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March 13, 2019

Via ECFS

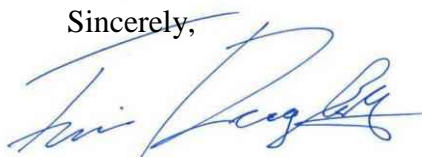
Marlene J. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Washington, DC 20054

**Re: Defendant PPL Electric Utilities Corporation's First Set of
Interrogatories to Complainant (Proceeding Number 19-29); Bureau ID
Number EB-19-MD-001)**

Dear Ms. Dortch:

Please find attached Defendant PPL Electric Utilities Corporation's First Set of Interrogatories to Complainant in Proceeding Number 19-29; Bureau ID Number EB-19-MD-001.

Sincerely,



Timothy A. Doughty
Attorney for PPL Electric Utilities Corporation

Enclosure

cc: Lisa Saks, Enforcement Bureau
Adam Suppes, Enforcement Bureau

)	
)	
MAW Communications, Inc.,)	
<i>Complainant,</i>)	
)	
v.)	Proceeding Number 19-29
)	Bureau ID Number EB-19-MD-001
)	
PPL Electric Utilities Corporation,)	
<i>Defendant</i>)	
)	

Defendant PPL Electric Utilities Corporation (“PPL”), pursuant to the Notice of Formal Complaint issued February 14, 2019 by the FCC Enforcement Bureau in this proceeding and pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submits this First Set of Interrogatories to Complainant MAW Communications, Inc. (“MAW”). PPL hereby requests that the Complainant MAW respond to the following First Set of Interrogatories fully, in writing, and that said written responses be signed and served upon counsel for PPL within twenty (20) days after service. Consistent with Rule 1.730(b), all of the information requested herein pertains to PPL’s Answer to MAW’s complaint. As set forth in the instructions, PPL is not seeking information that is available from any source other than PPL. These interrogatories are governed by the following definitions and instructions:

DEFINITIONS

1. The terms “you,” or “your,” as used herein, means the Complainant MAW and any and all employees, members, agents, and any other persons acting on your behalf or under your direction or control.
2. The term “Complainant” and “MAW” mean and refer to MAW Communications, Inc., all affiliated entities doing business as “MAW,” and all entities doing business as “MAW” over which Complainant exercises control or that exercise control over Complainant.

“Complainant” and “MAW” include any persons associated with it, including, but not limited to, officers, directors, employees, agents, representatives, predecessors, successors, assigns, attorneys, and/or any of them.
3. “Complaint” means and refers to MAW’s Complaint filed in this proceeding with the FCC on or about February 15, 2019, and any subsequent amendments thereto.
4. “Communication” includes any form of intended, attempted, or actual oral, written, graphic, electronic, or other representation or articulation Complainant received or sent, or attempted to receive or send.
5. The words “relate,” “relating,” “pertain,” “pertaining,” “reference,” “referencing,” “refer,” “referring,” and/or derivatives thereof, whether followed by a preposition or not, have the broadest meaning that may be accorded to them and include, but are not limited to, the following: directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, setting forth, discussing, commenting upon, analyzing, supporting, contradicting, proving, disproving, referring to, constituting, concerning, and/or connected, or reflecting in any way upon the stated subject matter of a given request.

6. “Person” and “persons” mean any individual, corporation, firm, company, partnership, joint venture, association, unincorporated association, governmental or public agency, and/or all other legal entities.
7. The terms “each” and “every” include the term “each and every.” “Any” shall include the term “any and all.”
8. The singular of words includes the plural and the plural includes the singular.
9. Masculine, feminine, or neuter pronouns include the other gender(s).
10. The words “and” and “or” have either a disjunctive or conjunctive meaning so as to bring within the scope of these document requests all information that might otherwise be construed to be outside their scope by use of a more restrictive meaning.
11. The words “and” and “or” have either a disjunctive or conjunctive meaning so as to bring within the scope of these document requests all information that might otherwise be construed to be outside their scope by use of a more restrictive meaning.
12. References to the name of a company or the designation of a party include the company or corporation, as the case may be, or the party, and its employees, agents, directors, officers, stockholders, principals, partners, representatives, attorneys, investigators, consultants, and subcontractors.
13. Identification.
 - a. The term “identify” when used in reference to an individual person means to state the person’s full name, present address, and telephone number, if known; the person’s present or last known title, position, and business affiliation; and the general subject matter(s) about which the person has knowledge. When used in reference to a person other than an individual

