

March 21, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: Docket No. TO12020155
In the Matter of Verizon New Jersey, Inc.'s Alleged Failure to Comply with
Opportunity New Jersey Commitments

Dear Ms. Izzo,

The Board has received comments from a number of New Jersey municipalities in this matter. The League has reviewed those comments and takes the position espoused by its members. The New Jersey State League of Municipalities (League) opposes this proposed stipulation agreement because it runs contrary to Verizon New Jersey's (VNJ) obligations under Opportunity New Jersey (ONJ). Furthermore, we urge the Board to reject this proposed stipulation agreement and have Staff negotiate a new one. Ultimately, as the Borough of Bay Head states in its comments, "Verizon is not living up to its earlier pledge to make fiber optic service available to every home and business in the State."

The proposed stipulation agreement should not be adopted by the Board because VNJ has not complied with its ONJ commitments in the past and the proposed stipulation agreement would not fulfill them in the future. ONJ requires that VNJ provide fiber optic service (FIOS) to 100% of its service area by 2010. Weymouth Township states in its comments that "the township humbly requests that the Board ... require Verizon to give [our residents] what they were originally promised under the 1993 PAR-1 [order], which is full Broadband service utilizing the latest Verizon FIOS technology."

The proposed stipulation agreement defines “broadband” as:

“..any technology medium (including 4G-based wireless, fiber, copper, or cable), data transmission service at speeds no less than the minimum speeds of Verizon NJ’s Digital Subscriber Line Services (DSL) that is provided by Verizon New Jersey as of today’s date.”¹

The agreement further defines how VNJ will carry out its obligations through an Implementation of Broadband Request Process (IBRP). Under the IBRP, VNJ will provide “broadband” (as VNJ defines that term) to its service areas upon a “bona fide retail request” (BFRR). A BFRR occurs when there is: 1) in a census tract where there is currently no “broadband”; and 2) there are 35 single-line businesses or residential customers within that census tract; 3) who will each sign a contract for a least one year of service; and 4) have a \$100 deposit credited to their service. Upon a BFRR, VNJ will provide “broadband” service to those residents.

A number of municipalities have taken issue with the definition of “broadband” in the proposed stipulation agreement. ONJ requires VNJ to build out its broadband network to where it doesn’t exist. Under this definition VNJ would not have an obligation to build out its FIOS network to areas where there is currently 4G, copper line DSL, or cable service. Conversely, where these technologies do not exist, VNJ would have no obligation to build out FIOS.

These technologies are no substitute for FIOS. 4G is not equivalent to FIOS concerning both price and service quality. In its comments Pilesgrove Township states that “broadband access through mobile devices is not an acceptable solution; the speed and size of the internet service provided by cable or FIOS is far superior to anything available on mobile devices.” Verizon’s 4G data service for residential customers, HomeFusion, is costly. Initially, customers are required to purchase a \$200 antennae setup which must be installed in their homes.² Thereafter, data usage is capped. A customer who orders 15GB of data every month would be charged \$90.³ An additional charge of \$10 per GB would be assessed for any data used beyond that cap.⁴

Copper line DSL is also not equivalent to FIOS in these regards. As Alloway Township states in their comments, these wires are in disrepair and do not provide adequate service. Lower Alloways Creek Township states in its comments, “[the

¹ IN THE MATTER OF VERIZON NEW JERSEY, INC.’S ALLEGED FAILURE TO COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS, Docket No. TO12020155 (1/29/14), 3-4

² <http://usatoday30.usatoday.com/tech/news/story/2012-03-05/verizon-home-wireless-broadband/53378086/1>

³ <http://www.verizonwireless.com/b2c/homefusion/hf/main.do>

⁴ Id.

township] suffers from an inadequate and aging copper wire telephone communications infrastructure, that routinely fails during damp and wet weather, leaving residents with no means of land line communication.” Indeed, the genesis of the Board’s order to show cause in this case arose from complaints of poorly operating copper telephone lines during rain storms in Greenwich and Stowe Creek Townships.⁵ In some areas copper lines do not currently exist. As the Borough of Bay Head notes in its comments, there are not copper wire lines left in its town after Super Storm Sandy. Simply put, copper wire is no substitute for FIOS.

Lastly, the existence (or non-existence) of cable internet is of no legal significance in this matter. VNJ is a telecommunications provider that must fulfill its obligations under the Telecommunications Act of 1992 and this Board’s PAR-1 and PAR-2 orders.

