

COMMONWEALTH OF PENNSYLVANIA



DOCUMENT
FOLDER

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William R. Lloyd, Jr.
Small Business Advocate

(717) 783-2525
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June 6, 2008

RECEIVED

JUN - 9 2008

E-MAIL AND HAND DELIVERY

Hon. Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

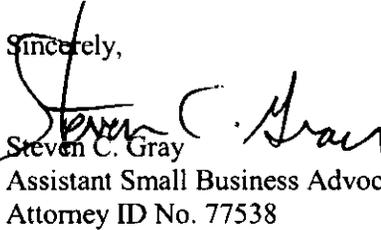
**Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers, and the
Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Judge Colwell:

I am delivering today the Notice of Appearance, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding. This is in response to your Prehearing Order, dated May 21, 2008.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

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

Sincerely,

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosure

RECEIVED
OFFICE OF CAL.J.
08 JUN - 9 AM 7:40
PA PUC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

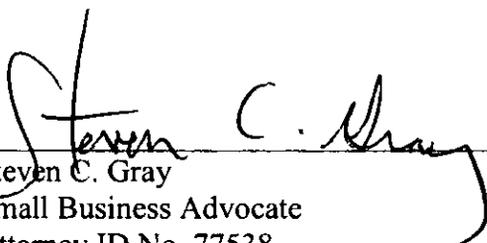
Investigation Regarding Intrastate Access :
Charges and IntraLATA Toll Rates of Rural : Docket No. I-00040105
Carriers, and the Pennsylvania Universal :
Service Fund :

NOTICE OF APPEARANCE

The Office of Small Business Advocate, pursuant to 52 Pa. Code § 1.24, hereby enters the appearance of Steven C. Gray, in the above-captioned proceeding.

Documents in this proceeding should now be served on the following:

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Steven C. Gray
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Attorney ID No. 77538

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Dated: June 6, 2008

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OFFICE OF C.A.L.J.
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PA PUC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation Regarding Intrastate Access :
Charges and IntraLATA Toll Rates of Rural : Docket No. I-00040105
Carriers, and the Pennsylvania Universal :
Service Fund :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Notice of Appearance, on behalf of the Office of Small Business Advocate, by e-mail and first class mail (unless otherwise noted) upon the persons addressed below:

Hon. Susan D. Colwell
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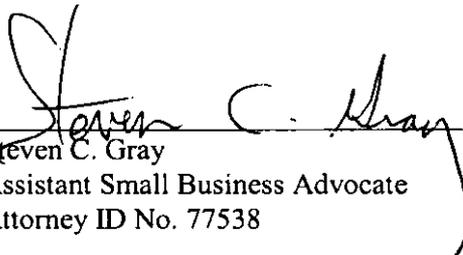
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Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Date: June 6, 2008

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF SMALL BUSINESS ADVOCATE

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William R. Lloyd, Jr.
Small Business Advocate

June 11, 2008

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E-mail and Hand Delivery

Hon. Susan D. Colwell
Administrative Law Judge
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

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FOLDER**

RECEIVED

JUN 11 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll
Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Judge Colwell:

Enclosed are two copies of the Prehearing Memorandum on behalf of the Office of Small Business Advocate.

As evidenced by the enclosed certificate of service, all parties have been served as indicated.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Gray".

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: James J. McNulty, Secretary ✓
Parties of Record
Allen G. Buckalew

BTL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation Regarding Intrastate Access :
Charges and IntraLATA Toll Rates of Rural : Docket No. I-00040105
Carriers, and the Pennsylvania Universal :
Service Fund :

OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Steven C. Gray.

Please address all correspondence as follows:

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Suite 1102, Commerce Building
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(717) 783-2525
(717) 783-2831 (fax)
sgray@state.pa.us

II. FILING BACKGROUND

On April 24, 2008, the Commission reopened the *Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund*, at Docket No. I-0004010. The Commission referred a series of issues to the Office of Administrative Law Judge for hearings and the preparation of a recommended decision by April 24, 2009.

On May 21, 2008, Administrative Law Judge (“ALJ”) Susan D. Colwell issued her Prehearing Order, setting forth, among other topics, the issues to be addressed in this proceeding.

III. IDENTIFICATION OF THE OSBA WITNESS

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Allen Buckalew
J.W. Wilson & Associates, Inc.
Rosslyn Plaza C - Suite 1104
1601 North Kent Street
Arlington, VA 22209
(703) 243-1049
(703) 243-3389 (fax)
abuca@aol.com

IV. IDENTIFICATION OF ISSUES

The Commission’s April 24th Order and ALJ Colwell’s May 21st Prehearing Order summarized the issues that are to be addressed by this proceeding. The OSBA does not propose any additions at this time. The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

As appropriate and necessary, the OSBA will investigate and analyze the claims and proposals of the other parties through discovery, through the cross-examination of witnesses appearing for those parties, and through briefing. The OSBA will particularly focus on any issue where the impact on the interests of small business consumers would be unjustifiably different than, or disproportionate to, the impact on another class of customers, or otherwise lacking in reasonableness or basic fairness.

V. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.

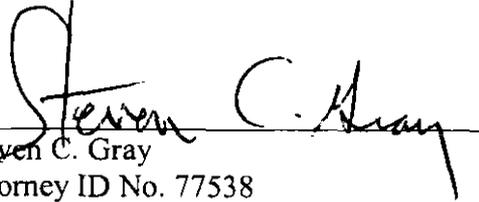
VI. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VII. HEARING AND BRIEFING SCHEDULE

The procedural schedule proposed by ALJ Colwell is acceptable to the OSBA. Given the Governor's desire to limit the travel of State Offices under his jurisdiction, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,


Steven C. Gray
Attorney ID No. 77538
Assistant Small Business Advocate

For:

William R. Lloyd, Jr.
Attorney ID No. 16452
Small Business Advocate

Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Dated: June 11, 2008

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation Regarding Intrastate Access :
Charges and IntraLATA Toll Rates of Rural : Docket No. I-00040105
Carriers, and the Pennsylvania Universal :
Service Fund :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, by e-mail and first class mail (unless otherwise noted) upon the persons addressed below:

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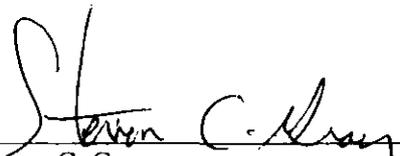
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Date: June 11, 2008

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June 16, 2008

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Harrisburg, PA 17108

RE: Investigation Regarding Intrastate Access
Charges and IntraLATA Toll Rates of Rural
Carriers, and the Pennsylvania Universal
Service Fund
Docket No. I-00040105

Dear Norm:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set I, in the above-referenced proceeding.

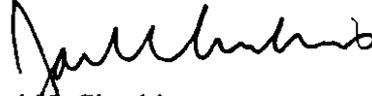
In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Bob Loube
10601 Cavalier Drive
Silver Spring, MD 20901
(301) 681-0338
bobloube@earthlink.net

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. #81617

Enclosures

cc: Parties of Record
James J. McNulty (Certificate of Service Only)

100667

CERTIFICATE OF SERVICE

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Interrogatories, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 16th day of June, 2008.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

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Harrisburg, PA 17105

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OALJ Hearing Report

Please Check Those Blocks Which Apply

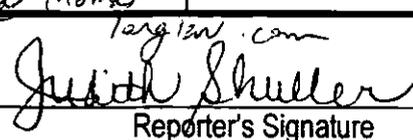
Docket No.:	I-00040105, et al.		YES	NO
		Prehearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Case Name:	Investigation Regarding Intrastate Access	Hearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Charges IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund		Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Hearing Concluded:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Location:	Harrisburg	Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Estimated Add'l Days:	4	
Date:	Wednesday, June 18, 2008			
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ALJ:	Susan D. Colwell	DATE:		
		Briefs to be Filed:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	DATE:		
		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		REMARKS:	PAGE 1 OF 2	
		SCHEDULING ORDER TO BE ISSUED		

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 JUL - 1 AM 8:37
 PA PUBLIC UTILITY BUREAU

PLEASE PRINT CLEARLY - Incomplete information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
Steven Gray Telephone: (717) 783-2525	Suite 1102 Commerce Bldg 300 N. Second St City: HBG State: PA Zip: 1701	OSBA
John Dodge Telephone: 202-973-4205	E-mail Address: JDODGE@FIRE.PA.US 1919 Penn Ave NW # 200 WDC City: Washington State: DC Zip: 20006	Comcast
Norman Kennard Thomas Long Nieren and Kennard Telephone: 717/255-7600	E-mail Address: nkennard@tomer Jennifer Sultzbeger 212 Locust Street, Suite 500 City: Harrisburg State: PA Zip: 17101	PA Telephone Ass'n Rural Telephone Carlisle

Check this box if additional parties or attendees appear on back of form.

