuss scheduling a hearing in this matter.

On March 19, 2026, an Initial Telephonic Prehearing Notice was issued scheduling a prehearing conference for April 9, 2026.

II. I&E PREHEARING CONFERENCE MEMORANDUM

A. Service

All service on and communication to I&E in this proceeding should be addressed to:

By Mail: Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

By Telephone: (717) 783-5243

By E-mail: grosul@pa.gov

B. Presently Identified Issues

The issues to be addressed include whether Respondent owes the Universal Service Fund the outstanding balance as stated in the Complaint and whether the civil penalty requested by I&E is just, reasonable, and in the public interest in accordance with the *Rosi* factors for assessing a civil penalty adopted by the Commission at 52 Pa. Code § 69.1201.

Additionally, I&E will seek a ruling as to whether Respondent is barred from challenging its Calendar Year 2021 USF assessment amount, as it had already sought relief from the Commission by way of a Petition for Reconsideration, which had been denied, at Docket Nos. P-2023-3044290 and M-2022-3030277.

Respondent has indicated to I&E that its jurisdictional revenue is considerably lower than what had reported to the USF administrator and the Commission, and that it should be permitted to revise or alter its revenue reporting to the administrator and the Commission at this late date.

I&E's position is that a jurisdictional telecommunications utility cannot collaterally attack the imposition of the USF assessment by raising this argument for revenue that dates to 2021 and 2023, respectively. Altering the USF assessment calculation for one party will alter the calculation for all telecommunications utilities who must contribute to the Universal Service Fund. Additionally, waiting this long to challenge the imposition of the USF assessment is barred by laches.

C. Witnesses

Should this matter proceed to a hearing, I&E's witness will be Spencer Nahf, Fixed Utility Financial Analyst Supervisor, Pennsylvania Public Utility Commission, Bureau of Technical Utility Services—Telecommunications.

Spencer Nahf's contact information is as follows:

Spencer Nahf
Pennsylvania Public Utility Commission
Bureau of Technical Utility Services – Telecommunications
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 787-5964
snahf@pa.gov

Mr. Nahf is expected to testify regarding the authenticity and accuracy of the USF assessment, how USF assessments are handled by the Commission, and how jurisdictional telecommunications utilities are identified as having to pay into the USF.

I&E reserves the right to modify the identified witness and/or present additional witnesses as it deems necessary based on the issues identified by the parties.

D. Position Regarding Written Pre-Served Testimony

I&E supports the use of written pre-served testimony in this matter. In addition to serving judicial efficiency and conserving Commission resources, pre-served written testimony will facilitate comprehension among the parties and any other reader, as the testimony to be presented in a written format will be technical in nature.

E. Statement Regarding Settlement

I&E supports settlement of this matter and is open and willing to continue to discuss settlement with Get Wireless Inc.

F. Amount of Hearing Time Needed

Should this matter proceed to a hearing, I&E estimates that one half day (4 hours) for a hearing would be sufficient. This estimation may change depending on the witnesses offered and testimony presented by Get Wireless Inc.

G. Plan and Schedule of Discovery

I&E proposes that discovery be conducted consistent with the Commission's regulations at 52 Pa. Code §§ 5.321, *et seq.*

H. Proposed Litigation Schedule

I&E proposes the following litigation schedule:

1. Written direct testimony due on June 26, 2026.
2. Written rebuttal testimony due on July 10, 2026.
3. Witness schedule due 3 business days before the hearing.
4. Hearing to occur the week of July 20, 2026.
5. Briefing schedule to be established at the hearing.

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
Phone: (717) 783-5243
Email: grosul@pa.gov

Dated: April 7, 2026

**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	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Prehearing Conference Memorandum** dated April 7, 2026, 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 Only

Michael A. Gruin, Esq.
Nicholas A. Stobbe, Esq.
Stevens & Lee
17 N. Second Street, 16th Floor
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Counsel for Get Wireless, Inc.



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