

Verizon's to the FCC on why it cannot repair FI copper lines: "We have not located any formal reports or studies that documented the results of the field investigations."

Verizon New Jersey Inc. and Verizon New York Inc.  
First Response to Information, Data, and Document  
Request  
WC Docket No. 13-150  
August 28, 2013

On 8/28/2013, Verizon of New York, Inc and Verizon of New Jersey Inc, in an FCC filing in Docket Case # WC 13-150, in "Answer to Interrogatory" (<http://apps.fcc.gov/ecfs/document/view?id=7520940254> ) was asked by the FCC on page 16 to "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."

Verizon stated the following:

"Verizon's outside plant facilities in the western portion of Fire Island sustained severe damage as a result of Hurricane Sandy. Verizon thoroughly investigated the state of the facilities to determine the extent of the damage and the difficulty of repair...: As a result of MLT (Mechanized Loop Testing) of the buried copper cables on Fire Island in November 2012, Verizon concluded that a large number of working circuits had metallic troubles such as hard grounds and cross battery. Field investigations made by our cable field maintenance forces confirmed the existence of water in all of the six buried copper feeder cables... As part of Verizon's attempts to restore service, the six main feeder cables were evacuated and exposed in a number of locations in an attempt to dry out the cables and begin identification of possible replacements for damaged sections. As more buried cable became exposed and existing sheath stripped back, it became apparent that very little of the buried cable had escaped significant water damage."

The statement above is merely Verizon's version of facts – made without substantiation, and wholly unresponsive to the FCC's question.

**The FCC asked Verizon "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."**

Verizon's answer to the FCC's precise question, on page 17, is as follows.:

**We have not located any formal reports or studies that documented the results of the field investigations.**

**In other words, Verizon -- unable to substantiate its claims that Fire Island copper telephone lines were destroyed and cannot be repaired – is completely unresponsive to the Regulator's document request, and simply asks that the FCC and NYS PSC trust that Verizon is telling the truth.**

Sincerely,

Jim Rosenthal  
Resident of Dunewood, Fire Island  
Town of Islip, New York  
(917) 362-9491  
[jrosenthal@mintzgroup.com](mailto:jrosenthal@mintzgroup.com)

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Suite 700  
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