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Joseph A. Post
Deputy General Counsel — New York



July 3, 2013

Honorable Jeffrey C. Cohen
Acting Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-0350

Re: Case 13-C-0197

Dear Secretary Cohen:

On June 26, 2013, Christopher M. Shelton, Vice President of Communications Workers of America (“CWA”) District 1, filed a letter with the Commission concerning Verizon New York Inc.’s deployment of Voice Link outside of Fire Island. CWA is not a party to this case, and according to the Commission’s web site, its letter has been accepted as a “Public Comment” document. Accordingly, there would normally be no occasion for Verizon to respond to the letter at this time. Moreover, Verizon’s response to the Attorney General’s “Emergency Petition” fully addressed CWA’s claims concerning Verizon’s right to offer Voice Link in other parts of the State. We would, however, like to take this opportunity to correct CWA’s distorted version of Verizon’s deployment of Voice Link in the building at 308 East Eighth Street in Manhattan.

Prior to Superstorm Sandy, the residents of that building were served by a Digital Loop Carrier (“DLC”) system utilizing multiplexing equipment located in the basement. The building sustained flood damage as a result of Sandy, and utility equipment located in the basement (including but not limited to Verizon’s DLC system) had to be replaced. First, however, access issues had to be discussed with building management, and considerable work was required to restore electrical power, to remove damaged equipment, backboards, and racks, to remediate mold conditions and otherwise clean the equipment room, and to replace damaged drywall. Once these steps were completed, Verizon installed new DLC equipment and worked on restoring damaged risers and reconnecting the customers’ lines to the new equipment. All of this work was completed by late May, and landline service through the DLC system was available to the entire building by June.

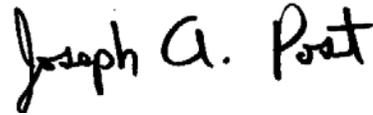
In the period before repairs in the building were completed and landline service was fully restored, Verizon offered Voice Link *without charge* as an interim alternative. (This was similar to the company’s provision of Home Phone Connect in other buildings where service had been disrupted by Sandy-related damage.) Thus, Voice Link provided an option to customers who otherwise would have had no service alternatives from Verizon.

It is unclear why CWA would object to Verizon providing such an option. Its description of the offering as a “replacement service,” and as an “attempt[] to switch an 81-unit senior residence to Voice Link,” are inaccurate and misleading. Unfortunately, here as elsewhere,

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CWA's advocacy seems to be driven by its rather narrow interest in preventing Verizon from offering customers a service that is easy to install and requires fewer repair dispatches.¹

Respectfully submitted,

A handwritten signature in black ink that reads "Joseph A. Post". The signature is written in a cursive, slightly slanted style.

Joseph A. Post

Active Parties
Peter McGowan, Esq
Brian Ossias, Esq.
Mr. Michael Corso
Mr. Chad G. Hume

¹ This interest is made clear in a July 1, 2013 email from the Working Families Party to elected officials, which notes that “VoiceLink destroys good jobs<<http://cwa1109.org/content/message-president>> – Wireless systems require far fewer workers to maintain the networks. Thousands of well-trained Verizon technicians could eventually lose their jobs, harming local economies.”