

REDACTED – FOR PUBLIC INSPECTION

September 4, 2013

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application of Verizon New Jersey Inc. and Verizon New York Inc. to Discontinue Domestic Telecommunications Services*, WC Docket No. 13-150: Second Response to Information, Data, and Document Request

Dear Ms. Dortch:

Verizon New Jersey Inc. and Verizon New York Inc. (collectively “Verizon”), by its counsel, submits this Second Response to the Information, Data, and Document Request made by the Wireline Competition Bureau (“WCB”), dated August 14, 2013.¹ Enclosed please find:

- A document with narrative responses to Questions III.2, III.3, III.4.A, III.4.B, III.6, III.7.A, III.7.C, III.7.D, III.7.F, III.7.G, III.8.A, and III.8.B (the “Narrative Response”). These responses are complete, with the exception of portions of the responses to Questions III.6, III.7.A, and III.7.C. Pursuant to a discussion with WCB staff, Verizon will provide additional responses to Questions III.6, III.7.A, and III.7.C, and will respond to Questions III.5, III.7.B, III.7.E, IV.1, and IV.2 on or before September 13, 2013. Verizon will also be supplementing its August, 28, 2013 Response to Question III.1 on an ongoing basis as reflected in that filing. Portions of

¹ See Letter from Julie A. Veach, Chief, Wireline Competition Bureau, to Kathleen Grillo, Senior Vice President – Federal Regulatory Affairs, Verizon Communications, Inc., WC Docket No. 13-150, DA 13-1760 (Aug. 14, 2013) (“Request”).

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the Narrative Response contain information that meets the requirements for treatment as “Highly Confidential” under the Second Protective Order in this docket.²

- Documents, Bates numbers VZ-NYNJ-000513 -- VZ-NYNJ-000517, that are responsive to Question III.3.³
- In accordance with the Second Protective Order, Verizon is also submitting separately two sets of the Narrative Response and the associated documents to Natividad Persaud, Competition Policy Division, WCB.

Because this submission contains information that is “Highly Confidential,” Verizon is filing an unredacted copy of the materials identified above pursuant to the procedures established in the Second Protective Order. Verizon will also file a redacted version of the above materials for public inspection in the FCC’s Electronic Comment Filing System. To avoid confusion, a copy of this cover letter, bearing the appropriate confidentiality legend, will accompany each submission.

Verizon has made diligent efforts to ensure that none of the material it is submitting herewith is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. Verizon requests that any privileged documents inadvertently produced be returned to Verizon as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

² *Section 63.71 Application of Verizon New York Inc. and Verizon New Jersey Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended to Discontinue the Provision of Service, Second Protective Order, WC Docket No. 13-150, DA 13-1757 (WCB rel. Aug. 14, 2013).*

³ *See Request at Attachment at III.3.*

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Should any questions arise concerning this submission, please contact the undersigned.

Sincerely,

/s/ Adam D. Krinsky

Adam D. Krinsky
J. Wade Lindsay
*Counsel to Verizon New Jersey Inc.
and Verizon New York Inc.*

Attachments

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Section 63.71 Application of)	
Verizon New York Inc. and)	
Verizon New Jersey Inc.)	
)	WC Docket No. 13-150
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934,)	
As Amended, To Discontinue the)	
Provision of Service)	
)	
Request for Additional Information)	

**VERIZON NEW YORK INC. AND VERIZON NEW JERSEY INC.'S
SECOND RESPONSE TO INFORMATION, DATA, AND DOCUMENT REQUEST**

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September 4, 2013

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of)	
Verizon New York Inc. and)	
Verizon New Jersey Inc.)	
)	WC Docket No. 13-150
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934,)	
As Amended, To Discontinue the)	
Provision of Service)	
)	
Request for Additional Information)	

**VERIZON NEW YORK INC. AND VERIZON NEW JERSEY INC.’S
SECOND RESPONSE TO INFORMATION, DATA, AND DOCUMENT REQUEST**

I. INTRODUCTION

Verizon New York Inc. and Verizon New Jersey Inc. (collectively “Verizon”) hereby respond to the Wireline Competition Bureau’s (“WCB”) request for information in support of Verizon’s Section 214 application to discontinue interstate wireline telecommunications services in discrete parts of Fire Island, New York and parts of two wire centers on the New Jersey Barrier Islands where Superstorm Sandy destroyed existing copper facilities.¹ As Verizon has previously informed the Commission, this proceeding is a narrow one brought on by the destruction of facilities and effective discontinuance of certain services by this storm, and Verizon determined that its wireless Voice Link product was the best, most reliable, and fastest way to restore voice services

¹ See Letter from Julie A. Veach, Chief, Wireline Competition Bureau, to Kathleen Grillo, Senior Vice President – Federal Regulatory Affairs, Verizon Communications Inc., WC Docket No. 13-150, DA 13-1760 (rel. Aug. 14, 2013) (the “Request”).

to its customers in these particular areas. While Verizon's filing was a narrow one limited to interstate wireline telecommunications services, it endeavors below to answer all of the Bureau's questions to the extent it or its vendor, Verizon Wireless, have the requested information.² Where information directly responsive to a Question is not available, Verizon has provided and described the information that is available to it. Pursuant to a discussion with WCB staff, Verizon intends to provide additional information in response to the following Questions not later than Friday, September 13, 2013: III.1; III.5; parts of III.6; parts of III.7.A and C; III.7.B; III.7.E; IV.1; and IV.2.

