



Federal Communications Commission
Washington, D.C. 20554

August 14, 2013

DA 13-1760

Via Electronic Mail and First-Class Mail

Kathleen Grillo
Senior Vice President – Federal Regulatory Affairs
Verizon Communications Inc.
1300 I Street, NW, Suite 400 West
Washington, DC 20005

RE: Comments Invited on Application of Verizon New Jersey Inc. and Verizon New York Inc. to Discontinue Domestic Telecommunications Services (WC Docket No. 13-150)

Dear Ms. Grillo:

On June 7, 2013, Verizon New Jersey Inc. and Verizon New York Inc. (collectively, Verizon) filed an application requesting authority under section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and section 63.71 of the Federal Communications Commission's (FCC or Commission) rules, 47 C.F.R. § 63.71, to discontinue certain domestic telecommunications services in certain parts of New Jersey and New York affected by Hurricane Sandy.¹ In order for the Commission to complete its review of the application, we require additional information from Verizon.

Accordingly, we request that you provide written responses and supporting documentation for each request set forth in the attached Information, Data and Document Request. In order to expedite consideration of your discontinuance application, please respond to the following requests by **September 4, 2013**, except that any material provided to the New York State Public Service Commission (NY PSC) that is responsive to any Department of Public Service Interrogatory/Document Request in Case Number 13-C-0197 should be filed with the Commission by **August 28, 2013** if previously filed with the NY PSC, and otherwise filed with the Commission concurrent with the filing with the NY PSC.

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, in the above-captioned docket. The Wireline Competition Bureau should also receive an electronic copy, pursuant to the attached instructions. If you submit information pursuant to the Protective Orders issued in this proceeding, please follow the filing procedures specified therein.²

¹ Letter from Frederick E. Moacdieh, Executive Director – Federal Regulatory Affairs, Verizon, to Marlene H. Dortch, Secretary, FCC, Attach. (filed June 7, 2013) (Verizon Application), *available at* <http://apps.fcc.gov/ecfs/document/view?id=7022424983>.

² See 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, WC Docket No. 13-150, Comp. Pol. File No. 1115, Protective Order, DA 13-1756 (Wireline Comp. Bur. rel. Aug. 14, 2013); see also 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, WC Docket (continued...)

If you have any questions regarding this matter or the Commission's request, please contact Tim Stelzig at (202) 418-0942.

Sincerely,

Julie A. Veach
Chief, Wireline Competition Bureau

Attachment

(Continued from previous page) _____
No. 13-150, Comp. Pol. File No. 1115, Second Protective Order, DA 13-1757 (Wireline Comp. Bur. rel. Aug. 14, 2013).

INFORMATION, DATA, AND DOCUMENT REQUEST

I. Definitions

Affected Areas means Fire Island and the New Jersey Barrier Island Communities.

Communications Act means Communications Act of 1934, as amended.

Fire Island means those portions of Fire Island, New York for which Verizon sought discontinuance authority in WC Docket No. 13-150.

New Jersey Barrier Island Communities means the New Jersey barrier island communities for which Verizon sought discontinuance authority in WC Docket No. 13-150.

NY PSC means the New York State Public Service Commission.

Outage means that a cell site either wholly or within a sector is not capable for any reason of supporting the relevant service(s) to consumers.

Verizon means Verizon New Jersey Inc. and Verizon New York Inc., and any entities that own or control them, and, as relevant, Verizon Wireless.

Plain Old Telephone Service (POTS) means Verizon's wireline telephone service as provided in the months prior to October 29, 2012 in the Affected Areas.

Verizon Wireless means Cellco Partnership d/b/a Verizon Wireless.

Voice Link means the wireless service Verizon is marketing in the Affected Areas as a replacement for Verizon's copper-based telephone service.

II. Instructions

1. All responses should be in machine readable and text-searchable format. Responses to data specification questions should be submitted in electronic form only, preferably CDs. Please contact the Wireline Competition Bureau staff members listed in the cover letter to this request if you would like to submit an electronic medium other than a CD.
2. Information, data or documents provided in response to Interrogatory and Document Request Number 1, *infra*, need not also be provided in response to the Interrogatory and Document Request Numbers 2–8, *infra*, so long as any such other response states specifically and with precision where to find the relevant information provided in response to Interrogatory and Document Request Number 1 (*e.g.*, “Verizon DPS-1 Qn 3 Response, page 15”).
3. Question IV.2 is a data specification. Responses to this question should be prepared pursuant to the instructions provided in the templates available in the attached spreadsheets, also found at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-322836A1.xlsx.
4. Data specifications should be submitted in accordance with these instructions, as well as the instructions provided in the excel spreadsheets attached to this Letter.
5. For data specification submissions, label each CD or other electronic media device submitted, and on that label, please provide your name and the content of the electronic media device (*e.g.*, “Verizon response to Question III.A.2”).
6. Responses to Interrogatory questions should be prepared as narratives, separately from the data specification submissions described above, and submitted in accordance with the instructions in this Letter.
7. With each submission, provide an accompanying cover letter that: (a) identifies the type of submission (data specification, narrative, or both); (b) identifies each response by question

number (*e.g.*, “we are submitting a response to Question III.1.A in this submission”); and (c) indicates whether the materials are a partial or full response to the data request.

8. Unless otherwise specified, each request is for data as of **August 14, 2013**.

III. Interrogatories and Document Requests

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.
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.
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.
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.
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.
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.

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.
 - 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; and
 - 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 back-up 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).
 - 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.
 - E. Explain whether, and if so how, standard mobile wireless voice traffic interferes with or impedes Voice Link.
 - 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.
 - 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?
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.

- 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?

IV. Data Request

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.
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.