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May 23, 2025

Shonda D. Green, Secretary
MA Department of Telecommunications and Cable
One Federal Street, Suite 0740
Boston, MA 02110

Re: D.T.C. 24-3 – Petition of Verizon New England Inc. for Reclassification as a Non-Dominant Telecommunications Carrier

Dear Secretary Green:

Enclosed please find Verizon New England Inc.’s Objections and Responses to the Department’s Second Set of Information Requests, together with a Motion for Confidential Treatment.

Two of the exhibits to Verizon’s responses, Exhibits 1 and 4, are confidential and are being provided to Hearing Officer Gill.

Please do not hesitate to contact me should you have any questions concerning this submission.

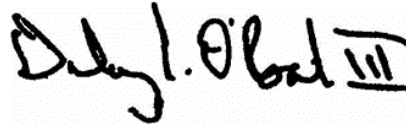
Respectfully submitted,

A handwritten signature in black ink that reads "Dulaney L. O'Roark III". The signature is written in a cursive style with a clear "III" at the end.

Dulaney L. O’Roark III

CERTIFICATE OF SERVICE

I hereby certify that on this day the attached document was filed with the Department of Telecommunications and Cable, and copies thereof were served by email upon each person designated on the official service list in this proceeding.

A handwritten signature in black ink, reading "Dulaney L. O'Roark III". The signature is written in a cursive style with a horizontal line under the "III".

Dulaney L. O'Roark III

Dated: May 23, 2025

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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

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D.T.C. 24-3

**VERIZON NEW ENGLAND INC.'S OBJECTIONS AND RESPONSES
TO THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE'S
SECOND SET OF INFORMATION REQUESTS**

Verizon New England Inc. ("Verizon") objects and responds to the Second Set of Information Requests (the "Information Requests") by the Department of Telecommunications and Cable (the "Department") to Verizon as follows.

PRELIMINARY STATEMENTS

1. By submitting these objections and responses to the Information Requests, Verizon does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of any such responses, and any related information, as evidence in this proceeding, or in any other proceedings, on any and all grounds, including but not limited to, competency, relevancy, materiality, and privilege. Further, Verizon makes the objections and responses without in any way implying that it considers the Information Requests to be relevant or material to this proceeding.

2. Verizon expressly reserves the right to supplement, clarify, revise, or correct any or all of the objections herein, and to assert additional objections or to make additional privilege claims, in one or more supplemental responses.

GENERAL OBJECTIONS AND EXPLANATIONS

The following General Objections and Explanations apply to all of the Information Requests and are therefore deemed to be incorporated into each of Verizon's responses. The assertion of the same, similar or additional responses or objections in any specific objection does not waive Verizon's General Objections set forth below. Certain information may be provided notwithstanding such objections, but without waiving them.

1. Verizon objects to the Information Requests to the extent they request information regarding matters beyond the authority and jurisdiction of the Department.

2. Verizon objects to the Information Requests to the extent that they address matters not at issue in this proceeding.

3. Verizon objects to the Information Requests insofar as they exceed the discovery authorized by 207 C.M.R. § 1.06(6)(c), or the regulations, policies, and discovery practices of the Department.

4. Verizon objects to the Information Requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. Verizon hereby claims, and does not waive, all applicable privileges and protections to the fullest extent implicated by the Information Requests and excludes privileged information and materials from its responses. Should any such disclosure by Verizon occur, it is inadvertent and shall not constitute a waiver of any privilege.

5. Verizon objects to the Information Requests to the extent that they are overly broad, unduly burdensome, or would require an investigation by Verizon that is unreasonable in view of the needs of the proceeding.

6. Verizon objects to the Information Requests to the extent that they seek from Verizon documents that are not within its possession, custody or control, are unavailable in the format requested, or would require the creation of new documents.

7. By responding to the Information Requests, Verizon does not adopt any of the characterizations made by or assumptions incorporated into any of the Information Requests.

8. For purposes of these responses, Verizon will interpret ambiguous terms in the manner that it believes to be most consistent with normal usage and industry understandings, as will be specifically indicated in its substantive responses.

D.T.C. 24-3
Requestor: DTC
Date of Request: April 3, 2025
Respondent: Verizon New England Inc.
Date of Response: May 23, 2025

D.T.C. 2-1 Request

Provide the number of Verizon basic exchange service subscribers in Massachusetts by wire center.

Response

The requested information is available in Verizon's most recent annual filing (filed May 1, 2025) made in compliance with the May 8, 2002 Order in D.T.E. 01-3.

D.T.C. 2-2 Request

Identify Verizon's CLEC competitors using Verizon wholesale services that offer basic exchange service in Massachusetts.