II. NARRATIVE RESPONSES TO QUESTIONS AND DOCUMENT REQUESTS

Question III.1 Submit confidential and redacted for public inspection copies of all Verizon's responses to any New York Department of Public Service Interrogatory and/or Document Requests in NYPSC Case Number 13-C-0197, including all responses to such Interrogatory and/or Document Requests submitted in the NYPSC docket after today. To the extent Verizon responses reflect clarifications and/or modifications to the NYPSC Interrogatory and/or Document Requests, and the NYPSC has clarified and/or agreed to Verizon's modifications, please provide a description of those clarifications and/or modifications.

Verizon's Response, III.1

Verizon responded to this Question on August 28, 2013. Verizon will provide any additional information submitted to the New York Public Service Commission ("NYPSC") after that date on an ongoing basis.

² Verizon purchases on a wholesale basis from Verizon Wireless the wireless connectivity that supports the Voice Link product. Verizon Wireless does not offer Voice Link to end-users and is not a party to this proceeding. In order to respond to the Bureau's Request in a timely manner, Verizon has worked with its vendor to obtain responsive information.

Question III.2 To the extent Verizon’s responses to any New York Department of Public Service Interrogatory and/or Document Requests in NYPSC Case Number 13-C-0197 would be significantly different if those questions had applied to the New Jersey Barrier Island Communities, provide responses to any such questions as applied to the New Jersey Barrier Island Communities.

Verizon’s Response, III.2

Verizon’s deployment of Voice Link in the small portions of the New Jersey Barrier Islands served by parts of two central offices substantially parallels its deployment on the western side of Fire Island, and the decision to offer voice service in this manner was driven by the same factors. As in Fire Island, customers whose copper facilities continue to be in working order may continue to use them; those whose copper is no longer operable will be offered Verizon Voice Link for their voice service. The device installation and its specifications also remain the same throughout the Affected Areas (as that term is defined in the Request).

The circumstances surrounding these limited areas on the New Jersey Barrier Islands differ in only three material ways. First, unlike in Fire Island, customers in these areas also have the ability to receive service from Comcast, and many of these customers have done just that. [BEGIN

HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL] Finally, the Voice Link

terms of service in the Barrier Islands is the same as the terms of service implemented nationally in

places where Voice Link is offered as an alternate service, rather than the NYPSC approved terms of service specific to Voice Link service provided on Fire Island.

Question III.3 How are 9-1-1 calls placed by Voice Link customers in the Affected Areas routed to the appropriate Public Safety Answering Point (PSAP)? Describe how Voice Link routing for 9-1-1 differs, if at all, from routing of 9-1-1 calls using Verizon's copper-based telephone service.

Verizon's Response, III.3

Voice Link 911 Call Routing. The voice portion of 911 calls placed by Voice Link customers in the Affected Areas is routed to the appropriate PSAP in an identical manner to 911 calls from other wireless users. 911 calls placed via the customer's Voice Link supported telephone will route through a cell site to the Mobile Switching Center, which routes the call to the Verizon ILEC selective router (S/R) based on the location of the serving cell site. The 911 call is recognized as originating from a wireless network and is routed to the appropriate PSAP for the cell site. The call is transmitted to the PSAP on a trunk between the S/R and the PSAP's premises typically dedicated to wireless-originated 911 traffic (although many PSAPs as a general matter have opted not to allocate trunks to wireless traffic only). Caller location information is separately routed to the PSAP's premises via a third party-maintained database for Voice Link subscribers that, in turn, provides the PSAP with the 911 caller's physical address (*not* an address based on x/y coordinates, like a traditional mobile wireless 911 call). A diagram of the call flow for the Voice Link call flow is attached at Bates number VZ-NYNJ-000517.

911 Call Routing Differences Between Voice Link and Legacy Wireline Service. A 911 call placed by a customer using services offered over Verizon's copper-based network is, by definition, transmitted to the ILEC S/R via the wireline network rather than via Verizon Wireless' network. In those cases, the 911 call is routed from the customer's premises to the local Central Office and then

to the S/R. The S/R then routes the call to the appropriate PSAP's premises, typically via trunks dedicated to wireline-originated 911 traffic. Caller location information is also provided via the PSAP's legacy ALI database (rather than the database Verizon Wireless has provisioned for Voice Link), which matches the caller's telephone number with the physical address associated with the account. A diagram of the call flow for the legacy wireline network is attached at Bates numbers VZ-NYNJ-000513 -- VZ-NYNJ-000516.

Question III.4 The subscriber contract for Voice Link contains a disclaimer clause: “[The customer] agree[s] that any 911 calls made using the Service may be subject to network congestion and/or reduced routing or processing speed.”

A. Is this clause included, or has it been included in the past, in contracts for all Verizon Wireless customers, or all Verizon Wireless customers in New York? If so, in which contracts? If not, please explain why it is included in the Voice Link subscriber contract. If the clause is used but the wording of the clause differs in any other current Verizon Wireless contracts, please describe the differences and explain why there is variation.

B. Please respond to the questions and provide the same information as in Qn. 4.A with regard to Verizon wireline services.

Verizon's Response, III.4.A and B

Although the Voice Link terms of service include certain limitations of liability, the terms of service in this regard are not substantively different from long established terms of service for Verizon's traditional landline voice services and were intended to collect the various traditional terms in one place. Historically, those limitations on liability were filed in tariffs, but over the years ended up in a number of disparate places.³ For Voice Link terms of service, Verizon sought to

³ See, e.g., PSC NY No. 1 – Communications, Verizon New York Inc. § 1 (D)(2)(b) and (f) (noting that “service difficulties such as slow dial tone, circuits busy or other network and/or switching capacity shortages” do not constitute an “interruption” for which an interruption allowance will be paid, and stating that apart from defined “interruptions”, no liability shall attach to Verizon for “errors, mistakes, omissions, interruptions, or delays of the Telephone Company” in the course of

collect the relevant language all in one place and to discuss these issues in a way that is easier for most consumers to understand. The language regarding potential network congestion and/or reduced routing or processing speed is not particular to wireless services, and Verizon includes these same terms of service for its wireline voice services not sold through tariffs. This language simply reflects the fact, and informs consumers, that any communications network can be subject to congestion, and that this has the potential to affect a service provider's ability to complete a 911 call or any other call. The language in the Voice Link terms of service was not provided by Verizon Wireless or intended to reflect any terms of service Verizon Wireless offers for its services.

