

**Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES
and
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Joint Investigation by the Department of)	
Public Utilities and the Department of)	D.P.U. 26-10
Telecommunications and Cable to amend)	D.T.C. 26-1
220 CMR 45.00: Pole Attachment, Duct,)	
Conduit, and Right-of-Way Access,)	
Removal, Complaint and Enforcement)	
Procedures.)	
)	

REPLY COMMENTS OF VERIZON NEW ENGLAND INC. ON PROPOSED RULES

Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon”), respectfully submits these reply comments concerning the March 6, 2026 Order Instituting Joint Rulemaking and Further Inquiry on Memorandum of Agreement (“Rulemaking”). Verizon is a Massachusetts pole owner and broadband provider with a longstanding history of advancing broadband deployment in the Commonwealth and across the nation.¹ Pursuant to the Broadband Technology Opportunity Program, Capital Projects, and most recently BEAD-funded programs, Verizon has worked collaboratively with the Commonwealth and the Massachusetts Broadband Institute to ensure that broadband providers and attachers have been able to meet deployment obligations and timelines. As such, Verizon responds to key issues raised in opening comments

¹ Verizon provides Fios-branded broadband in Connecticut, Delaware, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island, and Washington, DC. It also provides 5G Home Internet Service in Alabama, Arizona, California, Colorado, Delaware, Florida, Illinois, Indiana, Iowa, Louisiana, Maryland, Minnesota, Nevada, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, and Washington. See [Verizon Availability & Coverage Map for Home Internet, TV, Phone | Verizon](#).

and to highlight necessary amendments to the pole attachment rules to promote efficient broadband deployment, operational feasibility, and safety.

DISCUSSION

I. The Departments Should Only Consider Issues Within this Proceeding’s Scope.

Due to the wide ranging scope of this Joint Proceeding, Verizon recommends the Departments only consider issues clearly within that scope. For example, several parties raise issues related to double pole reporting requirements in opening comments.² Verizon respectfully points out that such statutory reporting issues are more appropriate for the Departments’ existing joint proceeding in D.P.U. 25-10/D.T.C. 25-1 which explicitly considers these statutory requirements.³ While double pole reporting requirements are an important issue, this proceeding is limited to reporting requirements pursuant to the Departments’ pole attachment regulations. The Departments should not consider issues like double pole reporting that the Departments are already addressing in another proceeding.

II. 220 CMR 45.01: Purpose and Applicability – Verizon Supports a 180-day Implementation Period.

The Electric Distribution Companies (“EDCs”) correctly assert that additional time for implementation will reduce interference with ongoing make-ready work and deadlines.⁴ Verizon

² See Comments of Massachusetts Municipal Association (“MMA Comments”) at 1-2 (“our primary concern as it relates to these proposed regulations is the impact on timely and complete removal of decommissioned ‘double poles’ in our municipalities”); Comments of Town of Nantucket (“Town of Nantucket Comments”) at 4 (“In order to mitigate the safety concerns presented by double poles, a more regular inventory of double poles and their conditions must be made publicly available in a simple and accessible format and include a defined mechanism for municipal feedback and departmental enforcement”).

³ See Notice of Inquiry and Request for Comments, D.P.U. 25-10/ D.T.C. 25-1 (Mass. Dep’t of Pub. Utils. & Dep’t of Telecomms. & Cable Jan. 17, 2025). The scope of the 2025 proceeding is “to explore utility pole attachment, conduit access, double pole, and related considerations applicable to utility work conducted on public rights-of-way in the Commonwealth.”

⁴ Comments of EDCs (“EDC Comments”) at 7.

maintains, as detailed in its initial comments, that 180 days is the minimum implementation period necessary to allow pole owners and attachers to update internal systems, test processes, and avoid disruption to ongoing deployment projects. This timeframe strikes an appropriate balance by providing sufficient lead time to ensure an orderly transition without unnecessarily delaying the benefits of the new rules.

III. 220 CMR 45.02: Definitions – Verizon Opposes Adding Electrical Vehicle Supply Equipment (“EVSE”) as Allowable Attachments to Poles.