Reporter's Signature

 Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address	Who are you representing?
SUE BENEDEK EMBARCO PA 240 N. 3RD ST., Suite 201 HARRISBURG, PA 17101	City: _____ State: _____ Zip: _____	United Telephone of PA LLC S/B/E EMBARCO Penna
Telephone: 717 717-245-6346	E-mail Address: sue.e.benedek@embargo.com	Fax Number: 717-236-1389
Suzan Paiva	1717 Arch St. 10th FL City: Philadelphia State: PA Zip: 19103	Verizon
Telephone: 215-466-4755	E-mail Address: suzan.d.paiva@verizon.com	Fax Number: 215-563-2658
Shelby Linton-Keddie Pamela Polacek	100 Pine St P.O. Box 1166 City: Hbg State: PA Zip: 17101-1166	Broadband Cable Association of PA ("BCAP")
Telephone: 717-232-8000	E-mail Address: ppolacek@unw.com	Fax Number: 717-237-5300
BRADFORD M. STERN ROTHFELDER STERN, LLC 625 CENTRAL AVE WESTFIELD NJ	City: _____ State: _____ Zip: _____ E-mail Address: bmsstern@rothfelderstern.com	T-MOBILE
Telephone: 908-201-0803	E-mail Address: _____	Fax Number: _____
Ben Aron 2001 Edmund Halley Dr. Reston, VA 20191	City: _____ State: _____ Zip: _____	Sprint
Telephone: _____	E-mail Address: benjamin.aron@sprint.com	Fax Number: 703 542 7407
Michelle Painter	13017 Dunhill Dr City: Fairfax State: VA Zip: 22030	AT&T Comm. of PA TCB NS SCB PIH.
Telephone: 703 201 8378	E-mail Address: painterlaw@firmaven.com	Fax Number: 703 968 5936
Shelby Linton-Keddie	City: _____ State: _____ Zip: _____	
Telephone: _____	E-mail Address: _____	Fax Number: _____
	City: _____ State: _____ Zip: _____	
Telephone: _____	E-mail Address: _____	Fax Number: _____

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
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800-684-6560 (in PA only)

IRWINA. POPOWSKY
Consumer Advocate

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FAX (717) 783-7152
consumer@paoca.org

June 23, 2008

Norman J. Kennard
Thomas Long Niesen & Kennard
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Harrisburg, PA 17108

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JUN 23 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Investigation Regarding Intrastate Access
Charges and IntraLATA Toll Rates of Rural
Carriers, and the Pennsylvania Universal
Service Fund
Docket No. I-00040105

Dear Norm:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set II, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
Rcolton.fsc@comcast.net

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. #81617

Enclosures

cc: Parties of Record
James J. McNulty (Certificate of Service Only)

100667

CERTIFICATE OF SERVICE

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Interrogatories, Set II, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 23rd day of June, 2008.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Robert V. Eckenrod, Esq.
Office of Trial Staff
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Leigh A. Hyer, Esq.
Verizon
1717 Arch Street, 10W
Philadelphia, PA 19103

Christopher M. Arfaa, Esq.
150 North Radnor Chester Rd.
Suite F200
Radnor, PA 19087-5245

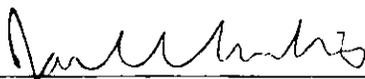
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Suzan.D.Paiva@Verizon.com

July 1, 2008

VIA UPS OVERNIGHT DELIVERY

Zsuzanna Benedek, Esquire
Embarq Corporation
240 North Third Street, Suite 201
Harrisburg, PA 17101

**RE: Investigation Regarding Intrastate Access Charges and IntraLATA Toll
Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Ms. Benedek:

Enclosed please find the Verizon Companies' First Set of Data Requests to the United Telephone Company of Pennsylvania d/b/a Embarq Pennsylvania, propounded by Verizon Pennsylvania, Inc., Verizon North Inc. and MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services, LLC, in the above-referenced matter.

Do not hesitate to contact me if you have any questions.

Respectfully,

Suzan D. Paiva

**DOCUMENT
FOLDER**

SDP/slb
Enclosure

RECEIVED

JUL 01 2008

Via E-Mail and UPS Delivery
cc: Certificate of Service

Via UPS Delivery
cc: Secretary James J. McNulty (cover letter and certificate only)
The Honorable Susan Colwell (cover letter and certificate only)

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the the Verizon Companies' First Set of Data Requests to the United Telephone Company of Pennsylvania d/b/a Embarq Pennsylvania, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 1st day of July, 2008.

VIA E-MAIL AND UPS DELIVERY

Norman J. Kennard, Esquire
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Jennifer M. Sultzaberter
Thomas, Long, Niesen & Kennard
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Rural Telephone Company Coalition

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Rothfelder Stern, L.L.C.
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Westfield, NJ 07090
Omnipoint Communications Inc. d/b/a T-Mobile; Omnipoint Communications Inc. d/b/a T-Mobile and Voicestream
Pittsburgh LP d/b/a T-Mobile Nextel Communications, Inc.

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Michelle Painter
Painter Law Firm, PLLC
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AT&T Communications of PA, LLC,
TCG Pittsburgh and TCG New Jersey

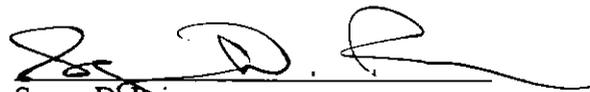
Pamela C. Polacek, Esquire
Shelby A. Linton-Keddie, Esquire
McNees Wallace & Nurick LLC
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100 Pine Street
Harrisburg, PA 17108-1166
Broadband Cable Association of PA

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Douglas Bonner, Esquire
Sonnenschein Nath & Rosenthal LLP
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Suite 600, East Tower
Washington, DC 20005



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Attorney for
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Verizon North Inc.
MCImetro Access Transmission Services, LLC
d/b/a Verizon Access Transmission Services

Suzan DeBusk Paiva
Assistant General Counsel
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Philadelphia, PA 19103

Tel: (215) 466-4755
Fax: (215) 563-2658
Suzan.D.Paiva@Verizon.com

July 1, 2008

VIA UPS OVERNIGHT DELIVERY

Norman J. Kennard, Esquire
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17108

DOCUMENT
FOLDER

**RE: Investigation Regarding Intrastate Access Charges and IntraLATA Toll
Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Mr. Kennard:

Enclosed please find the Verizon Companies' First Set of Data Requests to Each Rural Incumbent Local Exchange Carrier Represented by the Pennsylvania Telephone Association, propounded by Verizon Pennsylvania, Inc., Verizon North Inc. and MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services, LLC, in the above-referenced matter.

Do not hesitate to contact me if you have any questions.

Respectfully,

Suzan D. Paiva

SDP/slb
Enclosure

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JUL 01 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via E-Mail and UPS Delivery
cc: Certificate of Service

Via UPS Delivery
cc: Secretary James J. McNulty (cover letter and certificate only)
The Honorable Susan Colwell (cover letter and certificate only)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the the Verizon Companies' First Set of Data Requests to Each Rural Incumbent Local Exchange Carrier Represented by the Pennsylvania Telephone Association, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 1st day of July, 2008.

VIA E-MAIL AND UPS DELIVERY

Norman J. Kennard, Esquire
Regina L. Matz, Esquire
Jennifer M. Sultzaberter
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17108
Rural Telephone Company Coalition

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Barrett Sheridan, Esquire
Christy Appleby, Esquire
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Rothfelder Stern, L.L.C.
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Pittsburgh LP d/b/a T-Mobile Nextel Communications, Inc.

