

New Networks

Comments Filed:

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ADDITIONAL COMMENTS:

New Networks Calls for an Immediate Investigation of Verizon’s Bell Harbor Short Term Network Change—Impacting over 50,000 Residents of “The Rockaways”, in New York City.

RE: WIRELINE COMPETITION BUREAU SHORT TERM NETWORK CHANGE NOTIFICATION FILED BY VERIZON NEW YORK INC.

Report No. NCD-2353¹
Report No. NCD-2351²

PREVIOUS FILED COMMENTS—MAY 19th, 2014 New Networks Requests the FCC Halt this Section 251 Short Term Wireline Network Change and Start Investigations of Verizon New York’s (VNY) Actions.³

Map of the Rockaways and the Bell Harbor Central Office Coverage.



- This is map of the Rockaways territory that depends on the Bell Harbor CO as told by telecommunications databases that supply central office coverage.

¹ http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-326960A1.docx

² http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-326958A1.docx

³ There are two notifications -- Report No. NCD-2353 and NCD-2351, but our primary concern is with any changes to shut off the copper networks and we will refer to them as one group.

New Networks

- It represents about 50,000 customers, an area that is larger than 90% of all municipalities in the State of New York.
- Based on experts, the prefixes for the phone service (such as “718---634—XXXX”) include:
- Prefixes are: “634”, “318”, “474”, “734” and “945”.
- The Central Office in question: Belle Harbor, New York Central Office (NYCQNYBH) is located at 216 Beach 81st St., Queens, NY

This is a massive change of a very large area of New York City and the questions we asked in our previous comments are now compounded by the failure to disclose basic details that should have been addressed in their original short term network change.

- Is this being done as part of the utility?
- Is Verizon doing it to offer FIOS?
- How many competitors are there there using these wires?
- How many copper lines are in service?
- How many people, businesses, schools, etc. are impacted?

As we mentioned, we are pro-fiber optic services to residential and business customers.

However, this is a wholesale change which may be used to help Verizon New York sell more cable services and meanwhile, POTS customers have been paying excess local phone charges for ‘massive deployment of fiber optics’ as as utility product.

Our experts concluded that over 50,000 people are in proposed network change area – and that makes this area in the Top 20 of cities, towns or municipalities in the New York State.

And this is also an ‘IP transition’ without any oversight, as compared to the requirements of the AT&T IP transition trials. In this case, the copper wire, (the utility wire, the PSTN wire) is now being disregarded for an IP service.

This should never have been allowed as a simple ‘network change’ notification as part of Section 251 but as a formal process, with data required from Verizon New York and the rights of customers and competitors to air their views with a full comments period and the right to question Verizon New York’s plans.

We call on the FCC to halt Verizon’s application and start immediate investigations as requested.