The initial comments by multiple stakeholders, including the EDCs and the Municipal Electric Association of Massachusetts (“MEAM”), share Verizon’s concern that pole-mounted EVSE would complicate the pole attachment process and introduce additional coordination burdens.⁵ Specifically, adding EVSE attachments has the potential to impede the goal of streamlining and increasing the overall effectiveness of the attachment process. Among the unresolved technical and policy concerns, EVSE attachments involve the following analyses: (i) the proximity of EVSE-related voltages to the communications space; (ii) interference with routine inspection, maintenance, and pole replacement; and (iii) increased make-ready complexity that will delay attachment timelines.⁶ These concerns are not theoretical and run counter to the Departments’ stated goal of improving the efficiency of pole attachments.

Paradoxically, commenters advocating for expansion of pole-mounted EVSE deployments simultaneously emphasize concerns regarding the proliferation of double poles.⁷

⁵ EDC Comments at 8 (opposing inclusion of EVSE in revised definition of “Licensee” as “problematic and premature”); Comments of Municipal Electric Association of Massachusetts (“MEAM Comments”) at 2 (opposing EVSE attachment because it “could complicate and slow down the current pole attachment process by including another pole attachee to consider and coordinate with regarding make-ready work”); Comments of Verizon (“Verizon Comments”) at 3 (opposing pole mounted EVSE because EVSE would be mounted closer to the ground, making poles more difficult and dangerous to inspect and potentially foreclosing all but limited types of inspections).

⁶ Verizon Comments at 3.

⁷ Comments of Town of Nantucket (“Town of Nantucket Comments”) at 3-5.

Verizon explained in its initial comments that pole-mounted EVSE would make pole replacements more difficult and time-consuming, exacerbating the prevalence of double poles.⁸ For these reasons, Verizon agrees with the EDCs and MEAM that the Departments should decline to add EVSE to the definition of “Licensee.”⁹

If the Departments permit EVSE attachments, Verizon urges the Departments to require the party that causes costs pay for such costs, including any resulting indirect costs of EVSE attachments.¹⁰

IV. 220 CMR 45.04: Duties of Licensees and Attachment Owners – Verizon Supports Mandated Use of NJUNS.

Verizon and others strongly advocate for an amended rule requiring all parties to track pole work through the National Joint Utilities Notification System (“NJUNS”) database. CTIA correctly notes that a centralized system, such as NJUNS, will promote timely and efficient application processes by standardizing the available information to entities working on the poles.¹¹ NJUNS is a standard, industry tool for transparently coordinating and managing pole attachments by allowing parties to communicate and track their interrelated workflows. NJUNS has been formally adopted in thirty-four states with more than 15,000 users.¹² By adopting and requiring all pole owners and attachers to use NJUNS, the Departments would align the Commonwealth with prevailing industry practice and ensure access to a standardized system to improve efficiency, accountability, and coordination.

⁸ Verizon Comments at 3.

⁹ EDC Comments at 8.

¹⁰ Verizon opposes WiredWest’s proposal that investor-owned utilities (“IOUs”) should bear the cost of moving wires to accommodate EVSE when the IOU makes the decision to move them. *See* Comments of WiredWest (“WiredWest Comments”) at 3.

¹¹ CTIA Comments at 2.

¹² <https://web.njuns.com/about/>

While NECTA opposes using NJUNS, arguing that “it is not clear that NJUNS has all of the capabilities that the Proposed Rules appear to assume it has,” NECTA fails to identify any such missing features.¹³ Where it has been implemented, NJUNS effectively manages common pole work issues including transfers, replacements, make-ready, changes of ownership, attachment requests, overflashing, and violations.¹⁴ NECTA also fails to offer any alternative system for efficient communication and pole management, let alone one meeting NJUNS’s functionality. In addition, most stakeholders already use NJUNS in the Commonwealth and elsewhere and would have to expend more resources to onboard another system. The Departments should therefore retain their proposal requiring use of NJUNS.

V. 220 CMR 45.05: Duties of Utilities – Verizon Opposes Technology-Based Cost Allocation and Burdensome Documentation Mandates.

Contrary to NECTA’s recommendation to burden a specific class of utility customer with a higher share of attachment costs, Verizon opposes requiring a specific group or class of customer to pay for certain pole work regardless of who caused or created the attachment cost. NECTA proposes adding language requiring wireless providers to pay the cost of adding capacity to a pole.¹⁵ However, NECTA provides no reason to support its single-technology-based cost limitation or obligation. Costs incurred to expand capacity should be the responsibility of any new attacher requiring the added pole capacity. Similarly, WiredWest suggests that towns should not have to pay for pole replacements that would need to happen independent of

¹³ NECTA Comments at 49.

