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**Keefe B. Clemons**  
General Counsel – Northeast Region



May 3, 2013

Honorable Jeffrey Cohen  
Acting Secretary, Public Service Commission  
State of New York  
Three Empire State Plaza  
Albany, New York 12223

**Re: Proposed Amendments to Verizon New York Inc. Tariff PSC No. 1**

Dear Acting Secretary Cohen:

Enclosed is an Application for Special Permission to put into effect on May 18, 2013, on short notice, the following schedule:

PSC NY No. 1--COMMUNICATIONS  
Section 1  
1<sup>st</sup> Revised Page 60  
Original Page 60.1

The purpose of these revisions is to add language to the tariff setting forth the circumstances under which Verizon could discontinue its current wireline service offerings in a specified area and instead offer a wireless service as its sole service offering in the area. Additionally, the western portion of Fire Island is identified as a location where Verizon would be authorized to provide a wireless service as its sole offering.

In order to enable Verizon to move forward to implement its plans to restore voice service on Fire Island as rapidly as possible, Verizon respectfully requests that this filing be allowed to go into effect on less than 30 days' notice, and that the requirement of newspaper filing be waived.

Very truly yours,

A handwritten signature in cursive script that reads "Keefe B. Clemons".

Attachment

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Honorable Jeffrey Cohen  
Acting Secretary, Public Service Commission  
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Albany, New York 12223

**Re: Proposed Amendments to Verizon New York Inc. Tariff PSC No. 1**

Dear Acting Secretary Cohen:

Verizon New York Inc., by Keefe B. Clemons, General Counsel, hereby applies under Section 92 (Telephone) of the Public Service Law for permission to put the following schedule into effect on May 18, 2013, on short notice:

PSC NY No. 1--COMMUNICATIONS  
Section 1  
1<sup>st</sup> Revised Page 60  
Original Page 60.1

The purpose of these revisions is to add language to the tariff setting forth the circumstances under which Verizon could discontinue its current wireline service offerings in a specified area and instead offer a wireless service as its sole service offering in the area. Additionally, the western portion of Fire Island is identified as a location where Verizon would be authorized to provide a wireless service as its sole offering. The basis for this identification is set forth in the attached certification of Manuel J. Sampedro.

In order to enable Verizon to move forward to implement its plans to restore voice service on Fire Island as rapidly as possible, Verizon respectfully requests that this filing be allowed to go into effect on less than 30 days' notice, and that the requirement of newspaper filing be waived.

These changes are being filed with the Secretary's office by e-mail.

Very truly yours,  
VERIZON NEW YORK INC.

A handwritten signature in cursive script that reads "Keefe B. Clemons".

By \_\_\_\_\_

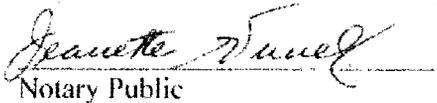
Attachment

State of New York)  
County of New York) <sup>ss:</sup>

Keefe B. Clemons, being duly sworn, states that he is the General Counsel named in the foregoing Application, that he has read said Application and knows the contents thereof, and the same is true of his own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters he believes it to be true.



Subscribed to and sworn to before me  
this 3rd day of May, 2013.



Notary Public

JEANETTE NUNEZ  
Notary Public, State of New York  
No. 01NU4647134  
Qualified in Nassau County  
Commission Expires March 30, 2015

Attachment

## CERTIFICATION OF MANUEL J. SAMPEDRO

1. I am employed as Region President for the South/East region of Verizon New York Inc. ("Verizon"). As such, I oversee an organization of more than 5,000 men and women delivering service to consumers and businesses on Long Island, Brooklyn, the Bronx, and the northern suburbs of New York City. My responsibilities include oversight of the program described below for the restoration of service in Fire Island following the devastation caused by Hurricane Sandy in late 2012.

2. Fire Island is a barrier island located about 5.5 miles off of the southern shore of Long Island. It has a few hundred permanent residents, but is also well known as a summer vacation destination. Cellular voice and data services — provided by Verizon Wireless and other carriers — are widely used on the Island.

3. Historically, Verizon has provided landline service on Fire Island through two exchanges served by a single central office: the Fire Island exchange, which covers the western portion of the Island (including the communities of Fair Harbor, Kismet, Ocean Beach, Saltaire, etc.), and the East Fire Island exchange, which covers the eastern portion of the Island (including the communities of Atlantic Beach, Cherry Grove, Pines, etc.).<sup>1</sup> Prior to Hurricane Sandy, Verizon provided voice service over some 3,800 access lines on Fire Island. Approximately 1,100 of the lines are located on the eastern portion of the Island, and the remaining 2,700 are on the western portion.