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Radnor, PA 19087-5245
Cingular Wireless LLC
Cellco Partnership d/b/a Verizon Wireless

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AT&T Communications of PA, LLC,
TCG Pittsburgh and TCG New Jersey

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Comcast Digital Phone and Comcast Business Communications, LLC

Pamela C. Polacek, Esquire
Shelby A. Linton-Keddie, Esquire
McNees Wallace & Nurick LLC
P.O. Box 1166
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Harrisburg, PA 17108-1166
Broadband Cable Association of PA

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PA PUBLIC UTILITY COMMISSION
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Verizon North Inc.
MCImetro Access Transmission Services, LLC
d/b/a Verizon Access Transmission Services



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Attorneys and Counsellors at Law

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nkennard@thomaslonglaw.com

July 7, 2008

DOCUMENT
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Joel Cheskis, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Re: Investigation Regarding Intrastate Access Charges and Intra LATA Toll Rates
of Rural Carriers, and the Pennsylvania Universal Service Fund; Docket
No. I-00040105

Dear Mr. Cheskis:

Enclosed please find the Answers of The Pennsylvania Telephone Association to the
Office of Consumer Advocate's Interrogatories - Set I. Due to the voluminous nature of the
documents, the answers will only be provided in electronic format to the other parties.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By:


Norman J. Kennard

NJK:tit
enclosure

cc: Per Certificate of Service
James J. McNulty, Secretary (w/o enclosure)
Hon. Susan D. Colwell (w/o enclosure)

SECRETARY'S BUREAU
PA 17101

2008 JUL -7 PM 3:17

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CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of July, 2008, served a true and correct copy of the foregoing document upon the persons listed below via electronic mail:

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painterlawfirm@verizon.net

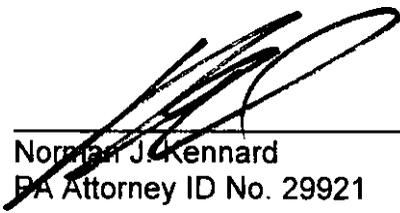
Christopher M. Arfaa
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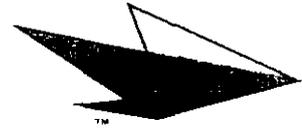
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Norman J. Kennard
PA Attorney ID No. 29921

Voice | Data | Internet | Wireless | Entertainment



EMBARQ™

Embarq Corporation
240 N. 3rd Street, Suite 201
Harrisburg, PA 17101
EMBARQ.com

July 7, 2008

ORIGINAL

VIA ELECTRONIC AND FIRST-CLASS MAIL

Joel H. Cheskis, Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

DOCUMENT
FOLDER

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

Dear Mr. Cheskis:

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find an original and two (2) copies of Embarq Pennsylvania's Responses to Set I Interrogatories propounded by the Office of Consumer Advocate.

A copy has been sent to your consultant, Mr. Bob Loube via electronic and first-class mail.

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

Sincerely,

Sue Benedek
Attorney ID No. 60451

ZEB/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
Mr. Bob Loube (*via electronic and first-class mail*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

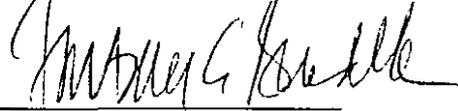
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2008 JUL -7 PM 2:54
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Respectfully Submitted,



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SECRETARY'S BUREAU

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July 8, 2008

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JUL 08 2008

Joel Cheskis, Esquire
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Harrisburg, PA 17101-1923

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and Intra LATA Toll Rates
of Rural Carriers, and the Pennsylvania Universal Service Fund; Docket No.
I-00040105

Dear Mr. Cheskis:

Enclosed please find the Answers of The Pennsylvania Telephone Association to the
Office of Consumer Advocate's Interrogatories - Set II.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By:

Norman J. Kennard

NJK:tlt

enclosure

cc: Per Certificate of Service
James J. McNulty, Secretary (w/o enclosure)
Hon. Susan D. Colwell (w/o enclosure)

CERTIFICATE OF SERVICE

I hereby certify that I have this 8th day of July, 2008, served a true and correct copy of the foregoing document upon the persons listed below by first class mail, postage prepaid:

Joel H. Cheskis, Esq.
Office of Consumer Advocate
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(717) 232-8000
PPOLACEK@MWN.COM

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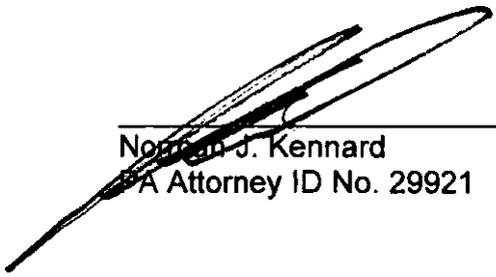
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JUL 08 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Norman J. Kennard
PA Attorney ID No. 29921



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800-684-6560 (in PA only)

IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

July 9, 2008

ORIGINAL

Zsuzsanna E. Benedek, Esq.
240 North Third Street
Suite 201
Harrisburg, PA 17101

**DOCUMENT
FOLDER**

RE: Investigation Regarding Intrastate Access
Charges and IntraLATA Toll Rates of Rural
Carriers, and the Pennsylvania Universal
Service Fund
Docket No. I-00040105

Dear Sue:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set III Directed to Embarq, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Bob Loube
10601 Cavalier Drive
Silver Spring, MD 20901
(301) 681-0338
boobloube@earthlink.net

2008 JUL -9 PM 3:55
SECRETARY'S BUREAU

15077

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. #81617

Enclosures

cc: Parties of Record
James J. McNulty (Certificate of Service Only)
101329

2008 JUL -9 PM 3: 55
PA P.U.C.
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105

I hereby certify that I have this day served a true copy of the foregoing document.

Office of Consumer Advocate's Interrogatories, Set III Directed to Embarq Corp., upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 9th day of July, 2008.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Robert V. Eckenrod, Esq.
Office of Trial Staff
Pa. PUC
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17105

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Steven C. Gray, Esq.,
Office of Small Business Advocate
300 North Second Street
Suite 1102 Commerce Bldg.
Harrisburg, PA 17101

Norman J. Kennard, Esq.
Regina L. Matz, Esq.
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108-9500

Zsuzsanna E. Benedek, Esq.
240 North Third Street
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Michelle Painter, Esq.
Painter Law Firm
13017 Dunhill Drive
Fairfax, VA 22030

Bradford M. Stern, Esq.
Martin C. Rothfelder, Esq.
Rothfelder Stern, L.L.C.
625 Central Avenue
Westfield, N.J. 07090

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2008 JUL -9 PM 3:55

A. J. JONES

Suzan DeBusk Paiva, Esq.
Leigh A. Hyer, Esq.
Verizon
1717 Arch Street, 10W
Philadelphia, PA 19103

Christopher M. Arfaa, Esq.
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Pamela C. Polacek, Esq.
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P.O. Box 1166
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Angela Hart-Davis, Esq.
John C. Dodge, Esq.
Davis, Wright Tremaine, LLC
1919 Pennsylvania Ave. NW, Suite 200
Washington, DC 20006

Brian A. Rankin
Vice President, Deputy General Counsel
Comcast Cable Communications, LLC
One Comcast Center, 50th Floor
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Deanne M. O'Dell, Esq.
WolfBlock, LLP
213 Market St., 9th Fl.
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Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney ID# 81617
jcheskis@paoca.org

Counsel for
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(717) 783-5048
*82775

COMMONWEALTH OF PENNSYLVANIA



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IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

July 9, 2008

Norman J. Kennard
Thomas Long Niesen & Kennard
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108

 ORIGINAL

DOCUMENT
FOLDER

RE: Investigation Regarding Intrastate Access
Charges and IntraLATA Toll Rates of Rural
Carriers, and the Pennsylvania Universal
Service Fund
Docket No. I-00040105

Dear Norm:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set III, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

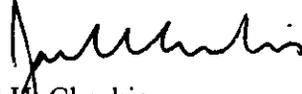
Bob Loube
10601 Cavalier Drive
Silver Spring, MD 20901
(301) 681-0338
bobloube@earthlink.net

2008 JUL -9 PM 3:54
SECRETARY'S BUREAU

170000

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. #81617

Enclosures

cc: Parties of Record
James J. McNulty (Certificate of Service Only)

