

**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

**PRE-FILED RESPONSIVE TESTIMONY OF  
TOM PERRONE  
ON BEHALF OF  
CRC COMMUNICATIONS LLC, d/b/a OTELCO**

August 1, 2022

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CRC COMMUNICATIONS LLC, d/b/a OTELCO**

10 **Q. Please state your name and title and summarize your experience and responsibilities.**

11 A. My name is Tom Perrone. I am the Chief Operating officer of NetSpeed LLC. NetSpeed  
12 LLC, OTELCO and Finger Lakes Telecommunications Group are owned by Future Fiber  
13 LLC, and form the GoNetspeed family of companies. I have been COO of NetSpeed LLC  
14 for six years. I have worked in the competitive telecommunications industry for over 25  
15 years. I have a Bachelor of Science degree in Telecommunications from Rochester  
16 Institute of Technology. I have worked at competitive telecommunications providers,  
17 building fiber networks throughout the Northeast, Mid-Atlantic, and Midwest regions of  
18 the United States. Because of my experience at NetSpeed and other providers, I have  
19 experience building communications networks by attaching fiber to existing utility poles,  
20 and knowledge of pole attachment rules and standards, and their impact on fiber  
21 deployment speed and costs. I also have first-hand knowledge of GoNetspeed's network  
22 buildout in Connecticut, where opposite side construction is commonly used for building  
23 competitive broadband networks.

24 **Q. Did you provide pre-filed testimony on behalf of OTELCO in support of their case**  
25 **against National Grid and Verizon in this matter?**

26 A. Yes, I did.

1 **Q. What is the purpose of your current testimony?**

2 A. The purpose of my current testimony is to respond to certain discovery responses National  
3 Grid and Verizon have submitted in this case relating to boxing.

4 **Q. Have you reviewed National Grid's responses to the Department of Public Utilities'**  
5 **("DPU") First Set of Information Requests?**

6 A. Yes, I have.

7 **Q. In response to DPU-NG-1-2, National Grid discusses the National Joint Use**  
8 **Notification System ("NJUNS") used in Massachusetts. Is this the same electronic**  
9 **notification system used in Connecticut?**

10 A. No. While I'm familiar with NJUNS, in Connecticut the primary electronic notification  
11 system used is Alden One. Like NJUNS, Alden One is a program used to notify third-  
12 party entities via email to transfer their attached facilities from an existing pole to a  
13 newly installed pole. Both systems follow similar pole transfer process workflows. For  
14 instance, like NJUNS, the Alden One notification takes the form of a ticket with steps  
15 identifying each third-party entity that needs to transfer, and the order in which the third-  
16 party entity transfers are to occur. Both systems facilitate tracking the use of the poles by  
17 others as the process unfolds.

18 **Q. Given the similarities between the processes in NJUNS and Alden One, what is your**  
19 **reaction to National Grid's argument in DPU-NG-1-2 that OTELCO's alternative**  
20 **attachment proposals will complicate the pole transfer process?**

21 A. This is not a valid concern, in my opinion. Under an electronic notification process, such  
22 as NJUNS or Alden One, the most common challenge in completing a pole transfer is the

1 failure of any given party to perform work within its allotted time-sequence. As  
2 explained by Alden One on its website describing “Pole Transfer Challenges”:  
3 “Sometimes attached entities never receive a transfer notice. Sometimes the notice goes  
4 to the wrong contact or in the trash. Sometimes contractors are tied up with other work.”<sup>1</sup>  
5 In my experience in Connecticut, where boxing is ubiquitous, the most commonly cited  
6 problem with the transfer process has been that the incumbent local exchange carrier,  
7 Frontier, fails to perform its transfers in a timely manner. Moreover, as I said in my prior  
8 testimony, boxing the pole allows the pole owner to avoid a premature pole replacement  
9 and therefore avoids even this transfer challenge.

