



September 12, 2008

# **VIA ELECTRONIC AND FIRST-CLASS MAIL**

Joel Cheskis, Esquire Assistant Consumer Advocate Office of Consumer Advocate 555 Walnut Street, 5<sup>th</sup> Floor 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 Mr. Cheskis,

On behalf of The United Telephone Company of Pennsylvania LLC d/b/a Embarq Pennsylvania, please find Set I Interrogatories and Requests for Production of Documents directed to the Office of Consumer Advocate ("OCA").

Please provide responses as soon as they become complete. 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)

Mr. Bob Loube (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 12<sup>th</sup> day of September, 2008, served a true copy of the foregoing Interrogatories were served upon the persons below, via electronic and 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, 5<sup>th</sup> Floor

Harrisburg, PA 17101

e-mail: jcheskis@paoca.org

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

e-mail: Suzan.D.Paiva@verizon.com

Steven C. Gray, Esquire Office of Small Business Advocate 300 North 2<sup>nd</sup> Street, Suite 1102 Harrisburg, PA 17101

e-mail: sgray@state.pa.us

Michelle Painter, Esquire Painter Law Firm 13017 Dunhill Drive Fairfax, VA 22030

e-mail: painterlawfirm@verizon.net

Bradford M. Stern, Esquire Rothefelder Stern, LLC 620 Central Avenue Westfield, NJ 07090

Email: bmstern@rothfelderstern.com

Christopher M. Arfaa, Esquire Christopher M. Arfaa, PC 150 North Radnor Chester Road Suite F200

Radnor, PA 19087

e-mail: carfaa@arfaalaw.com

Pamela Polacek, Esquire McNees Wallace and Nurick LLC 100 Pine Street Box 1166 Harrisburg, PA 17108

e-mail: ppolacek@mwn.com

John J. Calkins, Esquire Sonnenschein, Nath and Rosenthal, LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005 e-mail: jcalkins@sonnenshchein.com

Benjamin J. Aron, Esquire Sprint Nextel Corporation 2001 Edmund Halley Drive, Room 208 Reston, VA 20191 e-mail: Benjamin.aron@sprint.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

#### COMMONWEALTH OF PENNSYLVANIA





OFFICE OF CONSUMER ADVOCATE

DOCUMENT FOLDER

IRWINA, POPOWSKY Consumer Advocate

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560 (in PA only)

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

September 26, 2008

RECEIVED

SEP 2 & ZUUS

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

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Investigation Regarding Intrastate Access RE:

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 V, 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 M. Cheskis

Assistant Consumer Advocate PA Attorney I.D. #81617

**Enclosures** 

cc: I

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 V Directed to PTA, 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 26th day of September, 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 Suite 201 Harrisburg, PA 17101

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 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 P.O. Box 1166 100 Pine Street Harrisburg, PA 17108-1166

John J. Calkins, Esq. Sonnenschein Nath & Rosenthal LLP 1301 K Street, N.W. Suite 600 East Tower Washington, DC 20005

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, 50<sup>th</sup> Floor Philadelphia, PA 19102

Deanne M. O'Dell, Esq. WolfBlock, LLP 213 Market St., 9<sup>th</sup> Fl. P.O. Box 865 Harrisburg, PA 17108-0865

Joseph R. Stewart, Esq. Embarq 50 West Broad Street, Suite 3600 Columbus, OH 43215 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 Harrisburg, PA 17101-1923 (717) 783-5048 \*82775



September 30, 2008

PA PUC SECRETARY'S BUREAU

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VIA HAND DELIVERY

Joel Cheskis, Esquire Office of Consumer Advocate 555 Walnut Street, 5<sup>th</sup> Floor 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 Mr. Cheskis,

Per ALJ Colwell's August 20, 2008 Discovery Order, please find on behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, Embarq Pennsylvania's Responses to Set III Interrogatories propounded by The Office of Consumer Advocate ("OCA"). Consistent with ALJ Colwell's Order, the only parties being served with these responses are The Office of Consumer Advocate and, at your request, your consultant, Mr. Bob Loube.

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

Sincerely,

Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (letter and certificate only)

The Honorable Susan D. Colwell (letter and certificate only)

Mr. Robert Loube (via overnight mail)

All Parties on the attached Certificate of Service (letter and certificate only)

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 5 00 12 30 6	
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 30<sup>th</sup> day of September, 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:

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, 5<sup>th</sup> Floor Harrisburg, PA 17101 e-mail: jcheskis@paoca.org

Suzan DeBusk Paiva, Esquire Verizon Pennsylvania 1717 Arch Street, 10<sup>th</sup> Floor Philadelphia, PA 19103 e-mail: <u>Suzan.D.Paiva@verizon.com</u>

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North 2<sup>nd</sup> Street, Suite 1102
Harrisburg, PA 17101
e-mail: sgray@state.pa.us

Michelle Painter, Esquire
Painter Law Firm
13017 Dunhill Drive
Fairfax, VA 22030
e-mail: painterlawfirm@verizon.net

Bradford M. Stern, Esquire Rothefelder Stern, LLC 620 Central Avenue Westfield, NJ 07090 Email: bmstern@rothfelderstern.com

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

Pamela Polacek, Esquire
McNees Wallace and Nurick LLC
100 Pine Street
Box 1166
Harrisburg, PA 17108
e-mail: ppolacek@mwn.com

John J. Calkins, Esquire Sonnenschein, Nath and Rosenthal, LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005 e-mail: jcalkins@sonnenshchein.com

Benjamin J. Aron, Esquire Sprint Nextel Corporation 2001 Edmund Halley Drive, Room 208 Reston, VA 20191 e-mail: Benjamin.aron@sprint.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@enibarq.com