100667

REC'D
2008 JUL -9 PM 3:55
PA PUC
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Interrogatories, Set III, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 9th day of July, 2008.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Robert V. Eckenrod, Esq.
Office of Trial Staff
Pa. PUC
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17105

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

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300 North Second Street
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Regina L. Matz, Esq.
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Bradford M. Stern, Esq.
Martin C. RothFelder, Esq.
Rothfelder Stern, L.L.C.
625 Central Avenue
Westfield, N.J. 07090

PAUC
SECRETARY'S BUREAU

2008 JUL -9 PM 3:55

1300 11

Suzan DeBusk Paiva, Esq.
Leigh A. Hyer, Esq.
Verizon
1717 Arch Street, 10W
Philadelphia, PA 19103

Christopher M. Arfaa, Esq.
150 North Radnor Chester Rd.
Suite F200
Radnor, PA 19087-5245

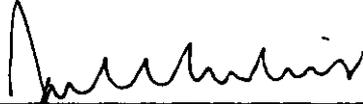
Pamela C. Polacek, Esq.
McNees Wallace & Nurick LLC
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Harrisburg, PA 17108-1166

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Angela Hart-Davis, Esq.
John C. Dodge, Esq.
Davis, Wright Tremaine, LLC
1919 Pennsylvania Ave. NW, Suite 200
Washington, DC 20006

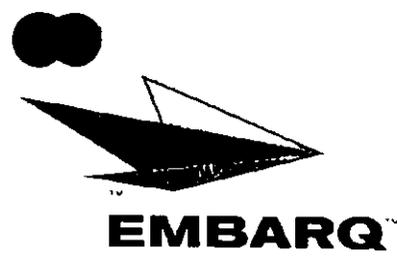
Brian A. Rankin
Vice President, Deputy General Counsel
Comcast Cable Communications, LLC
One Comcast Center, 50th Floor
Philadelphia, PA 19102

Deanne M. O'Dell, Esq.
WolfBlock, LLP
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PA Attorney ID# 81617
jcheskis@paoca.org

Counsel for
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048
*82775



July 14, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

Suzan DeBusk Paiva, Esquire
Verizon Pennsylvania, Inc.
1717 Arch Street, 32NW
Philadelphia, PA 19103

SECRETARY'S BUREAU
2008 JUL 14 PM 3:25

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

**DOCUMENT
FOLDER**

Dear Ms. Paiva,

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Objections to Set I Interrogatories propounded by Verizon Pennsylvania, Inc., Verizon North Inc. and MCImetro Access Transmission Services, LLC *d/b/a* Verizon Access Transmission Services, LLC., (collectively "Verizon").

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

Sincerely,


Joseph Stewart
Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Joseph R. Stewart
Senior Counsel
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
(614) 220-8625 (phone)
(614) 224-3902 (fax)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access Charges and)
IntraLATA Toll Rates of Rural Carriers, and the)
Pennsylvania Universal Service Fund) Docket No. I-00040105
_____)

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of July, 2008, served a true copy of the foregoing Objections were served upon the persons below, via first-class mail, in accordance with the requirements of 52 Pa. Code §1.54:

Norman J. Kennard, Esquire
Thomas, Long, Niesen and Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17109
e-mail: nkennard@thomaslonglaw.com

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Rothfelder Stern, LLC
620 Central Avenue
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Email: bmstern@rothfelderstern.com

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Verizon Pennsylvania
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Christopher M. Arfaa, Esquire
Christopher M. Arfaa, PC
150 North Radnor Chester Road
Suite F200
Radnor, PA 19087
e-mail: carfaa@arfaalaw.com

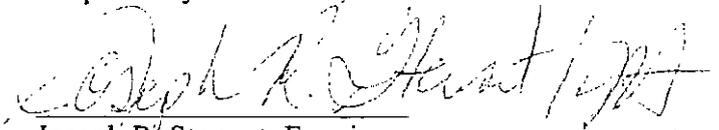
Steven C. Gray, Esquire
Office of Small Business Advocate
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e-mail: sgray@state.pa.us

Pamela Polacek, Esquire
McNees Wallace and Nurick LLC
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e-mail: ppolacek@mwn.com

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e-mail: jcalkins@sonnenshchein.com

John Dodge, Esquire
Davis, Wright, Tremaine, LLP
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006
e-mail: johndodge@dwt.com

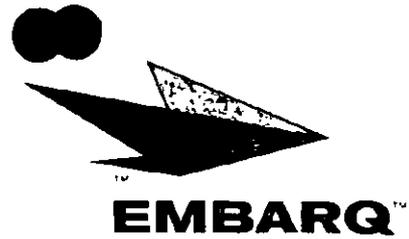
Respectfully Submitted,



Joseph R. Stewart, Esquire

Admitted Pro Hac Vice

The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
Direct Phone: (614) 220-8625
Fax: (614) 224-3902
E-mail: joseph.r.stewart@embarq.com



July 14, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

Joel H. Cheskis, Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

SECRETARY'S BUREAU
2008 JUL 14 PM 3:26

Dear Mr. Cheskis:

**DOCUMENT
FOLDER**

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find an original and two (2) copies of Embarq Pennsylvania's Responses to Set II Interrogatories propounded by the Office of Consumer Advocate.

A copy has been sent to your consultant, Mr. Roger Colton via electronic and first-class mail.

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

Sincerely,


Joseph R. Stewart
Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
Mr. Roger Colton (*via electronic and first-class mail*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Joseph R. Stewart
Senior Counsel
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
(614) 220-8625 (phone)
(614) 224-3902 (fax)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers, and the
Pennsylvania Universal Service Fund

)
)
)
)
)

Docket No. I-00040105

2008 JUL 14 PM 3:26
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of July, 2008, served a true copy of the foregoing Responses were served upon the persons below, via first-class mail, in accordance with the requirements of 52 Pa. Code §1.54:

Norman J. Kennard, Esquire
Thomas, Long, Niesen and Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17109
e-mail: nkennard@thomaslonglaw.com

Joel Cheskis, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
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e-mail: jcheskis@paoca.org

Suzan DeBusk Paiva, Esquire
Verizon Pennsylvania
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Bradford M. Stern, Esquire
Rothefelder Stern, LLC
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Christopher M. Arfaa, PC
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Pamela Polacek, Esquire
McNees Wallace and Nurick LLC
100 Pine Street
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Harrisburg, PA 17108
e-mail: ppolacek@mwn.com

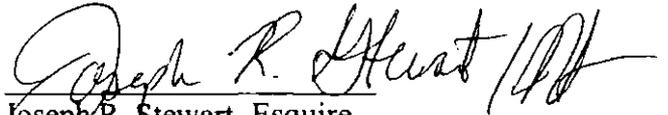
John J. Calkins, Esquire
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John Dodge, Esquire
Davis, Wright, Tremaine, LLP
1919 Pennsylvania Avenue, NW

Suite 200
Washington, DC 20006
e-mail: johndodge@dwt.com

Respectfully Submitted,



Joseph R. Stewart, Esquire
Admitted Pro Hac Vice

The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
Direct Phone: (614) 220-8625
Fax: (614) 224-3902
E-mail: joseph.r.stewart@embarq.com

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

July 17, 2008

DOCUMENT
FOLDER

Suzan DeBusk Paiva, Esq.
Verizon Pennsylvania
1717 Arch Street, 32NW
Philadelphia, PA 19103

RE: Investigation Regarding Intrastate Access
Charges and IntraLATA Toll Rates of Rural
Carriers, and the Pennsylvania Universal
Service Fund
Docket No. I-00040105

Dear Suzan:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set I Directed to Verizon Pennsylvania, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

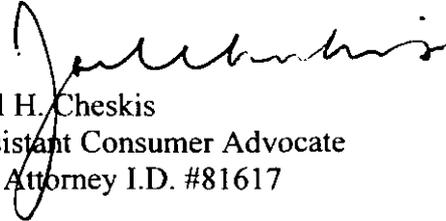
Bob Loube
10601 Cavalier Drive
Silver Spring, MD 20901
(301) 681-0338
bobloube@earthlink.net