Question III.5 Since May 2011, have there been any cell site outages that have impacted the Affected Areas? If so, when did these outages occur, how long did each outage last, and how many users were potentially affected? What were the causes of any such outages? If outage reports were filed with the Commission in connection with any of these outages in accordance with Part 4 of the Commission's rules, please provide the outage report numbers.

Verizon's Response, III.5

Verizon will respond to this Question in a supplemental filing.

Question III.6 Please provide documentation and describe in detail actions Verizon and Verizon Wireless have taken to ensure that 9-1-1 calls from the Affected Areas using Voice Link have at least the same call completion rate and the same or better routing time as these calls did before Hurricane Sandy using Verizon POTS. For example, has Verizon checked whether the allocation of trunks supporting wireline 9-1-1 calls and wireless 9-1-1 calls from the selective routers to the PSAPs needs to be changed? Is Verizon Wireless increasing the capacity of its cell sites to improve the chances that Voice Link subscribers calling 9-1-1 will be able to access the wireless network (e.g., a cell tower)? Does Verizon Wireless intend to add more antennas and/or cell sites that will serve the Affected Areas, and if so, how many and at what locations? Explain any other actions Verizon and Verizon Wireless have taken, or are taking, to support completion of wireless 9-1-1 calls over Voice Link.

(footnote cont'd.)

establishing or furnishing service to end users in the absence of gross negligence or willful misconduct); *id.* §§ 19(A)(3) and (B)(3)(i) (describing liability for 911 and E911 services).

Verizon's Response, III.6

The following describes the actions Verizon has taken that directly or indirectly relate to improvement or maintenance of 911 call completion or routing for Voice Link subscribers in the Affected Areas. Verizon will provide additional information with respect to the wireless network in response to this Question in a supplemental filing.

Verizon Trunk Allocations.

In conjunction with the relevant PSAPs, Verizon and Verizon Wireless have worked to ensure that there is ample trunk capacity to meet the demands of both wireline and wireless customers in the Affected Areas. The allocation of trunks supporting wireline and wireless 911 calls from the S/Rs to Verizon's PSAP customers serving the Affected Areas is determined on historical and projected utilization needs for a geographic area substantially larger than the Affected Areas, and based on wireless 911 call traffic originating from *any* wireless carrier with coverage in those larger geographic areas, not just 911 calls from Verizon Wireless or Voice Link subscribers.

Verizon has taken several actions in coordination with its PSAP customers to ensure that these trunks are adequate for wireless 911 calls, including 911 calls from Voice Link subscribers originating in the Affected Areas:

- *Fire Island.* The serving PSAP (Suffolk County PD) **[BEGIN HIGHLY CONFIDENTIAL]**

[REDACTED]

[END HIGHLY CONFIDENTIAL]

- *New Jersey Barrier Islands.* The two PSAPs serving the New Jersey segment of the Affected Areas (the Ocean County 1 and Ocean County 2 PSAPs) **[BEGIN HIGHLY CONFIDENTIAL]**

[REDACTED]

[REDACTED]
[END HIGHLY CONFIDENTIAL]

Question III.7 On its public policy website Verizon has described Voice Link as providing “plain-old telephone service over the Verizon Wireless voice network.” We want to better understand Voice Link and how it compares to Verizon’s copper-based telephone service.

A. What quality of service does Verizon expect Voice Link to provide? Specifically, how has Verizon defined the minimum acceptable service for Voice Link in terms of engineering parameters, including: minimum channel rate, packet loss rate, dial tone availability or other applicable parameters? Please also describe Verizon’s minimum performance objectives for Voice Link, such as time to repair, and what Service Level Agreements (SLAs), if any, are available to Voice Link customers. Please provide a comparison of the service characteristics and objectives provided in response to this question for Verizon POTS with Voice Link.

Verizon’s Response, III.7.A

Verizon will provide additional information in response to this Question in a supplemental filing.

Minimum Acceptable Service

Verizon has designed Voice Link to generally mimic customers’ experience with Verizon’s copper-based telephone service. The service thus: enables consumers to use their wireline telephone CPE; powers all jacks in the house; provides dialtone; and, as described below, supports the common voice dialing features popular among Verizon customers. With respect to the network-based engineering parameters described in the Question, such as minimum channel rate and packet loss rate, those parameters are associated with legacy wireline networks, but a call placed through Voice Link is carried on the Verizon Wireless network and handled like other calls that originate on Verizon Wireless’s network in the Affected Areas.

Minimum Performance Objectives for Voice Link (e.g. Time to Repair)

There are no Service Level Agreements (SLAs) available to Voice Link customers at present, but customer care transactions for Voice Link customers are handled by the same work groups that handle the wireline customer transactions. Voice Link customers can thus expect a similar level of performance for such things as:

- Response time when calling Sales and Service (ordering, billing, etc.);
- Response time when calling Technical Support (to report a trouble or request help); and
- Average time to fix a repair request.

Comparison of Service Characteristics for Verizon POTS with Voice Link

The following table outlines the more significant service characteristics and additional features or services available with POTS services and Voice Link.

