

# **ATTACHMENT C**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of

Deployment of Wireline Services Offering  
Advanced Telecommunications Capability

CC Docket No. 98-147

And

Implementation of the Local Competition  
Provisions of the  
Telecommunications Act of 1996

CC Docket No. 96-98

**DECLARATION OF RALPH W. CAREY**

1. My name is Ralph W. Carey. I am the Director of Real Estate Construction Services for the eastern Verizon states. I have prepared this declaration for the purpose of analyzing the ability of an incumbent local exchange carrier to meet a 90-calendar day interval for providing collocation.

**I. Background and Experience.**

2. I graduated from Drexel University with a Bachelor of Science in Civil Engineering. Additionally, I have attended a number of technical and business-related courses and seminars sponsored by Verizon and its partners. My career with Verizon began in 1972, working as an engineer in Building Engineering in Philadelphia. Throughout my 28-year career at Verizon, I've held several critical positions in the construction and facilities management of Verizon's building portfolio.

3. My organization is responsible for conditioning and provisioning space and associated building support systems for all collocation applications submitted for any of the 2,398 Verizon east central office buildings. As of this date, my team has been directly responsible for delivering physical collocation space at more than 1,560 separate areas in 1,250 central offices, accommodating more than 9,000 collocation arrangements.

## **II. Purpose & Summary of Declaration**

4. I have reviewed the FCC's *Advanced Services Order* and August 10, 2000 *Order on Reconsideration*. In the *Order on Reconsideration*, the FCC required incumbent local exchange carriers ("ILECs"), such as Verizon, to provision all forms of collocation space within 90 calendar days. The purpose of my declaration is to address the reasonableness of the requirement to meet this 90-calendar day interval for unconditioned space from a building alteration perspective. The timeline to provision the network infrastructure and interconnection architecture to support the collocated equipment for space that is already conditioned is addressed in the declaration of Ms. Karen Maguire. My declaration will describe the required activities typically involved in conditioning space to provide a suitable environment for today's telecommunication equipment and the associated timeframes and constraints. In my experience, the 90-calendar day interval is far too short to allow an incumbent local exchange carrier to perform the necessary activities to provide collocation in unconditioned space.

## **III. Discussion**

5. Prior to the point that a competitive local exchange carrier can take occupancy of a collocation arrangement, the space must be environmentally conditioned, the supporting network infrastructure must be installed, and all necessary security

arrangements must be in place. Real Estate Construction Services coordinates the work activities by architectural engineering consultants and contractors that prepare physical collocation space to accommodate the collocator's equipment as well as Verizon's supporting telecommunications infrastructure. The supporting telecommunication infrastructure includes voice grade, DS1, DS3 and fiber cross connects and cable racking superstructures as well as the DC power requirements. In order to have a functional collocation arrangement, the necessary cross connects and DC power must be installed prior to the turnover of space to the collocator. The preparation and conditioning of the space must occur before the supporting telecommunication equipment and systems can be installed.

6. Verizon has already improved its internal controls, methods and procedures to meet the burgeoning demand for collocation and has significantly reduced intervals from previously filed tariff intervals. Our current internal processes have dramatically changed from the earlier years as a by-product of process improvements. Examples of the improvements include reallocating internal resources to establish a dedicated team to focus on collocation projects, approving and hiring additional contractors, vendors and Verizon personnel, redefining the bidding requirements for collocation and like projects and establishing calendar year-based estimate cases for spending authorizations. These improvements are essential for Verizon to meet the explosion of unforecasted demand for collocation. However, as in all construction, many activities must be done sequentially, and Verizon is subject to external factors such as the availability of supplier and vendor support and permit approvals by local authorities. While Verizon strives for continuous improvement in its processes, the prospect of

further improvement presents no hope of meeting a 90-calendar day interval in all cases, especially for unconditioned space.

7. Verizon and its contractors have already streamlined their work processes. The fact is that every collocation application processed by Verizon is done on an expedited basis and is typically completed in advance of real estate work done for Verizon's own use. Similar work activities for Verizon's own use take 120 to 240 days to complete for design and construction.

