

Arthur L. Farnsworth
c/o 2100 Sterners Road
Green Lane, Pennsylvania
14 December 2001

William E. Lehman
Malatesta Hawke & McKeon LLP
Harrisburg Energy Center
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
Delivered via certified mail #7099 3400 0006 9190 7749

Re: Arthur L. Farnsworth, Complainant vs. Verizon Pennsylvania Inc., Respondent; Docket No. C-20016223; **DISCOVERY**

Mr. Lehman:

In accordance with 52 Pa. Code §5.321 and §5.341, I am conducting discovery by sending you this interrogatory. I am seeking proof that the Respondent has had imposed upon it by the Internal Revenue Service a lawful requirement to collect the communications excise tax in question. Please provide the information identified in item 1 below.

1. Written evidence that the Internal Revenue Service has imposed a lawful requirement on Verizon Pennsylvania Inc., Respondent, to collect the tax described in 26 U.S.C. 4251. Evidence should include but not be limited to correspondence from the I.R.S. to the Respondent citing requirements from applicable tax law, and applicable statutes, regulations, and Federal Register extracts.

52 Pa. Code §5.342 (d) states "The answering participant shall serve interrogatories and answers within 15 days for rate proceedings, and 20 days after service of the interrogatories for other cases. Time periods may be modified by the presiding officer, on motion or by agreement of the participants." I look forward to your timely response.

Sincerely,



Arthur L. Farnsworth

Attachment A