¹⁴ <https://web.njuns.com/about/>

¹⁵ NECTA Comments Att. B at 11.

attachments.¹⁶ Here too, Verizon supports a cost-causer theory of responsibility for attachment costs, and the party who causes the cost, should pay the cost.

NECTA further proposes new requirements for utilities to provide certain supporting documentation, including FERC Form 1 and FCC reports, whenever there is an attachment rate change.¹⁷ Consistent with Verizon’s initial comments, such information should be provided upon request but not as a requirement for every change.¹⁸ Federal rules require utilities to provide notice of a rate change, but back-up information need only be provided upon request.¹⁹ The Departments should adopt a similar framework to the FCC’s current pole reporting rules and only require such information sharing upon request.²⁰

VI. 220 CMR 45.06: Attachment Application Size and 220 CMR 45.07: Deviation from Timeline – Verizon Supports the Departments’ Timelines and Opposes Unnecessary Procedural Delays.

The timelines proposed by the Departments appropriately balance efficiency and the attachment processes time requirements. Verizon disagrees with NECTA’s objections to the Departments’ proposed timelines.²¹ As explained in opening comments, Verizon recommends against the Departments mandating “meet-and-confer” requirements that introduce unnecessary procedural steps that are likely to delay, rather than facilitate, pole attachments.²² Several

¹⁶ WiredWest Comments at 5 (“The language of 220 CMR 45.05(4)(c) should make clear that where a Utility already has plans to replace poles, because they do not comply with industry standards and codes, or they have reached the end of their useful lives, those replacements or upgrades would need to happen regardless of whether there were attachers; this is the reality of electric infrastructure and managing utility plant the costs of which are recovered through electric rates. Utilities should not be permitted to place this financial burden on attachment owners when such upgrades and/or replacements are part of their utility operations regardless of whether attachments are present”).

¹⁷ NECTA Comments Att. B at 12.

¹⁸ Verizon Comments at 6.

¹⁹ 47 C.F.R. § 1.1404.

²⁰ Verizon Comments at 6.

²¹ NECTA Comments Att. B at 14.

²² Verizon Comments at 7.

commenters recognize that these broad and prescriptive meet-and-confer obligations are unnecessary, overinclusive, and risk pausing the attachment process at critical stages without offering any efficiency gains.²³ While party coordination can be beneficial, mandatory meet-and-confer requirements impose a one-size-fits-all process on projects that are often neither disputed nor complex. In practice, this requirement would force parties with no disputes to dedicate time and resources to unnecessary procedural formalities, diverting attention from actual progress on make-ready work. Optional or targeted engagement mechanisms are sufficient and preferable to mandatory procedural steps that may stall deployment. An optional dispute resolution process allows parties to address contested issues without adding unnecessary process delays to all applications.²⁴

Commenters also propose a similarly unnecessary process delay in the form of mandatory coordination on small and medium-sized orders.²⁵ These orders typically involve fewer poles and parties, and are, therefore, less likely to benefit from a default rule presuming that each application requires alternative dispute resolution. Additional procedural burdens, such as default coordination requirements, disproportionately slow workstreams. As the Departments are seeking to expedite pole attachments, such presumptive—albeit well-intended—dispute resolution processes will likely undermine the Rulemaking’s core objective of accelerating broadband deployment.

²³ Comments of OpenCape (“OpenCape Comments”) at 2 (requesting a streamlined safe-harbor template and an optional, not mandatory, meet-and-confer when no conflicts are anticipated); CTIA Comments at 4 (suggesting that meet-and-confer requirements only mandate a “good faith effort” to schedule a meeting); NECTA Comments at 15 (opposing the pre-application meet-and-confer requirement as overbroad and unworkable) and 19 (supporting elimination of the make ready stage meet-and-confer requirement to avoid a pause in make-ready work at a critical point).

²⁴ *Id.*

²⁵ Town of Nantucket Comments at 6.

VII. 220 CMR 45.08: Timelines, Application, Survey, Make-Ready, and Related Requirements for Access – Verizon Opposes Procedural Changes that Undermine Efficient, Workable, and Established Attachment Processes.