8. The conditioning of space refers to the work activities of evaluating, designing and constructing building infrastructure systems to provide the required environment to accommodate the telecommunication equipment. In addition, it includes providing a safe working environment for Verizon personnel, vendors and collocator personnel and agents as well as safeguarding the network integrity of the existing equipment. The building systems affected by the conditioning of space process are heating, ventilation air conditioning, plumbing, electrical distribution, safety, security, and structural and architectural systems. All design and construction alterations must conform to the applicable building code requirements. Building codes require that egress and ingress within the confines of a central office must be properly maintained. In establishing collocation space or renovating space for any reasons, modifications to common corridors may be necessary. All affected areas must be evaluated for conformance to safety requirements. Although wire mesh partitioning is used in place of walls in many cases, code requirements will dictate if modifications require solid partitioning and fire rated egress corridors to meet fire, safety, and Occupational Health and Safety Administration specifications. In addition to the need to prepare collocation

space, the collocation application requirements frequently trigger the need to condition additional space in other areas of the central office. The space to accommodate the supporting telecommunication equipment may require conditioning and can exceed 200% of the collocator-assigned space in square footage. This can include space preparation for additional power plant capacity, core drilling of floors for conduit and cable racking, and preparation of space for additional transport and switch capacity.

9. Upon receipt of an application for collocation that requires space conditioning, the Real Estate Construction Services team immediately starts the conditioning process. In order to allow sufficient time for the installation of the supporting telecommunications equipment, Real Estate Construction Services tries to prepare the space for beneficial occupancy by the 53rd calendar day of the application process. (In this declaration, I will refer to days as calendar days unless otherwise indicated). The space to accommodate the collocation arrangement is usually identified between day five (5) and twelve (12) of the application process. Verizon's architectural consultants are required to design the building infrastructure system modifications and to develop the construction documents for all work to be performed by Verizon contractors. Space must be designed to provide a reasonable level of security necessary to protect Verizon's network. It must also be evaluated for the presence of asbestos material (as discussed below). The availability of air conditioning capacity and distribution with respect to the heat dissipation of the collocator's equipment as well as forecasts for potential future applications are considered. The mechanical engineering consultant must calculate the new cooling load requirements in this evaluation and determine if existing systems are adequate or can be augmented or if new systems are required. In addition,

the presence of power and cable routes that traverse through multiple floors and walls within the central office must be evaluated at the implementation planning stage. Several other activities of the process are dependent on the preparation of Construction Documents and cannot start until those documents are complete.

10. Central offices and support systems vary in complexity, with each having unique variables and constraints. This creates a challenge for Verizon architectural consultants in evaluating and designing the space and supporting systems in an effort to leverage standardization and to minimize the design cycle time. The infrastructure requirements of a central office are dramatically different than the typical commercial business environment. Central offices are designed and constructed with floor loadings, and power plants are closer to triple the normal building load requirements. The heating, ventilation, air conditioning, electrical distribution and stand-by power systems are complex and engineered to extremely high degrees of automation, reliability and redundancy.

11. Verizon has developed design guidelines for conditioning space for collocation arrangements. These guidelines were developed from existing policies and provide a road map for our architectural consultants in the design phase. Although it is impractical and technically infeasible for Verizon to have a “cookie cutter” design that can be applied to all collocation requests, this approach minimizes the overall cycle time by standardizing the design methodology.

12. Construction Documents are developed for submission to governmental agencies to obtain building permits. These documents are also a prerequisite for contractors to develop and submit their cost proposals. The contractor awarded the

contract for construction utilizes the Construction Documents for the actual construction and building modifications. The magnitude and complexity of work that must be performed influence the cycle time required to develop these documents. This interval cannot exceed fifteen (15) days under Verizon's current time interval constraints. The average cycle time for Construction Document development for Verizon's own network projects of a magnitude comparable to collocation ranges from 45 to 75 days. The design phase is one of the most influential value-added activities in the construction process. The quality of the design, drawings and specifications, coupled with the creativity in value engineering and the development of alternatives influence the overall construction costs, cycle time, and overall life cycle costs. Verizon solicited comments from several of our architectural consultants in evaluating the effect of a reduction in the collocation interval. Their responses support our conclusion that the 90-day interval does not provide sufficient time for normal construction activities. A collocation interval that is too short will limit the design to a potential solution that may work, which may not be the optimum and most efficient solution. This contributes to higher initial and life cycle costs of Verizon's building systems. A 90-calendar day interval, even with overtime and weekend hours and the associated increase in costs, is still unrealistic. Any further attempt to shorten the design cycle time will result in ill-conceived designs, which can lengthen the overall cycle time due to confusion in the construction, bidding and permitting processes.