10 **Q. National Grid also suggests in response to DPU-NG-1-2 that OTELCO’s proposals**  
11 **for boxing and wire placement below Verizon would prolong the cycle time of**  
12 **licensing for attachers. Do you agree?**

13 A. No, I do not. As I explained in my prior testimony, boxing actually reduces the time  
14 required to build networks and service customers because the amount of actual make-  
15 ready work required to be completed is dramatically reduced or eliminated. Moreover,  
16 what Verizon seems to be saying in the text following this statement is that boxing could  
17 increase the licensing time cycle *when a new pole is set to accommodate the new*  
18 *attachment and the old pole is boxed* (it talks about reconstructing boxing and pole butt  
19 removal). But this argument also makes little sense to me. First, if a new pole is being set  
20 to accommodate a new licensed attachment, it will typically be at least five feet taller  
21 than the old pole because poles come in five-foot increments. When a new, taller pole is

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<sup>1</sup> See <https://info.aldensys.com/joint-use/how-to-streamline-joint-use-utility-pole-transfers>.

1 set, sufficient space on the new pole exists to accommodate all attachments on the same  
2 side of the pole so there is no need to “reconstruct the boxing.” This is how it has worked  
3 in Connecticut. Second, any incremental time required to address boxing during the pole  
4 *removal* process would not extend the licensing process for attaching to the new pole,  
5 which would be set prior to the removal of the old pole.

6 **Q. In Connecticut, where you previously testified that boxing is “prevalent,” has**  
7 **NetSpeed experienced the type of increased operations costs National Grid describes**  
8 **in response to DPU-NG-1-2?**

9 A. No. National Grid states that additional resources will be required to access opposite side  
10 construction during the maintenance and storm restoration process and will increase  
11 vegetation and tree-trimming costs. That has not been the case in Connecticut, where  
12 nearly 100 percent of the 110,000 poles to which NetSpeed is attached are boxed. In fact,  
13 I have observed no difference in operational costs where poles are boxed compared to  
14 where poles are not boxed (which is more typically the case in OTELCO’s Pennsylvania  
15 service territory that I also oversee).

16 **Q. Do you agree with National Grid’s assertion in response to DPU-NG-1-2 that boxing**  
17 **compromises worker safety?**

18 A. No. As I previously testified, I am not aware of any instance in which boxing has led to a  
19 worker injury. Nor am I aware of any damages caused by or related to boxing in  
20 Connecticut.

21 **Q. Based on your experience in Connecticut, does boxing increase storm restoration**  
22 **times as National Grid asserts in response to DPU-NG-1-2?**

1 A. No, it does not. In my experience in Connecticut, where we have experienced many  
2 strong storms since NetSpeed started attaching to poles, boxing does not contribute to  
3 storm outages, nor does it increase storm restoration times. And, to put this in  
4 perspective, NetSpeed is attached to more than 10 percent of the approximately 900,000  
5 poles in the state.<sup>2</sup> And, based on my experience, nearly all poles in Connecticut with  
6 competitive providers attached are boxed.

7 **Q. Have you reviewed Verizon’s responses to the DTC’s and the DPU’s First Set of**  
8 **Information Requests?**

9 A. Yes, I have.

10 **Q. Verizon states in response to DTC-Verizon 1-3 that the “key added expense imposed**  
11 **by boxing comes from the extra degree of difficulty of replacing a pole.” What is your**  
12 **response?**

13 A. In my view, Verizon’s arguments concerning pole replacements is somewhat self-  
14 serving. As I explained in my prior testimony, limiting boxing will frequently trigger the  
15 need to replace a pole with a new, taller utility pole – a cost that is typically charged as  
16 make-ready to the applicant. Often these pole replacements are premature and could be  
17 avoided with boxing. Yet it seems that Verizon is resistant to boxing because it may  
18 eventually be more expensive for *it* to replace a boxed pole that may actually need to be  
19 replaced for reasons other than spacing (i.e., poles that are old or in poor condition). My  
20 experience in Connecticut has shown that pole owners are not only capable of replacing  
21 boxed poles, but also any incremental increase in pole replacement difficulties and/or

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<sup>2</sup> See <https://portal.ct.gov/-/media/OCC/91912margaretpdf.pdf>

1 costs is offset by the substantial decrease in the number of poles requiring early  
2 replacement due to the use of boxing.

