

The following documents, filed by the New York State Attorney General and by the New York State Public Service Commission, in Case # 13-C-0197 ([13-C-0197 - NYSDPS-DMM: Matter Master](#)) have a direct bearing on the Public Comment Review of FCC Matter/Docket WC# 13-150 – so its findings and conclusions can be considered by the FCC as part of its review of Verizon of New York, Inc,'s Wireline Emergency Discontinuance Application under Section 214(a), -- FCC WC# 13-150.

Please have the following documents entered into the ECFS System for consideration and review.

Sincerely,

Jim Rosenthal
Resident, Fire Island
(917) 362-9491
jrosenthal@mintzgroup.com

5/15/2013	Comments	Comments of The State of New York Office of The Attorney General	New York State Office of The Attorney General
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<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={6BA6CC48-2D06-4B1D-81BA-D1E1F88DE6A3}>



ERIC T. SCHNEIDERMAN
Attorney General

STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

May 15, 2013

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DIVISION OF ECONOMIC JUSTICE JANE M. AZIA, CHIEF
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The Honorable Jeffrey Cohen
Acting Secretary
New York State Public Service Commission
3 Empire State Plaza
Albany, New York 12223

Re: 13-C-0197 VERIZON NEW YORK INC

Dear Secretary Cohen:

On May 3, 2013, Verizon New York Inc. ("Verizon") submitted a proposed tariff setting forth the standards and conditions that would allow it to discontinue wireline service and instead offer wireless service as its sole service offering in any particular area. The proposed tariff also requests authorization to provide a wireless service, "Voice Link",¹ as the sole offering in the Western portion of Fire Island. The Attorney General's Office ("OAG") requests that the Commission not take formal action on Verizon's proposed tariff at the Commission's May 16, 2013 meeting, and instead set a schedule for an in-depth review of the proposal.

As proposed, the tariff applies to any New York area where Verizon has its franchise. Paragraph C.3 provides:

The Telephone Company may offer service using wireless as its sole service offering in an area if the company: (a) certifies and demonstrates that a substantial portion of its facilities in the area is destroyed, rendered unusable, or beyond reasonable repair, or (b) demonstrates that the use of wireless to serve specified customers, or groups of customers, is otherwise reasonable in light of the geographic location, the availability of competitive facilities to serve those customers or groups of customers, or in light of other criteria acceptable to the Commission.

¹ Voice Link is a hybrid voice-only service that transmits calls wirelessly to the customers' premises where it is then delivered by wire to traditional home telephones. It requires installation of a device in each customer's building that is plugged into a power source and contains backup batteries that allow it to operate for a limited time if power is lost.

Changing from wireline to wireless service has great significance to hundreds of thousands of Verizon's New York customers. Yet, as drafted, the proposal is not sufficiently developed to clearly outline when such a change would be warranted. For example, the proposal lacks any definition of what "criteria" would suffice to expand the wireless service, or what standards would apply to "availability of competitive facilities." As such, before the Commission sets the standards that will be used to allow these types of significant changes, any decision should have the benefit of a complete and thorough analysis, as well as public review. That review would provide time to evaluate the benefits and detriments of this service proposal, and clarify the proposed criteria and standards. We strongly recommend that the Commission take action on Verizon's proposal only after a full record has been compiled, with reasonable opportunity for public input and interested parties to examine Verizon's factual assertions.

The Commission has long encouraged telephone carriers to provide customers with facilities capable of supporting Internet access so that residents and businesses may fully benefit from Internet usage. Until now, Verizon and other New York landline telephone service providers have maintained traditional copper wireline networks that enable customers to access a variety of communications services and features. However, wireless services such as Voice Link would have the effect of eliminating Digital Subscriber Line ("DSL") access to customers who rely on this as their sole means to connect with the Internet. In rural areas where no FiOS or cable Internet alternative is available, such customers would be denied any viable means to use the Internet for distance learning, shopping, job searching, research, keeping in touch with friends and family, interacting with government agencies, etc. Wireless service such as Voice Link would also deny other communications services to customers including fax machine transmission, medical alert and home alarm systems. In the modern age, this is a serious hardship that demands careful evaluation before the Commission adopts the proposed tariff.