Verizon opposes the following changes proposed by parties because they would impose unnecessary administrative burdens, introduce unworkable requirements, and depart from established, well-functioning regulatory frameworks without corresponding benefits to efficiency, safety, or fairness.

1. Verizon opposes NECTA’s suggested deletion of section 45.08(2)(d)’s requirement that an application be reviewed for completeness before being reviewed on the merits.²⁶ The Departments’ proposed language tracks with FCC process, which NECTA otherwise recommends.²⁷ Reviewing applications first for completeness is an appropriate and efficient sequence to follow to avoid devoting time to an incomplete application.
2. Verizon opposes NECTA’s suggestion to delete the clause “unless the violation involves a safety issue or impacts the structural integrity of the pole” from section 45.08(2)(f)2.(1), which allows pole owners to deny licensee access for safety and structural reasons.²⁸ Safety violations and violations that undermine structural integrity are significant and must be addressed to ensure that processes are in place to avoid a repeat of this serious compliance matter.
3. Verizon opposes NECTA’s proposal permitting partial make-ready work payments in section 45.08(3)(c)3.²⁹ Verizon’s internal systems do not accommodate partial payments and requiring that attachers make the full payment is not overly

²⁶ NECTA Comments Att. B at 18.

²⁷ 47 C.F.R. § 1.6003(d)(1); NECTA Comments at 14-15.

²⁸ NECTA Comments Att. B at 21.

²⁹ NECTA Comments Att. B at 23.

burdensome. A staggered approach to make-ready payments would also administratively burden pole owners without accelerating deployment. Pole owners would need to issue more invoices, track more payments, and engage in more collection efforts.

4. Verizon opposes NECTA's suggested additions regarding final invoices to section 45.08(3)(d) as unworkable.³⁰ First, Verizon cannot reliably provide invoices within sixty days because municipalities often invoice pole details after that period. Second, Verizon cannot commit to a 15 percent cap with preapproval. Requiring pole owners go back to attachers for final approval will unnecessarily halt the make-ready process. As long as make-ready costs reflect the actual cost of the work required for the attacher, they are the attacher's responsibility even when they are unexpectedly higher than estimated, and there are many reasons why actual costs can exceed estimated costs. Despite best efforts, pole owners cannot always predict the site-specific challenges that will later arise and increase the cost of the make-ready work.
5. Verizon opposes NECTA's proposal adding the words "the utility and" to the provision setting top-down, sequential work timeframes in section 45.08(5)(b)7.(2).³¹ Verizon and attachers cannot dictate to EDCs, who occupy the top of the pole, the amount of time it takes for them to complete their work in the power space.

³⁰ NECTA Comments Att. B at 24 (proposal to add the following language to 45.08(3)(d): "The final invoice must be provided no later than 60-days after the completion of the make-ready and may not exceed the make-ready estimate by more than 15% without prior approval of the Licensee").

³¹ NECTA Comments Att. B at 28.

6. Verizon opposes NECTA's proposal adding a section (b) to 45.08(6) to allow attachers to perform their own make ready estimates for self-help.³² Attachers are not aware of the costs pole owners incur in make-ready work.
7. Verizon opposes NECTA's proposed changes to 45.08(7)(a). NECTA proposes eliminating language providing that a new licensee may forfeit its designated space in favor of others in the queue if timelines are not met and fails to account for subsequent attachers.³³ The Departments' proposed language is appropriate and should not be deleted. A new licensee must complete work in a timely fashion if there are other attachers waiting in line behind them.
8. Verizon opposes suggestions by parties that object to sending applications to both owners of jointly owned poles.³⁴ The Departments asked the utilities to consider a single application process, which Verizon and the EDCs are willing to discuss.³⁵ In the meantime, applications must be delivered to both owners.

The above-referenced edits would increase reporting obligations, impose rigid timelines and documentation requirements, and disrupt the operational realities of coordinating make-ready work among utilities, attachers, and municipalities. Verizon supports the Departments' proposed language, which better reflects real-world constraints, aligns with applicable federal processes, and promotes safe, efficient, and predictable pole attachment administration.

³² NECTA Comments Att. B at 29.

³³ NECTA Comments Att. B at 32.