13. Because of Verizon's construction standards, many central offices are exempt from certain aspects of today's fire codes for occupied spaces. If Verizon were to

lower its standards, it could lose these current waivers, and the costs to retrofit the approximately 2,400 central offices would be financially damaging.

14. The construction bidding process is designed to obtain the lowest achievable construction cost for end product that meets the specifications. It is Verizon's corporate policy that any real estate work for collocation and similar projects exceeding \$150,000 requires multiple bid estimates from Verizon's contractors. The average interval for contractors to submit bids and for Verizon to award a contract is approximately 15 to 21 days after the architect's design specifications are complete. The bidding process commences with the distribution of the bid package to Verizon's construction contractors. The bid package includes an invitation to bid, the bid requirements and the Construction Documents. Typically, a bid walk is conducted at the site with the architectural consultants and the contractors to review and discuss the requirements of the project. This is to ensure all parties have a clear understanding and expectation of the proposed project. Verizon must allow the contractors sufficient time to formulate their proposals. This allows the contractors to research availability and pricing for materials, components and labor that meet the project's performance specifications from manufactures, distributors and subcontractors. A bid analysis is conducted on the submitted proposals, and the construction contract is then awarded to the successful bidder. An Authorization To Proceed is developed and signed to solidify the contractual agreement. The majority of the interval is dedicated to providing time for the contractors to formulate their proposals. Shortening this interval would reduce the contractors' ability to develop competitive proposals and thus would increase costs and possibly the cycle time for construction.

15. A contractor can begin once it is awarded the contract. The contractor needs to execute contracts with subcontractors, order materials, secure the required equipment and obtain the required construction permits. With the exception of obtaining the construction permits, these tasks can be done between one (1) and five (5) days. The average interval for obtaining building permits is between seven (7) and thirty (30) days. However, the process for obtaining building permits is unpredictable and is often much longer. When exterior construction is required, such as additional entrances, zoning variances can extend this interval by several months. Many planning boards in small communities typically only meet once a month. Attachment A contains many of the standard filing and permitting requirements and their associated timeframes for the various jurisdictions within Verizon east. It is not uncommon for awards to be delayed based on subsequent requirements that may be set forth by community boards or zoning commissions. Construction cannot legally commence until all required permits have been obtained.

16. The actual construction task for collocation projects ranges from 20 to 50 days. This range is highly dependent on the complexity of the system modifications and the availability of materials. Expensive components required in the modifications, such as heating, ventilation, and air conditioning package units and refrigeration chillers are not readily available. These components typically have a lead time of at least 120 days. In such circumstances, Verizon has provided temporary measures in the interest of delivering conditioned space on schedule. Temporary cooling, temporary electrical feeders, etc., are installed while the permanent solution is being developed and constructed. Another influence in the construction cycle time is the necessary protection

for existing telecommunications equipment to reduce the risks associated with a network outage during construction. This includes developing detailed Methods of Procedures describing the work, erecting temporary dust proof partitioning, and conducting the work out of normal business hours to minimize accidental interference with critical network equipment. A core competency of Verizon contractors is orchestrating the various construction trades to achieve the shortest construction interval possible. In fact, Verizon has tapped the expertise of several construction management firms to help direct the collocation construction program. During the construction process, many jurisdictions require inspections of work for various trades. These inspections must take place before any additional work and/or occupancy can take place.

