



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 24-3

December 3, 2024

Petition of Verizon New England Inc. For Reclassification as a Non-Dominant
Telecommunications Carrier

**FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO VERIZON NEW ENGLAND INC.**

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

Instructions

The following instructions apply to this first set of information requests.

1. All answers should be filed with the Department by the close of business on January 6, 2025.
2. Unless otherwise stated, each request should be answered in writing and include: the case docket number, a reference to the request number, the name of the person responsible for the answer, and a recitation of the request.
3. The term “Alternative Regulation Plan” refers to the document titled Massachusetts Alternative Regulation Plan created in 2003 under *Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Regulatory Plan to succeed Price Cap Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts’ intrastate retail telecommunications services in the Commonwealth of Massachusetts*, D.T.E. 01-31 Phase I (May 8, 2002) and D.T.E. 01-31 Phase II (April 11, 2003).
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, legal filings, 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. The term “PAL” means public access lines.
6. The term “PASL” means public access smart lines.
7. The term “Petition” refers to the Petition of Verizon New England Inc. for Reclassification as a Non-Dominant Telecommunications Carrier which the Department received on June 20, 2024.
8. 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 by Verizon in developing the projections or estimates.
9. “Vasington Testimony” refers to the Direct Testimony of Paul B. Vasington on Behalf of Verizon New England Inc. which the Department received on June 20, 2024.
10. The term “Verizon” means Verizon New England Inc., d/b/a Verizon Massachusetts and its corporate predecessors, agents, officers, employees, and assigns.
11. The term “Verizon Home Phone Service” means Verizon’s residential landline phone service offered through either copper or fiber optic cables.
12. Requests shall be deemed continuing so as to require further supplemental responses if Verizon and/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.
13. Unless specified otherwise, all requests for information are specific to Massachusetts.
14. If any of these requests are ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

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| D.T.C. 1-1 | Describe the basic service offerings Verizon currently provides over fiber optic cables. Does Verizon anticipate any changes to these offerings within the next three years? If yes, provide an explanation. |
| D.T.C. 1-2 | Provide Verizon’s annual revenues from wireline phone connections and CLEC attachment fees. Provide data by county. |
| D.T.C. 1-3 | Explain how Verizon will guarantee that consumers in rural, copper-reliant communities will receive high-speed, reliable, and affordable services. |

- D.T.C. 1-4 Describe Verizon's anticipated use of wireless replacement products, such as Verizon Voice Link, for basic voice services.
- D.T.C. 1-5 Describe Verizon's anticipated fiber replacement strategy for basic voice services.
- D.T.C. 1-6 Describe the steps for purchasing a basic standalone home phone service from Verizon as a new customer.
- D.T.C. 1-7 Explain whether and to what extent pricing has increased for Verizon Home Phone Service since the creation of the Alternative Regulation Plan.
- D.T.C. 1-8 State the price of adding Verizon Home Voice Service to a service bundle for a new customer.
- D.T.C. 1-9 Identify the percentage of Verizon Home Phone Service subscribers that also subscribe to any wireless products offered by Verizon.
- D.T.C. 1-10 Explain how Verizon calculates its pole attachment rates for both cable conduit and telecommunications attachments. Provide complete and detailed calculations, including explaining any assumptions and providing citations to applicable federal and state statutes, orders, rules and regulations.
- D.T.C. 1-11 Describe how Verizon complies with Paragraph M of the Alternative Regulation Plan.
- D.T.C. 1-12 Verizon has indicated that it has lost residential switched access lines each year for at least a 20-year period. See Petition at 8.
- A. Explain why current customers with residential switched access lines have not left for alternative voice services.
 - B. Explain whether, and to what extent, customers with residential switched access lines are subsidized by other Verizon customers.
- D.T.C. 1-13 In regard to Paragraph K of the Alternative Regulation Plan, explain the following:
- A. Why should special construction no longer be regulated?
 - B. Provide examples and explanations of the most recent special construction requests (company name, date of request, the nature of request, breakdown of the cost, timeframe it was implemented, whether it involved construction on Verizon's already existing facilities, whether it a new construction, etc.).

- C. How many special construction requests did Verizon receive during the last five-year period? Provide a breakdown by year.
 - D. Can a third-party construction company be involved in special construction?
 - E. Can the requesting company ask that a third-party be hired for special construction?
 - F. Has Verizon or the requesting company ever hired a third-party construction company?
 - G. How is the actual cost of special construction estimated/calculated?
 - H. Does Verizon receive special construction requests from end-user customers?
 - I. Has Verizon ever had any disputes with a company requesting special construction in other state jurisdictions? Provide a summary of any such dispute and include the docket or case number.
- D.T.C. 1-14 What percentage of Verizon customers with residential switched access line service have access to alternative voice services. Clarify which types of services are available and to what extent.
- D.T.C. 1-15 Verizon describes the current residential basic exchange service price as “intentionally inefficient.” See Petition at 10. Identify what subsidies currently remain on such service, and what Verizon estimates is the efficient market price for residential basic exchange service.
- D.T.C. 1-16 Explain how PAL/PASL services can be argued as existing in a competitive marketplace if the services “do not meet a market need.” See Petition at 6.
- A. Does Verizon offer PAL/PASL services to payphone providers? If so, which companies?
 - B. Outline all alternatives available for PAL/PASL services (and providers of such services).
- D.T.C. 1-17 Identify all other states in which Verizon is still operating under an alternative form of regulation plan or an equivalent plan. If any such plan was retired, provide a summary concerning the retirement process and any new form of regulatory treatment.
- D.T.C. 1-18 Verizon states that other competitors “offer voice-only services at higher prices or with promotional offerings.” See Vasington Testimony at 16. Identify the voice-only offerings provided by competitors in Massachusetts that Verizon considers

equivalent to Verizon basic exchange service and known pricing and promotional offerings for such products.

D.T.C. 1-19 Identify the specific competitor products Verizon considers the most comparable to basic exchange service for the following. Include publicly known pricing and new customer promotions.

- A. Cable broadband/VoIP bundles
- B. Wireless broadband/voice bundles
- C. Over the top VoIP products
- D. Verizon FIOS broadband/VoIP bundle

D.T.C. 1-20 Describe Verizon's current strategy for retaining basic voice subscribers.

D.T.C. 1-21 Identify any currently available, non-grandfathered promotions available for the following:

- A. New subscribers to basic voice service
- B. Existing subscribers of basic voice service