3 **Q. Verizon states in response to DTC-Verizon 1-8 that “[b]oxing makes pole work**  
4 **more complicated and less safe” and “problematic.” Are you aware of whether**  
5 **Verizon is currently using boxing in Connecticut despite these stated arguments**  
6 **against the practice?**

7 A. Yes. It is my understanding that Verizon currently boxes poles as a third-party attacher  
8 in Connecticut. Attached as Exhibit TP-1 to my testimony are true and correct copies of  
9 photographs of these boxed poles in Connecticut. They were taken by an employee of  
10 OTELCO’s construction affiliate on August 1, 2022, in the regular course of business,  
11 and are kept in the course of OTELCO’s regularly conducted business activities. These  
12 photographs depict new construction by Verizon in Trumbull, Connecticut, and reflect  
13 the prevalent practice in Connecticut of having third-party attachers place fiber on the  
14 field side of the pole.

15 **Q. In response to DPU-Verizon 1-5, Verizon claims that if OTELCO were allowed to**  
16 **box poles, “pole owners and other attachers, some of whom may directly compete**  
17 **with OTELCO, [would be forced] to foot the bill for OTECLO’s build ... by making**  
18 **poles more expensive to work on and maintain for every other attacher, including**  
19 **the pole owners.” Do you agree with Verizon’s assessment?**

20 A. No, I do not. As a general matter, the mere presence of new facilities on a pole  
21 complicates work on the pole for other parties, regardless of whether any of the new

1 facilities are boxed. Further, the marginal increase of complication created by boxing is  
2 minimal and far outweighed by the benefits of boxing.

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

4 A. Yes.

5 **Q. Does this conclude your pre-filed responsive testimony?**

6 A. Yes

# **Exhibit TP-1**

## Verizon Aerial Attachments in the Trumbull area, Connecticut



All images were taken 8-1-2022 between 11:00am – 12:00pm

(RS) – Roadside

(FS) – Field side



Points to Verizon Strand

Pole 1 - Picture (RS), Strand on (FS) of the Pole

Pole Number – 2822

Pole address - 220 Lake Ave, Trumbull, CT 06611



Pole 1 - Picture (FS), Strand on (FS) of the Pole

Pole Number – 2822

Pole address - 220 Lake Ave, Trumbull, CT 06611



Pole 2 - Picture (RS)

Pole Number – 2823

Pole address - 226 Lake Ave, Trumbull, CT 06611



Pole 2 - Picture (FS), Strand on (FS) of the Pole

Pole Number – 2823

Pole address - 226 Lake Ave, Trumbull, CT 06611



Pole 3 - Picture (RS)