17. A key factor that plays a significant role in overall space conditioning intervals is the inspection and abatement of asbestos containing materials during the initial preparation of space in a designated central office. Prior to beginning any construction, renovation or conditioning of any space, including collocation, in any central office, Verizon must first evaluate and test the designated area for the presence of asbestos containing materials. In many of the initial collocation applications, asbestos containing materials, such as pipe insulation, insulation and caulking of heating, ventilation and air conditioning systems, heater insulation, fire stopping, transite walls, transite floor panels, doors/window caulking, lighting, carpet mastics, ceiling tiles, wall/ceiling plasters and floor tiles must first be removed in the designated collocation space. Because of the vintage of the majority of Verizon's central offices, most of which were constructed prior to 1980, the presence of asbestos containing materials in existing central offices is a common occurrence. It is Verizon's policy, because of safety concerns

for all personnel working in a central office, that asbestos containing materials will be replaced at any designated collocation space. This is not limited to the associated assigned collocation space. Conduit and cable routes are also inspected for asbestos and abated if required. The potential need for asbestos abatement alone makes a 90-calendar day interval on all applications unreasonable and unobtainable. Attachment B illustrates the work processes to inspect, test and remove hazardous materials from Verizon's facilities and their associated intervals. The various environmental agencies impose notification and filing requirements with which Verizon must comply. The are also illustrated in Attachment B.

18. Once all the potential construction areas are identified, Verizon environmental consultants can inspect, take samples and test potential asbestos containing materials. The results are usually available within 4 days of the inspection. If the results are positive, the environmental consultant must develop the specifications for the abatement of the material. This typically takes approximately 3 days. Once the abatement specifications are developed, the activities of the bid walk-through, submission of bids and the award of contract for removal of asbestos containing materials can take place. These activities will take approximately 5 days to complete. Abatement cannot commence until notification is filed with the appropriate governing agency. The filling period is typically 10 calendars days for most abatement projects. The actual abatement interval ranges from 3 to 25 days. Air monitoring of the site is required to insure air-borne asbestos fibers are within the allowable limits. This task takes 3 days. Because the abatement process must allow a minimum of 41 calendar days, a 90 calendar day interval would leave insufficient time for space conditioning, and no time would be left for the

installation of the telecommunications infrastructure. The inspection and evaluation process is conducted nearly 100% of the time an application is received that requires any construction. Abatement is required for over 75% of the time construction is required.

19. After removal of asbestos containing materials, additional time is needed for the construction activities to prepare the space for collocation. Attachment C provides timelines for Verizon to complete space conditioning with and without asbestos abatement. These intervals vary from 54 to 96 calendar days. This work must be completed before Verizon can begin installing DC Power, cabling and network infrastructure for the collocation arrangement. Real Estate categorizes jobs into different categories that include minor jobs, major jobs and complex jobs. Minor jobs are the space conditioning to meet a collocator's application when space is readily available. These jobs may require additional conduit space for fiber facilities, minor heating, ventilation, and air conditioning duct work, electrical distribution work for AC convenience outlets and lighting. The minor jobs, like major jobs, still require the architectural design and permitting requirements as previously discussed. Major construction jobs include conditioning of available space with necessary security and partitions, safety and early warning detection systems, heating, ventilation, and air conditioning capacity growth, and any structural affecting work within the central office. Complex projects are evaluated on an individual basis. Complex jobs include those requiring demolition prior to space conditioning, asbestos abatement, upgrades and additions to support systems, and/or replacement of major infrastructure components. As previously discussed, it is impossible to complete all the required tasks and conform

to applicable laws governing permitting and zoning requirements within standard intervals, much less the 90-calendar days prescribed by the Commission.

20. Verizon east has more than 2.6 million square feet of collocation space within its central offices. To achieve numbers of this magnitude, and to accommodate the vast majority of all physical collocation requests, Verizon has developed creative ways to make space available for collocation. Attachment D illustrates Verizon's creativity and commitment to developing space for collocator use. Verizon voluntarily relocates administrative work groups, reclaims administrative spaces currently in use and conditions this administrative space to accommodate the collocators' equipment in a central office. The scope and magnitude of work required to reclaim administrative space and/or relocate administrative work groups preclude meeting a 90-calendar day interval.