Furthermore, unlike the traditional copper wireline network, which is self-powered, Voice Link requires connection to an electrical outlet in the customer's home or business. This increases customers' vulnerability to power outages. Despite the battery backup feature of Voice Link, if utility electric power is interrupted, customers would be limited to two hours of talking time. This would be inadequate during prolonged outages. In just the last two years, in the aftermath of Hurricane Irene and Superstorm Sandy, New Yorkers experienced how their lives can be disrupted and their ability to cope in emergencies made more difficult without working telecommunications, particularly as power outages continued for many days and even weeks. Similar prolonged power outages have caused Upstate residents extreme hardship after ice storms and river flooding events. We are concerned that the short-duration battery backup feature of Voice Link will not adequately serve customers during major disasters and emergencies, when they most need telecommunications to protect their health and safety and reach family members.

OAG is particularly concerned that Verizon will rely on this provision to abandon its copper landline network in rural areas across New York. Verizon CEO McAdam publicly announced last year that the company wished to replace landline with wireless service wherever it had not built FiOS facilities, which includes most of the company's New York service territory:

[T]he vision that I have is we are going into the copper plant areas and every place we have FiOS, we are going to kill the copper. We are going to just take it out of service and we are going to move those services onto FiOS. We have got parallel

networks in way too many places now, so that is a pot of gold in my view.

And then in other areas that are more rural and more sparsely populated, we have got LTE built that will handle all of those services and so we are going to cut the copper off there. We are going to do it over wireless?

Given the short notice period, neither the OAG nor other interested parties have had a reasonable opportunity to fully evaluate these effects on consumers nor how Voice Link service might impact small business customers. Before action is taken on the proposed tariff, the Commission should seriously weigh the effects of losing wireline services on all customers, and evaluate the effectiveness of any alternatives that may be available. Also, because Verizon states, "Voice Link pricing will generally be aligned with the pricing of current landline service packages," the Commission should weigh whether it is reasonable to charge the same amount for Voice Link service that lacks so many valuable features included in the traditional landline rates.

Regarding the request to discontinue service in Fire Island, although Verizon raises valid points, the Commission should at a minimum closely review Verizon's assertion that Voice Link is more reliable than traditional wireline networks in coastal areas susceptible to severe storms. There are many critical questions that need to be answered. For example, has Voice Link been demonstrated to have greater storm-resistance capability over landlines? It is worth noting that during Hurricane Irene and Superstorm Sandy, many wireless cell sites lost service along with landline networks. Has the PSC investigated whether there are reasonable means available to make copper landline networks more storm resistant? In other equally vulnerable parts of the country, such as the Florida Keys, utilities use concrete poles that can withstand high winds in place of wooden poles. Perhaps such storm hardening of Verizon's wireline service would provide more reliable and better public service than Voice Link.

Such a large scale change for so many customers should not be approved without careful analysis and deliberation. For the reasons stated above, the Attorney General's Office requests that Verizon's tariff proposal not be approved in a summary manner, and that no action be taken until after hearings and a record have been compiled that allows the Commission to weigh all aspects of the proposal.

Sincerely,



Keith H. Gordon

Assistant Attorney
General

CC: Keefe B.
Clemmons,
Verizon Counsel

² See Thompson Reuters Street Events Edited Transcript of June 21, 2012 1:00 P.M. G.M.T interview of Verizon Chairman and CEO Lowell McAdam at Guggenheim Securities Symposium.

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6/26/2013	Petitions	Emergency Petition of NYS Attorney General for an Order Preventing Verizon from Illegally Installing Voice Link Service in Violation of its Tariff & the Commission's May 16, 2013 Order.	New York State Office of The Attorney General
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<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={A3F0A269-8613-4437-AEB3-35ACCF6E5A47}>

STATE OF NEW YORK PUBLIC
SERVICE COMMISSION

CASE 13-C-0197 Tariff filing by Verizon New York, Inc. to introduce language under which Verizon could discontinue its current wireline service offerings in a specified area and instead offer a wireless service as its sole service offering in the area.

