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Alexander W. Moore
Associate General Counsel

June 3, 2022

Shonda Green, Secretary
Department of Communications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118-6500

Re: D.T.C. 18-3 – Investigation into Accounting Practices of Telecommunications Carriers

Dear Secretary Green:

Enclosed for filing in the above-captioned proceeding on behalf of Verizon New England Inc. are a Petition to Intervene and an Appearance of Counsel.

Thank you for your attention to this matter.

Sincerely,

Alexander W. Moore (kms)

Alexander W. Moore

Enclosure
cc: Service List



Investigation by the Department of
Telecommunications and Cable on its own Motion
into Accounting Practices and Recordkeeping
of Telecommunications Carriers

Pursuant to 220 CMR §1.03, Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) hereby petitions the Department of Telecommunications and Cable (“Department”) for leave to intervene in the above proceeding as a party. As grounds for this petition, Verizon MA states the following:

2. The Department opened this proceeding as an inquiry into the potential impact of changes in federal rules governing the accounting and reporting practices of telecommunications carriers on the calculation of pole and conduit attachment rates in Massachusetts. *See* Order Opening Notice of Inquiry dated June 25, 2018. On May 3, 2022, the Department issued a Notice of Proposed Requirements and Further Request for Comment in this docket, in which the Department: (1) proposed to require “Telecommunications Pole Owners ... to file a Pole Owner Report for each calendar year” reporting data used to calculate attachment rates; (2) declined to impose requirements on the accounting methods Telecommunications Pole Owners may use to complete such Report; and (3) proposed new requirements on such Pole Owners to retain data and documentation of their accounting methods underlying those Reports. *See* Notice of Proposed Requirements, at 5-6, 12 and 14-16.

4. Verizon MA intends to participate fully in the case and will submit written comments, present testimony, conduct discovery, cross-examine witnesses and/or file briefs as necessary to protect its interests.

5. All correspondence and other communications regarding this proceeding should be served on the following:

Alexander W. Moore
Verizon
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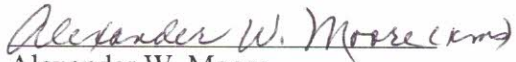
Christopher E. Bean
Verizon
6 Bowdoin Square, 9th Floor
Boston, MA 02114
e-mail: Christopher.e.bean@verizon.com

WHEREFORE, Verizon MA respectfully requests leave to intervene in this proceeding with all the rights of a full party.

Respectfully submitted,

VERIZON NEW ENGLAND INC.,

By its attorney


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Dated: June 3, 2022

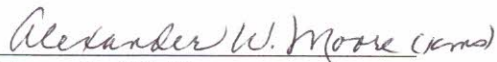
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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of Telecommunications Carriers)	

APPEARANCE OF COUNSEL

The undersigned hereby appears in the above-captioned proceeding on behalf of Verizon New England Inc., d/b/a Verizon Massachusetts.

Respectfully submitted,


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