Response

Verizon has active interconnection agreements with the following CLECs, but has no knowledge as to what services they are providing:

A.R.C. Networks Inc.
AboveNet Communications, Inc.
ACN Communication Services, LLC
Airus, Inc.
AOC Connect, LLC
AT&T Enterprises, LLC, successor in interest to AT&T Corp.,
Bandwidth.com CLEC, LLC
Barr Tell USA, Inc.
BCM One, Inc.
BCN Telecom, Inc.
Block Line Systems, LLC
Broadview Networks, Inc.
Broadview NP Acquisition Corp.
Broadwing Communications, LLC
BullsEye Telecom, Inc.
CBTS Technology Solutions Inc.
CCG Communications, LLC
CenturyLink Communications, LLC
Charter Fiberlink MA-CCO, LLC
Choice One Communications of Massachusetts Inc.
Clear Rate Communications, Inc.
Comcast Phone of Massachusetts Inc.
Conversent Communications of Massachusetts LLC
CRC Communications of Maine, Inc.
Crocker Communications, Incorporated
CTC Communications Corporation
dishNET Wireline L.L.C.
DSCI, LLC
Dynalink Communications, Inc.
Earthgrid PBC
Entelegant Communications Solutions
Equal Access Networks LLC

Eureka Telecom, Inc.
First Communications, LLC
Freedom Ring Communications, LLC
Fusion Cloud Services, LLC
GC Pivotal, LLC d/b/a Global Capacity
GC Pivotal, LLC d/b/a Global Capacity
Global Crossing Local Services Inc.
Granite Telecommunications, LLC
IDT America Corp.
InteleTel, LLC
Intrado Communications, LLC
Level 3 Communications, LLC
Lightpath of New England, LLC
Lightship Telecom LLC
Lingo Telecom, LLC
Lingo Telecom, LLC
Lingo Telecom, LLC
Local Access LLC
Looking Glass Networks Inc.
Massachusetts Local Telephone Company, Inc.
MCImetro Access Transmission Services LLC
MegaCLEC Inc.
Metropolitan Telecommunications of Massachusetts, Inc.
Mobilitie Management, LLC
Mosaic Networx LLC
NEON Connect, Inc.
New Horizons Communications Corp.
North Atlantic Networks, LLC
NOS Communications Inc.
Onvoy Spectrum, LLC
Onvoy, LLC
OpenCape Corporation
PacOptic Networks, LLC
PaeTec Communications LLC
Peerless Network of Massachusetts, LLC
PNG Telecommunications, Inc.
Prospeed.Net, Inc.
QuantumShift Communications, Inc.
RCLEC, Inc.
RCN Telecom Services of Massachusetts Inc.
RingSquared APC LLC
Ringsquared Telecom, LLC
Ringsquared Telecom, LLC

D.T.C. 24-3
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Spectrotel of New England, LLC
Sprint Communications Company L.P.
Synergem Technologies, Inc.
Syniverse Technologies, LLC
Talk America LLC
Teleport Communications America, LLC
Teliax, Inc.
Telrite Corporation
Time Warner Cable Information Services (Massachusetts), L.L.C.
TNCI Operating Company LLC
Voxbeam Telecommunications, Inc.
West Telecom Services, LLC
Wholesale Carrier Services, Inc.
Wholesale Carrier Services, Inc.
Wide Voice, LLC
WiTel Local Network, LLC
WiMacTel, Inc.
Windstream New Edge, LLC
XO Communications Services, LLC
Ymax Communications Corp.

Additional detail concerning wholesale services provided by Verizon to CLECs, by wire center, is provided annually to the Department by Verizon in accordance with the May 8, 2002 Order in D.T.E. 01-3.

D.T.C. 24-3
Requestor: DTC
Date of Request: April 3, 2025
Respondent: Verizon New England Inc.
Date of Response: May 23, 2025

D.T.C. 2-3 Request

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.

Response

We interpret the term “transitioned to a fixed wireless voice product” to mean customers who voluntarily chose to switch to Verizon’s Voice Connect service. Confidential Exhibit 1 shows the number of customers by wire center that voluntarily transitioned to Voice Connect since 2020.

D.T.C. 24-3
Requestor: DTC
Date of Request: April 3, 2025
Respondent: Verizon New England Inc.
Date of Response: May 23, 2025

D.T.C. 2-4 Request

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.

Response

In this context, the term “chronic repair conditions” refers to a situation in which a customer has required two or more repair dispatches for his or her service within the prior 12-month period. This customer-specific condition does not refer to general network conditions or outages and therefore is not tracked.