**EMERGENCY PETITION OF
NEW YORK ATTORNEY GENERAL ERIC T. SCHNEIDERMAN
FOR AN ORDER PREVENTING VERIZON
FROM ILLEGALLY INSTALLING VOICE LINK SERVICE
IN VIOLATION OF ITS TARIFF
AND THE COMMISSION'S MAY 16, 2013 ORDER**

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June 26, 2013

Summary

Verizon's request to amend its tariff to permit substitution of Voice Link hybrid wireless service for traditional wireless service beyond Fire Island was explicitly denied in the Commission's May 16, 2013 Order. After permitting Verizon to install Voice Link on western Fire Island as a pilot test of the new technology due to the special circumstances stemming from Superstorm Sandy's damage to the coast, the Commission held specifically that it was "suspending Verizon's tariff amendment regarding its use of Voice Link in other parts of the State subject to further review."¹

Despite the unambiguous language of the Commission Order, Verizon has proceeded to implement its plans to install Voice Link service to seasonal customers in the Catskills. In clear violation of a Commission directive, and without any valid tariff permitting its use, Verizon has shipped a large quantity of Voice Link devices to its Monticello installation/maintenance center. Whenever a seasonal customer requests that their wireline Plain Old Telephone Service ("POTS") be restored for the summer, but dial tone is not functioning when the line is activated at Verizon's switch, the company has directed its technicians not to repair the existing service, but instead to install Voice Link in its place. Only where a customer forcefully refuses Voice Link will Verizon repair the wireline service.

Verizon's provision of Voice Link outside the confines of western Fire Island is illegal, and its open defiance of the Commission's May 16 Order must be met with effective sanctions.

¹ Case 13-C-0197, ORDER CONDITIONALLY APPROVING TARIFF AMENDMENTS IN PART, REVISING IN PART, AND DIRECTING FURTHER COMMENTS, issued May 16, 2013, at 2.

On May 3, 2013, Verizon New York, Inc. ("Verizon") filed a proposed amendment to Tariff PSC No. 1 "setting forth the circumstances under which Verizon could discontinue its current wireline service offerings in a specified area and instead offer a wireless service as its sole service offering in the area." Verizon specifically sought permission to offer this wireless service alternative, called Voice Link, in the western portion of Fire Island? Verizon also asked to expedite approval sooner than the normal 30-day review period and to waive newspaper publication so it could "move forward to implement its plans to restore service on Fire Island as rapidly as possible."

Verizon's proposed tariff set out two different circumstances where Voice Link might be implemented as a substitute for traditional wireline service. These are where Verizon:

(a) certifies and demonstrates that a substantial portion of its facilities in the area is destroyed, rendered unusable, or beyond reasonable repair, or

(b) demonstrates that the use of wireless to serve specified customers, or groups of customers, is otherwise reasonable in light of the geographic location, the availability of competitive facilities to serve those customers or groups of customers, or in light of other criteria acceptable to the Commission.

At its May 16, 2013 Session, the Commission decided to conditionally approve the part of Verizon's tariff applying to western Fire Island "because it is critical that service be available on Fire Island immediately," while it suspended the second tariff provision quoted above "subject to further review" after seeking public comment?

² May 3, 2013 tariff filing, cover letter to the Commission from Keefe B. Clemons, Verizon counsel.

³ May 16, 2013 Order, *supra*, at 1-2.

