



May 3, 2023

Audience: Pole Attachers, Conduit Occupants

Subject: Verizon New York Inc. Pole and Conduit Investment

On May 2, 2023, Verizon filed at the New York Public Service Commission the attached letter regarding pole and conduit investment and associated ARMIS data filed at the Federal Communications Commission.

If you should have questions regarding this matter, please contact the Verizon License Administration Group (LAG) using the contact information available at the following link:

<https://www22.verizon.com/wholesale/contactus/poleconduit/Access-to-Poles-Conduits-Rights-Way.html>.



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May 2, 2023

Ms. Debra LaBelle, Director
Mr. Brian Ossias, Deputy Director
Office of Telecommunications
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 11223

Re: Verizon New York Inc. Pole and Conduit Investment

Dear Ms. LaBelle and Mr. Ossias:

I write on behalf of Verizon New York Inc. (“Verizon”) to advise you of Verizon’s filing of revised ARMIS data with the Federal Communications Commission (FCC). On April 28, Verizon filed with the FCC its 2022 ARMIS Report 43-01, which includes investment and other data for poles and conduits. At the same time, Verizon also filed revised ARMIS data for the years 2013 through 2021. Verizon revised its reports for those years because it determined that revisions were required, primarily related to the treatment of reimbursements for make-ready work. These revisions do not affect ARMIS data filed by Verizon for any year prior to 2013.

Verizon will also be filing a revised cost study in support of the pole attachment rates that it filed in Case 16-M-0330 on June 12, 2019,¹ and that became effective on August 1, 2019. The original study was based on 2018 ARMIS data that has been changed as a result of the refiling.

No conduit occupancy or pole attachment rate filings, other than the one made on June 12, 2019 for pole attachment rates, were affected by the revisions discussed above. Prior to the 2019 rate change, Verizon had not filed revised pole attachment rates since long before 2013. Its current conduit rates were put in place in 2002 as a result of rate orders entered in Case 98-C-1357, and thus they were also unaffected by the revisions. There is also no effect on the non-recurring make-ready charges set forth in Verizon’s updated Unit Cost Schedule that became effective in September 2022.

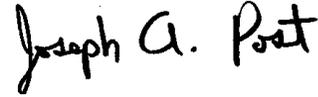
We would be happy to answer any questions that the Department might have concerning this matter.

¹ The June 12, 2019 cost study was refiled, with revisions, on June 20, 2019.

Ms. Debra LaBelle and Mr. Brian Ossias
May 2, 2023

A copy of this letter is being filed with the Secretary in Case 16-M-0330, and will also be made available to pole attachers and conduit occupants on Verizon's wholesale website.

Respectfully submitted,

A handwritten signature in black ink that reads "Joseph A. Post". The signature is written in a cursive style with a large, prominent "P" at the end.

Joseph A. Post