

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. D.T.C 22-4**

**Respondent:** David L. Wolanin  
**Title:** Senior Engineer – Outside Plant

**REQUEST:** Department of Telecommunications and Cable, Set #3

**DATED:** May 15, 2024

**ITEM:** DTC-Verizon 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?

**REPLY:**

- A. The survey results do not specifically note whether all of the facilities on a pole are properly labelled.
- B. Yes, the surveys identify the owners of the existing attachments on the pole where possible.
- C. Yes. Where there is insufficient information from the field to identify an attacher that will be required to perform make-ready work, Verizon MA will conduct further investigation to identify the attacher.
- D. The make-ready survey process identifies the make-ready work that is required on a given pole, such as pole replacement and transfers or moves of existing attachments up or down the pole. The survey process does not identify a specific sequence of work for each pole because that is determined by the nature of the work. For example, if the existing attachments must be

moved up to accommodate the new facilities, the topmost attacher will be required to move its facilities first, followed by the next-highest attacher, and so on, working down to Verizon MA at the lowest location on the pole. For more detail on the sequencing of make-ready work, see Verizon MA's response to DTC-VZ 1-9.

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**ITEM:** DTC-Verizon 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.

**REPLY:**

- A. Yes, Verizon MA has received third-party applications since October 11, 2022, to attach to poles that are covered in OTELCO's applications. Going back further, Verizon MA received third-party applications in each of Belchertown, Northampton and Palmer since the original OTELCO surveys were conducted in 2021 and 2022 that may also cover poles that are also covered by OTELCO's applications.
- B. Some of the additional third-party applications received since October 11, 2022, are in the make-ready survey process. The surveys for other such applications have been

completed, and Verizon MA has issued make-ready estimates and is awaiting payment by the applicant before beginning construction. In addition, Verizon MA has issued licenses for the older third-party applications referred to in part A above.

C. Not applicable.

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**ITEM:** DTC-Verizon 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.

**REPLY:**

- A. Verizon MA does not track the number of poles in an application that are jointly owned or solely owned, and therefore it is not able to answer this request directly. However, as stated in Verizon MA's response to OTELCO-VZ 1-1, Verizon MA is the sole owner of approximately 40,000 poles in Massachusetts and is a joint owner of approximately 1.3 million poles in the state. We have no reason to think that this ratio is significantly different for the poles covered by OTELCO's applications, implying that, of the 6,529 poles covered by OTELCO's applications, perhaps 200 of them might be solely-owned by Verizon MA.
- B. The poles that are not solely-owned by Verizon MA are jointly-owned with National Grid, unless a few poles are solely-owned by National Grid.
- C. See responses to parts A and B, above.

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**ITEM:** DTC-Verizon 3-4 To date, what amount has OTELCO paid Verizon in field survey fees?

**REPLY:**

OTELCO has paid Verizon MA \$272,735 for the surveys of approximately 6,500 poles that Verizon MA has conducted in Belchertown, Palmer and Northampton.

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**ITEM:** DTC-Verizon 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, 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?

**REPLY:**

- A. For clarification, all survey results for jointly-owned poles are reconciled with the joint pole owner, if only to confirm that both owners agree on the work to be performed. For OTELCO's applications at issue here, the reconciliation discussions were between National Grid's contractor (Osmose) and Verizon MA's contractor (Pike). In addition, Verizon MA understands that, before having those reconciliation discussions with Pike, Osmose provided preliminary make-ready results to OTELCO and worked with OTELCO regarding concerns OTELCO raised with some of the proposed work.
- B. No, reconciliation discussions did not take place in the field. They took place in the offices of Osmose and Pike after each of them had analyzed the results of their surveys and made an initial determination of the work to be performed.
- C. Verizon MA does not track how many poles, or which ones, for which the joint owners or their contractors recommended the same make-ready work. It therefore has insufficient information to respond to this request. As noted above, however, even if each pole owner recommends the same make-ready work on every pole in an application, the pole owners or their contractors would not know that until they compare their results. That too is part of the reconciliation process.
- D. See response to part C, above.
- E. Verizon MA does not track how long the reconciliation process alone takes, and did not track this for OTELCO's applications. As noted in Part A above, that process did not begin until after Osmose had provided preliminary make-ready results to OTELCO and discussed concerns OTELCO raised with those results. On average, the time for the entire survey process from the date on which OTELCO paid for a survey to the date Verizon MA issued its make-ready estimate was four to six months. For most of that time, Verizon MA was waiting for OTELCO and Osmose to complete their discussions over the preliminary make-ready results from Osmose. Verizon MA generally completed the field surveys themselves within a month of payment from OTELCO.



