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Alexander W. Moore  
Associate General Counsel

August 2, 2022

Shonda Green, Secretary  
Department of Communications and Cable  
1000 Washington Street, Suite 600  
Boston, MA 02118-6500

Re: D.T.C. 22-4 – Pole Attachment Complaint of CRC Communications LLC, d/b/a  
OTELCO

Dear Secretary Green:

Enclosed for filing in the above-captioned proceeding are Verizon MA's Responses to the Second Set of Information Requests of the Department of Telecommunications and Cable to Verizon.

Thank you for your attention to this matter.

Sincerely,



Alexander W. Moore

Enclosures  
cc: Service List

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

**Commonwealth of Massachusetts**

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

**Respondent:** Christopher Bean  
**Title:** Regulatory Manager

**REQUEST:** Department of Telecommunications and Cable, Set #2

**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-1 Please describe Verizon's methods for surveying its poles outside of the make-ready process, including the frequency of routine inspections.

**REPLY:**

Please see Verizon MA's responses to OTELCO's Information Requests OTELCO-VZ 1-23 and OTELCO-VZ 2-13.

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**Commonwealth of Massachusetts**

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

**Respondent:** David Wolanin  
**Title:** Senior Engineer

**REQUEST:** Department of Telecommunications and Cable, Set #2

**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-2 Please describe the pole survey information Verizon makes available to potential new attachers before an attachment application is submitted.

**REPLY:**

Verizon MA does not provide pole survey information to potential new attachers before they submit an attachment application for a particular pole.

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**Respondent:** David Wolanin  
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**REQUEST:** Department of Telecommunications and Cable, Set #2

**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-3 Please explain how Verizon's boxing policy changes in situations where a wire is already extended onto the "field" or "opposite" side of the pole, such as intersections or last-mile connections.

**REPLY:**

To be clear, where a pole is at an intersection of lines, the pole will support lines on two adjacent sides, but not on opposite sides of the pole from one another. This would be a factor against allowing that pole to be boxed, because replacing such a boxed pole would likely require coordination with the party that boxed it, as explained in the Direct Testimony of David L. Wolanin and John P. Gallagher on behalf of Verizon New England Inc. ("Verizon Panel Direct Testimony") at 6-7.

Where a pole supports a drop line to serve an individual customer location, the drop line would not run across the opposite side of the pole, and so would not box the pole. The presence of a drop line would generally not be considered in Verizon MA's analysis of whether to allow a pole to be boxed.

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**Respondent:** Christopher Bean  
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**REQUEST:** Department of Telecommunications and Cable, Set #2

**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-4 Please refer to David Allen's pre-filed testimony on page 19 (lines 19-22). Please describe Verizon's amenability to being paid a unit price to transfer OTELCO's facilities at the same time Verizon transfers its own facilities.

**REPLY:**

Please see Verizon Panel Direct Testimony at 21.

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**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-5 Please refer to David Allen's pre-filed testimony on page 20 (lines 9-11).  
Please respond to Mr. Allen's claim that "there are numerous poles in [Massachusetts] where Verizon is attached higher above grade than is required by the NESC and other applicable standards." In particular, if this claim is accurate, and Verizon will not permit any attachment below its own, state whether Verizon would be responsible for the costs to lower its wire to make room for a new attach.

**REPLY:**

Yes, there are poles where Verizon MA installed its facilities at a height on the pole above the bare minimum required to meet the applicable clearance standard, when there was sufficient room on the pole to do so. This provides additional clearance over the ground, roadway, foliage, driveway or other area. Moreover, Verizon MA's facilities are often higher on the poles than the bare minimum allowed by the NESC to meet Verizon MA's heavy storm loading clearance requirements. If Verizon MA and possibly other existing attachers need to move their facilities down on the pole to make room for a new attachment, that work would be charged to the new attacher as the cost causer in that situation.

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**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-6 Please refer to Dr. Lawrence Slavin's pre-filed testimony on pages six and 13. Please describe Verizon's amenability to this approach under which OTELCO would be required to pay increased future costs caused by boxing.

**REPLY:**

Verizon is not amenable to this approach, for the reasons stated in Verizon Panel Direct Testimony at p. 9-10.

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**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-7 Please refer to Dr. Lawrence Slavin's pre-filed testimony on page 16 (lines 12-15). Please specify whether Verizon would permit an attachment below Verizon's copper in this situation.

**REPLY:**

Verizon would not permit an attachment below its copper in this situation, for the reasons stated in Verizon Panel Direct Testimony at p. 19-21.



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**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-8 Please refer to page 27 of Attachment DTC-NG-1-2 (IOP #9). Given that National Grid is responsible for inspecting all jointly owned poles, please describe the necessity of both joint owners conducting a field survey on a given pole, if only one party is required to inspect the pole to ensure its integrity.