³⁴ NECTA Comments Att. B at 18 (proposing language that applications be submitted "via a single application process"); Comments of GoNetSpeed ("GoNetSpeed Comments") at 23 ("The rules should instead require joint pole owners to designate a single pole administrator responsible for coordinating the attachment process"); Comments of Massachusetts Municipal Association ("MMA Comments") at 2 ("We recommend the regulations designate a Primary Responsible Owner for every pole who serves as the single point of accountability for the final physical removal of the structure and also streamline the new licensee application via one application to the primary pole owner instead of individually to each joint owner").

³⁵ EDC Comments at 17-18 ("the Departments could renew [] efforts to have the joint pole owners develop a single application process" once the new pole attachment regulations have been in operation for some time).

VIII. 220 CMR 45.10: Deviation from Timelines & “Good Cause” Clause – Verizon Supports Good-Cause Exceptions for Emergencies, Third-Party Delays, and Preexisting Violations.

Verizon maintains its support for retaining a tailored exemption provision that requires pole owners to demonstrate “good cause” in the form of circumstances beyond a pole owner’s control, including delays caused by existing attachers, that prevent compliance with the required timing. Verizon agrees with the EDCs that a properly bound standard is necessary to reflect real-world conditions including weather limitations, third-party delays, and dependencies among attachers.³⁶ The Departments should adopt a balanced approach that preserves enforceable timelines while recognizing operational realities.

Verizon opposes NECTA’s proposal in section 45.10(1)(a). NECTA proposes deleting language allowing deviations from timeframes for major emergencies and storm events.³⁷ This deletion is inappropriate. Verizon understands that the EDCs have defined emergency response plans for weather and emergency events. While NECTA is concerned that this provision could cover routine weather events, the language is specifically limited to only “major weather or emergency events that trigger the utility’s emergency response plan.”³⁸

³⁶ EDC Comments at 20 (“The EDCs would indicate that there are other examples [of what constitutes good cause] which could be expressly included, such as: (1) actions by the licensees which delay the pole owner such as requests for route changes or disputes over make-ready costs or failure to pay; (2) weather conditions which inhibit the ability to perform surveys or make-ready work; and (3) actions by third parties which are beyond the control of the EDC”).

³⁷ NECTA Comments Att. B at 41.

³⁸ *See Joint Investigation by the Department of Public Utilities and the Department of Telecommunications and Cable on their own motion instituting a rulemaking pursuant to G.L. c. 30A, § 2, 220 CMR 2.00, and 207 CMR 2.00, to Amend 220 CMR 45.00: Pole Attachment, Duct, Conduit, and Right-of-Way Complaint and Enforcement Procedures.*, D.P.U. 26-10/D.T.C. 26-1, Order Instituting Joint Rulemaking and Further Inquiry on Memorandum of Agreement (Mass. Dep’t of Pub. Utils. & Dep’t of Telecomms. & Cable Mar. 6, 2026) (“Order”) at 52.

Verizon also opposes NECTA's suggested changes to section 45.10(1)(c).³⁹ NECTA proposes extending the period utilities can deviate to "in no case longer than 90 days."⁴⁰ No party can commit to resolve within a 90-day period all delays due to events outside of their control. NECTA further proposes adding the following unworkable sentence: "A utility cannot delay completion of make-ready because of a preexisting violation on an affected pole not caused by the new attacher."⁴¹ This proposed language should be rejected. If a preexisting violation must be cleared before a new attacher can proceed, make-ready work may also be contingent on clearing the preexisting violation.

The Departments should also reject NECTA's proposed addition of the words "utility delays" to section 45.10(2)(a).⁴² If the EDC's work is delayed, attachers may have to wait to perform their own work that is contingent on the EDC's performance.

IX. 220 CMR 45.11: Contractors for Surveys and Make-Ready – Verizon Supports Contractor Qualification Standards and Flexibility in Contractor Oversight.

Verizon continues to support revisions that clarify contractor roles and allow flexibility to manage contractor lists based on performance and qualifications. NECTA proposes deleting section 45.11(4)'s references to contractors needing experience with safety and operational guidelines and insurance for pole damage.⁴³ These suggestions are not appropriate and should be rejected. The Departments' language assures contractors have the necessary experience and insurance to safely perform pole work.

³⁹ NECTA Comments Att. B at 41.

⁴⁰ NECTA Comments Att. B at 41.

⁴¹ NECTA Comments Att. B at 41.

⁴² NECTA Comments Att. B at 41.

⁴³ NECTA Comments Att. B at 44.