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**REQUEST:** Department of Telecommunications and Cable, Set #3

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**ITEM:** DTC-Verizon 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?

**REPLY:**

Pole applicants generally pay Verizon MA's make-ready estimates within a few months of when they are issued, or they withdraw their applications. There was one project, however, where the applicant failed to pay the make-ready estimates within 18 months of when they were issued. In addition, the applicant proposed solutions for make-ready different than the work described in Verizon's estimates. As a result, Verizon MA required resurveys for that project in order to identify any changed conditions on the poles due to the passage of time and also to determine whether the customer's make-ready suggestions were workable and consistent with Verizon MA's construction standards. The applicant paid for the resurveys.

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**ITEM:** DTC-Verizon 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?

**REPLY:**

If the Department permits the pole owners to resurvey the poles which OTELCO has requested to box, Verizon MA would coordinate the field work with National Grid so that both pole owners would conduct a joint survey. Verizon MA would also invite OTELCO to attend the field surveys. Further, Verizon MA would propose to eliminate the intermediate step in which Osmose and OTELCO negotiate over preliminary results. This would significantly reduce the time it takes for the pole owners to issue make-ready estimates, while still allowing OTELCO the opportunity to raise any concerns once it reviews the reconciled estimates issued by both pole owners.

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**REQUEST:** Department of Telecommunications and Cable, Set #3

**DATED:** May 15, 2024

**ITEM:** DTC-Verizon 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?

**REPLY:**

- A. The spreadsheets OTELCO provided to Verizon MA with its initial request to box in October of 2022 identified 732 poles in National Grid service areas that were scheduled to be replaced and that OTELCO therefore sought to box. Ninety-six of these poles, however, are scheduled to be replaced at the Pole Owner's cost (not at OTELCO's cost) for reasons not caused by the need to accommodate OTELCO's attachments, leaving 636 poles as potential candidates for boxing. If the Department determines that only those poles and relevant neighboring poles should be re-surveyed, then Verizon MA would

plan to resurvey those 636 poles and the immediately neighboring poles on each side. That would mean approximately 1,908 poles (636 x 3). Verizon MA would leave it to the surveyors to determine while in the field whether boxing a given pole would affect the make-ready work for poles further down the line and, if so, to survey any such poles as well. The number of poles to be surveyed may also be reduced to the extent that the O-Calc reports show that any of the relevant poles are not suitable for boxing.

- B. Verizon MA does not know how many hours it would take to survey these poles. Verizon MA's contractor, Pike, estimates one hour of travel each way to the survey location and survey time of about six poles per hour. The number of hours in the field, however, are only part of the total time to prepare make-ready estimates. Office work time (for reconciliation, data entry, quality control, final billing) must also be taken into account. In order to estimate the number of hours needed to complete the survey process for the 1,908 poles at issue here, Pike would need to reconstruct OTELCO's applications with only these poles identified and run it through their estimation process. Fortunately, however, Verizon MA can roughly estimate the cost of the surveys without knowing how many hours they would take. See part C below.
- C. The cost of Verizon MA's pole survey process, from collecting the data in the field to providing a make-ready estimate to the applicant, currently averages between \$40 and \$45 per pole. Those figures would project a total cost for resurveying the 1,908 poles referenced in part A above, of \$76,000 to \$86,000. The actual costs to OTELCO, however, would likely be somewhat greater, because these figures are based on current experience and do not include the added costs of collecting and analyzing the additional data needed to assess whether a pole is appropriate for boxing under the standard in the Final Order.
- D. Verizon MA would apply the Department's ruling in the Final Order in this proceeding, dated October 11, 2022. Accordingly, Verizon MA would allow OTELCO to box any pole that is scheduled to be replaced at OTELCO's expense as part of the make-ready work unless conditions at a given pole create a specific safety, reliability, or engineering issue regarding that pole.
- E. See response to part D, above. With the guidance of the Final Order, Verizon MA intends to not allow OTELCO, or any other attacher, to box a pole if there are side-taps on the pole, if the pole is a corner pole, if there is conduit riser on the pole, if there is a large piece of equipment mounted in the communications space on the pole, or if the pole is on a steep embankment. In addition, Verizon MA would not allow a pole to be boxed if doing so

would cause another pole or the pole line to be out of compliance with applicable codes or Verizon MA's standards – for example if boxing a pole rather than replacing it with a taller one would result in a mid-span clearance violation. There may be other pole conditions that Verizon MA has not yet identified but which, if the pole were to be boxed, would raise a specific safety, reliability or engineering issue specific to that pole. If a pole survey were to reveal such a condition, Verizon MA would not allow that pole to be boxed.

