

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

CRC Communications LLC d/b/a OTELCO v.  
Massachusetts Electric Company d/b/a National Grid  
and Verizon New England Inc.

D.T.C. 22-4

**FIRST SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF PUBLIC UTILITIES  
TO VERIZON NEW ENGLAND**

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Pursuant to 207 CMR 1.06(6)(c), the Department of Public Utilities (“DPU”) submits to Verizon New England d/b/a Verizon Massachusetts (“Verizon” or “Company”) its First Set of Information Requests.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the DPU to the Company in this proceeding.

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers

and calculations in the form of working Microsoft Excel spreadsheets with all cell references and formulae intact.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company finds that any one of these requests is ambiguous, please notify the issuing attorney at [kerri.phillips@mass.gov](mailto:kerri.phillips@mass.gov) so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an information request of another party, please provide that response and answer with information that supplements the previous response.
8. All responses should contain an internally consistent and usable form of referencing. Documents of three pages or more without a preexisting referencing system should be marked with consecutive page numbers. Where it is necessary to supply page numbers for a document, the numbers should be added in some way that differentiates the additions from the preexisting text. Each individual information request response should be submitted in a separate PDF file. In addition, the entire set of information request responses should be submitted as a single PDF file (or, in the case of large sets, as few separate PDF files as possible). In each instance, the electronic file name should identify the document, but should not exceed 50 characters in length.

### Requests

- DPU-VZ 1-1 Refer to Verizon’s Response to CRC Communications LLC, d/b/a OTELCO’s (“OTELCO’s”) Complaint (“Response”) at 5; Wolanin Affidavit, ¶ 2; Exh. A at 2; Exh. B, § 2.2.
- a. For the three municipalities identified by Verizon in its Response, please explain whether any of the municipalities prohibit or limit boxing on utility poles. If so, identify and provide a copy of the applicable municipal requirement(s), code(s), standard(s), or by-law(s) that addresses boxing for each municipality.
  - b. For all other municipalities within Verizon’s service territory, explain whether the Company is aware of any municipalities that prohibit or limit boxing on utility poles and, if so, identify those municipalities.

- DPU-VZ 1-2 Refer to Verizon's Response at 18, 23; and Wolanin Affidavit, ¶¶ 7, 9. For emergency pole replacements and non-emergency pole replacements, both storm-related and unrelated to storm events, please:
- a. describe in detail the current pole attachment transfer and notification process in Massachusetts for Verizon solely-owned and jointly-owned poles; and
  - b. provide a detailed explanation for how OTELCO's proposals for boxing and wire placement will make the pole attachment transfer process more difficult and complicated.
- DPU-VZ 1-3 Refer to Double Utility Poles, D.T.E. 03-87, Massachusetts Electric Company and Nantucket Electric Company Double-Pole Report at 2 (May 27, 2022); D.T.E. 03-87, Verizon Semi-Annual Double-Pole Report (May 18, 2022).
- a. Please confirm that Verizon utilizes the National Joint Use Notification System ("NJUNS") database as the source for its semi-annual double-pole reports filed with the DPU and the DTC and for its pole attachment transfer notifications in Massachusetts.
  - b. Explain whether the NJUNS database accommodates the use of boxing and alternative wire placements relative to the telephone company wires ("alternative wire placements") in the system.
  - c. Provide an illustrative screenshot from NJUNS of an electronic transfer notification under the current pole transfer process for Verizon-owned poles.
  - d. If the NJUNS database accommodates the use of boxing and alternative wire placements in the system, provide an illustrative screenshot of an electronic transfer notification for Verizon-owned poles on which those attachment methods are utilized.
  - e. If the NJUNS database does not accommodate the use of boxing and alternative wire placements in the system, describe and provide support for any anticipated costs to update NJUNS to account for those attachment methods. Additionally, explain how those costs would be allocated between major pole owners.
- DPU-VZ 1-4 Refer to Verizon's Response at 10-11; Wolanin Affidavit, ¶¶ 9, 14. Please explain whether existing contracts or collective bargaining agreements with Verizon employees and external contractors limit the use of boxing or alternative wire placements.

- DPU-VZ 1-5 To the extent the Department of Telecommunications and Cable (“DTC”) allows OTELCO’s make-ready proposals in relation to boxing and alternative wire placements, please confirm whether this will require revisions to the Company’s existing contracts, agreements, and internal processes (e.g., Joint Ownership Agreements, Pole Attachment Agreements, vegetation management and storm restoration processes, mutual aid agreements, collective bargaining agreements, etc.) and the anticipated process(es) and timeline(s) for such revisions.
- DPU-VZ 1-6 Refer to Verizon’s Response at 4, 5, 9, 17-18; Wolanin Affidavit, ¶¶14; Exh. B, § 3.1.1; and DTC Consumer Guide, “Copper to Fiber Transition: What Consumers Need to Know” available at <https://www.mass.gov/doc/dtc-english-copper-to-fiber-guide/download> (last viewed July 6, 2022).
- a. Please (i) confirm whether Verizon continues to use copper cable in the three municipalities identified in the complaint; and (ii) identify all Massachusetts municipalities in which Verizon continues to use copper cable in its service territory.
  - b. Discuss whether Verizon has the same safety concerns where Company-owned fiber has replaced copper cable.
- DPU-VZ 1-7 Refer to Verizon’s Response, Wolanin Affidavit, ¶¶ 8-9, 14; Exhs. A&B. Please elaborate on Verizon’s public safety and reliability concerns in relation to boxing and alternative wire placements. Include in this discussion and provide support for the factors considered by the Company in whether to allow these attachment methods, and address whether considerations also include possible weather or emergency events, population density, pole location (e.g. urban versus rural, proximity to private property, etc.), proximity of buildings and other structures, etc.

Dated: July 6, 2022