**REPLY:**

The inspections that National Grid and Verizon MA perform for each pole have different purposes and therefore assess different facts and factors. IOP 9 inspections occur to ensure the ongoing structural integrity of a pole, whereas field surveys performed for a given pole specifically assess and determine what make-ready work is needed to accommodate the specific attachment giving rise to the field survey inspection, including moving existing attachments up or down on the pole.

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**REQUEST:** Department of Telecommunications and Cable, Set #2

**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-9 Please refer to DTC-VZ 1-16. Given Verizon's deferral to National Grid on the question of the current attachments' compliance with applicable codes on the pole labeled T.27/E.38 Allen Road, please clarify what steps are required of each stakeholder (*i.e.*, Verizon, National Grid, Charter, and OTELCO) in order to bring existing attachments into compliance, and the associated timeline.

**REPLY:**

In order to bring the pole labeled T.27/E.38 on Allen Road into compliance with applicable codes, Verizon MA and Charter would each need to lower their cable facilities by several inches. There is no timeline for this work, however, because even if Verizon MA and Charter were to do it,, there would still not be room on this pole for OTELCO to attach. In order for OTELCO to attach to this pole, the pole would need to be upgraded, so it would be wasteful and nonsensical for Charter and Verizon MA to move their facilities down to new locations on the old pole only to then have to transfer the attachments to the new pole when it is replaced to accommodate OTELCO's attachment.

This demonstrates that the work that would be necessary to bring existing attachments on a pole into compliance with applicable codes may not be the same as the work that is needed to prepare the pole to accommodate a new wattachment.

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**ITEM:** DTC-Verizon 2-10 Please refer to DTC-VZ 1-19 and DTC-NG 1-15. Verizon indicates that generally it overlashes its fiber-optic cable to the existing strand and copper. Please describe why overlashing is not an option for the referenced second Verizon attachment on the pole NGrid P38 on Allen Road.

**REPLY:**

Verizon MA's local engineering team would have determined whether or not to overlash this particular facility at the time it was installed, based on a number of factors in the field, including the age and condition of the existing facilities. It is not technically feasible to overlash cable once it has already been placed, so overlashing the facility on this pole now to make room on the pole for OTELCO's attachment is not an option.

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**DATED:** August 2, 2022

**ITEM:** DTC-Verizon 2-11 Please refer to DTC-VZ 1-19. Please specify how high Verizon places its fiber on a pole in instances in which it removes its copper from the pole.

**REPLY:**

When Verizon MA installs fiber-optic cable on a pole and also removes the copper cable on that pole, typically Verizon MA would first install the fiber immediately above the copper cable, subject to applicable clearances. Once the fiber is in service and the copper cable is no longer in use, Verizon MA would then remove the copper cable. The actual height of the fiber on any particular pole will vary based on the applicable ground clearances, the height of the Verizon MA copper on the pole, and the height of any other attachments on the pole.

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**ITEM:** DTC-Verizon 2-12 Please refer to Page 33 of Attachment DTC-NG-1-2 (IOP #13). Please define “single stream pole attachment transfer process” and provide a complete and detailed description of the referenced trial, including what the trial entailed, what Verizon learned from the trial, and how this information is used to inform the current make-ready process.

**REPLY:**

The single stream pole attachment transfer process was a one-time pilot program that National Grid and Verizon MA conducted in Billerica. The program involved engaging a dedicated independent administrator to coordinate a field review of all pending transfers for licensed third-party attachers, identify any unknown pole attachments, and determine what resources would be required to complete all third-party attachment transfers in the pole space between the power company’s facilities and Verizon facilities in a single dispatch. This resulted in the transferring of 25 attachments over a period of four business days in December of 2016, making 18 poles ready for removal. In this case, the Town of Billerica ultimately chose to move its own attachments. The results of the pilot were inconclusive, and plans for further pilots were suspended.

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**ITEM:** DTC-Verizon 2-13 Please refer to DTC-OTEL 1-14. Please specify why Verizon permitted opposite-side construction on the referenced poles and if any issues related to the opposite-side construction have arisen with respect to the poles' safety or upkeep.

**REPLY:**

Please see Verizon MA's response to OTELCO-VZ 2-7. Verizon MA is not aware of whether any issues have arisen with respect to these poles' safety or upkeep.

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**ITEM:** DTC-Verizon 2-14 Please state whether there are incremental make-ready costs associated with replacing a pole that had non-compliant attachments that could not otherwise be brought into compliance as compared to replacing a compliant pole that simply does not have enough space to accommodate an additional attacher. If so, please identify and quantify such incremental costs.

**REPLY:**

No, the cost of replacing a pole generally does not depend on whether the attachments on the pole are in compliance with applicable codes. An obvious exception would be where a pole has been boxed, which would make it more expensive to replace the pole.