D.T.C. 24-3
Requestor: DTC
Date of Request: April 3, 2025
Respondent: Verizon New England Inc.
Date of Response: May 23, 2025

D.T.C. 2-5 Request

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.

Response

Please see Exhibit 2.

D.T.C. 2-6 Request

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.

Response

Exhibit 3 provides Verizon's maintenance performance from 2022 through April 2025 for its copper infrastructure and copper-served customers in Massachusetts. The exhibit shows performance results that demonstrate Verizon's continued commitment to operating and maintaining its copper infrastructure and providing a high level service to the customers served over that infrastructure.

The metric categories provided in Exhibit 3 are similar to those provided to the Department through Verizon's service quality reporting and focus on reliability, maintenance and repair. The differences between the data provided in Exhibit 3 and Verizon's regular service quality reporting are as follows:

- *Scope of Customers.* The reporting in Exhibit 3 is focused specifically on customers served by Verizon's legacy copper distribution facilities¹ and the customers served by those facilities. In comparison, Verizon's normal service quality reporting also includes customers that receive regulated voice services over all-fiber facilities.
- *Reporting Period.* The reporting periods in Exhibit 3 are for the calendar months and years indicated. In comparison, Verizon's normal service quality reporting calculates performance over a 12-month rolling period.
- *Additional Metrics.* In addition to reporting results for % of Troubles Cleared in 24 hours, results are also provided for % of Troubles Cleared in 48 hours, which is not included in the normal service quality reporting to the Department.

These differences in reporting methodology have two significant impacts on the reported results. First, by limiting the metrics to copper-served customers, the results exclude customers served by all-fiber facilities and thus are a subset of those captured in normal reporting. Second, by using monthly data, rather than a 12-month rolling average, the information provided shows greater volatility or variation.

¹ Exhibit 3 provides performance results for customers served by all copper facilities (copper end-to-end from the central office to the customer location) and by hybrid copper/fiber facilities (where part of the local loop is provided over fiber). The results exclude customers served over end-to-end fiber.

Reliability & Maintenance

The Network Report Rate shown in Exhibit 3 demonstrates that Verizon's copper facilities are operating at a high and consistent level. This metric is the most important and best indicator of overall network performance because it is a direct reflection of network reliability. Over the 40 months of performance provided in Exhibit 3, the Network Report Rate was better than the target threshold of 1.9 in 30 months and was better than the standard threshold of 2.25 in 7 additional months. The Network Report Rate did not meet the standard threshold in only 3 of the 40 reported months. Across each year of 2022, 2023, and 2024, the Network Report Rate was better than the target threshold of 1.9. These annual performance results are analogous to the formal reporting provided to the Department for Verizon's service quality because they were calculated with 12 months of data. The excellent results for Network Report Rate demonstrate Verizon's continued commitment to operating and maintaining reliable networks in service to its customers.

Timeliness

Exhibit 3 provides monthly results for Troubles Cleared in 24 hours and 48 hours for both business and residential customers. The performance results for business customers shows a high level of responsiveness to this customer segment. The results show that more than 75% of business customer troubles were resolved within 24 hours in 21 of the reported months. When the trouble resolution time period is measured in 48 hours, 85% of business customer troubles were resolved within 48 hours in 30 of the 40 of the reported months and 75% were resolved in all 40 of the reported months.

Performance results are provided in the same metric categories for residential customers. While the reported results are generally below the target and standard thresholds, there are several factors that affect the performance. Most significantly, with the prevalence of mobile phones across the customer base, residential customer behavior and expectations have evolved over recent years. When residential customers report a trouble with their landline phone, they generally ask for repair visits that align with their schedules and may request a repair appointment several days out. Residential customers feel less urgency to repair a landline phone and schedule technician visits accordingly. The longer repair intervals for residential customers are as much a reflection of consumer behavior as other factors.

D.T.C. 2-7 Request

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.

Response

Verizon's interface was built to accommodate the preponderance of services demanded by customers. There is no requirement that Verizon offer its services through diverse modalities. It is Verizon's experience that a very low number of customers purchase a standalone, basic service offering – and that number has been significantly declining for over two decades. The number of new requests for this service is also very small.

D.T.C. 2-8 Request

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.

Response

Verizon's Alternative Regulation Plan does not have any provisions that directly relate to measurement or compliance with Verizon's carrier-of-last-resort ("COLR") obligations. Therefore, there would be no change in the Department's monitoring of compliance with this designation as a result of approval of the Petition. Verizon specifically noted in its Petition that it is not seeking modification of the Department's designation of Verizon as a COLR. Under current rules, Verizon would seek Department authorization if it were to request a change to its COLR obligations.

