

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-1 In response to DTE-2-3, Verizon provided monthly trouble reports for the Town of Middlefield (“Town” or “Middlefield”) for the months of March 2006 and April 2006. Please provide monthly reports for the Town for June 2006 when such information becomes available.

REPLY: June 2006 monthly trouble reports for the Town of Middlefield will not be available until the end of the second week in July 2006. Verizon MA will provide the requested information at that time.

VZ #22

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-2 Please explain the discrepancy between the number of double poles viewed in the Town photographs provided by the Board of Selectmen on June 9, 2006 (“Town Photographs”), and the Double Pole Report provided by Verizon in response to DTE-1-13.

REPLY: The Backlog Double Pole Progress Report, generated from the Pole Line Management (PLM) database, which was filed with the Department on May 5, 2006, in Docket DTE 03-87, provides the documentation for Verizon MA’s response to DTE 1-13. In the town of Middlefield, the entry of pole data into the PLM database is the responsibility of Western Massachusetts Electric Company, not Verizon MA.

VZ #23

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-3 Please state whether the double poles in Middlefield, as shown in the Town Photographs 005, 006, 007, 008, 009, 010, 011, 012, 042, 043, 044, 045, 046, 047, 048, 063, 064, 065, 066, 071, 072, 073, 078, 079, 080, 092, 093, 094, 095, 096, 097, 101, 102, 103, 112, 114, 115, 116, 117, 119, 120, 121, 123, 124, 125, 126, 127, 128, 129, 130, 143, 144, and 145, have any impact on service quality or constitute a safety concern.

REPLY: The information as presented in Town Photographs 005, 006, 007, 008, 009, 010, 011, 012, 042, 043, 044, 045, 046, 047, 048, 063, 064, 065, 066, 071, 072, 073, 078, 079, 080, 092, 093, 094, 095, 096, 097, 101, 102, 103, 112, 114, 115, 116, 117, 119, 120, 121, 123, 124, 125, 126, 127, 128, 129, 130, 143, 144, and 145 does not have an impact on service quality or constitute a safety concern.

VZ #24

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-4 Please state whether the open interfaces or other equipment in Middlefield, as shown in Town Photographs 018, 035, 036, 040, and 041, have any impact on service quality or constitute a safety concern.

REPLY: The information as presented in Town Photographs 018, 035, 036, 040, and 041 does not have an impact on service quality or constitute a safety concern.

VZ #25

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-5 Please state whether the equipment hanging by a wire shown in Town Photographs 037, 038, and 039 has any impact on service quality or constitutes a safety concern.

REPLY: The information as presented in Town Photographs 037, 038, and 039 does not have an impact on service quality or constitute a safety concern.

VZ #26

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-6 Please state whether the unraveling, unconnected, and/or crossed wires as shown in Town Photographs 057, 058, 084, 085, 086, 087, 088, 089, 098, 099, 118, 119, 120, and 122 have any impact on service quality or constitute a safety concern.

REPLY: The information as presented in Town Photographs 057, 058, 084, 085, 086, 087, 088, 089, 098, 099, 118, 119, 120, and 122 does not have an impact on service quality or constitute a safety concern.

VZ #27

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-7 Please state whether the wires that are not attached to nearby poles or support, as shown in the Town Photographs 013, 014, 059, 060, 061, 062, 075, 076, 077, 083, 146, 147, 148, 149, 150, 151, and 159, have any impact on service quality or constitute a safety concern.

REPLY: The information as presented in Town Photographs 013, 014, 059, 060, 061, 062, 075, 076, 077, 083, 146, 147, 148, 149, 150, 151, and 159 does not have an impact on service quality or constitute a safety concern.

VZ #28

**Verizon New England Inc.
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Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-8 Please state whether the pole as shown in Town Photographs 069 and 070 has Verizon and/or WMECO attachments. Also, state whether there is a secondary pole to which any attachments could be moved. Please state whether the pole shown in Town Photographs 069 and 070 constitutes a safety concern.

REPLY: The pole shown in Town Photographs 069 and 070 does not appear to have Verizon attachments.

