

**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

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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 communities<sup>1</sup> 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

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<sup>1</sup> 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:** \_\_\_\_\_