COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

CRC Communications LLC, d/b/a OTELCO, Complainant, v. Massachusetts Electric Company d/b/a National Grid, and Verizon New England Inc., Respondents.	D.T.C. 22-4

REBUTTAL TESTIMONY OF JOSEPH TEED ON BEHALF OF CRC COMMUNICATIONS LLC, d/b/a OTELCO

May 29, 2024

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PRE-FILED TESTIMONY OF
JOE TEED
ON BEHALF OF
CRC COMMUNICATIONS LLC, d/b/a OTELCO

I. INTRODUCTION

A. WITNESS IDENTIFICATION

Q. Please state your name and job title.

A. My name is Joseph Teed. I am currently the Director of Construction at Otelco, Inc., parent company of CRC Communications LLC ("OTELCO").

Q. Have you previously provided testimony in this proceeding?

A. No, I have not previously provided testimony in this proceeding.

Q. Please describe your background and experience in working with pole attachments.

A. I am a professional in the field of aerial and underground construction and make-ready, and have worked for OTELCO for almost ten years. Prior to my work with OTELCO, I started my career in the telecommunication industry in the year 2000 as a Lineman for Frontier Telephone of Rochester, NY. I was then hired by Lantek Fiber Optic Service (now "OTELCO") in 2015 as their Line Construction Manager. I am currently the Director of Construction for GoNetspeed for New York, Pennsylvania, Connecticut, Massachusetts, and Maine. I have over twenty years experience in analyzing pole loading and field surveys and evaluating the design and performance of make-ready work for, and the construction of, pole attachments in accordance with applicable NESC specifications. This includes proper evaluation of the physical environment, determination of the necessary equipment and materials, and anticipation of potential challenges or obstacles and making any

necessary modifications in the field. Hence, in my role as Director of Construction, I am able to review and analyze pre-construction survey materials to determine whether poles can accommodate additional attachments using various construction methods, including boxing of poles.

B. PURPOSE OF TESTIMONY

Q. Please explain the purpose of your testimony.

A. The purpose of my Rebuttal testimony is to respond to the testimony provided by David Wolanin on behalf of Verizon New England Inc. ("Verizon"), and Joy Banks on behalf of Massachusetts Electric Company d/b/a National Grid ("National Grid"), as well as assertions made in Verizon's and National Grid's (collectively, "Pole Owners") responses to the DTC's Third Set of Information Requests.

C. SUMMARY OF TESTIMONY

Q. Would you briefly summarize the areas upon which you are testifying?

A. My testimony addresses: (1) the process of performing Desktop Engineering of the existing pre-construction survey information of the poles on OTELCO's information submitted in the record in this proceeding on May 15, 2024 ("Survey information") to evaluate the feasibility of OTELCO boxing poles identified by Verizon and Grid as needing replacement if a communications line is attached on the same side of the pole as other communications attachments; (2) whether any changed pole conditions can be addressed in the field at the time of construction; and, (3) certain claims and testimony proffered by Verizon and National Grid.

II. TESTIMONY

A. EVALUATION OF BOXING REQUESTS

Q. Have you reviewed the existing Survey information submitted by OTELCO in this proceeding?

A. Yes, I am familiar with all of the Survey information submitted by OTELCO in this proceeding, including the Exhibit 5s and O'Calc reports (both performed by National Grid contractor Osmose), the Form 3s and Verizon Prelims (both performed by Verizon contractor Pike), the IKE Files and photographs (performed by OTELCO's contractor CHR Solutions), as well as additional photographs of Verizon boxed poles.

Q. Is the information provided in the existing Survey materials sufficient to conduct a desktop review of the pole conditions to evaluate whether a pole is suitable for boxing?

A. Yes, it is. In order to conduct a review of pole conditions to determine whether a pole has capacity to accommodate additional attachments, whether through boxing or another construction technique, one would review the existing attachments to the pole, any additional equipment on the pole, ground clearance and attachment heights and separations. This type of review (referred to hereinafter as "Desktop Engineering") is a common method by which pole capacity is evaluated.

Q. Were you able to perform Desktop Engineering of OTELCO's boxing requests?

Yes, I performed Desktop Engineering for a number of poles which OTELCO has requested to box.

