

VERIZON PENNSYLVANIA LLC
AND VERIZON NORTH LLC
STATEMENT NO. 4.0

VERIZON PENNSYLVANIA LLC AND
VERIZON NORTH LLC

V.

METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY
AND PENN POWER COMPANY

DOCKET NO. C-2020-3019347

VERIZON PENNSYLVANIA LLC
AND VERIZON NORTH LLC

STATEMENT NO. 4.0
(SURREBUTTAL TESTIMONY)

WITNESS: Thomas K. MacNabb

DATED: June 18, 2020

1 **I. INTRODUCTION**

2 **Q. Please state your name, title and business address.**

3 A. My name is Thomas K. MacNabb. I am Director – Business Operations Support in the
4 Wireline Network Operations organization at Verizon. My business address is One
5 Verizon Way, Basking Ridge, NJ 07920.

6 **Q. Did you submit direct testimony in this case?**

7 A. No.

8 **Q. On whose behalf are you submitting this surrebuttal testimony?**

9 A. I am submitting this surrebuttal testimony on behalf of Verizon Pennsylvania LLC
10 (“Verizon PA”) and Verizon North LLC (“Verizon North”) (together, “Verizon”).

11 **Q. What is the purpose of your surrebuttal testimony?**

12 A. The purpose of my surrebuttal testimony is to respond to allegations in the rebuttal
13 testimony submitted by Mr. Stephen F. Schafer, a witness for the Pennsylvania operating
14 subsidiaries of FirstEnergy Corp. known as Metropolitan Edison Company (“Met-Ed”),
15 Pennsylvania Electric Company (“Penelec”), and Pennsylvania Power Company (“Penn
16 Power”) (collectively, “FirstEnergy”), that Verizon does not properly inspect and
17 maintain its pole plant in Pennsylvania.

18 **Q. Are you sponsoring exhibits with your surrebuttal testimony?**

19 A. No.

20 **Q. Please describe your relevant education and professional background.**

21 A. I have a Bachelor of Arts (English) and a Bachelor of Science (Mechanical Engineering)
22 from Tufts University (1988), and a Master of Business Administration from Babson

1 College (1995). I have over 31 years of experience with Verizon, including assignments
2 as: Director of Field Operations, with responsibility for installation and maintenance of
3 fiber optic and copper based services; Director of Construction, with responsibilities for
4 building Verizon's copper and fiber-optic outside plant networks; and Director of Region
5 Operations Support, with responsibilities for business and financial planning,
6 performance assurance and field operations support. Earlier in my career, I had a
7 position of Outside Plant Engineer with direct responsibility for designing fiber optic and
8 copper networks and associated pole line and underground (manhole and conduit)
9 carrying plant. In my current position as Director of Business Operations Support, I am
10 the program director for Verizon's Enhanced Pole Inspection and Treatment Program.
11 These roles have given me direct knowledge of Verizon's and industry best practices for
12 safely deploying and maintaining joint use infrastructure, including utility poles and
13 utility pole attachments. I am familiar with and responsible for Verizon's pole inspection
14 and maintenance practices and programs throughout Verizon's wireline serving areas,
15 including Verizon's overlapping service territory with FirstEnergy.

16 **Q. Mr. Schafer says, "FirstEnergy also inspects Verizon's pole plant because Verizon**
17 **cannot be relied upon to properly inspect its own pole plant." Do you agree with his**
18 **statement?**

19 A. No. Verizon has robust pole inspection and maintenance procedures in place in
20 Pennsylvania that include ongoing inspections during work operations (for example,
21 during pole replacements, maintenance, and service installations), and an Enhanced
22 Inspection and Treatment Program that includes an inspection at least once every ten
23 years utilizing the most comprehensive inspection procedure in use across the industry

1 today, treatment of poles to extend their useful life and remediation or replacement of
2 poles as necessary.

3 I also take issue with Mr. Schafer's broad assertion that "FirstEnergy inspects Verizon's
4 pole plant...." I am not aware of any organized or programmatic approach by
5 FirstEnergy to inspect Verizon's poles, nor have I ever seen any evidence of regular
6 inspection results or reports from FirstEnergy. If what Mr. Schafer means to say is
7 FirstEnergy alerts Verizon to damaged poles that it has observed in the field during the
8 normal course of our joint use relationship, the same is true of Verizon when it comes to
9 issues with FirstEnergy's poles that Verizon identifies during normal field work.