Pole Number – 2824

Pole address - 232 Lake Ave, Trumbull, CT 06611



Pole 3 - Picture (FS), Strand on (FS) of the Pole

Pole Number – 2824

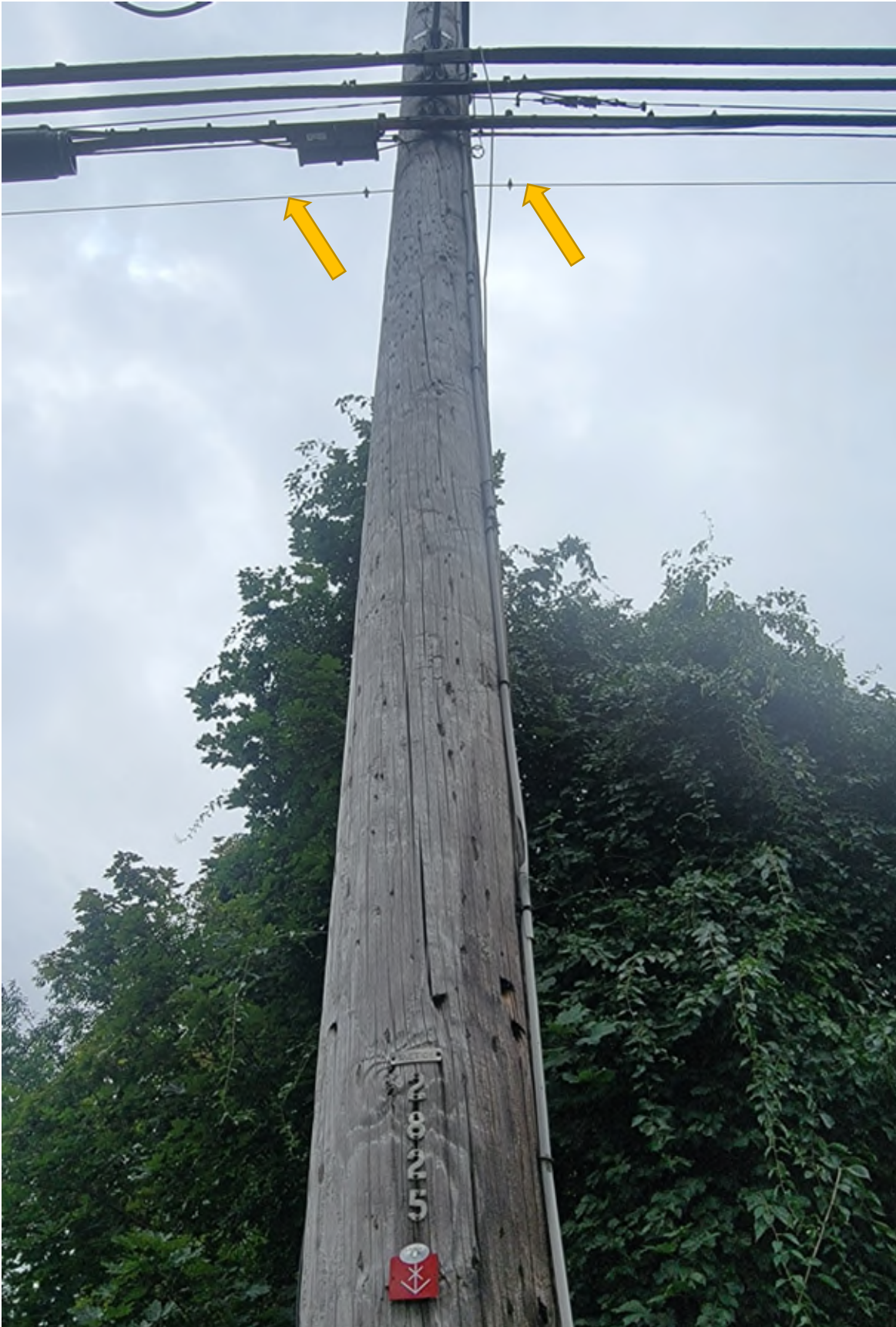
Pole address - 232 Lake Ave, Trumbull, CT 06611



Pole 4 - Picture (RS), Strand on (FS) of the Pole

Pole Number – 2825

Pole address - 238 Lake Ave, Trumbull, CT 06611



Pole 4 - Picture (FS), Strand on (FS) of the Pole

Pole Number – 2825

Pole address - 238 Lake Ave, Trumbull, CT 06611



Pole 5 - Picture (RS)

Pole Number – 1278

Pole address - 239 Lake Ave, Trumbull, CT 06611



Pole 5 - Picture (FS), Strand on (FS) of the Pole

Pole Number – 1278

Pole address - 239 Lake Ave, Trumbull, CT 06611