Service Feature	Verizon POTS	Verizon Voice Link
Transport Network	Wireline PSTN	Wireless
911	PSAP provided with customer address	PSAP provided with customer address
Calling Area	Local and national calling available based on plan selected	Unlimited local and nationwide calling
3-Way Calling	Yes	Yes
Caller ID, Caller ID w Name	Yes	Yes
Call Forward	Yes	Yes
Call Waiting	Yes	Yes
Voicemail	Yes	Yes
*69 Call Return	Yes	Yes

As Verizon has previously disclosed to subscribers and regulators, some aspects of Voice Link differ from the voice service previously available. For this reason, certain non-telecommunications functionalities or CPE products that may have been designed by third parties to

utilize services offered on legacy copper facilities (such as fax machines and some – but not all – alarm or monitoring systems) may not work on Voice Link. Voice Link also does not support DSL, an information service that was previously available over some of the affected copper facilities (although this is also true in other areas, including the eastern portion of Fire Island, where DSL service was not offered before Sandy.)

B. Identify the probability that Voice Link will be available during peak busy hour periods equivalent to the expected dial-tone availability or reliability standard (“four-nines”, “five-nines”, “six-nines”, etc.) for POTS; (*cont’d*)

Verizon’s Response, III.7.B

Verizon will respond to this Question in a supplemental filing.

C. Identify the disaster survivability characteristics of Radio Access Networks (RANs) providing service to Voice Link customers including battery backup, electrical generator availability and other survivability characteristics. What is the type and capacity of backup power, if any, Verizon will provide to customer premises equipment that is used to support Voice Link? Please describe any special provisions Verizon has made to protect the wireless assets in the Affected Areas against physical damage that can be caused by natural disasters and other catastrophic events (e.g., more resilient enclosure).

Verizon’s Response, III.7.C

Verizon will respond to this Question with respect to the wireless network in a supplemental filing.

Customer Premises Equipment Backup Power. The Voice Link device is provided with integrated battery back-up. Although powered in the ordinary course by a standard electrical outlet, Voice Link includes a built-in rechargeable battery back-up option with 36 hours of standby and two hours of talk life. Verizon has also made available a version of the device that uses off the shelf AA batteries. Customers can either purchase replacement batteries off the shelf (for either the rechargeable battery or, even more easily, for the double AA battery model), and thus there is not an

inherent time limit on the length of time for which service may be maintained even if commercial power is out.

D. Identify each POTS feature or service capability—e.g., alarm services, fax capability—that was supported by POTS but would not be supported by Voice Link.

Verizon’s Response, III.7.D

As Verizon has previously disclosed to subscribers and regulators, given the differences in the technological platform being used, some aspects of Voice Link differ from the telecommunications service previously provided by Verizon over copper facilities. As a result, certain third-party services or devices that were designed specifically to work with traditional voice services offered over copper facilities may not be compatible with Voice Link. This includes fax machines, DVR services, credit card machines, some medical alert devices, and some (but not all) other monitoring systems like alarm systems. Such devices and services were not, however, offered by Verizon as a “POTS feature or service capability” of its telecommunications services.

E. Explain whether, and if so how, standard mobile wireless voice traffic interferes with or impedes Voice Link.

Verizon’s Response, III.7.E

Verizon will respond to this Question in a supplemental filing.

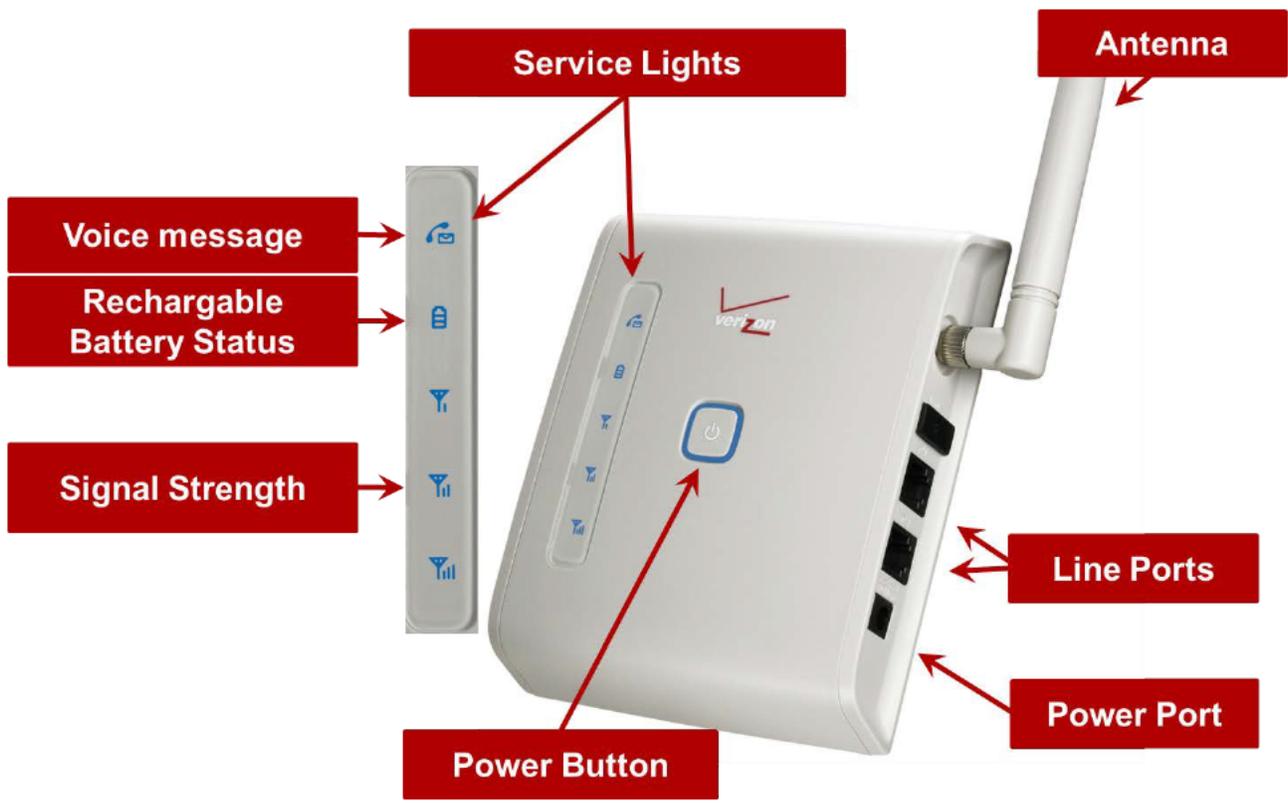
F. Provide details regarding the type of customer premise boxes that will be installed at Voice Link customer locations, including how those boxes will interface with the existing inside wiring at those locations.

