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April 7, 2026

VIA ELECTRONIC FILING

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

RE: Pennsylvania Public Utility Commission, Bureau of Investigation & Enforcement v. Get Wireless, Inc.

Docket No. C-2025-3056837

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Conference Memorandum of Get Wireless, Inc. in above-captioned matter. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions, please contact me by any of the means listed above. Thank you.

STEVENS & LEE



Michael A. Gruin

Enclosures

cc: Administrative Law Judge Charece Z. Collins (via electronic mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM OF
GET WIRELESS INC.**

Pursuant to 52 Pa. Code § 5.22 and the direction of Administrative Law Judge Charece Z. Collins (“ALJ Collins”), Get Wireless, Inc. (“Get Wireless”) hereby submits its Pre-Hearing Conference Memorandum in this matter.

I. INTRODUCTION

1. On August 13, 2025, the Bureau of Investigation and Enforcement (“I&E”) of the Public Utility Commission (“Commission) filed a Formal Complaint against Get Wireless, alleging violations of the Commission regulations related to the Pennsylvania Universal Service Fund (“PaUSF”).
2. On September 26, 2025, Get Wireless filed its Answer and New Matter to the Formal Complaint.
3. On October 15, 2025, I&E filed its Reply to New Matter.
4. A hearing in this matter was originally scheduled for November 3, 2025, but was subsequently cancelled at the request of the parties, to allow the parties to discuss a potential resolution of the Formal Complaint.

5. On March 17, 2026, the parties informed ALJ Collins that their attempts to resolve the Formal Complaint were unsuccessful, and proposed the scheduling of a prehearing conference to establish a litigation schedule.

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

II. COUNSEL FOR GET WIRELESS

7. Get Wireless is represented in this matter by the following counsel:

Michael A. Gruin, Esq.
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III. PRESENTLY IDENTIFIED ISSUES

8. Get Wireless believes that the issues to be resolved in this proceeding are as follows:

- a. Whether Get Wireless's revenues qualify as "intrastate end-user telecommunications retail revenues" for purposes of the Commission's

Universal Service Fund regulations at 52 Pa. Code §63.161, et. seq., PaUSF assessments are to be determined based on a carrier's "intrastate end-user telecommunications retail revenues".

- b. Whether the USF amounts claimed due by I&E were accurately calculated.
- c. Whether I&E has met its burden of proving that the USF and civil penalty amounts claimed due are warranted.

IV. WITNESSES AND EVIDENCE

9. Get Wireless expects to submit testimony from at least one witness who will explain Get Wireless's service offerings during the time periods in question and explain why Get Wireless does not believe that the PaUSF amounts being claimed due by I&E are correct. Get Wireless reserves the right to supplement its Prehearing Conference Memorandum to identify its witnesses and their scope of testimony.

V. DISCOVERY MODIFICATIONS

10. Get Wireless does not propose any modifications to the Commission's standard discovery procedures.

VI. PROCEDURAL SCHEDULE

11. Get Wireless proposes that both parties serve written Direct and Rebuttal Testimony, followed by cross examination at a hearing, briefs, and reply briefs.

12. Get Wireless believes that one half day of hearings will be sufficient for this matter.

13. As of the date of this filing, Get Wireless continues to discuss a potential Procedural Schedule with I&E, and expects to reach agreement on a Procedural Schedule prior to the Prehearing Conference.

VII. SETTLEMENT

14. Get Wireless is willing to engage in settlement discussions with I&E and attempt to reach a partial or full resolution of the matter.

Respectfully submitted,

STEVENS & LEE, P.C.



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DATE: April 7, 2026

Counsel For Get Wireless Inc.

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Pennsylvania Public Utility Commission, :
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v. : Docket No. C-2025-3056837
: :
Get Wireless Inc. :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Prehearing Conference Memorandum upon the party listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA Electronic Mail

Grant Rosul
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April 7, 2026

Michael A. Gruin