10 **Q. Please describe the standards and procedures Verizon follows for its ongoing**
11 **inspections during normal work operations.**

12 A. Verizon's ongoing pole inspection process during work operations involves the following
13 standards and procedures. Before a pole can be accessed by climbing, ladder, or aerial
14 lift (such as a bucket truck), the pole must be tested using a variety of visual, sound, and
15 instrument tests. First, the Verizon employee or authorized contractor must perform a
16 visual pre-survey of the pole and surrounding area, including associated poles in that lead
17 or line. Next, the employee or authorized contractor must validate that the pole is set at
18 proper depth by verifying the pole brand, or "birthmark," confirming that it resembles a
19 "cat face" and is six feet or less above ground. After that, the employee or authorized
20 contractor is required to conduct a series of tests on the pole itself. These tests include:
21 (a) prod testing using a screwdriver with a shaft of five inches or longer and inserting the
22 tool into the pole at a 45 degree angle below ground line to identify if wood decay exists;
23 (b) sound testing by striking the pole with a hammer on all sides from the ground line as

1 high as can be reached to identify if wood decay exists; (c) hand-line testing on poles
2 where power is not attached by pulling a rope at right angles to the strand to test and
3 ensure the additional load from the work operation can be performed safely; and (d) pike
4 testing on poles where power is not attached by pushing the pole at right angles to the
5 strand to test and ensure the additional load from the work operation can be performed
6 safely. Poles that do not pass these tests must be tagged and escalated to a field
7 supervisor. All of this work follows guidelines and recommendations provided by the
8 National Electrical Safety Code (“NESC”) and Telcordia Blue Book Manual of
9 Construction Procedures.

10 **Q. Please describe Verizon’s Enhanced Inspection and Treatment Program.**

11 A. In 2018, Verizon implemented the Enhanced Pole Inspection and Treatment Program
12 across its ten-state footprint detailing standards for pole inspections, replacements, and
13 remediations throughout its pole network, including in Pennsylvania. Verizon’s
14 Enhanced Inspection and Treatment Program incorporates guidelines and
15 recommendations provided by the NESC, U.S. Department of Agriculture Rural Utilities
16 Services, and Telcordia Blue Book Manual of Construction Procedures with respect to
17 the inspection and treatment of utility poles. The Program’s inspections meet or exceed
18 industry standards regarding excavation below ground, boring, shell thickness testing,
19 and circumference testing as required to determine the remaining strength of a pole in
20 Verizon’s pole network. Verizon’s Enhanced Inspection and Treatment Program also
21 includes reinforcing poles when needed and replacing poles when necessary. Like
22 Verizon’s ongoing pole inspection program, it follows NESC-recommended criteria for
23 determining when a pole should be replaced or remediated because of deterioration,

1 decay, or any other safety or reliability concern. Based on the results of the inspections,
2 Verizon's Enhanced Inspection and Treatment Program provides for applicable pole
3 replacement, remedial treatment to interrupt degradation and extend the useful life of
4 utility poles, or other pole restoration effort, such as trussing.

5 **Q. How does Verizon perform the work required by the Enhanced Inspection and**
6 **Treatment Program?**

7 A. Verizon contracted with Osmose Utilities Services, Inc. ("Osmose") to perform the work
8 required by its Enhanced Inspection and Treatment Program. Osmose is an industry-
9 leading engineering firm that provides a variety of services to help pole owners increase
10 the safety, reliability, and resiliency of their pole network. I lead the management team
11 overseeing Osmose's work for Verizon's Enhanced Inspection and Treatment Program.

12 **Q. You mentioned the Enhanced Inspection and Treatment Program began in 2018.**
13 **What inspection and maintenance programs did Verizon have before then?**

14 A. Verizon's ongoing work inspections have been in place for decades. The Enhanced
15 Inspection and Treatment Program augmented those existing industry-standard protocols.

16 **Q. Have Verizon's ongoing work inspections or the Enhanced Inspection and**
17 **Treatment Program found anything to support Mr. Schafer's statement about**
18 **Verizon's care of its pole plant?**

19 A. No. Neither Verizon's ongoing work inspections nor the Enhanced Inspection and
20 Treatment Program has identified any systemic issues with Verizon's pole network in
21 Pennsylvania that would support the unsubstantiated allegations by FirstEnergy in these
22 proceedings.

1 **Q. Mr. Schafer also mentions a 2015 petition filed with the Commission by the**
2 **Communications Workers of America alleging issues with Verizon’s maintenance of**
3 **its pole plant. Does that petition change your assessment of Verizon’s inspection**
4 **and maintenance programs?**

5 A. No. Verizon disputed the petition’s allegations about its pole plant, but nonetheless
6 committed to additional operational, safety, and maintenance actions in an amicable
7 resolution of the proceeding.¹

8 **Q. Does this conclude your surrebuttal testimony?**

9 A. Yes, although I reserve the right to supplement my surrebuttal testimony should it
10 become necessary to do so.

¹ See Settlement Agreement, PaPUC Docket No. P-2015-2509336 (June 2, 2017), available at <http://www.puc.pa.gov/pcdocs/1523200.pdf>.