X. 220 CMR 45.12: Overlapping Wires in the Communications Space – Verizon Supports Maintaining FCC Overlapping Framework and Rejects Risk-Increasing Deviations.

Verizon reiterates that the Departments should adopt the FCC’s overlapping framework, which promotes efficient deployment and preserves necessary safety protections.⁴⁴ While some commenters advocate alternative approaches, they do not demonstrate a need to deviate from the well-established FCC framework, which already balances efficiency and safety.⁴⁵ NECTA proposes deleting section 45.12(3)(c) which provides that a licensee cannot overlap to telephone utility lines.⁴⁶ Deletion of the word “lowest” is acceptable, but the rest of the provision must stay, as Verizon cannot allow other entities to overlap its own facilities.

In Section 45.12(4)(a), NECTA proposes that a utility may “not prevent an existing licensee from overlapping because another existing licensee has not fixed a preexisting violation...”⁴⁷ The Departments should reject this language. There may be instances where the new attachers’ ability to overlap relies on an existing licensee clearing a violation. In those instances, the overlapping must wait to avoid increasing the risks associated with non-compliant attachments. This will be case-specific, and the final rules should reflect this need for flexibility.

In section 45.12(6), NECTA proposes adding the words “or existing license.”⁴⁸ However, Verizon cannot complete any remedial work on an existing licensee’s facilities. That will need to

⁴⁴ Verizon Comments at 8-9.

⁴⁵ GoNetSpeed Comments at 27-29 (supporting express permission for alternative construction techniques like boxing on a case-by-case basis); OpenCape Comments at 2 (requesting that existing licensees’ overlapping be deemed approved if no response is received within fifteen days); Verizon Comments at 8-9 (citing 47 C.F.R. 1.1416, which sets overlapping rules related to prior approval, preexisting violations, advanced notice, overlasher responsibility, and post-overlapping review).

⁴⁶ NECTA Comments Att. B at 46.

⁴⁷ NECTA Comments, Att. B at 46.

⁴⁸ NECTA Comments, Att. B at 47.

be addressed between that new attacher and the existing licensee. Therefore, NECTA's suggestion should be rejected, and the provision should stay as the Departments proposed.

XIII. 220 CMR 45.15: Formal Complaint Procedure – Verizon Supports Addressing Policy Considerations through Rulemaking, not Complaint Adjudication.

The Commission should reject NECTA's proposal to delete section 4 concerning "Policy Considerations."⁴⁹ NECTA argues that, as drafted, section 45.15(4) could transform individual complaints into broader rulemakings, thereby delaying relief for the complaining attacher.⁵⁰ However, Verizon's concern is not with the Departments' ability to adjudicate routine complaints under established rules. Rather, where resolution of a complaint would require interpreting or effectively modifying a rule in a manner that has broader impact on other attachers, fundamental fairness and due process support addressing such issues through a rulemaking proceeding. A rulemaking ensures that all affected parties receive notice and an opportunity to be heard on changes that may alter their rights or obligations, as opposed to having such determinations made in the context of a single-party dispute. Accordingly, the Departments should retain section 4 to preserve an appropriate procedural mechanism for addressing policy-level questions with industry-wide implications.

XIV. 220 CMR 45.17: Annual Reporting Requirements – Verizon Opposes Increased Reporting Frequency without Demonstrated Benefits.

NECTA proposes making informational filings semi-annual instead of annual.⁵¹ These informational filings require pole owners to compile and submit detailed spreadsheets tracking the status and progress of every individual pole application received, imposing a substantial

⁴⁹ NECTA Comments, Att. B at 56.

⁵⁰ NECTA Comments, Att. B at 56.

⁵¹ NECTA Comments at 48-49, Att. B at 60-61.

administrative burden. Requiring such filings twice per year would meaningfully increase that burden without providing commensurate benefits to interested parties. An annual filing (consistent with current policy in New York) is sufficient to ensure transparency and oversight, and the Departments should proceed with their original language.

CONCLUSION

Opening comments reflect broad party agreement on improving the pole attachment process and demonstrate that new procedures must be grounded in operational feasibility, safety, and party coordination. Verizon looks forward to working with the Departments and other stakeholders to implement regulations that maintain safe and reliable facilities for ratepayers, pole workers, utilities, and attachers.

Respectfully submitted this 11th day of June, 2026,

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