

**REDACTED – FOR PUBLIC INSPECTION**

September 27, 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. to Discontinue Domestic Telecommunications Services*, WC Docket No. 13-150: Fourth Response to Information, Data, and Document Request

Dear Ms. Dortch:

Verizon New Jersey Inc. (“Verizon”), by its counsel, submits this Fourth Response to the Information, Data, and Document Request made by the Wireline Competition Bureau (“WCB”), dated August 14, 2013.<sup>1</sup> Enclosed please find:

- A document with narrative responses to Questions III.5, III.6, III.7.A, III.7.B, III.7.C, III.7.E, IV.1, and IV.2. With this narrative response and the associated materials, Verizon’s responses to these questions are complete. This narrative response contains information that meets the requirements for treatment as “Confidential” and/or

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<sup>1</sup> 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”). The pending Section 214 discontinuance application in this proceeding has been amended as of right to limit the covered geographic area to the New Jersey Barrier Islands in light of Verizon New York Inc.’s decision to deploy fiber to the western portions of Fire Island, NY. See Letter Amendment from William H. Johnson, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 13-150, filed Sept. 27, 2013.

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“Highly Confidential” under the Protective Order and Second Protective Order in this proceeding.<sup>2</sup>

- A document, Bates numbers VZ-NYNJ-000526 -- VZ-NYNJ-000528, that contains information responsive to Question III.5. This document contains information that meets the requirements for treatment as “Highly Confidential” under the Second Protective Order in this proceeding.
- A CD, Bates number VZ-NYNJ-000529, that contains electronic files in shapefile format responsive to Question IV.1. The files on this CD contain information that meets the requirements for treatment as “Highly Confidential” under the Second Protective Order in this proceeding.
- A CD, Bates number VZ-NYNJ-000530, that contains a spreadsheet with data responsive to Question IV.2. The spreadsheet on this CD contains information that meets the requirements for treatment as “Highly Confidential” under the Second Protective Order in this proceeding.
- In accordance with the Protective Order and Second Protective Order, Verizon is also submitting separately two sets of the Narrative Response and the associated documents to staff of the 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. Because the submission also contains information that is “Confidential,” Verizon is simultaneously filing a copy of the items listed above that excludes “Highly Confidential” information pursuant to the procedures established in the Protective Order. Verizon is also filing 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.

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<sup>2</sup> *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*, Protective Order, DA 13-1756 (WCB rel. Aug. 14, 2013); *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, DA 13-1757 (WCB rel. Aug. 14, 2013).

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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.

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.*

Attachments

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

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

**VERIZON NEW JERSEY INC.'S  
FOURTH RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

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September 27, 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 Jersey Inc.	)	
	)	
For Authority Pursuant to Section 214 of	)	WC Docket No. 13-150
the Communications Act of 1934,	)	
As Amended, To Discontinue the	)	
Provision of Service	)	
	)	
Request for Additional Information	)	
	)	

**VERIZON NEW JERSEY INC.’S  
FOURTH RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**I. INTRODUCTION**

Verizon New Jersey Inc. (“Verizon”) hereby provides additional information in response to the Wireline Competition Bureau’s request for information in support of Verizon’s Section 214 application to discontinue interstate wireline telecommunications services in discrete parts of two wire centers on the New Jersey Barrier Islands where Superstorm Sandy destroyed or rendered inoperable existing copper facilities.<sup>1</sup> In light of Verizon New York Inc.’s decision to deploy fiber on Fire Island, NY and to withdraw its request to discontinue interstate wireline telecommunications services in that area, the pending Section 214 discontinuance application in this proceeding has been amended as of right to limit the covered geographic area to the New Jersey

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<sup>1</sup> 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”).

Barrier Island section of the Affected Areas.<sup>2</sup> This response is therefore limited in scope to the New Jersey Barrier Island portion of the Affected Areas.

Verizon below answers all of the Bureau's questions to the extent it or its vendor, Verizon Wireless, have the requested information and to the extent the answers were not already provided in Verizon's previous responses to the Request.<sup>3</sup> Where information directly responsive to a Question is not available, Verizon has provided and described the information that is available to it.

## II. NARRATIVE RESPONSES TO QUESTIONS AND DOCUMENT REQUESTS

**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

The attached table, Bates Nos. VZ-NYNJ-000526 -- VZ-NYNJ-000528, provides the following for each of the cell site outages potentially affecting the relevant portions of the New Jersey Barrier Islands, as recorded by Verizon Wireless' Network Operations Center: date; duration; potentially affected users; cause; and the associated NORS outage report numbers (if applicable).

**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**

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<sup>2</sup> See Letter Amendment from William H. Johnson, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 13-150, filed Sept. 27, 2013.

<sup>3</sup> 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, Verizon has worked with its vendor to obtain responsive information.