Verizon's Response, III.7.F

Verizon's unionized technicians will mount the Voice Link unit at a location in the customer's premises where there is optimum wireless reception. Once the unit is mounted, it is plugged into a normal electrical outlet and into any working telephone jack. Once the unit has power and is plugged into a working jack, the in-home network is connected, and the unit provides dial tone to all of the telephone jacks at the customer's premises.



In addition to the wireless antenna, the power port, two line ports, and the power button, the Voice Link unit includes several service-light indicators. One light indicates whether the customer has a voice message. Another indicates the status of the rechargeable battery. And there are three other lights that indicate the wireless-signal strength by displaying one, two, or three bars. The device must show at least two bars of signal strength – translating to at least -95 dBs – to be installed, to ensure appropriate voice quality.



G. Please identify any problems Verizon customers in the Affected Areas have had completing 9-1-1 calls due to damage to the copper plant or other wireline facilities prior to October 29, 2012. What measures has Verizon taken to address these problems and ensure that they will not recur for any remaining wireline customers in the Affected Areas?

Verizon's Response, III.7.G

Verizon has reviewed trouble tickets relating to Verizon's wireline 911 network facilities for the period January 1 through October 29, 2012. That review process has revealed the following for the Affected Areas: **[BEGIN HIGHLY CONFIDENTIAL]**

- [REDACTED]

• [REDACTED]
[END HIGHLY CONFIDENTIAL]

Question III.8 Please describe how Verizon plans to comply with the statutory provisions below with the Voice Link service. If Verizon believes that it will need a waiver or forbearance from the following or any other statutory provision, or any regulation, please identify any such provision and the basis for the request.

A. Section 255(c) of the Communications Act requires providers of telecommunications services to “ensure that the service is accessible to and usable by individuals with disabilities, if readily achievable.” Describe any arrangements Verizon has made, or is making, to support the 9-1-1 and other communications needs of people with disabilities, including those who are deaf/hard of hearing or those who have speech disabilities, in the Affected Areas. In your response, itemize the arrangements Verizon has made for people with disabilities, and provide any and all supporting documentation.

Verizon’s Response, III.8.A

Voice Link is accessible to and usable by individuals with disabilities, and Voice Link service supports telecommunications relay service. The Voice Link unit also supports TTY devices, and Verizon has successfully tested many TTY units in lab testing. In addition, Voice Link customers can receive their bills from Verizon in braille upon request. Accessibility features and other arrangements available to Verizon customers generally, including Voice Link customers, are provided on the company’s website at the following URL:

<http://www.verizon.com/Support/Residential/generic/generic/130380.htm>

B. Section 251(g) of the Communications Act provides for the continued enforcement of certain exchange access, information access, and exchange services obligations when provided by a local exchange carrier, to the extent that it provides wireline services. What is Verizon's position regarding its legal obligations under this provision if Voice Link replaces its wireline service in the Affected Areas? For example, when an interexchange carrier (IXC) terminates an interstate interexchange or international call to a Voice Link customer on Fire Island, what will govern whether any transport and termination provisions apply - the Verizon relevant interstate access tariff? Similarly, when a Voice Link customer originates an interstate or international call in the Affected Areas, is such customer able to select its interexchange carrier? If so, what intercarrier compensation charges, if any, would Verizon apply to the IXC for such call origination?

Verizon's Response, III.8.B

The Verizon incumbent LECs are discontinuing interstate wireline telecommunications services, including interstate interexchange and exchange access service, in the Affected Areas. Voice Link is a wireless voice service. It is not a wireline service. In addition, the Verizon incumbent LECs provide Voice Link through the resale of wireless voice service.

By its terms, Section 251(g) of the Communications Act applies only to the extent a local exchange carrier provides wireline services. Section 251(g) does not apply to the provider of the wireless service that the Verizon incumbent LECs will be reselling. In the areas where Verizon is no longer providing wireline services and is providing Voice Link as an alternative, Section 251(g) therefore does not impose any obligations.

As wholesale purchasers of a service that they resell, the Verizon incumbent LECs do not provide access service via Voice Link and do not assess or collect intercarrier compensation via Voice Link. Existing materials that govern intercarrier compensation between the wireless provider and other providers will apply.

Finally, because Section 251(g) does not apply to the Voice Link service, and because Voice Link is a wireless service that Verizon is reselling, Verizon is not required to provide equal access

to common carriers for the provision of telephone toll services.⁴ In any event, Voice Link includes unlimited nationwide long distance calling so this makes no difference from the consumer perspective.

IV. DATA REQUEST

IV.1. Provide, as of the date of this Request, maps by bands of the geographic coverage of each relevant network provided by Verizon Wireless in the Affected Areas, distinguishing by technological format (*i.e.*, 1X and LTE). On these coverage maps: (1) depict in separate colors two ranges of signal levels (-95 to -85 dBm, and greater than -85 dBm); (2) depict all major and minor roads; and (3) indicate locations of their cell sites (color coded with frequency band). Provide the maps in a geo-referenced format, such as a shapefile (for ArcMap) or table (for MapInfo). Provide all assumptions, methodology (*e.g.*, propagation, field measurements), calculations (including link budgets), tools (*e.g.*, predictive and field measurements) and data (*e.g.*, terrain, morphology, buildings) that are used to produce the maps.