4. Fire Island sustained severe damage in late 2012 as a result of the high winds and floodwaters associated with Hurricane Sandy. According to news reports, 80 percent of the homes were flooded and some 90 homes were completely destroyed.<sup>2</sup> Verizon's outside plant facilities shared in the damage, particularly in the western part of the Island, where about 40% of the access lines were found to be defective after the storm. Five of the six cables that run between Fire Island and the mainland — the five that serve the western portion of the Island — were also badly damaged by the storm.

5. For the present, Verizon believes it can continue to provide service in the eastern portion of Fire Island through the use of existing landline facilities.

6. However, in the western portion of the Island, where a large percentage of Verizon's copper facilities were damaged beyond repair, Verizon is offering a wireless service known as "Verizon Voice Link<sup>®</sup>" as its principal service option. Where existing copper pairs are still functional, Verizon will continue to use them to provide service to the extent possible. However, Voice Link service will be provided where outside plant facilities were destroyed by Hurricane Sandy, and as surviving copper facilities go out of service. All orders for new service

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<sup>1</sup> Generally speaking, Sunken Forest is the dividing line between the eastern and western portions of the Island.

<sup>2</sup> <http://newyork.cbslocal.com/2012/11/14/residents-return-to-fire-island-where-the-protective-dunes-are-no-more/>

will be fulfilled using Voice Link. (Verizon will deploy and repair copper facilities to provide landline service on an as-needed basis to firehouses, police stations, and other municipal buildings.)

7. The use of a wireless service as the primary service option on western Fire Island makes sense. The cost of replacing facilities is very high, and if hurricanes or other severe storms occur in the future, there is a significant risk that the newly installed outside plant would again be damaged or destroyed. Wireless service is already the predominant mode of voice communication on the Island. Finally, requiring deployment of new landline facilities would delay the restoration of service for many customers for several months.

8. In order to ensure that sufficient wireless coverage is available on the Island to support a Voice Link offering, even during the summer months, Verizon Wireless has agreed to enhance its wireless coverage on the Island.<sup>3</sup> I have discussed the proposed network enhancements with Verizon Wireless, and I believe that they will be adequate to meet the demand for Voice Link service.

9. Voice Link utilizes the same cellular technology as a conventional mobile phone. However, the Voice Link transmitter/receiver — a unit about the size of a small router (4" x 5" x 1.25") — would remain in the customer's premises, at a location chosen for optimum reception. Aside from signal-strength considerations, this ensures that the unit will remain at a specified address, which will enable Verizon to offer conventional Enhanced 911 service to the customer.<sup>4</sup> The unit is plugged into a normal electrical outlet, and then into any telephone jack. Once this is done, the unit will provide dial tone to all working jacks in the house. Thus, customers will be able to use their current telephone sets simply by plugging them into any jack. The installation of the device will be handled by a trained Verizon technician. Customers will not have to change their current telephone numbers. Bills will be in the same format as landline customers receive today.

10. Voice Link service will provide customers with the ability to make and receive voice telephone calls, and to access local and toll calling, emergency services with Enhanced 911 capability, directory assistance services, and telecommunications relay services. The directory listing process will be the same as for landline customers, including the availability of non-published service. Voice Link will also support a variety of popular calling features.

11. Voice Link units require electrical power, which they normally obtain through an electrical outlet in the customer's house. However, in case of commercial power failures, they

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<sup>3</sup> Verizon Wireless is a joint venture partly owned by Verizon's parent corporation, Verizon Communications Inc. Voice Link service will be provided over Verizon Wireless' network. However, a customer using Voice Link service on Fire Island will remain a customer of Verizon, rather than of Verizon Wireless. (In providing Voice Link, Verizon will act as a reseller of Verizon Wireless' service.)

<sup>4</sup> In other words, the customer's address will normally be provided to the emergency service operator when a 911 call is made — as would be the case for landline E911 service.

are equipped with a rechargeable backup battery that provides up to two hours of talk time and 36 hours of standby time. Additionally, a new model planned for distribution shortly will accommodate customer-provided non-rechargeable batteries, which can be used during prolonged outages after the rechargeable batteries run down.