The information as presented in Town Photographs 069 and 070 does not constitute a safety concern.

VZ #29

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-9 Please state whether the tree density in proximity to poles and/or wires, as shown in Town Photographs 015, 016, 017, 019, 020, 021, 022, 023, 024, 025, 026, 027, 031, 032, 033, 034, 055, 056, 104, 105, 106, 107, 108, 110, 111, 113, 131, 132, 133, 134, 137, 138, 139, 140, 141, 142, 152, 160, 161, 162, 163, and 167, has any impact on service quality or constitutes a safety concern.

REPLY: The information as presented in Town Photographs 015, 016, 017, 019, 020, 021, 022, 023, 024, 025, 026, 027, 031, 032, 033, 034, 055, 056, 104, 105, 106, 107, 108, 110, 111, 113, 131, 132, 133, 134, 137, 138, 139, 140, 141, 142, 152, 160, 161, 162, 163, and 167 does not have an impact on service quality or constitute a safety concern.

VZ #30

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-10 Please state whether the low hanging wires, as shown in Town Photographs 049, 050, 051, 052, 053, 054, 153, 157, and 158, have any impact on service quality or constitute a safety concern.

REPLY: The information as presented in Town Photographs 049, 050, 051, 052, 053, 054, 153, 157, and 158 does not have an impact on service quality or constitute a safety concern.

VZ #31

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-11 Please provide the minimum clearance height requirements for wires in the communications space as well as the minimum ground clearance height requirements for such wires as they traverse from pole to pole.

REPLY: Attachment heights in the communications space of a joint use utility pole are determined based on the clearance requirements shown below.

Situation	Clearance* (In Feet)
Public streets, roads, areas subject to truck traffic	15.5
Alleys, parking lots, non-residential driveways	15
Residential driveways	15**
Land traversed by vehicles (cultivated, grazing, orchard, forest)	15.5
Spaces or ways accessible to pedestrians only	9.5

*All clearances are measured at **maximum sag condition**.

**11.5 feet clearance for service drops.

Where Facilities Run	Clearance (Max. Sag)	Comments
Urban or rural roads and streets	15.5 ft.	May be reduced to 15 ft. if poles are back of curb or other obstruction.
Alleys, driveways, parking lots	15 ft.	May also cross.
Roads in rural areas where it is unlikely that vehicles will cross under the line	13 ft.	May be reduced to 9.5 ft. if ground beneath line is considered accessible to pedestrians only.

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DATED: June 20, 2006

ITEM: DTE 3-12 If Verizon identifies any item in response to Information Requests DTE-3-3, DTE-3-4, DTE-3-5, DTE-3-6, DTE-3-7, DTE-3-8, DTE-3-9, or DTE-3-10 that affects service quality or constitutes a safety concern, please describe Verizon's plans to address the situation(s) and provide a proposed timeframe for resolution of the problem.

REPLY: See responses to Requests DTE-3-3, DTE-3-4, DTE-3-5, DTE-3-6, DTE-3-7, DTE-3-8, DTE-3-9, and DTE-3-10.

VZ #33

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-13 In response to DTE-2-6, Verizon provided customer records indicating that the technician determined the pole was unsafe to climb (see DTE-2-6, Att. 20, at 22). Please state whether this is a double pole situation where Verizon's equipment is scheduled to be moved to a new pole.

REPLY: This is not a double pole situation. The pole custodian (Western Massachusetts Electric Company) found the pole to be safe.

VZ #34

**Verizon New England Inc.
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Commonwealth of Massachusetts

Docket No. 06-6

Respondent: John Conroy

Title: Vice President – Regulatory MA

REQUEST: Department of Telecommunications and Energy, Set #3

DATED: June 20, 2006

ITEM: DTE 3-14 Please state when a pole survey was last conducted in Middlefield by either Verizon or WMECO.

REPLY: Verizon MA inspects a pole when in the course of constructing new telephone lines or maintaining existing telephone lines if it is necessary to perform work aloft at that pole location. Verizon MA can not address pole surveys conducted by WMECO.

VZ #35