Verizon's Response, IV.1.

Verizon will respond to this Question in a supplemental filing.

⁴ See 47 U.S.C. § 332(c)(8); *Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services*, Order, 11 FCC Rcd 12456, ¶¶ 2-3 (1996).

IV.2. Provide site-level and traffic data as indicated in the attached spreadsheets for all sites located within the Affected Areas and for any other sites that currently serve or are projected to serve customers on the Affected Areas, including both macro sites and distributed antenna systems.

Verizon's Response, IV.2.

Verizon will respond to this Question in a supplemental filing.

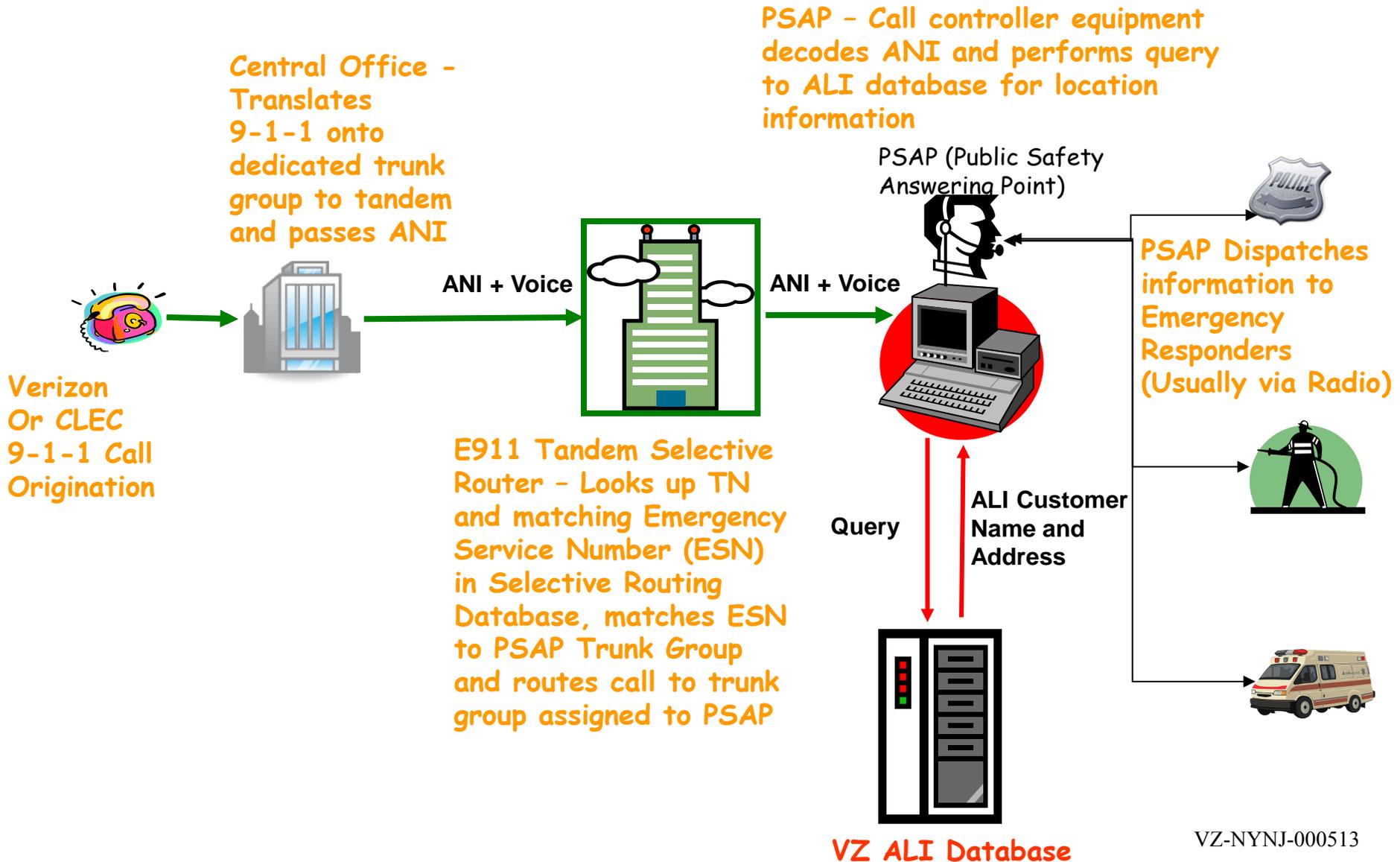
Respectfully submitted,

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September 4, 2013

E-911 Legacy Wireline Call Flow

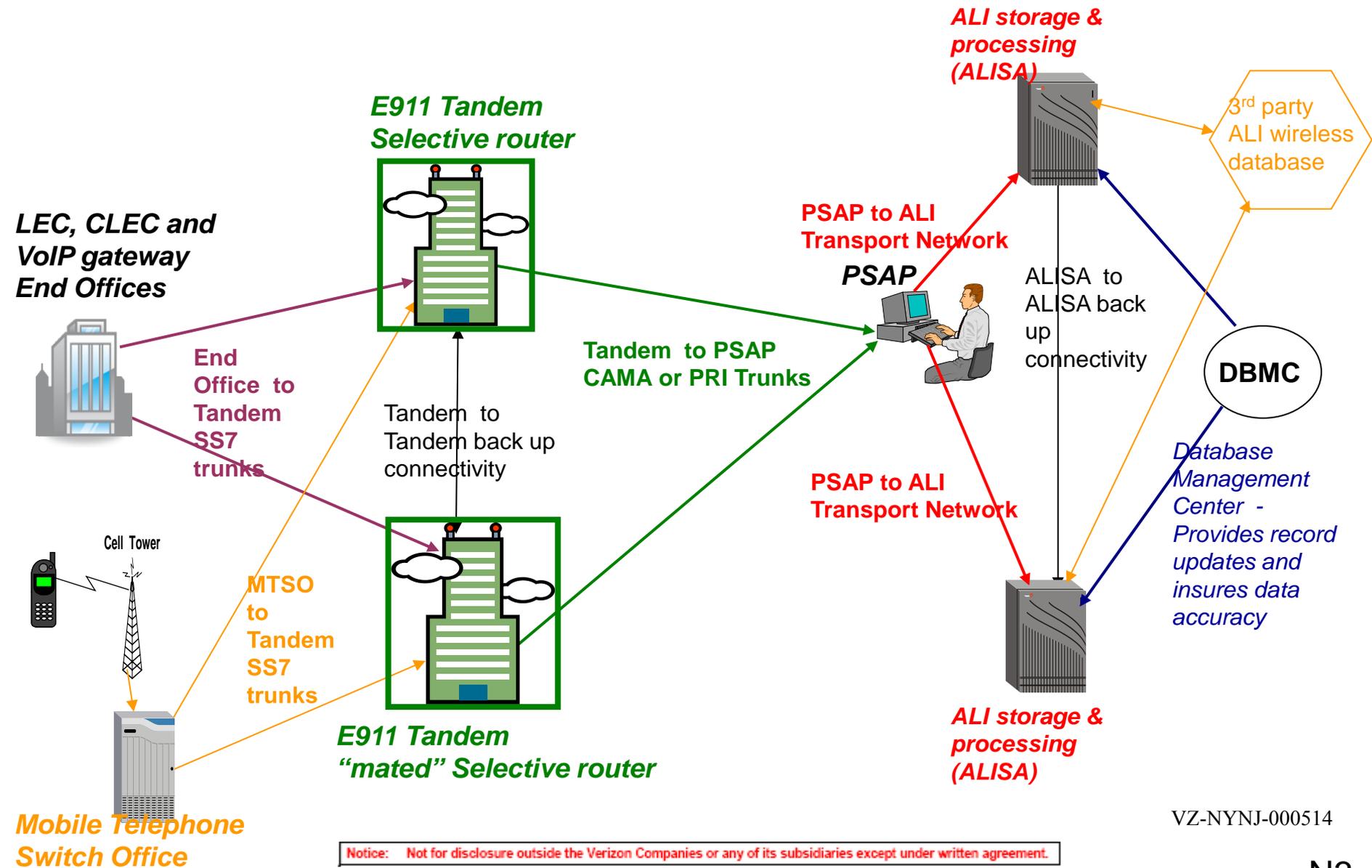


Notice: Not for disclosure outside the Verizon Companies or any of its subsidiaries except under written agreement.

VZ-NYNJ-000513

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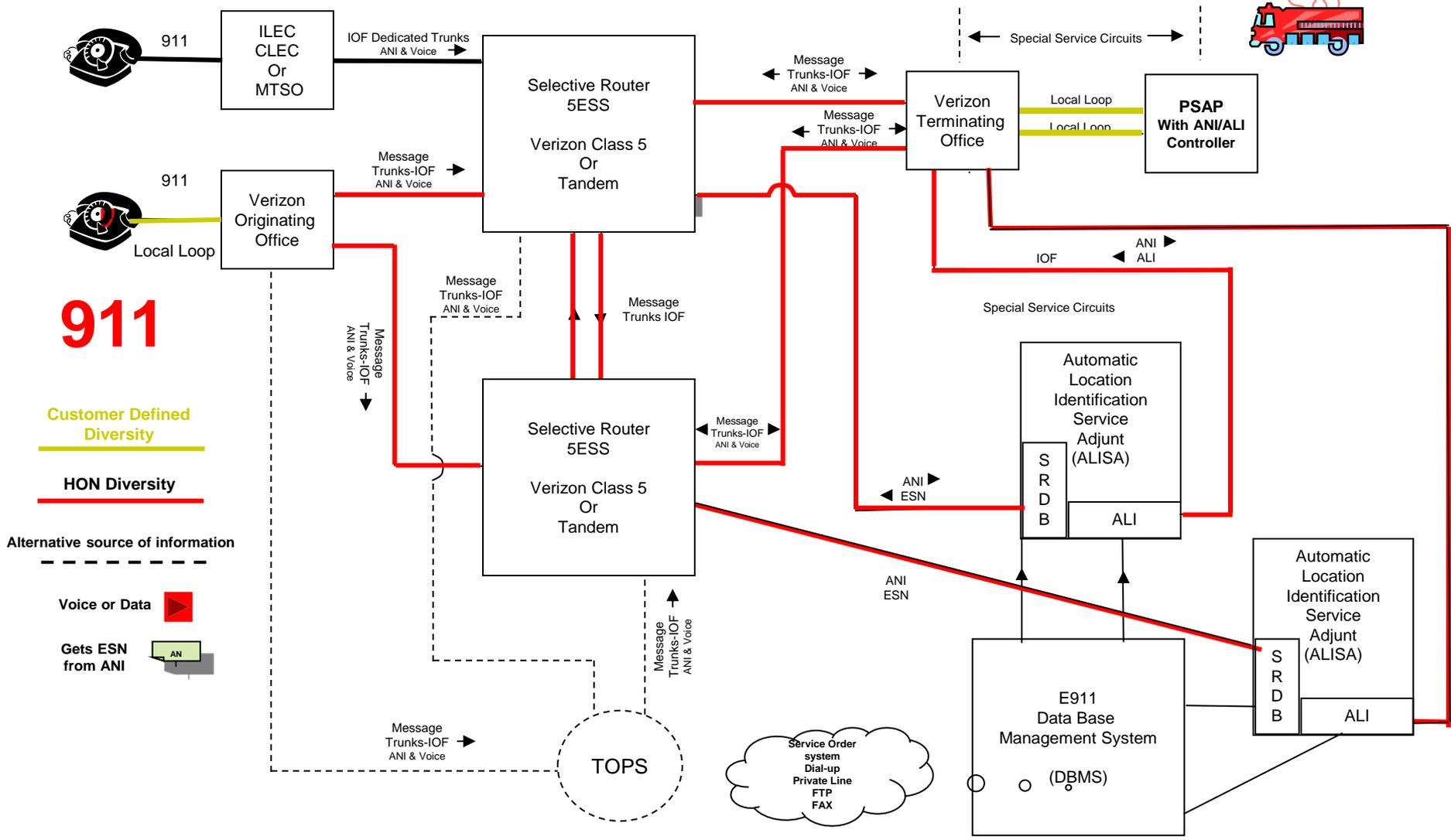
E-911 Legacy Network Overview