21. A representative example of the amount of work taken on by Verizon in relocating in an administrative work group is illustrated in Attachment E. In this particular example, Verizon received physical collocation applications in early 1999. The initial plan was to reclaim several administrative offices to make space available for physical collocation, but within several weeks of the initial application, Verizon received subsequent applications requiring a larger area. The only space available at this particular central office was a regional training center that was relocated from leased space into this central office in 1995. In reconditioning administrative space and the associated relocation of the administrative work groups, Verizon must first identify a suitable alternative to locate the current tenant. Prior to any demolition of existing space, Verizon must condition and prepare the new space to conditions comparable to that being vacated by the tenant. In addition to space preparation, the telecommunications requirements

must be considered. Because of the regional nature of much of the work being performed by these work groups, the telecommunications requirements include specially engineered circuits and the associated translation equipment. This type of work requires issuing service orders to initiate the special circuit designs, and establish the telecommunications network. In addition, internal telephone and data networks must be designed, installed and tested prior to any relocation of the workgroup. Such moves often require Verizon to operate duplicate service during the transition to minimize the disruption and facilitate a seamless relocation to both Verizon employees and the customers they serve. Only after all this work has taken place, can Real Estate Construction Services begin to demolish the existing administrative space and condition the space to house telecommunications equipment. This demolition typically requires complete removal of the internal infrastructure and partitioning walls as well all ceiling and lighting fixtures that do not support telecommunications equipment. Attachment E provides pictures and diagrams demonstrating the administrative space, as it existed prior to demolition, during the demolition, and after the completion of the collocation space. In making space available for collocation and thus embracing competition, Verizon expedited the intervals and actually displaced a training class in progress prior to completing the new training site.

22. Imposing a 90-calendar day interval for all collocation, including unconditioned space, would inhibit Verizon's past creativity and innovation to explore alternatives to provide space for collocation. Clearly, Verizon will be hard pressed to meet such unrealistic intervals in those locations where unused and unconditioned space may exist in a given central office.

23. The amount of work and associated time required to condition space increases as the number of collocators in a building increases. In some of Verizon's buildings, there are more than 20 collocators and Verizon is preparing the third, fourth and sometimes fifth additional areas. As the amount of equipment increases, the DC power plant requirements increase proportionately. In addition, the strain on the building infrastructure increases including cable support, distribution frames, and the need to expand Verizon's own telecommunications space for switch and transmission equipment. As capacities of major support systems such as refrigeration chillers and electrical switchboards are exhausted, the costs and time associated with adding this capacity increase significantly. Since the Telecommunications Act of 1996, Verizon has facilitated major upgrades to existing capacities of these support systems at numerous central offices. Verizon has had to actually freeze all growth activity at several central offices until upgrades to support systems could be completed due to unforecasted demand, in which collocators have played a key role. In addition, the forecast of building addition requirements has grown significantly from only 5 additions in 1998 to more than 200 building additions planned for the next two years. The majority of these building additions are directly attributable to the explosion of unforecasted demand for collocation over the past two years

#### **IV. Conclusion**

24. For all of the reasons discussed above, it is not reasonable to expect the local exchange carriers to provide collocation in unconditioned space within the 90 calendar day interval prescribed by the Commission.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10, 2000

A handwritten signature in cursive script, reading "Ralph W. Carey", is written over a horizontal line. The signature is fluid and includes a long, sweeping flourish at the end.