The Attorney General's Office has recently learned that Verizon intends to require customers outside of the Fire Island pilot area seeking to have their wireline service

installed accept instead wireless Voice Link service, notwithstanding the Commission's May 16 Order. According to reports by representatives of the Communications Workers of America, Verizon has delivered a pallet load of Voice Link devices to its Monticello Installation/Maintenance Center, and has instructed its technicians in that region to provide summer seasonal customers returning to Catskill vacation homes, who have long been received Verizon wireline service, only Voice Link service. The union's report is corroborated by two complaints of Verizon seasonal customers who have been told Voice Link will be installed instead of repairing their wireline telephone service. Only by firmly refusing Voice Link were both customers able to keep their wireline service.⁴

Many Verizon customers spend their summers in bungalow communities in the Catskills region, often requesting their service be restored *en mass*. Because these dwellings are vacant during the winter and early spring, any wind or snow damage to the distribution facilities is only identified now, as the customers return for the summer season. Based on prior history, it is likely that hundreds of customers will seek to have their wireline service repaired. Thus, if Verizon substitutes Voice Link instead of wireline POTS for its seasonal customers seeking repair in this region, a substantial number of illegal installations will occur contrary to Verizon's tariff.

Unlike Fire Island, wireline network damage from Superstorn Sandy cannot be used as an excuse for substituting Voice Link for wireline service in the Catskills, where

⁴ See e.g., attached Affidavit of Joshua Michaeli.

the storm had limited impact.⁵ Instead, it appears that in the Catskills, Verizon has chosen to pursue the company's business strategy in blatant disregard for the Commission's Order.

The Commission's May 16 Order could not have been clearer in limiting Verizon's substitution of Voice Link for wireline service to western Fire Island, to enable evaluation of this unproven technology on a pilot basis. Indeed, the Commission directed Verizon to submit by November 1, 2013 a comprehensive "report evaluating the provision of Voice Link service on Fire Island"⁶ so this pilot can be weighed in conjunction with the public comments before the service can be expanded elsewhere. Verizon's attempt to usurp the Commission's authority by installing Voice Link in other parts of the state without a tariff must be halted immediately.

Request for Relief

The Commission should order Verizon to immediately cease and desist its illegal activities provisioning Voice Link anywhere in New York beyond the authorized western Fire Island pilot area, and also to promptly provision wireline service to any customer improperly connected to Voice Link.

Moreover, Verizon's actions to provide Voice Link outside the western Fire Island pilot area, and efforts to compel customers in the Catskills region to accept Voice Link in place of wireline service is evidence that the company "knowingly fail[ed] or neglect[ed] to obey or comply with ... [a Commission] order." Therefore, pursuant to Public Service Law § 25, Verizon is subject to a \$100,000 "civil penalty for each and

⁵ Indeed, even after Hurricane Irene caused extensive damage to Verizon's wireline facilities in 2011, Catskills network facilities were repaired in the months following that extreme weather event.

⁶ May 16, 2013 Order, *supra*, at 12.

every offense, and in the case of a continuing violation, each day shall be deemed a separate and distinct offense." The Commission should commence penalty proceedings against the company citing as separate and continuing violations each customer who has been denied timely installation of wireline service or had Voice Link installed as a substitute for the POTS service authorized by Verizon's lawful tariff.

Dated: June 26, 2013

 , for
Keith H. Gordon, AAG

ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

Jane Azia, Bureau Chief
Keith H. Gordon, Assistant Attorney General
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cc: Keefe B. Clemons, Esq.
Joseph A. Post, Esq.
Legal Department
Verizon New York, Inc.
140 West Street, 2ih floor
New York, NY 1007-2109

AFFIDAVIT OF JOSHUA MICHAEL!

STATE OF NEW YORK COUNTY OF
SULLIVAN, to wit:

1. My name is Joshua Michaeli, and during the summer season I reside in the Catskill Mountains region with my family at 445 Old Liberty Road, unit 16A, Monticello, New York, 12701.

2. My family has summered in the unit for several years, using Verizon landline telephone service. Each year, we suspend our seasonal service in the Fall and then have it restored in Spring/Summer when we return.

3. When we closed up the home at the end of the 2012 season, I called Verizon and asked to suspend out telephone service until springtime. I also scheduled a date to turn our telephone back on in June 2013 (number 845-791-7092).

4. In mid-May, I called Verizon again to confirm when our service would be restored, and was told that there was no record of the installation request I had made last Fall. I then repeated my request to have telephone service turned on in mid-June.