SECRETARY'S BUREAU
2008 JUL 17 PM 3:35

3-00000000

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney I.D. #81617

Enclosures

cc: Parties of Record
James J. McNulty (Certificate of Service Only)
101677

2000 JUL 17 PM 3:35
PA PUC
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Interrogatories, Set I Directed to Verizon Pennsylvania, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 17th day of July, 2008.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Robert V. Eckenrod, Esq.
Office of Trial Staff
Pa. PUC
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17105

2008 JUL 17 PM 3:35
SECRETARY'S BUREAU

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

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Regina L. Matz, Esq.
Thomas, Long, Niesen & Kennard
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Rothfelder Stern, L.L.C.
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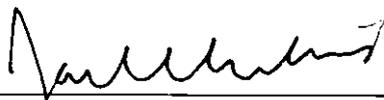
Angela Hart-Davis, Esq.
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Brian A. Rankin
Vice President, Deputy General Counsel
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Philadelphia, PA 19102

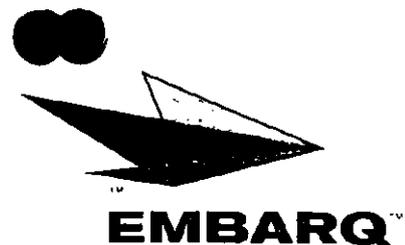
Deanne M. O'Dell, Esq.
WolfBlock, LLP
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P.O. Box 865
Harrisburg, PA 17108-0865

Joseph R. Stewart, Esq.
Embarq
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Columbus, OH 43215

2008 JUL 17 PM 3:35
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SECRETARY'S BUREAU


Joel H. Cheskis
Assistant Consumer Advocate
PA Attorney ID# 81617
jcheskis@paoca.org

Counsel for
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
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(717) 783-5048
*82775



July 21, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

Joel Cheskis, Esquire
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101

**DOCUMENT
FOLDER**

2008 JUL 21 PM 3:21
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

 **ORIGINAL**

Dear Mr. Cheskis,

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Objections to Set III Interrogatories propounded by The Office of Consumer Advocate.

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

Sincerely,

Joseph Stewart
Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Joseph R. Stewart
Senior Counsel
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
(614) 220-8625 (phone)
(614) 224-3902 (fax)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers, and the
Pennsylvania Universal Service Fund

)
)
) Docket No. I-00040195
)
)

SECRETARY'S BUREAU

2008 JUL 21 PM 3:21

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of July, 2008, served a true copy of the foregoing Objections were served upon the persons below, via first-class mail, in accordance with the requirements of 52 Pa. Code §1.54:

Norman J. Kennard, Esquire
Thomas, Long, Niesen and Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17109
e-mail: nkennard@thomaslonglaw.com

Michelle Painter, Esquire
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Joel Cheskis, Esquire
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Rothfelder Stern, LLC
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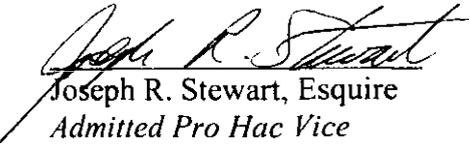
Steven C. Gray, Esquire
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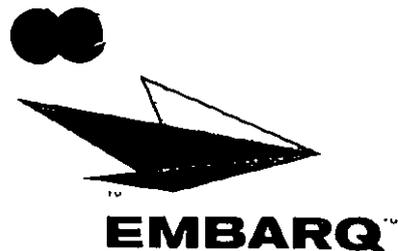
Respectfully Submitted,



Joseph R. Stewart, Esquire
Admitted Pro Hac Vice

The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
Direct Phone: (614) 220-8625
Fax: (614) 224-3902
E-mail: joseph.r.stewart@embarq.com

DOCUMENT
FOLDER



July 21, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

Suzan DeBusk Paiva, Esquire
Verizon Pennsylvania, Inc.
1717 Arch Street, 32NW
Philadelphia, PA 19103

2008 JUL 21 PM 3:20
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

Dear Ms. Paiva,

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Responses Set I Interrogatories propounded by Verizon Pennsylvania, Inc., Verizon North Inc. and MCImetro Access Transmission Services, LLC *d/b/a* Verizon Access Transmission Services, LLC., (collectively "Verizon").

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

Sincerely,

Joseph Stewart
Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Joseph R. Stewart
Senior Counsel
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
(614) 220-8625 (phone)
(614) 224-3902 (fax)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access Charges and)
IntraLATA Toll Rates of Rural Carriers, and the) Docket No. I-00040105
Pennsylvania Universal Service Fund)
_____)

CERTIFICATE OF SERVICE

I hereby certify that I have this 21th day of July, 2008, served a true copy of the foregoing Responses were served upon the persons below, via first-class mail, in accordance with the requirements of 52 Pa. Code §1.54:

Norman J. Kennard, Esquire
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McNees Wallace and Nurick LLC
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e-mail: ppolacek@mwn.com

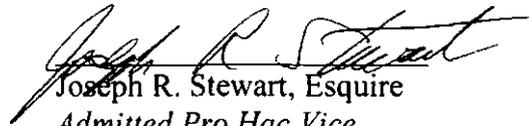
SECRETARY'S BUREAU

2008 JUL 21 PM 3:28

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1301 K Street, NW
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Washington, DC 20005
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Respectfully Submitted,



Joseph R. Stewart, Esquire

Admitted Pro Hac Vice

The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
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NIESEN & KENNARD

Attorneys and Counsellors at Law

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2008 JUL 21 PM 3:09

July 21, 2008

Joel Cheskis, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Re: Investigation Regarding Intrastate Access Charges and Intra LATA Toll Rates
of Rural Carriers, and the Pennsylvania Universal Service Fund; Docket No.
I-00040105

Dear Mr. Cheskis:

Enclosed please find the Objections of The Pennsylvania Telephone Association to
the OCA's Interrogatories Set III, Nos. 1-19.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By: 
Norman J. Kennard

NJK:ttt

enclosure

cc: Per Certificate of Service
James J. McNulty, Secretary (Certificate of Service only)
Hon. Susan D. Colwell (Certificate of Service only)

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of July, 2008, served a true and correct copy of the foregoing Objections of The Pennsylvania Telephone Association to OCA's Interrogatories, Set III, Nos. 1-19, upon the persons listed below by email and first class mail, postage prepaid:

Joel H. Cheskis, Esq.
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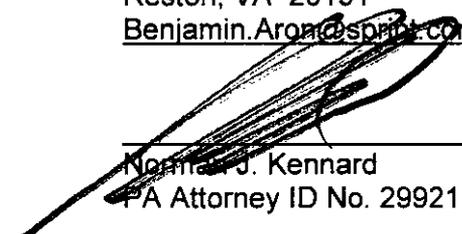
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Norman J. Kennard
PA Attorney ID No. 29921

SECRETARY'S BUREAU

2008 JUL 21 PM 3:09



THOMAS, LONG,
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Attorneys and Counsellors at Law

NORMAN J. KENNARD
Direct Dial: 717.255.7627
nkennard@thomaslonglaw.com

July 22, 2008

DOCUMENT
FOLDER

Suzan D. Paiva, Esquire
Verizon Pennsylvania
1717 Arch Street, 32N
Philadelphia, PA 19103

Re: Investigation Regarding Intrastate Access Charges and Intra LATA Toll Rates
of Rural Carriers, and the Pennsylvania Universal Service Fund; Docket No.
I-00040105

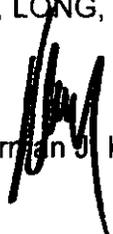
Dear Ms. ^{SP}Paiva:

Enclosed please find the Answers of The Pennsylvania Telephone Association to the
Verizon Companies' First Set of Data Requests.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By: 
Norman J. Kennard

NJK:flt
enclosure

cc: Per Certificate of Service
James J. McNulty, Secretary (Certificate of Service only)
Hon. Susan D. Colwell (Certificate of Service only)

RECEIVED
2008 JUL 24 AM 10:19
PA. P.U.C.
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this 22nd day of July, 2008, served a true and correct copy of the foregoing Answer of The Pennsylvania Telephone Association to Verizon Companies' First Set of Data Requests, upon the persons listed below by electronic mail, and served VZ I-8 and VZ I-41 via first class mail, postage prepaid :

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mrothfelder@rothfelderstern.com