Q. Please describe the Desktop Engineering process.

A. In evaluating the Survey information to determine whether sufficient information exists to make a boxing determination, I begin by reviewing the attachment height measurements. These can be identified in IKE photographs and are listed on the National Grid Exhibit 5s and Verizon Form 3s. I also review the midspan heights on both sides of the pole from the Verizon Prelims[1] provided as well as available O'Calc reports. Next, I review the pole conditions, which can also be gleaned from the existing Survey materials and can be viewed on the existing photographs of the poles from multiple sources. OTELCO has photographs of each pole in the IKE Excels compiled by our contractor, CHR Solutions. Additionally, photographs are included in the O'Calc Reports, and Google Maps and Google Earth photographs are available, which can be viewed from various sides of the pole. Using all of this existing information, I evaluate the pole to determine whether boxing the pole would create a safety, reliability or engineering issues in light of the existing attachments and pole conditions.

Q. In performing Desktop Engineering, do you review Verizon's "As of Now" pole conditions?

A. Yes, I do. Verizon Senior Engineer, David Wolanin provided "As of Now" conditions that he stated would be used to assess boxing requests. Please see Testimony of Larry Slavin for additional assessment of the As of Now conditions and Boxing Standards proposed by the Pole Owners. Verizon listed whether a pole has risers, side-taps, or large equipment

[1] OTLECO received several Verizon Prelims upon request from Osmose. The Pole Owners would have copies of the Exhibit 5s, Verizon Form 3s and Verizon Prelims for all poles. Verizon does not normally share the Verizon Prelims with OTELCO.

attached in communications space, and whether the pole is on an embankment or is a corner pole, and whether a pole is already boxed, as conditions that would be evaluated in assessing boxing feasibility. OTELCO provided a spreadsheet detailing whether each of these conditions is present on the poles OTLECO requested to box. Please see OTELCO's Boxing Data Compilation Excel spreadsheet, provided in OTELCO's evidence submission on May 15, 2024.

Q. Was any information missing in the existing Surveys that was needed to determine whether boxing was feasible?

A. No, I was able to locate all necessary information to evaluate OTELCO's boxing requests. To be clear, the information I relied upon is available for all poles, and there is overwhelming consistency and overlap between the information collected in the existing Surveys. In my opinion, requiring separate contractors to collect the information provided in the existing Surveys is an inefficient use of resources, particularly if the costs are billed to OTELCO which has already paid Verizon and Grid, or their contractors, thousands for the existing Survey information. In fact, going forward, the pre-construction survey process should be simplified to use a single contractor who collects all information and provides a streamlined survey for review in a single Excel spreadsheet.

Q. For illustrative purposes, please walk through the Desktop Engineering Process for a few sample poles.

A. Certainly. I reviewed Item Nos. 9, 10 and 19, identified as Electric Pole Nos. 2, 1 and 14 in column B of Exhibit 5 for OTLECO's PALM A3-1 pole attachment application,

attached hereto as *Attachment A.* The entries for these poles are located in rows 23, 24 and 33 of the Exhibit 5 spreadsheet (rows highlighted in yellow for easy identification).

As a first step, to ensure adequate clearance and separation for an opposite side attachment, I reviewed the attachment heights for secondary (column P), municipal (column T), Cable TV ("CATV," column X), and Telco (column Z). The existing attachment heights are also provided on the "Existing Attacher Mr InFo" tab of the Verizon Form 3, attached hereto as *Attachment B* (rows highlighted in green). To assess whether it would be possible to switch back and forth from the street side to the field side, I also looked at available midspan information. A review of the mid-span separations can be accomplished by visually examining photographs. Additional mid-span measurements can be found in column S of the Verizon Prelim, attached hereto as *Attachment C* (rows highlighted in blue) and in the O'Calc reports. Based on my review of these particular poles, boxing will not create a separation or clearance issue, nor will moving from the street to the field side and back again. For Pole No. 14, attachment can be made to the field side of the pole, 12 inches above the existing CATV attachment without separation issues between the existing attachers or the fire alarm wire (a small diameter copper wire referred to as "fire wire"). There is also room for attachment on Pole No. 1 at a height of 21'1" inches, leaving sufficient separation between CATV and Verizon's existing attachments, and Pole No. 2 can be boxed at an attachment height of 19'10". In all cases, OTELCO would sag in its lines to maintain required separations.

Next, I reviewed the pole conditions, such as attached equipment, also found on the "Existing Attacher Mr InFo" tab of the Verizon Form 3s. The Form 3s for Pole No. 2

shows the presence of a streetlight, and show pole anchor guys on both Pole Nos. 1 and 2, while the Form 3 for Pole No. 14 lists a pole anchor guy, street light, fire alarm (addressed above) and riser attachments. *See Attachment B*, column G rows 43, 44, 46, 87, 88, 90 and 91.