5. On June 18, 2013, my family returned to our unit and found that the telephone was not working properly. I then called Verizon to request that our telephone be repaired. The Verizon representative told me that the company wanted to install a wireless service called Voice Link instead of repairing our traditional wireline phone service. I declined Verizon's Voice Link offer, noting that our unit is in a wooded area where wireless communications may not work well. When I was transferred to the repair department to schedule a repair visit, the person making repair appointments again tried to convince me to accept Voice Link instead of having our existing service repaired, and I again said no thanks.

6. A short time later on June 18, a Verizon repair technician came to our summer home and in a few minutes repaired the wiring in the box attached to our building. Our wireline telephone service has been working since this repair.

Joshua Michaeli

Joshua Michaeli

⌚: *A

KEITH H. GORDON
Notary Public, State of New York
No. 4641880
Qualified in Westchester County
Commission Expires ~~3-18~~

4/25/2013

Subscribed and sworn before me ~~thi~~day of June, 2013 by Joshua Michaeli.

Keith H. Gordon

Notary Public (seal)

5/24/2013	Correspondence	DPS Staff Request - Cover Letter;	New York State Department of Public Service	14	cvr13-011971st set IRS.pdf	5966KB
6/26/2013	Correspondence	DPS Staff Request;	New York State Department			
6/26/2013	Correspondence	DPS Staff Request;	New York State Department of Public Service			
6/28/2013	Correspondence	DPS Staff Third set of Interrogatories and/or Document Requests ;	New York State Department of Public Service			

CASE 13-C-0197
VERIZON NEW YORK INC.

Staff of the Department of Public Service

Interrogatory/Document Request

Request No.: DPS-1
Requested By: Michael Rowley, Chief Network Reliability
Date of Request: May 24, 2013
Reply Date:
Witness:

Subject: Voice Link Certification for Fire Island

1. Prior to Superstorm Sandy, describe all copper and hybrid copper-fiber network facilities deployed from the Ocean Beach central office to provide voice and/or digital subscriber line (DSL) service to each of the communities identified in Verizon New York Inc.'s (Verizon or the Company) revised Certification #8 (i.e., Fair Harbor, Kismet, Ocean Beach, Saltaire, etc.).
 - a) Identify by size and type (copper and fiber cable bundle sizes) the feeder and distribution facilities used on Fire Island.
 - b) Identify facilities as underground, aerial (or both) and the number of working lines provided by each facility.
2. Describe the fiber optic and copper cable facilities traversing from the mainland to Fire Island.
3. Identify the location of any fiber-fed electronic equipment (Lightspan, DLC, DSLAM, etc.) deployed remotely from the Ocean Beach central office. Provide the areas and number of customers served in each of the western Fire Island communities.
4. Provide a complete and detailed description of the nature, cause and location of network facilities damaged on Fire Island serving the communities identified in Verizon's revised Certification. Identify all central office switching equipment building facilities, underground cables (fiber or copper), aerial cables (fiber or copper), poles, conduit and remote terminals, outside plant equipment (pair-gain/DLC/SLC,

Staff Interrogatory Requests
Case 13-C-0197

etc.), cabinets, terminal boxes, etc. Provide the number of working lines from affected facilities post-storm.

5. Describe the factors or criteria used to determine whether network facilities were beyond repair and provide an overview of the processes, within the Company that led to a determination to deploy Voice Link on Fire Island instead of repairing the existing network. Explain how the criteria used for the Fire Island determination was similar or dissimilar to criteria the Company used for other storm damaged areas, such as lower Manhattan, where fiber optic network reconstruction was chosen to restore service.

6. Provide all engineering reports, studies or other analyses used in making the determination not to repair existing facilities on Fire Island, including dates such reports, studies or other analyses were performed.

7. Provide support for cost and revenue estimates in the Company's revised Certification #8, to include-pre-storm Fire Island revenues, post-storm estimates and how derived (including what assumptions were made regarding rebuilding all lines or a portion based upon penetration estimates).

