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Chief, MDRD  
Enforcement Bureau

December 14, 2015

**VIA ECFS AND E-MAIL**

Lisa Griffin, Deputy Division Chief  
Federal Communications Commission  
Enforcement Bureau  
Market Disputes Resolution Division  
445 12th Street, SW  
Washington, DC 20554

Re: *Verizon Virginia LLC and Verizon South Inc. v. Virginia Electric and Power Company d/b/a Dominion Virginia Power*, Docket No. 15-190,  
File No. EB-15-MD-006

Dear Ms. Griffin:

The parties in the above-referenced proceeding agree to the following schedule:

On or before January 15, 2016, Dominion agrees to provide Verizon the following information:

- (1) License Agreements: Dominion's pole license agreements referenced throughout Dominion's response, including at pages 7 and 17-27, the production of which is provided for by 47 C.F.R. § 1.1424;
- (2) Survey: The survey relied upon by Dominion at pages 34-35 of its Response, including the data used to produce the expected distribution values that appear on pages 1-3 of Response Ex. B, Appendix B, Exhibit II;
- (3) Source Documents and Information Referenced in Dominion's Response:
  - The source documents establishing the figures claimed by Mr. Graf in Exhibit MAG-1 to Response Ex. A;
  - The amounts Dominion invoiced and collected for the engineering and inspection costs referenced on pages 19-20 of the Response if not included in Exhibit MAG-1 to Response Ex. A; and
  - The identity of each of the licensees that Mr. Graf alleges "collectively paid Dominion" certain amounts in Exhibit MAG-1 to



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Response Ex. A and the number of Dominion poles or attachments for which each of these licensees was invoiced by Dominion for annual rent from 2011 to 2015.

On or before February 9, 2016, Verizon will file its Pole Attachment Complaint Reply.

Dominion does not, at this time, seek information or discovery from Verizon or leave to file a sur-reply. Dominion reserves the right to seek leave to propound similarly targeted discovery requests on Verizon and leave to file a sur-reply if, and only to the extent that, Verizon's Pole Attachment Complaint Reply includes new facts that are not supported by documentation. Verizon reserves the right to oppose any request from Dominion at that time.

Best regards,

A handwritten signature in black ink, appearing to read "C. Huther", with a long horizontal line extending to the right.

Christopher S. Huther

cc: Brett Heather Freedson at [bfreedson@eckertseamans.com](mailto:bfreedson@eckertseamans.com)  
Charlie Zdebski at [czdebski@eckertseamans.com](mailto:czdebski@eckertseamans.com)