



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

D.T.C. 22-4

August 22, 2023

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

**THIRD SET OF INFORMATION REQUESTS
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO MASSACHUSETTS ELECTRIC COMPANY d/b/a NATIONAL GRID AND
VERIZON NEW ENGLAND INC.**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits the following information requests:

Instructions

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. These requests shall be deemed continuing so as to require supplemental responses if any party or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
3. 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 work-papers. Provide live Excel spreadsheets.
4. 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, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as

Facebook and Twitter, and/or 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.

5. If any one of these requests is ambiguous, notify the Department so that the request may be clarified prior to the preparation of a written response.
6. File responses with Shonda D. Green, Secretary of the Department, not later than the close of business on **September 21, 2023**.

Requests

Requests for Massachusetts Electric Company d/b/a National Grid (“National Grid”)

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| DTC-NG 3-1 | Do the field surveys that precede make ready work identify: <ol style="list-style-type: none">A. Whether all facilities on the pole are labeled to identify ownership?B. The individual attachers already on the pole?C. The owner of each facility that needs to move to allow for the new attachment?D. A specific sequence for moving prior attachers to allow for the new attachment? |
| DTC-NG 3-2 | For any of the poles covered in OTELCO’s applications: <ol style="list-style-type: none">A. Identify whether National Grid has received any additional third-party attachment requests that require a field survey since October 11, 2022.B. If National Grid has received any additional applications, describe the status of those applications.C. If National Grid has not received any additional applications, confirm whether National Grid has any pending attachment applications besides OTELCO for any of the municipalities included in OTELCO’s applications. |
| DTC-NG 3-3 | Of the poles covered by OTELCO’s applications that are mentioned in National Grid’s Opposition to OTELCO’s Motion for Enforcement on page 14-15, confirm: <ol style="list-style-type: none">A. The number of poles solely owned by National Grid. |

- B. The number of poles jointly owned by National Grid and Verizon.
- C. If there are any other ownership arrangements, what they are, and how many poles there are in each category.
- DTC-NG 3-4 To date, what amount has OTELCO paid National Grid in field survey fees?
- DTC-NG 3-5 For jointly owned poles, both Verizon and National Grid have referenced a reconciliation process in which the joint owners reach a consensus about what make ready work will be required for each jointly owned pole before a final make ready proposal is sent to an attacher such as OTLECO. *See* National Grid Response to DTC IR 1-3 (July 12, 2022) and Verizon Direct Testimony at 10 (August 1, 2022). For OTELCO's applications:
- A. When reconciliation was needed, who participated in the reconciliation discussions?
- B. Did reconciliation discussions take place in the field while observing the pole or some time afterwards at a different location? If discussions took place at a different location, specify where and when.
- C. For OTELCO's original applications, for what percentage of the poles did the joint owners, or their contractors, recommend the same make ready work, resulting in no reconciliation of the two surveys?
- D. Conversely, for OTELCO's original applications, for what percentage of the poles was reconciliation required because the joint owners, or their contractors, assessed the condition of the poles differently?
- E. How long did the reconciliation process take for the original surveys of OTELCO's poles?
- DTC-NG 3-6 Refer to National Grid's Opposition to the Motion for Enforcement at page 11 where National Grid argues that it needs to resurvey poles that OTELCO has requested to box. Has National Grid ever requested that an attachment applicant, besides OTELCO, pay for resurveys for an application? If so, what was the reason for that request and did the applicant pay for the resurveys?
- DTC-NG 3-7 If the Department permits the pole owners to resurvey the poles which OTELCO has requested to box, how could National Grid streamline the resurvey process to conduct a single survey with its joint pole owner to determine the feasibility of boxing, rather than having each pole owner conducting a separate survey?