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VZ-NYNJ-000514

Typical Verizon E911 Legacy Network Call Flow

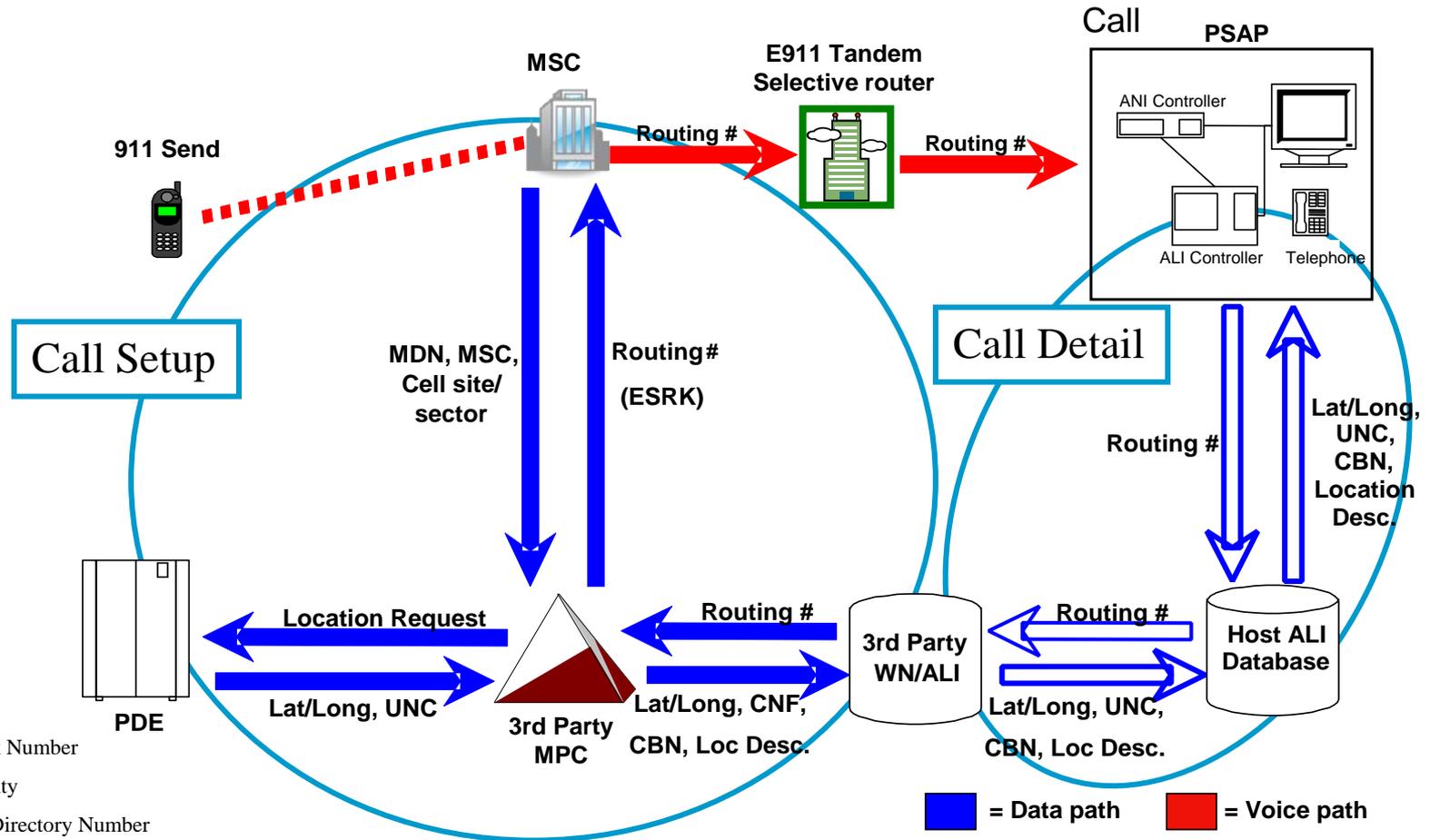


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VZ-NYNJ-000515

Wireless E-911 Phase II Platform Overview

Dynamic Call Processing & Location Determination of Wireless



CBN=Call Back Number

UNC=Uncertainty

MDN=Mobile Directory Number

MPC=Mobile Positioning Center

MSC=Mobile Switching Center

PDE=Positioning Determining Equipment

ESRK=Emergency Services Routing Key

Notice: Not for disclosure outside the Verizon Companies or any of its subsidiaries except under written agreement.

VZ-NYNJ-000516

N4