



August 21, 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

ECRETARY'S DUREAL

Re: Investigation Regarding Intrastate Access Charges and IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund – Docket No. 1-00040105

Dear Mr. Cheskis:

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find copies of Embarq Pennsylvania's Responses to Set IV Interrogatories propounded by the Office of Consumer Advocate. Please note that the enclosed responses have embedded documents located within them. Also, please note that the embedded documents contain **PROPRIETARY INFORMATION** and should be treated as such.

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,

R. Stewart

Admitted Pro Hac Vice

JRS/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)

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

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

Docket No. I-00040105 浸

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CERTIFICATE OF SERVICE

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I hereby certify that I have this 21st day of August, 2008, served a true copy of the foregoing Responses 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: <u>nkennard@thomaslonglaw.com</u>

Joel Cheskis, Esquire Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101 e-mail: jcheskis@paoca.org

Suzan DeBusk Paiva, Esquire Verizon Pennsylvania 1717 Arch Street, 32NW Philadelphia, PA 19103 e-mail: <u>Suzan.D.Paiva@verizon.com</u>

Steven C. Gray, Esquire Office of Small Business Advocate 300 North 2nd Street, Suite 1102 Harrisburg, PA 17101 e-mail: <u>sgray@state.pa.us</u> Michelle Painter, Esquire Painter Law Firm 13017 Dunhill Drive Fairfax, VA 22030 e-mail: <u>painterlawfirm@verizon.net</u>

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

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

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



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

Respectfully Submitted,

twat pf 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





August 21, 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. 1-00040105

Dear Mr. Cheskis:

On behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find copies of Embarq Pennsylvania's <u>Supplemental</u> Response to OCA Set I-1 propounded by the Office of Consumer Advocate. On July 7, 2008, Embarq PA responded to OCA Set I. Please note that Embarq PA inadvertently skipped pages of the attachment to OCA I-1(a) when responding to the discovery request. Thus, we have supplemented the discovery response with a complete copy of OCA I-1(a). For your convenience, we have also included subparts (b) and (c) as well. The supplemental attachment to OCA I-1(a) contains **PROPRIETARY INFORMATION** and should be treated as such.

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. R. Stewart amitted Pro Hac Vice

JRS/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)

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

Docket No. 1-00040105

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I hereby certify that I have this 21st day of August, 2008, served a true copy of the foregoing Supplemental Response was 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: <u>nkennard@thomaslonglaw.com</u>

Joel Cheskis, Esquire Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101 e-mail: <u>jcheskis@paoca.org</u>

Suzan DeBusk Paiva, Esquire Verizon Pennsylvania 1717 Arch Street, 32NW Philadelphia, PA 19103 e-mail: <u>Suzan.D.Paiva@verizon.com</u>

Steven C. Gray, Esquire Office of Small Business Advocate 300 North 2nd Street, Suite 1102 Harrisburg, PA 17101 e-mail: <u>sgray@state.pa.us</u> Michelle Painter, Esquire Painter Law Firm 13017 Dunhill Drive Fairfax, VA 22030 e-mail: <u>painterlawfirm@verizon.net</u>

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: <u>carfaa@arfaalaw.com</u>

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



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August 25, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

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

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

Dear Ms. Paiva,

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Per ALJ Colwell's Order dated August 20, 2008, on behalf of The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Response to Verizon I-32.

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

Sincerely Joseph Admitted Pro Hac Vice

JRS/jh

cc: James J. McNulty, Secretary (letter and certificate only)
The Honorable Susan D. Colwell (via hand delivery)
All Parties on the attached Certificate of Service (via first-class and electronic mail)

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

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I hereby certify that I have this 25th day of August, 2008, served a true copy of the foregoing Response 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: <u>nkennard@thomaslonglaw.com</u>

Joel Cheskis, Esquire Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101 e-mail: jcheskis@paoca.org

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

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

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,

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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



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August 25, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

Suzan DeBusk Paiva, Esquire Verizon Pennsylvania, Inc. 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 Ms. Paiva,

1 1

Per your discussion on August 12, 2008 with The United Telephone Company of Pennsylvania LLC *d/b/a* Embarq Pennsylvania, enclosed please find Embarq Pennsylvania's Responses to Set I Interrogatories (Nos. I-4, 30, 31) 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) The Honorable Susan D. Colwell (letter and certificate only) All Parties on the attached Certificate of Service (via first-class and electronic mail)

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

Docket No. I-00040105

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Respectfully Submitted,

Acut 1

Joseph R. Stewart, Esquire Manitted 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



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PA PUBLIC UTILITY COMMISSION SEGRETARY'S BUREAU

August 25, 2008

VIA ELECTRONIC AND FIRST-CLASS MAIL

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



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

Sincerely. Joseph S tewart Admitted Pro Hac Vice

JRS/jh

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

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

Docket No. I-00040105

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

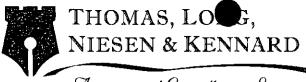
Pamela Polacek, Esquire McNees Wallace and Nurick LLC 100 Pine Street Box 1166 Harrisburg, PA 17108 e-mail: <u>ppolacek@mwn.com</u>

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Respectfully Submitted,

Hent/of

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



Attorneys and Counsellors at Law



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

August 26, 2008



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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. Dieskis:

Enclosed please find the Answer of The Pennsylvania Telephone Association to the Office of Consumer Advocate's Interrogatory - Set III-20.

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

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD By: Norman S. Kennard

NJK:tlt enclosure

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