In addition to this information, we also have an Osmose's O'Calc report for Pole No. 2, attached hereto as *Attachment D*, and an IKE Excel file for application PALM A3-1, attached hereto as *Attachment E*. While the above information is sufficient in and of itself – it can also be helpful to review photographs of the poles in question, which are included in the IKE files and O'Calc reports, and can also be found online using Google Maps and Google Earth. IKE photographs for Pole Nos. 1, 2 and 14 are attached hereto as *Attachments F, G and H* respectively.

In reviewing these pole conditions, I am examining whether boxing the pole would interfere with any of the attached equipment or otherwise create a safety, reliability or engineering issue. The photograph of Pole No. 1 clearly shows the Pole Anchor Guys leading from the backside of the pole. *See Attachment F*. However, this pole is easily accessed by bucket truck, has no visible embankment, and, there is no separation or clearance issues with the attached guy wire as OTELCO can maintain separation of 4 inches from the streetlight, and 40 inches from secondary as required by the NESC. *Id.* For Pole No. 2, the streetlight and pole anchor guy likewise do not create an issue if the pole is boxed because the pole is easily accessed by bucket truck, the street light is well above the communications space, and there is sufficient separation from the attached guy wire to avoid any interference. *See Attachment G.* With regard to concerns of moving

from the field side to the street side, one can always box a line of poles to avoid possible midspan clearance issues along the line. Please see a photograph of Electric Pole No. 6, attached hereto as *Attachment I.*[2] Lastly, the attachments on Pole No. 14 will not interfere with boxing the pole. Again, the street light is above the communications space and the riser is to the side of the pole and will not be damaged by boxing. *See Attachment H.* There is sufficient separation from the pole anchor guy, which is stretching from the backside of the pole, and it is not on an embankment and will not create an access issues for the pole. *Id.*

In short, my review of these materials demonstrates that boxing will not create any safety, reliability or engineering concerns on these poles.

B. DESIGN MODIFICATIONS CAN BE MADE IN THE FIELD

Q. The Pole Owners assert that the existing Surveys are outdated and should not be relied upon. Do you agree?

A. No, I do not. In my experience pole conditions remain unchanged for extended time periods and surveys conducted years prior are used successfully to review pole conditions and attachment information. Even storm restoration does not tend to change the pole conditions in a way that impacts communications attachments unless the pole is replaced. In this case, OTELCO has requested to box poles slated for replacement only. Thus, if another attacher wished to attach to one of those poles in the communications space, the attacher would either have to box the pole, or the pole would need to be replaced prior to the new attachment. In either scenario, OTELCO would still be able to attach to the pole

[2] Pole No. 2 is surrounding by Pole Nos. 1 and 6.

through boxing – or, if additional capacity was added through replacement with a taller pole, then OTELCO could simply attach to the new pole.

Q. What would happen if OTELCO encountered changed pole conditions in the field that prevented it from boxing a pole?

A. If conditions have changed on a pole after the survey was completed that affect the design of the attachment, the first response would be to reevaluate the attachment design and determine if it can be modified in the field consistent with the NESC and other applicable standards to complete the attachment. If it can be modified, then modifications should be made and notification of same should be provided to the Pole Owner. A post-construction inspection may be, and typically would be, conducted at the direction of the pole owner to ensure the constructed attachment is NESC compliant. If a post-construction inspection reveals non-compliance, OTELCO is required by its pole attachment agreement to make any necessary changes.

Q. The Pole Owners argue that if one encounters changed pole conditions in the field, it will result in substantial delays and additional costs to OTELCO. Do you agree?

A. Not necessarily. If the contractor is permitted to make appropriate modifications in the field to address possible changed conditions, then the delays and associated costs should be minimal. The costs and delays associated with resurveys would far outweigh any additional costs and time expended in making reasonable modifications in the field – as is common practice.

III. CONCLUSION

Q. Do you swear that your testimony is true and accurate to the best of your knowledge?

A. Yes.

Q. Does this conclude your pre-filed testimony?

A. Yes.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

By: Joe Teed

Joseph Teed

Dated: May 29, 2024

Confidential Attachment A

Exhibit 5 – PALM A3-1

Confidential Attachment B

Verizon Form 3 – PALM A3-1

Confidential Attachment C

Verizon Prelim – PALM A3-1

Confidential Attachment D

O'Calc Report – Pole No. 2

Confidential Attachment E

IKE File – PALM A3-1

Confidential Attachment F

Photo Pole No. 1

Confidential Attachment G

Photo Pole No. 2

Confidential Attachment H

Photo Pole No. 14

Confidential Attachment I

Photo Pole No. 6