**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.**

**Verizon’s Response, III.6**

Information with respect to Verizon’s actions concerning the wireline network is provided in the September 4<sup>th</sup> Response.<sup>4</sup>

In addition, Verizon’s vendor that provides the wireless connectivity for Voice Link, Verizon Wireless, has assessed its capacity needs for its cell sites serving the segment of the New Jersey Barrier Islands subject to this application, taking into account existing and projected demands at those sites for Voice Link subscribers and other users of its wireless network. For the New Jersey Barrier Islands, [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED] [END 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.**

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<sup>4</sup> See Letter from Adam D. Krinsky, Counsel to Verizon New Jersey Inc. and Verizon New York, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, in WC Docket No. 13-150, Attachment at 7-8, filed Sept. 4, 2013 (“September 4<sup>th</sup> Response”).

**Verizon’s Response, III.7.A**

This response supplements Verizon’s initial response to this Question on September 4, 2013. Generally, Verizon expects Voice Link to provide customers with service quality consistent with the quality of service experienced by other voice telephony users, including subscribers to Verizon Wireless or resellers on the Verizon Wireless network.

***Minimum Acceptable Service***

As stated in its September 4<sup>th</sup> Response, the engineering parameters described in this question are generally associated with a facilities-based, legacy wireline voice telephony service, and a call placed through Voice Link is carried on the Verizon Wireless network and handled like any other call that originates on Verizon Wireless’ network in the Affected Areas.<sup>5</sup> [BEGIN

CONFIDENTIAL] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [END CONFIDENTIAL]

**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.**

**Verizon’s Response, III.7.B**

See response to III.7.A above, [BEGIN CONFIDENTIAL] [REDACTED]  
[REDACTED]  
[REDACTED]

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<sup>5</sup> September 4<sup>th</sup> Response at 8.

[REDACTED] [END CONFIDENTIAL] [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL] Network outages that may have affected voice traffic are reported separately in response to Question III.5 above.

**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**

*Radio Access Network Survivability Characteristics.*

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END HIGHLY CONFIDENTIAL]

*Protections from Physical Damage.*

Verizon Wireless indicates that its cell sites are designed in compliance with the local building codes at the time of construction and built to withstand a variety of threats from natural and man-made sources, including coastal weather events. Verizon Wireless has informed Verizon that, as a matter of practice, coastal shore sites are often built to more stringent local codes, [BEGIN

**CONFIDENTIAL]** [REDACTED]

[REDACTED] **[END**

**CONFIDENTIAL]**

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

**Verizon’s Response, III.7.E**

Pursuant to discussions with Commission staff, Verizon understands that this Question relates to instances where the demands of standard mobile wireless voice traffic in the Radio Access Network affect the network capacity available to Voice Link customers. As noted above, Voice Link customers receive the same service quality as other voice telephony users of the Verizon Wireless network as a matter of course. A call placed through Voice Link is carried on the Verizon Wireless network and handled like any other call that originates on Verizon Wireless’ network in the Affected Areas. Calls from Voice Link users are not preempted by Verizon Wireless’ standard mobile wireless voice traffic, nor is standard mobile wireless traffic afforded any prioritization over

Voice Link service except pursuant to existing Wireless Priority Service (WPS) arrangements with the U.S. Department of Homeland Security, which would receive prioritization over Voice Link traffic to the same degree it receives prioritization over commercial mobile wireless traffic generally.

Although localized capacity constraints resulting from a high volume of calls can, under some circumstances, affect the ability of Voice Link or any other customers on the wireless network to complete calls via the cell sites serving the Affected Areas, congestion can occur on wireline networks during high volume calling events as well. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED] [END

HIGHLY CONFIDENTIAL] [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END CONFIDENTIAL]

#### 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 is providing the requested maps for Verizon Wireless' network to the extent that information is available to Verizon Wireless. The maps are provided on the attached CD marked Bates No. VZ-NYNJ-000529, in shapefile format. Explanatory information, including any necessary departures from specifics of the Request, follows below.

Voice Link is provided via the 1X network. [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED] [END  
CONFIDENTIAL]

**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 has provided the requested data for Verizon Wireless' network to the extent that information is available to Verizon Wireless. The data are presented in a spreadsheet included on the CD marked Bates No. VZ-NYNJ-000530. Explanatory information, including any necessary departures from the specifics of the Request, follows below.

***Traffic Data***

All data are directly or indirectly derived from the performance data available to Verizon Wireless through the reporting mechanisms made available by its base station vendor (Alcatel Lucent). Departures from the Request due to limitations of those reporting mechanisms are described below. [BEGIN CONFIDENTIAL]

[REDACTED]

[REDACTED]

[REDACTED] [END CONFIDENTIAL] [BEGIN HIGHLY  
CONFIDENTIAL]



Respectfully submitted,

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September 27, 2013

**DOCUMENTS AT BATES NOS. VZ-NYNJ-000526 – VZ-NYNJ-000530  
REDACTED PURSUANT TO SECOND PROTECTIVE ORDER IN  
WC DOCKET NO. 13-150 BEFORE THE FEDERAL  
COMMUNICATIONS COMMISSION**