Ralph W. Carey

**CAREY ATTACHMENT A**

**VERIZON REAL ESTATE**

**STANDARD**

**PERMITTING REQUIREMENTS**

Construction Permitting Requirements

CITY/Municipal	Applicable Code	CONSTRUCTION DOCUMENT PREPERATION and PERMIT NOTIFICATION DISCRIPTIONS	*Minor Projects		**Major Projects		REQUIRED BUILDING PERMIT APPROVALS TOTAL DAYS
			# Review Days (working)	# Days for Approval (working)	# Review Days (working)	# Days for Approval (working)	
<b>VA</b>	Uniform statewide building code - modified from BOCA & NFPA						
Arlington County		Building Permit	15 to 20	2	20 to 30	2	32
City of Alexandria		Building Permit	10 to 15	2	20 to 30	2	32
City of Fairfax		Building Permit	10 to 15	2	20 to 30	2	32
Fairfax County		Building Permit	15 to 20	2	20 to 40	2	42
City of Falls Church		Building Permit	10 to 15	1	20 to 30	1	31
Madison County		Building Permit	7 to 10	1	15 to 20	1	21
City of Fredericksburg		Building Permit	7 to 10	1	15 to 20	1	21
City of Winchester		Building Permit	7 to 10	1	15 to 20	1	21
Loudon County		Building Permit	5 to 10	1	10 to 20	1	21
<b>MD</b>	BOCA Code & Maryland Life Safety Code						
Montgomery County		Building Permit	15 to 20	2	20 to 40	2	42
Prince Georges County		Building Permit	15 to 20	2	20 to 40	2	42
St. Mary's County		Building Permit	7 to 10	1	15 to 20	1	21
<b>DC</b>	BOCA Code	Building Permit	15 to 20	2	20 to 40	2	42
<b>Maine</b>	BOCA Code	Building Permit	10 to 20		20 to 30	2	32
<b>New Hampshire</b>	BOCA Code	Building Permit	7 to 14	14	20 to 46	14	60
<b>Vermont</b>	BOCA Code	Building Permit	10 to 20	2	20 to 30	2	32
<b>New Jersey</b>	BOCA Code, UCC Rehabilitation subcode						
Washington Twnshp.		Building Permit			30-40	1	41
Woodbury Twnshp.		Building Permit			30-40	1	41
West Windsor Twnshp.		Building Permit			30-40	1	41
Pleasantville Twnshp.		Building Permit			30-40	1	41
Rutherford Twnshp.		Building Permit			30-40	1	41
Ocean Twnshp.		Building Permit			30-40	1	41

Construction Permitting Requirements

CITY/Municipal	Applicable Code	CONSTRUCTION DOCUMENT PREPERATION and PERMIT NOTIFICATION DISCRPTIONS	*Minor Projects		**Major Projects		REQUIRED BUILDING PERMIT APPROVALS TOTAL DAYS
			# Review Days (working)	# Days for Approval (working)	# Review Days (working)	# Days for Approval (working)	
PA Philadelphia	BOCA National Building Code Review/Construction Permit	Electrical Permit Mechanical Permit Fire Alarm Permit			up to 10 up to 10 up to 10 up to 10	1 1 1 1	41
Pittsburgh	BOCA National Building Code Review/Construction Permit	Electrical Permit Mechanical Permit Fire Alarm Permit			up to 10 up to 10 up to 10 up to 10	1 1 1 1	41
	Allegheny Plumbing review (Article 15) / Permit						
Allegheny	Pennsylvania Code Title 34, Labor And Industry Review and Approval Local BOCA National Building Code Review / Construction Permit	Electrical Permit Mechanical Permit Fire Alarm Permit			up to 3 up to 10 up to 10 up to 10 up to 10	1 1 1 1 1	54
	Allegheny Plumbing review (Article 15) / Permit				up to 10	1	
Harrisburg/Lancaster	Pennsylvania Code Title 34, Labor And Industry Review and Approval Local BOCA National Building Code Review / Construction Permit	Electrical Permit Mechanical Permit Fire Alarm Permit			up to 3 up to 10 up to 10 up to 10 up to 10	1 1 1 1 1	44
Wilkes-Barre/Scranton	Pennsylvania Code Title 34, Labor And Industry Review and Approval Local BOCA National Building Code Review / Construction Permit	Electrical Permit Mechanical Permit Fire Alarm Permit			up to 3 up to 10 up to 10 up to 10 up to 10	1 1 1 1 1	44

Construction Permitting Requirements

CITY/Municipal	Applicable Code	CONSTRUCTION DOCUMENT PREPERATION and PERMIT NOTIFICATION DISCRIPTIONS	*Minor Projects		**Major Projects		REQUIRED BUILDING PERMIT APPROVALS TOTAL DAYS
			# Review Days (working)	# Days for Approval (working)	# Review Days (working)	# Days for Approval (working)	
RI	BOCA Code 1996 version with Rhode Island suplments para.108.1				up to 30	1	31
MA	State Building Code Sixth Edition 780 CMR, para. 111.1				up to 30	1	31
NY	BOCA Code and Local Law 76-1985 Section 27-144 <i>*Note: If rejected for any reason an additional 20 days</i>				14 to 40 (*+20)	1	41

\*\* Major projects include either new mechanical, electrical systems or change to life safety elements or handicapped accessibility elements in the building including new entrances.