- DTC-NG 3-8 What information must be included in an O-Calc report developed by Osmose? How does National Grid decide what information Osmose should include in an O-Calc report for a particular application?
- DTC-NG 3-9 National Grid indicates that certain O-Calc reports contain information such as the presence of guy wires, side arms or embankments which would preclude certain poles from being boxed. If the Department permits National Grid to conduct resurveys on the poles in OTELCO's applications only for the purpose of determining boxing suitability:
- A. Does National Grid propose streamlining the resurveys to reduce costs for OTELCO, given that the original survey provided much of the information to assess the strength of the pole?
 - B. What would be included in a resurvey that was *not* included in the original survey?
 - C. What would *not* be included in a resurvey that was included in the original survey?
- DTC-NG 3-10 Based on the information contained in the O-Calc reports, how many of the poles OTELCO has requested to box can National Grid already determine are unsuitable for boxing without conducting a resurvey?
- DTC-NG 3-11 If the Department permits the pole owners to only resurvey poles to determine whether boxing is suitable for the poles OTELCO has requested to box:
- A. How many poles does National Grid propose to resurvey, including those requested by OTELCO and any relevant neighboring poles?
 - B. How many field hours would such a resurvey take?
 - C. How much does National Grid propose to charge OTELCO for such a resurvey?
 - D. Once resurveys are completed, how will National Grid decide whether boxing is allowed?
 - E. Under what set of circumstances will boxing be allowed?
 - F. How long would it take for National Grid to provide new make ready estimates to OTELCO, starting with the date on which National Grid receives payment for the resurveys from OTELCO?

- DTC-NG 3-12 During the typical make ready process, what happens during the make ready work if field conditions have changed since the field survey was conducted? If inaccuracies in field surveys typically result in increased costs or delays, quantify the average costs and delays per pole.
- DTC-NG 3-13 How frequently does National Grid update the unit costs of equipment and labor to generate make ready work estimates?
- DTC-NG 3-14 Refer to page 18 of National Grid’s Response to OTELCO’s Motion for Enforcement. National Grid states that the make ready estimates provided in 2022 are “no longer valid and are based upon stale data and expired field surveys.” Does National Grid have a written standard for when field surveys in Massachusetts are considered “expired”?
- A. If so, provide the standard and any supporting documentation.
 - B. If so, has this standard ever been applied in Massachusetts to an applicant besides OTELCO? Does National Grid inform applicants or provide advanced notice ahead of a field survey expiring?
- DTC-NG 3-15 If National Grid does not have a previously established definition of when pole surveys expire, is it National Grid’s position that some, or all, of the surveys OTELCO originally paid for have now expired?
- A. If so, why does National Grid believe that the original field survey should be deemed expired in OTELCO’s case?
 - B. What information contained in the original field surveys is *not* considered expired by National Grid due to the passage of time?
- DTC-NG 3-16 If the Department permits the pole owners to resurvey any poles which the pole owners wish to resurvey for the purpose of updating field conditions:
- A. How many poles does National Grid propose to resurvey?
 - B. How many field hours would such a resurvey take?
 - C. How much does National Grid propose to charge OTELCO for such a resurvey?
- DTC-NG 3-17 If the Department permits National Grid to conduct any resurveys, provide a detailed timeline for when National Grid estimates it will be able to give OTELCO detailed cost estimates for the make ready work after the resurveys are completed.

- A. How long will National Grid take to reconcile surveys for any jointly owned poles?
- B. How long will National Grid take to turn all make ready proposals of its contractor into a detailed cost estimate for OTELCO? Describe what elements are considered when estimating the time National Grid calculates it will take to provide these estimates.

Requests for Verizon New England, Inc. d/b/a Verizon Massachusetts “Verizon”

- DTC-VZ 3-1 Do the field surveys that precede make ready work identify:
- A. Whether all facilities on the pole are labeled to identify ownership?
 - B. The individual attachers already on the pole?
 - C. The owner of each facility that needs to move to allow for the new attachment?
 - D. A specific sequence for moving prior attachers to allow for the new attachment?
- DTC-VZ 3-2 For any of the poles covered in OTELCO’s applications:
- A. Identify whether Verizon has received any additional third-party attachment requests that require a field survey since October 11, 2022.
 - B. If Verizon has received any additional applications, describe the status of those applications.
 - C. If Verizon has not received any additional applications, confirm whether Verizon has any other pending attachment applications for any of the municipalities included in OTELCO’s applications.
- DTC-VZ-3-3 Of the poles covered by OTELCO’s applications, confirm:
- A. The number of poles solely owned by Verizon.
 - B. The number of poles jointly owned by Verizon and National Grid.
 - C. If there are any other ownership arrangements, what they are, and how many poles are there in each category.