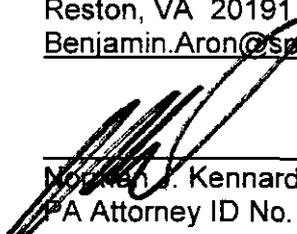
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Zsuzsanna E. Benedek, Esquire
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Attorneys and Counsellors at Law

NORMAN J. KENNARD
Direct Dial: 717.255.7627
nkennard@thomaslonglaw.com

July 31, 2008

Via Electronic Mail and First Class Mail

Suzan D. Paiva, Esquire
Verizon Pennsylvania
1717 Arch Street, 32N
Philadelphia, PA 19103

DOCUMENT
FOLDER

Re: Investigation Regarding Intrastate Access Charges and Intra LATA Toll Rates
of Rural Carriers, and the Pennsylvania Universal Service Fund; Docket No.
I-00040105

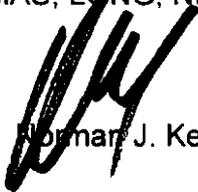
Dear Ms. Paiva:

Enclosed please find the Answers of The Pennsylvania Telephone Association to the
Verizon Companies' First Set of Data Requests Nos. 20 and 33.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By: 
Norman J. Kennard

NJK:tlt
enclosure

cc: Per Certificate of Service
James J. McNulty, Secretary (Certificate of Service only)
Hon. Susan D. Colwell (Certificate of Service only)

SECRETARY'S BUREAU

2008 AUG -1 AM 9:55

RECEIVED

CERTIFICATE OF SERVICE

I hereby certify that I have this 31st day of July, 2008, served a true and correct copy of the foregoing Answer of The Pennsylvania Telephone Association to Verizon Companies' First Set of Data Requests Nos. 20 and 33, upon the persons listed below via electronic mail:

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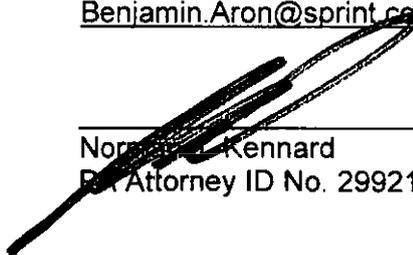
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Norman L. Kennard
Bar Attorney ID No. 29921

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2008 AUG -1 AM 9:55
SECRETARY'S BUREAU

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August 1, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

RECEIVED

AUG - 1 2008

Suzan DeBusk Paiva, Esquire
Verizon Pennsylvania, Inc.
1717 Arch Street, 10th Floor
Philadelphia, PA 19103

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

Dear Ms. Paiva,

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Updated Responses Set I Interrogatories propounded by Verizon Pennsylvania, Inc., Verizon North Inc. and MCImetro Access Transmission Services, LLC *d/b/a* Verizon Access Transmission Services, LLC., (collectively "Verizon"). Please note that these responses include information **CONFIDENTIAL TO EMBARQ PA** and should be treated as such.

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

Sincerely,



Joseph Stewart
Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (*letter and certificate only*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Joseph R. Stewart
Senior Counsel
50 West Broad Street, Suite 3600
Columbus, Ohio 43215
(614) 220-8625 (phone)
(614) 224-3902 (fax)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers, and the
Pennsylvania Universal Service Fund

)
)
) Docket No. I-00040105
)
)

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of August, 2008, served a true copy of the foregoing Updated Responses was served upon the persons below, via first-class and electronic mail, in accordance with the requirements of 52 Pa. Code §1.54:

Norman J. Kennard, Esquire
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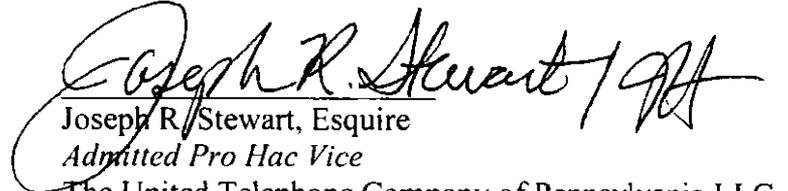
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Respectfully submitted,


Joseph R. Stewart, Esquire
Admitted Pro Hac Vice
The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
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Columbus, Ohio 43215
Direct Phone: (614) 220-8625
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MICHELLE PAINTER
ATTORNEY AT LAW

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August 4, 2008

Via Overnight Delivery

The Honorable Susan Colwell
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RECEIVED

AUG 04 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund,
Docket No. I-00040105

Dear Judge Colwell:

This letter is to request that both the PTA and Embarq Answers to Verizon's July 24, 2008 Motion to Compel discovery responses be disregarded as untimely.

Pursuant to 52 Pa. Code §5.342(g), a party must answer a Motion to Compel within five days of service. AT&T filed its Answer timely on July 29, 2008. I was surprised when PTA and Embarq did not respond to Verizon's Motion to Compel on that same date, but instead filed three days later on August 1, 2008. While I subsequently learned that PTA and Embarq had asked whether Verizon would object to a delay in the PTA or Embarq Answers, neither PTA nor Embarq conferred with AT&T.¹ A private, partial agreement between a subset of the parties is an inadequate basis for extending a statutorily mandated due date.² Both PTA and Embarq were required to obtain all parties' consent, and more importantly, obtain an extension from the presiding officer. They did neither.

I was further surprised to see that PTA and Embarq both took advantage of their self-granted extensions by responding to AT&T's timely filed arguments. Thus, in addition to granting themselves extensions of the filing deadline without seeking authority from Your Honor, both the PTA and Embarq have gained additional advantages not permitted under the Commission's rules.

¹ If PTA and Embarq had conferred with AT&T, of course professional courtesy would have required that we concur in the request of counsel; however, had they conferred, subject to Your Honor's approval, then AT&T would have filed simultaneously with the other responding parties.

² Although Verizon asked the discovery, all parties, including AT&T, have an interest in the responses. PTA and Embarq are required to serve their responses on all parties. Once Verizon issued its discovery questions, it did not make sense for AT&T to ask the exact same questions; instead, AT&T relies on the responses provided to Verizon's questions.

To remedy these violations of the Commission's rules, AT&T respectfully asks that Your Honor disregard the PTA and Embarq Answers and not consider them in addressing Verizon's Motion to Compel. If, on the other hand, parties are going to be permitted to negotiate private, unilateral amendments to the Commission's regulations without a ruling from Your Honor, AT&T and the other parties should be advised of that fact in advance.

Very truly yours,


Michelle Painter

cc: Certificate of Service
James McNulty, Secretary

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of AT&T's Letter to ALJ Susan Colwell upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Fairfax, Virginia, this 4th day of August 2008.

VIA E-MAIL AND FIRST CLASS MAIL

Norman J. Kennard, Esquire
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nkennard@thomaslonglaw.com

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Philadelphia PA 19103
(215) 466-4755
Suzan.D.Paiva@Verizon.com

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Martin C. Rothfelder, Esquire
Rothfelder Stern, L.L.C.
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**DOCUMENT
FOLDER**

August 6, 2008

Honorable Susan D. Colwell
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

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AUG - 8 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PA PUC

08 AUG - 7 11 5:28

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In re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers, and the Pennsylvania Universal Service Fund, Docket No. I-00040105

Dear Judge Colwell:

AT&T's letter to you dated August 4, 2008 requests that the Answers of the Pennsylvania Telephone Association and Embarq Pennsylvania to Verizon's Motion to Compel discovery responses "be disregarded as untimely." The claims made in the letter are distortive. This letter seeks to correct those misimpressions.

By way of background, upon the filing by Verizon of its Set I interrogatories, the PTA initiated contact with Verizon to discuss objections and possible resolution. Verizon invited AT&T to participate in the session stating that AT&T had drafted some of the interrogatories, including those that were under discussion. Counsel for AT&T, in fact, did participate and take positions relative to whether those interrogatories could be revised or withdrawn. An e-mail exchange documenting the participation of AT&T counsel is attached hereto.

Despite the fact that AT&T was involved in drafting the questions, AT&T, for some reason, elected not to make that fact public in either the interrogatories themselves or in the Motion to Compel. It is clear, however, that AT&T is not a third party observer in the matter of Verizon Set I discovery, rather AT&T is a participating party aligned with Verizon.