person, “identify” means to state whether such person is a corporation, company, partnership, association, joint venture, or other organization, and the name, present and last known address, and principal place of business.

INSTRUCTIONS

1. These interrogatories are continuing in nature. If you obtain additional information, a supplemental response shall be promptly furnished.
2. If any response to any request contains any objection, please state with specificity the grounds for each such objection and the part of the request to which the objection is made, but respond to such request fully insofar as it is not deemed objectionable or to the extent that it may be responded to subject to such objection.
3. Should you claim a privilege in connection with any of your responses, you shall identify the privilege claimed and produce an index identifying any document(s) or response(s) withheld under a claim of privilege. You shall state all facts that demonstrate why the information or the document(s) or response(s) sought by any of the following requests are entitled to the privilege asserted. Failure to produce the required index or to state the facts supporting the claim of privilege shall be a waiver of any privilege as to the information or document(s) or response(s) withheld.
4. Per FCC Rule 1.730(b), PPL is not seeking information that is available from any source other than MAW.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the date on which MAW first became aware that the requisite funding was not available to upgrade the Lancaster camera network so that it could operate on MAW's newly installed ADSS fiber system.

INTERROGATORY NO. 2:

At Paragraph 21 of the Complaint, MAW states: "The physical characteristics of the ADSS portion of MAW's network allows MAW's fiber to be placed closer to electric facilities than can conductive telecommunications cables." Please identify the MAW contractors used to place MAW's fiber on PPL's poles closer to electric facilities than conductive telecommunications could be placed. Please also explain how MAW believes these contractors are qualified to make such fiber attachments closer to electric facilities.

INTERROGATORY NO. 3:

Other than Mr. Eron Lloyd's guilty plea in Federal Court to conspiracy to commit bribery, identify every guilty plea by MAW or any of its officers and employees to a felony, or conviction of MAW or any of its officers and employees of a felony.

INTERROGATORY NO. 4:

Identify any and all instances in which a utility pole owner has accused MAW of making unauthorized attachments.

INTERROGATORY NO. 5:

Identify any and all claims filed in a court of law against MAW alleging breach of contract, other than PPL's breach of contract case litigated in the Court of Common Pleas of Lehigh County, Pennsylvania.

INTERROGATORY NO. 6:

Identify any and all claims filed in a court of law against MAW pertaining to MAW's attachments to utility poles, other than PPL's claims filed against MAW in the Court of Common Pleas of Lehigh County, Pennsylvania..

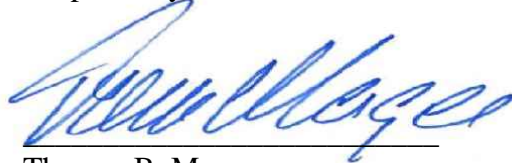
INTERROGATORY NO. 7:

Explain the efforts undertaken by MAW between September 1, 2015 to February 1, 2016 to identify the person at PPL who replaced Mr. William Klokis.

INTERROGATORY NO. 8:

Identify (by pole number and pole position) any and all PPL poles MAW has accessed, worked on, or connected to between April 13, 2018 to the present.

Respectfully submitted,



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Attorneys for PPL Electric Utilities Corporation

March 13, 2019

CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 13th day of March 2019, a true and authorized copy of PPL Electric Utilities Corporation's First Set of Interrogatories to Complainant was served on the parties listed below via electronic mail, unless noted otherwise, and was filed with the Commission via ECFS.

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/s/

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