D.T.C. 24-3
Requestor: DTC
Date of Request: April 3, 2025
Respondent: Verizon New England Inc.
Date of Response: May 23, 2025

D.T.C. 2-9 Request

Please confirm whether the two examples provided in response to D.T.C. 1-13 (B) are requests received from business retail customers.

Response

Confirmed.

D.T.C. 2-10 Request

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.

Response

Verizon objects to D.T.C. 2-10 because it is overly broad and unduly burdensome and would require a special study. Subject to and without waiving the objections, Verizon states that while it does not track special construction requests in the level of detail being requested, provided below is a breakdown of the data by wholesale and retail customers.

	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>
Wholesale	73	71	91	54	65
Retail	11	16	29	25	35

D.T.C. 2-11 Request

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).

Response

Please see Confidential Exhibit 4.

D.T.C. 2-12 Request

Describe Verizon's tentative plan for residential basic exchange service pricing should the Department grant Verizon's Petition.

Response

Verizon does not have a tentative plan for pricing residential basic local exchange service. We will devote resources to developing such plans only when we have the ability to execute on them. That said, because prices for Verizon's basic exchange services have been frozen for more than 20 years, it is likely that Verizon would increase these prices to some extent when Verizon is granted the same pricing flexibility that its regulated and unregulated competitors have in Massachusetts.

D.T.C. 2-13 Request

Identify Verizon's current requirements under federal regulation to provide unbundled network elements and wholesale resale, including unbundled network platform elements.

Response

Verizon has the following obligations under federal regulations to provide unbundled network elements (UNEs), and in all cases CLECs actually purchase no units or small volumes of units:

- UNE DS1 Dedicated Transport. Unbundling is required unless (a) both ends of the route are Tier 1 wire centers under the FCC's rules that pre-existed the FCC's 2020 UNE Order or (b) the UNE-triggering endpoint (i.e., the Tier 2 or Tier 3 wire center that, under the FCC's rules that pre-existed the FCC's 2020 UNE Order, triggers the unbundling obligation for DS1 or DS3 dedicated transport) is on the FCC's list as having competitive fiber within one-half of a mile. A CLEC may obtain a maximum of 10 UNE DS1 dedicated transport circuits on each route where DS1 dedicated transport is available as a UNE.
- UNE DS3 Dedicated Transport. Unbundling is required if (a) either end of the route is a Tier 3 wire center under the FCC's rules that pre-existed the FCC's 2020 UNE Order and (b) the UNE-triggering Tier 3 wire center is not on the FCC's list as having competitive fiber within one-half of a mile. A CLEC may obtain a maximum of 12 UNE DS3 dedicated transport circuits on each route where DS3 dedicated transport is available as a UNE.
- UNE DS1 and DS3 Loops. Unbundling is not required for DS1 and DS3 loops except at wire centers that (a) meet the applicable FCC non-impairment criteria and (b) are located outside of the FCC's list of "competitive counties." A CLEC may obtain no more than 10 UNE DS1 loops to any single building in which DS1 loops are available as UNEs, and a maximum of one UNE DS3 loop to any single building in which DS3 loops are available as UNEs.
- UNE DS0 Loops. Unbundling is required outside of urban census blocks (as designated by the U.S. Census Bureau).

- UNE Dark Fiber Transport. Unbundling is not required unless at least one end of the transport route is a Tier 3 Wire Center (under FCC's rules that pre-existed the FCC's 2020 Order) that is not on the FCC's list as having competitive fiber within one-half of a mile. There is an obligation to continue until 2029 any discontinued dark fiber circuits that were grandfathered as of February 8, 2021.

Verizon no longer has an obligation to provide discounted resale rates under 47 U.S.C. § 251(c)(4). Verizon is now subject to the standard 251(b) resale requirement (non-discounted) that applies to all LECs. Verizon is not required to provide the UNE platform (i.e., a combination of all the network elements necessary to provide local exchange service).

D.T.C. 2-14 Request

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.

Response

There have been no instances 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.

D.T.C. 2-15 Request

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

Response

Paragraph R of the Alternative Regulation Plan states that "Verizon MA will continue to offer all of the Intrastate services provided under tariff . . . unless it petitions and receives approval from the Department to withdraw a service." In the event that Verizon intends to withdraw services described in Paragraph R, Verizon would provide the Department's notification with 60 days written notice.

Verizon has not exercised the provision contemplated under Paragraph R, and consequently has not developed or contemplated its process for customer notification referenced in this question. That said, as the Department is aware, Verizon has developed comprehensive notification procedures for customer-impacting technology changes, such as those utilized for migration to fiber. Verizon is committed to providing customers with a similar notification for the withdrawal of services described in Paragraph R.