Verizon's subsequent service of its Motion to Dismiss Objections and Compel Answers thereafter created some confusion. At 3:59 p.m. on the due date for the Motion to Compel (July 24, 2008), Verizon e-mailed to some parties (the undersigned was excluded from that e-mail) the Motion to Compel. That e-mail submission was later described by Verizon's counsel as a "non-final draft" and also failed to contain the requisite attachments. These various deficiencies were corrected with a "final" version served with attachments by e-mail at 6:47 p.m. upon all parties (including upon the undersigned) with the note:

The electronic copies of the Verizon Companies' motions to dismiss the objections of the PTA's and Embarq's objections and to compel answers to discovery sent earlier today were incomplete and had production problems.

Please discard and replace them with the attached copies of the final documents.

The PTA notes that, on matters of service, Your Honor's Scheduling Order provides that "due dates are in-hand. "Parties may utilize e-mail to accomplish service on each other "if transmission occurs before 4:00 p.m. and hard copies follow."¹ Moreover, "Parties shall use overnight mail if the electronic copy omits exhibits or attachments."² Only as to discovery is service after 4:00 p.m. "deemed to be served the following day."³

Under these rules, Verizon did not electronically serve its Motion upon the parties on the due date July 24, 2008.⁴ There were two possible interpretations as to the resulting due date of a responsive Answer to this Motion (due five days from service of the Motion itself):

- The better approach assumes that, if the e-mail rule is not complied with, then service is calculated by the alternative, back-up method of delivery, in this case the U.S. Postal Service to which the 3 day mail rule applies,⁵ so that Answers were due August 1, 2008.⁶
- The other, less compelling, theory is that the original deficiencies were cured by the subsequent 6:47 p.m. version which should be deemed to be effective service on July 25th, in which case, the answer was due on July 30th. This approach is inferior to the first as it presumes that lack of timely filing on July 24th can be cured by service past the due date, clearly not an acceptable practice with the other forms of service (by mail) set forth in the Commission's regulations, for example.

Verizon, the PTA and Embarq took a practical approach and agreed to overlook a minor snafu. Verizon voluntarily offered to the PTA that it would not object to an Answer submitted on Friday, August 1st. A copy of correspondence from counsel for Verizon to this effect is attached. The PTA and Embarq accepted this resolution for the late-filed Motion to Compel.

Neither PTA nor Embarq envisioned a need to bother Your Honor with what readily could be (and was) agreed upon by the moving entity and the entities which would have to respond to the Motion. AT&T, through its actions of not officially joining in the Motion, effectively appointed Verizon as the single point of contact for the Motion to

¹ Scheduling Order at 8 (Para. 8)

² *Id.* at 6.

³ *Id.* at 8 (Para. 8)

⁴ The issue here is not the timeliness with the filing at the Commission (it is marked as overnight delivery to the Secretary), only the service date upon the parties.

⁵ The PTA did not physically receive the document by mail until five days later, July 29, 2008.

⁶ July 24th plus five day answer period (52 Pa. Code § 5.342(g)) plus the three day mail rule (§1.56 (b)) = August 1st.

Compel. If AT&T had joined in with Verizon and signed onto the Motion to Compel, Verizon, the PTA and Embarq would have coordinated with AT&T also.

Having hidden behind the Motion to Compel filed by Verizon, AT&T comes forward and now argues that the PTA and Embarq Answers filed on August 1st were unilaterally "self-granted" and somehow prejudiced AT&T such that the PTA and Embarq Answers should be disregarded. There are several flaws in these claims.

1. **There is no lateness.** As described above, the best interpretation is that Answers were not due until August 1st.

2. **AT&T's own "Answer" should be disregarded.** Having collaborated with Verizon in the drafting and negotiation of objections to the discovery, AT&T is a propounding party. An Answer to a Motion to Compel is not properly filed by such a party. AT&T should have undertaken to participate in the Motion to Compel.

3. **There is no prejudice.** Even were the due date calculated as July 30th, however, AT&T served the parties one day early on July 29th and, thus, the August 1st filing by the PTA and Embarq is not the source of AT&T's protest that the Answers were not filed simultaneously. In either event, AT&T elected not to join in the Motion to Compel, failed to communicate with Verizon, PTA or Embarq after the original service was conceded to be invalid, and then filed its own Answer too soon, a risk associated with making unwarranted assumptions about service dates.

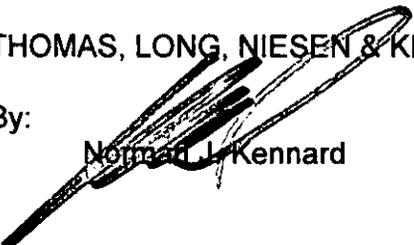
4. **Prejudice was avoided.** By filing a simultaneous Answer, AT&T was seeking to deny the PTA and Embarq the opportunity to address all reasons supporting the discovery that AT&T helped draft. Simply stated, AT&T's real underlying complaint is that AT&T was unable to prejudice the other parties by denying them a response to the Motion to Compel. This was tactic was thwarted, albeit involuntarily, by AT&T's filing prematurely.

The PTA believes that the above effectively brings us back to a point where AT&T's letter should be disregarded and the matter considered as ripe for Your Honor to rule upon the Motion and Answers as filed by all the Parties, including AT&T.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By:


Norman J. Kennard

NJK:tlt
Enclosures

Norman Kennard

From: suzan.d.paiva@verizon.com
Sent: Monday, July 07, 2008 12:26 PM
To: Norman Kennard
Subject: RE: USF case; VZ Set I.

Norm,

Thanks for the message. I am consulting with Michelle and Chris and will get back to you with our substantive response ASAP.

Suzan

From: Norman Kennard [mailto:nkennard@thomaslonglaw.com]
Sent: Thursday, July 03, 2008 8:18 AM
To: Paiva, Suzan D.; painterlawfirm@verizon.net; carfaa@arfaalaw.com
Cc: Regina L. Matz; Jennifer M. Sultzaberger
Subject: USF case; VZ Set I.

Suzan, Michelle and Chris:

After reviewing your Set 1 discovery, a conference call with you yesterday and discussion with the PTA companies, we can agree to answer most of the questions, although some of it is far afield of the subject matter and scope of the case and is not relevant under an evidentiary standard. Nevertheless, without waiving any future right to object, most can be answered using existing information without performing objectionable special studies.

We would ask for a three year time limit on answering the following interrogatories:

1. We will provide TRS reports limited to three years.
2. We will provide PUC annual reports and, for price cap companies, PSI/SPI reports for the last 3 years.
17. a. We will provide total company balance sheet and income statement for last three years. Also responsive to VZ I-22. (This actually provides an income statement, which you did not request).

Five years would seem excessive. We propose three as reasonable.

We believe that the following are objectionable:

18. Object. Burdensome and irrelevant. This level of specifics re access is not relevant. Access rates issues are stayed.
19. Object. Burdensome and irrelevant. This level of specifics re access is not relevant. Access rates issues are stayed.

20. Object. Burdensome and irrelevant. This level of specifics re access is not relevant. Access rates issues are stayed.
26. Object. Burdensome and irrelevant. This level of specifics re access is not relevant. Access rates issues are stayed.
27. Object. Burdensome and irrelevant. Company ownership/control is not an issue.
32. Object. Burdensome and irrelevant. This is not an investigation of the RLECs' networks or the provisioning of service.
33. Object. Irrelevant. Meeting Chapter 30 commitments are not at issue.

Please explain how these issues/areas of inquiry are not objectionable and the rationale for the information sought. Please identify whether there a compromise that we can reach to avoid burdening the ALJ.

Regards,
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Any Federal tax advice contained herein is not intended or written to be used, and cannot be used by you or any other person, for the purpose of avoiding any penalties that may be imposed by the Internal Revenue Code. This disclosure is made in accordance with the rules of Treasury Department Circular 230 governing standards of practice before the Internal Revenue Service. Any written statement contained herein relating to any Federal tax transaction or matter may not be used by any person without the express prior written permission in each instance of a partner of this firm to support the promotion or marketing of or to recommend any Federal tax transaction(s) or matter(s) addressed herein.