8. For the costs estimates identified in the revised Certification #8 for restoring wireline service, provide detailed support for both options, i.e., \$4.8 million for voice only digital loop carrier vs. \$6 million for fiber. Identify all investment and associated construction cost by equipment element/facility type with unit/mileage cost and quantity provided.

9. Provide detailed support of the costs associated with the installation of the distributed antennae system (DAS). Include investment and associated construction cost for make ready work, telephone poles, DAS equipment, backhaul cabling and other static and recurring costs necessary to provide the Voice Link service. Describe the arrangement between Verizon and Verizon Wireless regarding the DAS deployment expenses, operating expenses, ownership of facilities, etc., specifying costs to be allocated to Verizon vs. Verizon Wireless.

10. Provide support for the \$500,000 Voice Link service deployment cost identified in revised Certification #8.

11. Provide documentation for the projected 2013 revenue estimate of "\$200,000 annually" referred to in revised Certification

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Case 13-C-0197

#8, as well as the actual revenues (regulated and non-regulated) received from the same customer base for the years, 2010, 2011 and 2012. Please include the customer counts for each year.

12. Provide support for the statement in the revised Certification #7 that future hurricanes or severe storms could destroy or damage wireline facilities.

13. Identify and describe any pilots, testing, trials, consumer surveys, etc. conducted in New York or other states relating to Voice Link and/or its underlying technology and provide all resulting documentation, reports, analysis, etc.

14. Identify and describe all testing performed on Fire Island and results with regard to Voice Link deployment, including analysis of wireless signal strength, DAS placement and other technical analysis performed.

15. Describe all network modifications made, or to be made, by Verizon Wireless to accommodate Voice Link on Fire Island.

Respondent(s) Name:

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CASE 13-C-0197
VERIZON NEW YORK INC.

Staff of the Department of Public Service
Interrogatory/Document Request

Request No.: DPS-2
Requested By: Michael Rowley, Chief Network Reliability
Date of Request: June 26, 2013
Reply Date:
Witness:

Subject: Voice Link Certification for Fire Island

1. For the period of May 1, 2013 through October 31, 2013, please provide the following network outage/impairment and operational performance information on a real-time, or near real-time basis. For outages/impairments, standard Department reporting protocols expect carriers to notify staff within 1 hour of being recognized by the service provider. For cell tower utilization levels exceeding 90% for more than 30 minutes on a given day, please provide a summary to staff no later than 24 hours after the event has cleared:

- a. Network outages/events/congestion impacting Fire Island POTS, Voice Link or Verizon wireless customers;
- b. Instances when the utilization level at any of the cell towers located on, or providing coverage to Fire Island reaches 90% for more than 30 minutes;
- c. Instances when any of the cell towers located on, or providing coverage to Fire Island loses commercial power, goes on back-up battery or generation, or goes out of service.

2. For the period of May 1, 2013 through October 31, 2013, please provide the following data on a monthly basis. Monthly data should be provided to staff within 10 days after the close of each full month:

- a. All monthly service quality data as typically provided, but specific to Fire Island POTS and Voice Link customers;

- b. Separate CTRR data based on number of active Voice Link units/subscribers;
 - c. Summary of copper maintenance work associated with copper service; disconnects (i.e., drops disconnected, removed, isolated at NID, etc);
 - d. Number of Voice Link installations per month; installation summary (i.e., whether request for new installation, replacement as result of damaged/inoperable copper, etc.);
 - e. Number of Voice Link service calls, with descriptive information of the problem on a per-service call basis;
 - f. Number of requests to discontinue Voice Link and reason (i.e, return to wired service, other);
 - g. Number of dropped call attempts or fast busy situations experienced by Voice Link customer;
 - h. Summary of wireline, Voice Link, and wireless 911 call volumes and 911 call completion performance for Fire Island callers;
 - i. Dates and duration of down time (offline/inoperable) per DAS antenna, and causes;
 - j. Dates and duration of down time (offline/inoperable), per cell tower located on or providing coverage on Fire Island, and causes;
 - k. DAS antenna utilization data available on a per-antenna basis
 - 1. Cell tower utilization rate data that indicates daily low- point and peak usage, and time of day; on an individual tower basis, for a) towers located on Fire Island, and, b) towers on Long Island providing coverage on Fire Island.
3. Please provide the historical cell tower utilization data, on an individual monthly basis, for the months of May 2011 through October 2011, and May 2012 through October 2012.