- DTC-VZ-3-4 To date, what amount has OTELCO paid Verizon in field survey fees?
- DTC-VZ-3-5 For jointly owned poles, both Verizon and National Grid have referenced a reconciliation process in which the joint owners reach a consensus about what make ready work will be required for each jointly owned pole before a final make ready proposal is sent to an attacher such as OTELECO. *See* National Grid Response to DTC IR 1-3 (July 12, 2022) and Verizon Direct Testimony at 10 (August 1, 2022). For OTELCO's applications:
- A. When reconciliation was needed, who participated in the reconciliation discussions?
 - B. Did reconciliation discussions take place in the field while observing the pole or some time afterwards at a different location? If discussions took place at a different location, specify where and when.
 - C. For OTELCO's original applications, for what percentage of the poles did the joint owners, or their contractors, recommend the same make ready work, resulting in no reconciliation of the two surveys?
 - D. Conversely, in OTELCO's original applications, for what percentage of the poles was reconciliation required because the joint owners, or their contractors, assessed the condition of the poles differently?
 - E. How long did the reconciliation process take for the original surveys of OTELCO's poles?
- DTC-VZ-3-6 Has Verizon ever requested that an attachment applicant besides OTELCO pay for resurveys for a single application? If so, what was the reason for that request and did the applicant pay for the resurveys?
- DTC-VZ-3-7 If the Department permits the pole owners to resurvey the poles which OTELCO has requested to box, how could Verizon streamline the resurvey process to conduct a single survey with its joint pole owner to determine the feasibility of boxing, rather than having each pole owner conducting a separate survey?
- DTC-VZ-3-8 If the Department permits the pole owners to only resurvey poles to determine whether boxing is suitable for the poles OTELCO has requested to box:
- A. How many poles does Verizon propose to resurvey, including those requested by OTELCO and any relevant neighboring poles?
 - B. How many field hours would such a resurvey take?

- C. How much does Verizon propose to charge OTELCO for such a resurvey?
- D. Once resurveys are completed, how will Verizon decide whether boxing is allowed?
- E. Under what set of circumstances will boxing be allowed?
- F. How long would it take for Verizon to provide new make ready estimates to OTELCO, starting with the date on which Verizon receives payment for the resurveys from OTELCO?

DTC-VZ-3-9 During the typical make ready process, what happens during the make ready work if field conditions have changed since the field survey was conducted? If inaccuracies in field surveys typically result in increased costs or delays, quantify the average costs and delays per pole.

DTC-VZ-3-10 How frequently does Verizon update the unit costs of equipment and labor to generate make ready work estimates?

DTC-VZ-3-11 Refer to Verizon's Opposition to Motion to Enforce Order at page 12. Does Verizon have a written standard for when it considers field surveys outdated due to the passage of time in Massachusetts?

- A. If so, provide the standard and any supporting documentation.
- B. If so, has this standard ever been applied in Massachusetts to an applicant besides OTELCO?

DTC-VZ-3-12 If Verizon does not have a previously established definition of when pole surveys become outdated due to changing conditions, is it Verizon's position that some, or all, of the surveys OTELCO originally paid for have now become outdated?

- A. If so, why does Verizon believe that the original field survey should be deemed outdated in OTELCO's case?
- B. What information contained in the original field surveys is *not* considered outdated by Verizon due to the passage of time?

DTC-VZ-3-13

If the Department permits the pole owners to resurvey any poles which the pole owners wish to resurvey merely to update field conditions:

- A. How many poles does Verizon propose to resurvey?
- B. How many field hours would such a resurvey take?
- C. How much does Verizon propose to charge OTELCO for such a resurvey?