



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

D.T.C. 24-3

April 3, 2025

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

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**SECOND 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 May 16, 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 “CLEC” refers to competitive local exchange carrier.
5. The term “Critical Customers” refers to (A) customers including, but not limited to, public safety buildings, police and fire stations, hospitals, water treatment plants, public works buildings, power plants, pumping stations, communication towers, transportation depots, train stations, municipal buildings, or universities or (B) any other customers with facilities and infrastructure that, should telecommunications services be disrupted, could lead to a safety or security risk.

6. 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.
7. The term “PAL” means public access lines.
8. The term “PASL” means public access smart lines.
9. 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.
10. 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.
11. The term “Retail Service Quality Plan” refers to the document titled Verizon Massachusetts Retail Service Quality 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).*
12. “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.
13. The term “Verizon” means Verizon New England Inc., d/b/a Verizon Massachusetts and its corporate predecessors, agents, officers, employees, and assigns.
14. 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.
15. Unless specified otherwise, all requests for information are specific to Massachusetts.
16. 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

- D.T.C. 2-1 Provide the number of Verizon basic exchange service subscribers in Massachusetts by wire center.
- D.T.C. 2-2 Identify Verizon's CLEC competitors using Verizon wholesale services that offer basic exchange service in Massachusetts.
- D.T.C. 2-3 Identify the number of Verizon customers since January 1, 2020 that have transitioned to a fixed wireless voice product from a basic exchange service product. Provide information by wire center. Provide complete and detailed documentation.
- D.T.C. 2-4 Refer to D.T.C. 1-4. Verizon indicated that it offers "certain customers in chronic repair conditions" the choice of a wireless voice service. Provide complete and detailed information regarding the "chronic repair conditions" from 2022-2024, including, but not limited to, data by geographic area and duration of any repairs or outages.
- D.T.C. 2-5 Identify the number of Verizon basic exchange service customers that have remained without basic exchange service for a period of one week or longer since January 1, 2023. Provide complete and detailed documentation.
- D.T.C. 2-6 Provide complete and detailed documentation regarding Verizon's repair and maintenance of copper wire infrastructure in Massachusetts for 2022-2024. In the response, include information on procedures, policies, and timing.
- D.T.C. 2-7 Refer to Verizon's response to D.T.C. 1-6. Explain why customers must call into a Verizon customer service office to purchase a basic standalone home phone service. Explain why customers cannot purchase such a service through Verizon's website.
- D.T.C. 2-8 Explain how the Department would monitor Verizon's carrier-of-last resort obligations should the Alternative Regulation Plan and the Retail Service Quality Plan be retired.
- D.T.C. 2-9 Please confirm whether the two examples provided in response to D.T.C. 1-13 (B) are requests received from business retail customers.

- D.T.C. 2-10 Refer to Verizon's response to D.T.C. 1-13 (C). Provide a breakdown of special construction requests received from: (1) wholesale customers; (2) residential retail customers, (2a) basic voice subscribers; (3) business retail customers.
- D.T.C. 2-11 Provide examples and explanations of the most recent special construction requests received from (1) wholesale customers, (2) residential retail customers, and (3) business retail customers (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 was a new construction, etc.). Omit the response for any category if it has been previously provided in D.T.C. 1-13 (B).
- D.T.C. 2-12 Describe Verizon's tentative plan for residential basic exchange service pricing should the Department grant Verizon's Petition.
- D.T.C. 2-13 Identify Verizon's current requirements under federal regulation to provide unbundled network elements and wholesale resale, including unbundled network platform elements.
- D.T.C. 2-14 Identify each incidence in which Verizon has provided payment credit to residential and/or business customers in the past 10 years under Paragraph T of the Alternative Regulation Plan. Please identify the customer type and explain why the credit was issued.
- D.T.C. 2-15 Provide a written narrative of the process Verizon would follow to notify the Department of Verizon's intent to withdraw intrastate services that are currently covered under Paragraph R of the Alternative Regulation Plan.
- A. Explain how customers of these services would be notified and how much notice customers would receive.
  - B. Explain how Critical Customers would be identified, notified, and identified to the Department under this process.