Many of the municipalities that submitted comments are located in rural areas. The agri-businesses which are important to these municipalities need FIOS to compete in the 21st century. The State of New Jersey has made it a policy to promote agriculture and open spaces in the Garden State. Indeed, in passing the Agricultural Preserve Demonstration Program Act, the legislature declared that:

The preservation of agricultural open space and the retention of agricultural activities would serve the best interests of all citizens of this State by insuring numerous social, economic and environmental benefits which accrue from the continuation of agriculture in the garden state.⁶

These policies have, for the most part, been successful in retaining agricultural lands in many areas of the state. However, the success of this policy has been the reason that VNJ has not provided the broadband that it promised these rural areas under ONJ. While the more populated areas have benefited from FIOS, the rural areas have languished. The very nature of commercial agriculture requires that large tracts of land be sparsely populated. The agri-businesses which state policy has promoted would benefit greatly by having genuine broadband.

Hopewell Township submitted very poignant comments on this point:

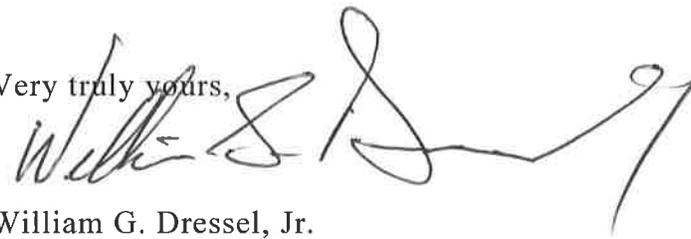
Without high speed internet, Hopewell citizens and particularly the *Hopewell Township Agri-business* community are unable to comply with Federal and State requirements calling for online submission of reports, tax returns, time sensitive financial filings and the like.

⁵ IN THE MATTER OF VERIZON NEW JERSEY, INC.’S ALLEGED FAILURE TO COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS, Docket No. TO12020155 (3/12/12)

⁶ N.J.S.A. 4:1B-2

In summation, New Jersey's municipalities want VNJ to provide FIOS to all areas within its service area. New Jersey's elected local officials want reasonably priced, reliable, high speed internet in order to promote the well being and economic development of their residents. The League urges the Board to reject this stipulation agreement and have VNJ and Staff develop a proposal in conformance with VNJ's Opportunity New Jersey Commitments.

Very truly yours,

A handwritten signature in black ink, appearing to read "William G. Dressel, Jr.", written in a cursive style.

William G. Dressel, Jr.
Executive Director

cc.

Mayor McKelvey, Alloway Township
Mayor Cimprich, Upper Pittsgrove Township
Mayor Hankins, Hopewell Township (Cumberland County)
Mayor Curtis, Borough of Bay Head
Mayor Hogan, Weymouth Township
Mayor Eachus, Pilesgrove Township
Mayor Bradway, Lower Alloways Creek Township
Stefanie Brand, Esq., Ratepayer Advocate
Barbara Stratton, Chairperson, Cumberland Co. Telecomm. Infra. Comm.
Mayor Brian Wahler, Piscataway Township

RAVENS HOPPE FOR BOYS 1901

N. ELIZABETH REAMSTER SCHOEL 1868

ALLOWAY TOWNSHIP AMBULANCE CORPS 1951

ALLOWAY TOWNSHIP FIRE COMPANY 1927

ALLOWAY TOWNSHIP ELEMENTARY SCHOOL 1929



ALLOWAY TOWNSHIP

P.O. BOX 425 / 49 SOUTH GREENWICH STREET
ALLOWAY, SALEM COUNTY, NEW JERSEY 08001-0425
www.AllowayTownship.com

Phone (856) 935-4080
Fax (856) 935-2993
Mary Lou Rutherford, *Clerk*

March 11, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: Docket No. TO12020155
In the Matter of Verizon New Jersey, Inc.'s Alleged Failure to
Comply with Opportunity New Jersey Commitments

Dear Ms. Izzo:

Alloway Township has reviewed the proposed Stipulation of Settlement in the above referenced matter and offers the following for the Board of Public Utilities consideration:

