



6 Bowdoin Square, 9th Floor
Boston, MA 02114

Keefe B. Clemons
General Counsel
State Regulatory Affairs – East
(212) 519-4716
keefe.b.clemons@verizon.com

January 29, 2021

ELECTRONIC FILING

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
1333 H Street, NW, 2nd Floor, West Tower
Washington, DC 20005

**RE: Formal Case No. 990 – Verizon Washington, DC Inc.’s Response to Order No. 15337
(Public Version)**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Verizon Washington, DC Inc.’s (“Verizon DC’s”) Fourth Quarter 2020 Report on non-Verizon contractor damages pursuant to Order No. 15337. Updates to the matrix are noted on Confidential Attachment A. Photographs of damaged plant are enclosed as Confidential Attachment B.

Verizon DC’s Report contains information that Verizon DC considers to be confidential and proprietary. Pursuant to Commission Rule of Practice and Procedure 150.2, Verizon DC requests confidential treatment for items so marked.

In this report, Verizon DC provides detailed locations and pictures of damage to Verizon DC facilities that was caused by non-Verizon contractors. This information is competitively sensitive, and its disclosure would put Verizon DC at a competitive disadvantage by providing valuable information to Verizon DC’s competitors relating to the location of key portions of Verizon DC’s network and facilities. Disclosure of this information also would be valuable to parties who may want to intentionally cause damage to the Verizon DC network.

Parties wishing to view this information may contact Verizon DC for appropriate proprietary agreement or file with the Commission for a Proprietary Information Determination. Parties may seek a Commission ruling on contention at any time in this proceeding.

If you have any questions regarding this filing, please contact Stephanie Ulrich at 216-462-9868 or at Stephanie.a.ulrich@veriozn.com.

Respectfully

Enclosures

cc: Sandra Mattavous-Frye, Esq., People’s Counsel

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF DEVELOPMENT OF)
LOCAL EXCHANGE CARRIER QUALITY)
OF SERVICE STANDARDS FOR THE)
DISTRICT)**

FORMAL CASE NO. 990


**VERIZON WASHINGTON, DC INC.'S
RESPONSE TO ORDER NO. 15337**

Pursuant to Order No. 15337 issued by the Public Service Commission of the District of Columbia on July 24, 2009, Verizon Washington, DC Inc. ("Verizon") provides in Confidential Attachment A, the updates to the third-party contractor excavation damages matrix. Confidential Attachment B provides digital photographs illustrating the type of damage sustained by the Verizon network in each incident.

Verizon is not aware of any information related to these incidents that would warrant revisions to the Remedial Plan.

Respectfully submitted,

VERIZON WASHINGTON, DC INC.



Keefe B. Clemons
[Bar ID: 454040]
6 Bowdoin Square, 9th Floor
Boston, MA 02114
(212) 519-4716 (telephone)
keefe.b.clemons@verizon.com

Dated: January 29, 2021

Counsel for Verizon Washington, DC Inc.

CONFIDENTIAL ATTACHMENT A

This portion contains information which Verizon DC alleges to be proprietary. Please contact Verizon DC for an appropriate proprietary agreement or file with the Commission for a Proprietary Information Determination. Parties may see a Commission ruling on contention at any time in this proceeding.

CONFIDENTIAL ATTACHMENT B

This portion contains information which Verizon DC alleges to be proprietary. Please contact Verizon DC for an appropriate proprietary agreement or file with the Commission for a Proprietary Information Determination. Parties may see a Commission ruling on contention at any time in this proceeding.