Additional notes;

1. Projects that require site plan approval because of new entrances or building additions will take between 6 and 16 months for approval.
2. Projects that require relocating administration or other functional areas may double the over all construction duration's.
3. Projects that require relocating data or telephone lines could add between 2 and 3 months to construction intervals because of OCS scheduling.
4. These time frames do not include asbestos or lead paint abatement.

**CAREY ATTACHMENT B**

**VERIZON REAL ESTATE**

**ASBESTOS/HAZARDOUS MATERIAL  
ABATEMENT**

**PERMITTING REQUIREMENTS**

## Asbestos/Lead Abatement Requirements

After the initial site inspection identifies the collocation expansion area, asbestos/lead inspections are required to be performed, as per OSHA 1910.1101 and OSHA 1926.62 respectively. **NOTE: NO CONSTRUCTION ACTIVITIES CAN TAKE PLACE UNTIL ASBESTOS IS IDENTIFIED AND REMOVED FROM THE WORK AREA AS PER STATE AND FEDERAL GOVT. REQUIREMENTS.**

The time frame for asbestos inspections and asbestos abatements are as follows:

The Collocation area is identified on day 5, after acceptance of the original application. Our design professionals develop floor plans by day 10. At this point the environmental asbestos/lead inspections can take place.

<i>Site inspection/Development of floor plans</i>	<i>10 days</i>
Asbestos inspection (after receiving floor plans)	1 day
Sample taking	1 day
Laboratory results	2 days
Specification development	3 days
Bid walk through	4 days
Award of contract	1 day
 Project Start after	
State/Federal notifications	10 (business) days
Abatement start to finish	(5 days/avg., range 3-25 days, depending on the size and amount of phasing)
 Final Air sampling	3 days
Tear down of critical barriers	1 day
 <b>TOTAL ADDITIONAL DAYS REQUIRED</b>	<b>41 DAYS (*minimum)</b>

**\* Note: Some projects may require more time for actual abatement activities do to the size and amount of materials to be removed as well as obtaining permits.**

The following table represents minimum time required for Federal, State, and City asbestos project notifications in the Verizon foot print.

CITY/STATE	NOTIFICATION DESCRIPTION	No. of Days
NY State	Industrial Code Rule-12NYCRR Part 56	Friable 10 working
		Non-friable 10 calendar
NY City	NYC Local Law Title 15 Chapter 1	Friable 7 working
		Non-friable 7 working
N J	NJDEP-NJAC-7:26-1 et seq., NJDOH/NJDOL joint regulations NJAC 8:60-1 et seq./NJAC 12:120-1 et seq.	10 working > 160 sq. ft or 260 in ft 10 calendar < 160 sq. ft or 260 in ft
Phila. PA City	Air Management Services, EPA	Friable 10 working
		Non-friable 10 calendar
Allegheny Cnty.	County of Allegheny PA Ordinance Number 16782 and Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control, 2/1/94, amended March 15, 1995 and September 6, 1995. Effective October 20, 1995	10 working
PA State	ACT 194	5 working
	And	
	NESHAPS Regulations	10 working
MD	Department of Natural Resources & Environmental Control	10 working
	Division of Air Emissions & Pollution	
VA	Virginia Dept. of Labor & Industry	20 calendar
	425-01-74 Dated 6/21/93	days
MA	DEP & DLWD NOTIFICATION & BOSTON DOH	10
VT	VOSHA & EPA – NOTIFACTION	10
NH	NHDES – NOTIFICATION	10
ME	DEM – NOTIFICATION	10
RI	DOH -----ABATEMENT PLAN AND 10 DAY NOTIFICATION & EPA	60 – PLAN 10- NOTIFY
WV	State of West Virginia, Division of Health Title 64, Series 63 (64 CSR 63), Paragraph 10.1.c Dated 1998	10 business days, can't start work until the 11 <sup>th</sup> day