Respondent(s) Name:

CASE 13-C-0197
VERIZON NEW YORK INC.

Staff of the Department of Public Service
Interrogatory/Document Request

Request No.: DPS-3
Requested By: Michael Rowley, Chief Network Reliability
Date of Request: June 28, 2013
Reply Date:
Witness:

Subject: Voice Link Certification for Fire Island

1. With respect to Verizon Revised IR-1 response, dated June 21, 2013, please provide the following clarifying information:
 - a. The Cable Facilities Table on page 4 of the response does not include any data regarding Copper Cable 9202. Cable 9202 was previously identified by Verizon as an 1100-pair copper facility, with two working pairs and 0 defective pairs. Verizon's most recent IR-1 response does not include this cable data. Please include an updated table which includes Cable 9202 data.
 - b. Copper Cable 9206 was previously identified as a 100-pair copper facility. IR-1 response now identifies Cable 9206 as a 200-pair copper facility. Please verify the pair count of Cable 9206, and explain the reason for the discrepancy.
 - c. The optical fiber cable served from the Ocean Beach Central Office was previously identified as having 1,119 working lines, and 0 defective lines. IR-1 response indicates, in text and in table form, two different numbers of working lines for this optical cable: 840 available lines in table form, and 792 available lines in text form. Please verify the number of available, working, and defective lines in the optical cable, and explain reason(s) for the discrepancies.
2. There are two tables on page 3 of the IR-1 response, with the top table relative to copper cable facilities, and the

bottom table relative to fiber optic cable facilities. Please provide clarifying information regarding these two tables as follows:

a. The copper cable table shows that the spare cable pairs in the copper cable facilities serving the 11 identified communities¹ is approximately 16% of the total available pairs in those cables. However, in specific communities such as Fair Harbor, Kismet, Robins Rest and Lonelyville, the percentage of spare pairs ranges from 21% to 66% of the total available pairs. Also, the number of working pairs in many locations is small compared to the total available pairs in the cables, despite the number of defective pairs reported by the company. Please explain why Verizon is not utilizing existing spare cable pairs, and performing routine cable maintenance in any communities, to restore wireline services to customers that do not request or desire Voice Link service.

b. The fiber cable table shows spare cable pairs in the fiber facilities serving the Ocean Beach, Lonelyville, Fair Harbor and Kismet communities is approximately 73% of the total available pairs in those fiber cables. By individual community, the percentage of spare pairs ranges from 62% to 94% of the total available pairs. Please explain why Verizon is not utilizing existing spare fiber pairs in any of the four named communities to restore wireline services to customers that do not request or desire Voice Link service.

3. Please provide the following information for all Voice Link devices/services that have been installed at any customer premises locations outside of the Western Fire Island area:

- a. Customer address
- b. Date Voice Link Installed
- c. Reason Voice Link Installed
- d. Was customer advised Voice Link service was optional or not
- e. Voice Link Service Calls/Repairs identified by location, date, reason for service visit, repair action taken

¹ The 11 communities are Point of Woods, Ocean Bay Park, Seaview, Ocean Beach, Robins Rest, Atlantique, Lonelyville, Dunewood, Fair Harbor, Saltaire, and Kismet.

f. If applicable to any locations, date Voice Link was uninstalled/disconnected and reason for termination

4. Please provide any marketing materials, scripts, and/or training materials in use by Verizon employees or contracted third party workers to inform customers about Voice Link service.

5. Please provide copies of any documentation provided to customers agreeing to accept Voice Link service outside of Western Fire Island, including Terms of Service Agreements. If there are any material differences between documentation and Terms of Service agreements for Western Fire Island customers, and customers in any other areas of New York State, please identify and explain those differences.

Respondent(s) Name:
