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April 24, 2025

By Email

Mark D. Marini, Secretary  
Kerri DeYoung Phillips, Hearing Officer  
Scott Seigal, Hearing Officer  
Department of Public Utilities  
1 South Station, 3rd Floor  
Boston, MA 02110

Shonda D. Green, Secretary  
William Bendetson, Hearing Officer  
Kevin Roberts, Hearing Officer  
Department of Telecommunications and Cable  
One Federal Street, Suite 0740  
Boston, MA 02110

***Re: D.P.U. 25-10/D.T.C. 25-1 – Notice of Participation in Technical Sessions  
and List of Proposed Topics for Discussion***

Dear Secretaries Marini and Green and Hearing Officers Phillips, Seigal, Bendetson and Roberts:

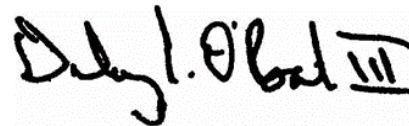
In the Memorandum (“Memorandum”) issued by the Department of Public Utilities and the Department of Telecommunications and Cable (the “Departments”) on April 10, 2025, the Departments requested that utility pole owners, including Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”), provide presentations on key issues at technical sessions to take place during the week of June 23, 2025. The Departments asked that any parties that would like to make presentations notify the Departments by April 24, 2025. The Departments also informed parties that they could propose topics for discussion at the technical conferences by the same date.

In compliance with the Memorandum, Verizon MA notifies the Hearing Officers that it wishes to make a presentation during the technical sessions and proposes that the following topics, listed in order of priority, be addressed:

1. Should all pole owners and attachers be required to use NJUNS for all pole-related work?
2. Should pole owners have a right to transfer or remove an attacher's facilities as part of the make-ready process, or when a pole is defective and needs to be replaced, if the attacher fails to transfer or remove its facilities within a specified number of days from when it becomes its turn to move the facilities? If so, must the attacher pay the costs of doing so?
3. Should the Departments adopt pole attachment rate formulas consistent with 47 CFR § 1.1406(d) that would apply to wireline and wireless telecommunications attachers and cable television attachers and allow pole owners to recover the costs associated with attachments in the usable and non-usable space on the pole? And, as a component of the rate formulas, should the Departments adopt requirements involving allocation of unusable space costs consistent with 47 CFR § 1.1409?
4. Should 220 CMR 45.00 apply to street light attachments?
5. Should the dispute resolution process in 220 CMR 45.00 be expanded to include claims by pole owners against attachers?

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, reading "Dulaney L. O'Roark III". The signature is written in a cursive, stylized font. The "D" is large and loops around the "u". The "L" is a simple vertical line. The "O'Roark" is written in a cursive script, and the "III" is written in a simple, bold, sans-serif font.

Dulaney L. O'Roark III