**CAREY ATTACHMENT C**

**VERIZON REAL ESTATE**

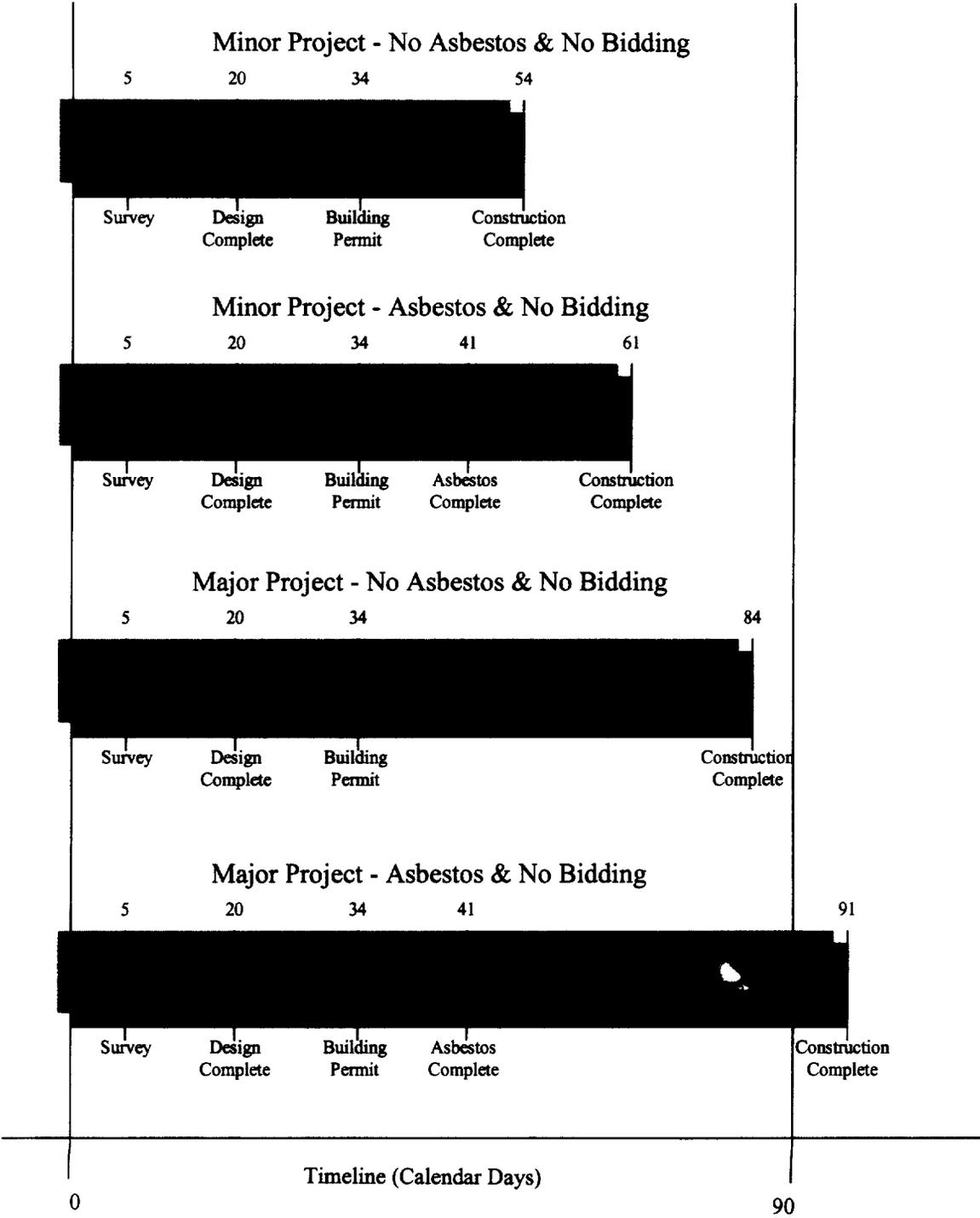
**TIMELINE**

**CENTRAL OFFICE SPACE**

**CONDITIONING FOR COLLOCATION**



# Timelines for Typical Central Office Space Conditioning for Collocation



These represent the space conditioning timelines that must be completed prior to the installation of DC power, cabling and network infrastructure required for each application.

Complex jobs are evaluated on a case-by-case basis.