12. Verizon has committed to adhere to the requirements of the New York Public Service Commission relating to customer protection, customer complaints, service quality, safety and reliability with respect to the Voice Link service offered as the sole service option on the western part of Fire Island.

13. Voice Link will be available to business customers as well as residence customers. Multi-line service will also be available for businesses, and Verizon Wireless will make available wireless data services and devices to support point-of-sale credit card processing and similar data functionalities required by small businesses.

14. Voice Link pricing will generally be aligned with the pricing of current landline service packages. Verizon will offer Voice Link residence plans that include features comparable to or more extensive than those included in the following service offerings: Regional Package, Verizon Local Package, Regional Essentials, Access Line Plus Flat-Rated Local Usage, and Access Line Plus Flat-Rated Local Usage at tariffed Lifeline pricing (Lifeline-eligible customers only). Verizon will also offer a business plan that includes features comparable to or more extensive than those included in the Solutions for Business offering. The net price of each such Voice Link plan (inclusive of available credits) will be at or below the price of the comparable tariffed plan (inclusive of the federal Subscriber Line Charge applicable to the tariffed plan), as such price may change from time to time.

**I, MANUEL J. SAMPEDRO, certify that to the best of my knowledge, the foregoing statements are true and correct, based on my own personal knowledge, information obtained from other employees of Verizon and its affiliated companies, records maintained by those companies, and other sources of information that I deem to be reliable.**



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**MANUEL J. SAMPEDRO**  
**May 3, 2013**

GENERAL RULES AND REGULATIONS

C. OBLIGATION OF TELEPHONE COMPANY

- 1. In furnishing service and/or facilities, the Telephone Company does not undertake to transmit messages, but furnishes the use of its facilities to its subscribers for communications. (T)
- 2. The Telephone Company's obligation to furnish service and/or facilities is dependent upon its ability (a) to secure and retain, without unreasonable expense, suitable facilities and rights for the construction and maintenance of the necessary circuits and equipment, (b) to secure and retain, without expense to it, suitable space for its plant and facilities in the building where service is or is to be provided, (c) to secure reimbursement of all costs where the owner or operator of a building demands relocations or rearrangement of plant and facilities used in providing service therein, or (d) to secure compliance with the provisions of Section 14, E.4. of this Tariff as to underground construction by the subscriber or any other party in interest, such as the applicant for service or the owner or operator of the premises where service is or is to be provided. (T)
- 3. The Telephone Company may offer service using wireless as its sole service offering in an area if the company : (a) certifies and demonstrates that a substantial portion of its facilities in the area is destroyed, rendered unusable, or beyond reasonable repair; or (b) demonstrates that the use of wireless to serve specified customers, or groups of customers, is otherwise reasonable in light of the geographic location, the availability of competitive facilities to serve those customers or groups of customers, or in light of other criteria acceptable to the Commission. T

The following conditions apply to the sole service offering under this paragraph:

- a. The service, at a minimum, will provide customers the ability to make and receive voice telephone calls; access local and toll calling, emergency services with E911 capability, assistance services, telecommunications relay services, and directory listings; and customers of the service will be able to obtain non-published service. (N)
- b. The Telephone Company will adhere to the provisions of this Section 1.C. and to the Commission's requirements relating to customer protection, customer complaints, service quality, safety and reliability.
- c. The customer will supply power to an interface provided by the Telephone Company subject to the limitations detailed in Section 1.A.5.
- d. At a minimum, the Company will offer separate residence plans that include features comparable to or more extensive than those included in the following service offerings: Regional Package, Verizon Local Package, Regional Essentials, Access Line Plus Flat-Rated Local Usage, and Access Line Plus Flat-Rated Local Usage at tariffed Lifeline pricing (Lifeline-eligible customers only). The Company will offer a business plan that includes features comparable to or more extensive than those included in the Solutions for Business offering. The net price of each such plan (inclusive of available credits) will be at or below the price of the comparable tariffed plan (inclusive of the federal Subscriber Line Charge applicable to the tariffed plan), as such price may change from time to time. J

GENERAL RULES AND REGULATIONS

C. OBLIGATION OF TELEPHONE COMPANY (Cont'd)

4. Section 1.C(3) shall not apply where the Telephone Company offers such an alternative service as an optional service.

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5. The Telephone Company is authorized to offer the alternative service described in Section 1.C(3) as its sole service offering in the following areas:

(N)

- Western portion of Fire Island

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