- F. Based on Verizon MA's current workload for other projects, including repair, expansion and upgrading work by the Pole Owners, municipal and state projects, and surveys for other third-party attachers who have already paid for their surveys, Verizon MA expects that it would be able to provide new make ready estimates for some of OTELCO's applications, following resurvey of the subset of poles described in part A, above, in as little as two months following receipt of payment for the resurveys, assuming the cooperation of the other parties. OTELCO could pay those, and make-ready work could then begin on those applications. In the meantime, Verizon MA would continue to issue new make-ready estimates for each application as soon as the survey results for that application are reconciled with National Grid, and it expects that it would be able to issue new estimates for all affected applications within approximately six months of payment.

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**ITEM:** DTC-Verizon 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.

**REPLY:**

If a technician assigned to perform make-ready work finds that he cannot perform the work described in the work order because conditions on the pole have changed since the survey was taken (for example, if there are more attachments on the pole than at the time of the survey, or if the attachments have been rearranged as a result of a repair or another project in the meantime), the technician will report that the conditions on the pole have changed and that he could not complete the work order. Verizon MA or its contractor will then send an engineer out to the field to review the new conditions on the pole. The engineer will develop a new make-ready plan for that pole and other poles that may be affected by the changes. Verizon MA might need to communicate with its joint pole owner to confirm concurrence with the new work. The engineer will then revise the work order for the pole and send it back to Construction. A technician or crew will then perform the work on the pole or poles. All of this additional work adds costs to the project and delays its completion. Verizon MA does not track how much extra cost such changes impose on a project or the exact number of days of delay they cause. However, based on experience, a minor change in make-ready work will most likely delay completion of the work by at least two weeks, and a major change is likely to delay the work by a month or more.

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

**REPLY:**

Verizon MA generally updates annually the costs it uses to generate make-ready estimates.

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**ITEM:** DTC-Verizon 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?

**REPLY:**

Verizon MA does not have a written standard for when it considers field surveys outdated due to the passage of time in Massachusetts.

A. Not applicable.

B. Not applicable.



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**ITEM:** DTC-Verizon 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?

**REPLY:**

Yes, the original surveys are outdated.

- A. Most of the original field surveys were conducted in 2021, and all but one of the remaining surveys were conducted in early 2022, so the data in the original surveys is over two years old. The configuration of attachments on Verizon MA's poles is continually changing due to work being performed on the poles for other projects. Those changes may affect the make-ready work that is necessary to accommodate the proposed new attachments. For example, in performing make-ready work on applications by OTELCO to attach to poles in the towns of Amherst and Ludlow (two municipalities that are not at issue in this proceeding), Verizon MA found that the municipalities have placed their own fiber on a number of poles to which OTELCO has applied to attach, without notifying the pole owners. This was done after Verizon MA had conducted its survey of the poles but before OTELCO paid for the make-ready work, and it has complicated the OTELCO make-ready construction process and has led to substantial delays. Likewise, Verizon MA has performed work on many poles in Palmer, Belchertown and Northampton in connection with road and/or bridge projects of the Department of Transportation since the surveys were conducted. Some of this

work may have changed the poles or the configuration of attachments on poles covered by OTELCO's applications.

The longer the time between the survey and the make-ready work, the more likely it is that there will be changes on the poles that affect the work to be performed. Here, moving forward with make-ready work on the basis of these very old 2021 and early-2022 surveys is likely to result in significant delays and cost escalation, as described in response to DTC-VZ 3-9 above.

- B. Verizon MA does not know which information contained in the original field surveys is outdated and which information is still valid. If there have been no changes on a particular pole over the past two years plus, then the survey data for that pole would still be accurate. Other poles, however, may have been replaced or may support new facilities, or the facilities may have been moved or re-arranged. For those poles, the survey data would no longer be accurate. New surveys are necessary in order to determine what information in the original surveys is no longer accurate.

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**ITEM:** DTC-Verizon 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?

**REPLY:**

- A. If the Department agrees that it is reasonable to resurvey the poles to update field conditions, Verizon MA would resurvey all of the poles in all of OTELCO's applications, other than the 96 poles that Verizon MA has already determined must be replaced at the Pole Owners' costs. That would be 6,433 poles.
- B. See Verizon MA's response to DTC-VZ 3-8, Part B, above.
- C. At the current average survey cost of \$40 to \$45 per pole (*see* response to DTC-VZ 3-8, part C, above), the cost of surveying and developing new make-ready estimates for these 6,433 poles would be in the range of \$258,000 to \$290,000. As noted above, the total cost of the surveys would be somewhat higher, due to the costs of collecting and analyzing the additional data needed to assess whether a pole is appropriate for boxing under the standard in the Final Order.