

**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

**OTELCO REBUTTAL TO VERIZON AND NATIONAL GRID TESTIMONY AND  
RESPONSES TO DEPARTMENT INFORMATION REQUESTS**

CRC Communications LLC d/b/a OTELCO (“OTELCO”) submits its Rebuttal to Verizon New England, Inc.’s (“Verizon”) and the Massachusetts Electric Company d/b/a National Grid’s (“National Grid”) Testimony and Responses to Massachusetts Department of Telecommunications and Cable’s (“DTC” or “Department”) Information Requests (“Rebuttal”) filed on May 15, 2024 in accordance with the Department’s May 1, 2024 order setting a procedural schedule and seeking to supplement the record in this proceeding and to hear from the parties regarding the resurvey issue (“Scheduling Order”).

***DTC Scheduling Order***

On May 1, 2024, the Department entered its Scheduling Order, which provided that any party may submit evidence to assist the Department in resolving the resurvey issue by May 15, 2024. Any party may submit rebuttal evidence by May 29, 2024.

***OTELCO's Rebuttal Evidence***

Accordingly, OTELCO now submits its Rebuttal in response to the information and testimonies submitted by Verizon and National Grid regarding the issue of whether the Pole Owners can reasonably require new preconstruction surveys, at OTELCO's expense, prior to evaluating OTELCO's boxing requests. Specifically, OTELCO is contemporaneously submitting the following testimony with its Rebuttal:

- a) Rebuttal Testimony of David Allen
- b) Rebuttal Testimony of Larry D. Slavin
- c) Rebuttal Testimony of Joseph Teed

OTELCO filed its request for confidential treatment of OTELCO's evidence, submitted in response to the Order on May 15, 2024. OTELCO is contemporaneously filing a request for confidential treatment of portions of its Rebuttal submission as well.

Respectfully submitted,

**CRC Communications LLC d/b/a OTELCO**

By its Attorneys:

/s/ Maria T. Browne  
Maria T. Browne  
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Date submitted: May 29, 2024

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2024, I caused a copy of the foregoing OTELCO's Rebuttal to Verizon and National Grid Testimony and Responses to Department Information Requests to be served via U.S. mail, first-class postage prepaid, in accordance with the requirements of 220 CMR § 1.05(1) on the following:

National Grid  
Attn: Joy Banks  
Manager, Third Party Attachments  
40 Sylvan Road  
Waltham, MA 02451  
[Joy.banks@nationalgrid.com](mailto:Joy.banks@nationalgrid.com)  
Tel.: 617-949-6134  
*(also sent via email)*

National Grid  
Attn: Commercial Legal  
Legal Department  
40 Sylvan Road  
Waltham, MA 02451

Verizon New England, Inc.  
Manager – License Administration Group  
6 Bowdoin Sq Floor 6  
Boston, Massachusetts 02114  
Attention: Terrence Toland  
Title: Agreement Manager  
Tel.: 978-372-4018  
[Terrence.Toland@one.verizon.com](mailto:Terrence.Toland@one.verizon.com)  
*(also sent via email)*

/s/ Maria T. Browne  
Maria T. Browne