Norman Kennard

From: Chris Arfaa [carfaa@arfaalaw.com]
Sent: Thursday, July 24, 2008 6:47 PM
To: 'Dodge, John'; 'Colwell, Susan'; 'Aron, Benjamin J [GA]'; Norman Kennard; Regina L. Matz; Jennifer M. Sultzaberger; mcrothfelder@rothfelderstern.com; jcalkins@sonnenschein.com; jcheskis@paoca.org; bsheridan@paoca.org; Cappleby@paoca.org; bobloube@earthlink.net; roger@fsconline.com; sue.e.benedek@embarq.com; joseph.r.stewart@embarq.com; russell.r.gutshall@embarq.com; dbonner@sonnenschein.com; sgray@state.pa.us; abuca@aol.com; painterlawfirm@verizon.net; mkeffer@att.com; psshapiro@att.com; ppolacek@mwn.com; skeddie@mwn.com
Subject: I-00040105 -- Verizon Companies' Motions to Dismiss Objections and to Compel
Importance: High
Attachments: 20080724.MTC-PTA.pdf; 20080724.MTC-EBQ.pdf

Judge Colwell and Counsel:

The electronic copies of the Verizon Companies' motions to dismiss the objections of the PTA's and Embarq's objections and to compel answers to discovery sent earlier today were incomplete and had production problems. Please discard and replace them with the attached copies of the final documents.

I apologize for any inconvenience.

Thank you.

Chris Arfaa
(610) 977-2001

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From: Dodge, John [mailto:JohnDodge@dwt.com]
Sent: Tuesday, July 22, 2008 10:47 AM
To: Colwell, Susan; Aron, Benjamin J [GA]; nkennard@thomaslonglaw.com; rmatz@thomaslonglaw.com; jms@thomaslonglaw.com; mcrothfelder@rothfelderstern.com; carfaa@arfaalaw.com; jcalkins@sonnenschein.com; jcheskis@paoca.org; bsheridan@paoca.org; Cappleby@paoca.org; bobloube@earthlink.net; roger@fsconline.com; sue.e.benedek@embarq.com; joseph.r.stewart@embarq.com; russell.r.gutshall@embarq.com; dbonner@sonnenschein.com; sgray@state.pa.us; abuca@aol.com; painterlawfirm@verizon.net; mkeffer@att.com; psshapiro@att.com; ppolacek@mwn.com; skeddie@mwn.com
Subject: Executed Protective Order -- I-00040105

Dear Judge Colwell, et al:

Attached please find executed Appendix A from the Protective Order on behalf of Comcast. Hard copy to follow via U.S. Mail.

Kindly direct any questions regarding this matter to the undersigned.

8/6/2008

Sincerely,

John Dodge | Davis Wright Tremaine LLP

1919 Pennsylvania Avenue NW, Suite 200 | Washington, DC 20006

Tel: (202) 973-4205 | Fax: (202) 973-4499

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Please consider the environment before printing this email.

Circular 230 - To comply with IRS rules, we must inform you that this message (including any attachment) if it contains advice relating to federal taxes, was not intended or written to be used, and it cannot be used, for the purpose of avoiding penalties that may be imposed under federal tax law. Under these rules, a taxpayer may rely on professional advice to avoid federal tax penalties only if that advice is reflected in a comprehensive tax opinion that conforms to stringent requirements under federal law.

Norman Kennard

From: Chris Arfaa [carfaa@arfaalaw.com]
Sent: Thursday, July 24, 2008 6:47 PM
To: sue.e.benedek@embarq.com; Norman Kennard
Subject: Pa USF

Norm and Sue—

As discussed, haste made waste of my filings today. We agree that you have until August 1 to respond.

Law Office of Christopher M. Arfaa, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of August, 2008, served a true and correct copy of the foregoing letter upon the persons listed below via electronic mail and first class mail, postage prepaid at Harrisburg, Pennsylvania, as follows:

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August 6, 2008

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AUG 06 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA UPS OVERNIGHT DELIVERY

Joel Cheskis, Esquire
Office of Consumer Advocate
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Harrisburg, PA 17101-1923

**RE: Investigation Regarding Intrastate Access Charges and IntraLATA Toll
Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Mr. Cheskis:

Enclosed please find the Verizon Companies' Responses to the First Set of Interrogatories to Verizon, propounded by the Office of Consumer Advocate, in the above-referenced matter. Please note that these Responses include information that is Proprietary to Verizon, and of course should be handled as such.

Do not hesitate to contact me if you have any questions.

Respectfully,


Suzan D. Paiva

SDP/slb
Enclosure

Via E-Mail and UPS Delivery
cc: Certificate of Service

Via UPS Delivery
cc: Secretary James J. McNulty (cover letter and certificate only)
The Honorable Susan Colwell (cover letter and certificate only)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of Verizon's Responses to the Office of Consumer Advocate's First Set of Interrogatories, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 6th day of August, 2008.

VIA E-MAIL AND UPS DELIVERY

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Pittsburgh LP d/b/a T-Mobile Nextel Communications, Inc.

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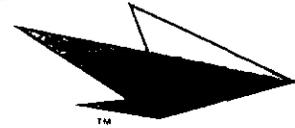
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Attorney for
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Verizon North Inc.
MCImetro Access Transmission Services, LLC
d/b/a Verizon Access Transmission Services

Voice | Data | Internet | Wireless | Entertainment



EMBARQ™

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ORIGINAL

August 6, 2008

VIA HAND DELIVERY

Honorable Susan D. Colwell
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, Second Floor
Harrisburg, PA 17101

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2008 AUG -6 PM 3:56
SECRETARY'S BUREAU

Re: Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers and the Pennsylvania
Universal Service Fund – Docket No. I-00040105

Dear Judge Colwell:

The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania (“Embarq PA”) is in receipt of correspondence dated August 4, 2008 from AT&T. Embarq PA has reviewed the Pennsylvania Telephone Association’s (“PTA”) response to AT&T. Rather than reiterate PTA’s response to AT&T’s misinformed letter, Embarq PA fully supports PTA and adopts the points made by PTA.

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

Sincerely,

Sue Benedek

ZEB/jh

cc: James J. McNulty, Secretary (*via hand delivery*)
All Parties on the attached Certificate of Service (*via first-class and electronic mail*)

Zsuzsanna E. Benedek
SENIOR COUNSEL
Voice: (717) 245-6346
Fax: (717) 236-1389

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2008 AUG -6 PM 3:56
SECRETARY'S OFFICE

Investigation Regarding Intrastate Access Charges and
IntraLATA Toll Rates of Rural Carriers, and the
Pennsylvania Universal Service Fund

Docket No. I-00040105

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of August, 2008, served a true copy of the foregoing pleading was served upon the persons below, via first-class and electronic mail, in accordance with the requirements of 52 Pa. Code §1.54:

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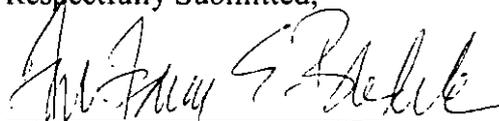
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Respectfully Submitted,



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ROTHFELDER STERN, L.L.C.

LAW OFFICES

DOCUMENT FOLDER

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ALBANY, NY 12210
TELEPHONE (518) 253-8750

August 7, 2008

Via E-Mail and First Class Mail

Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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AUG 12 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll
Rates of Rural Carriers, and the Pennsylvania Universal Service Fund
Docket No. I-00040105**

Dear Judge Colwell:

I am writing to advise Your Honor that I will not be present at the August 12 hearing as counsel of record for T-Mobile. T-Mobile has not made any filings either supporting or opposing the various motions pending before Your Honor at this time.

T-Mobile does desire to note for the record that, as Your Honor is aware, the subject matter of this hearing may be enlarged and/or clarified as a result of petitions for reconsideration pending before the Commission. The Commission has not yet ruled on those petitions to the best of T-Mobile's knowledge. T-Mobile therefore requests that any of the rulings that Your Honor makes regarding the pending motions be subject to any changes in the scope of this proceeding as a result of the Commission's rulings on the pending reconsideration petitions, and that all the parties have the opportunity to present their views and positions on the subject matters of the motions upon and in light of the Commission's anticipated rulings.

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Honorable Susan D. Colwell
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August 7, 2008

I thank Your Honor for considering the matters stated herein.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bradford M. Stern". The signature is written in a cursive style with a long horizontal flourish at the end.

Bradford M. Stern

cc: Counsel of Record