1. Alloway Township is a 36 square mile, rural municipality with a population of 3,467.
2. A letter was received in April 2005 from Verizon wherein it announced: "an upgrade to its existing telecommunications infrastructure...to replace the existing copper wire network with a fiber optic network. This upgrade...will bring crystal-clear voice and high-speed data directly to residence and small business customers." (See Attachment "A")
3. In 2007 Alloway Township made Verizon aware of numerous complaints from residents regarding poor telephone service, i.e. loud static, crackling and buzzing noises in the line, which was exacerbated by any amount of precipitation, usually degrading the service to the point of uselessness. (See Attachment "B")
4. Correspondence was received from Verizon in 2007 wherein names and telephone numbers of residents were requested to identify the locations experiencing service degradation. (See Attachment "C") Considering the square mileage of the municipality as noted above, this service degradation is widespread.
5. With residents' complaints persisting, in 2009 Alloway Township contacted the Board of Public Utilities seeking assistance in resolving this serious, long-standing communication problem which Verizon has failed to adequately address. (See Attachments "D" and "E")
6. In 2012 Alloway Township yet again contacted Verizon regarding the same continuing complaints. (See Attachment "F")

Alloway Township has limited cable service, as only a few areas meet the density requirement of 25 or more dwellings per linear mile. This, coupled with Verizon's failure to upgrade the telephone lines within the Township, leaves many residents with no access to broadband capabilities. This is simply unacceptable.

JOHN HARRISON HOUSE 1721

LEWIS ALLOWAY'S GREEN TOWNSHIP HOUSE WITH SHED 1720

ALLOWAY TOWN 1700

HEWLETT BROTHERS SHIPYARD 1800-1809

JOHN H. FRANK CARBON FACTORY 1871

New Jersey Board of Public Utilities

Kristi Izzo, Secretary

Re: Verizon New Jersey, Docket No. TO12020155

March 11, 2014

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Verizon first notified the Township of its plans to upgrade to fiber optic in 2005. Despite Verizon's rate increases, nine years later there is still no FIOS and many Alloway Township residents are still without reliable, affordable means of communication services.

I implore the Board of Public Utilities to ensure that Verizon fulfills its responsibility to its customers and our residents by upgrading its network in Alloway Township with fiber optic service.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Ed McKelvey". The signature is written in a cursive style with a long horizontal stroke extending to the left.

P. Ed McKelvey, Mayor
Alloway Township

Attachments (A-F)

Cc: John G. Hoffman, Alloway Twp. Solicitor (w/att.) via email
Edward W. Purcell, Esquire, NJSLOM (w/att.) via email

Peter J. Ventimiglia
Vice President - External Affairs
Verizon New Jersey Inc.



540 Broad Street, Floor 20
Newark, New Jersey 07102

April 26, 2005

The Honorable Joseph G Fedora
Mayor of Alloway Township
P. O. Box 425
Alloway, NJ 08001-0425

Dear Mayor Fedora:

Perhaps you were present at the luncheon at the Conference of Mayors Meeting in Atlantic City on Friday, April 15? If you were, you were witness to remarks by cable lobbyist, Karen Alexander, that were couched as a "legislative alert" in which Verizon was accused of subverting "home rule" by seeking legislation to obtain territory-wide video franchising that would deny municipalities the opportunity to negotiate with Verizon as it "plans to roll out video services in municipalities around the state."

Nothing could be farther from the truth.

Or perhaps you've received a package of "information" from your local cable franchisee that purports to represent the "facts" regarding Verizon's plans to upgrade its network. The package contains sample letters for you to send to your legislators and the Board of Public Utilities to demand that Verizon be required to stop the upgrade because its proposed upgrade violates franchising requirements.

This package of information is riddled with inaccuracies and untruths.

The fact is that Verizon New Jersey has announced an upgrade to its existing telecommunications infrastructure in more than 70 municipalities as the first phase of its plans to replace the existing copper wire network with a fiber optic network in those parts of the state where we now offer telephone services. We have longstanding rights of way authority in municipalities around the state that permit us to provide voice and data communications and it is these franchises that we invoke as we are upgrading our own network. This upgrade to our network will bring crystal-clear voice and high-speed data directly to residence and small business customers. Though this network also will permit Verizon to provide video services eventually, we will not be "turning up" that capability until we've secured the appropriate franchise agreements to do so.

ATTACHMENT A

At present the only route to obtaining these agreements is to negotiate with the more than 526 municipalities served in whole or part by our network. If necessary, that's the route we will take, even if it means prolonging the arrival of a host of new services to consumers because of the lengthy process associated with seeking franchise agreements one municipality at a time.

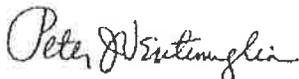
One alternative to that lengthy process that would hasten the delivery of 21st century telecommunications innovations to New Jersey consumers would be to seek approval of legislation for territory-wide franchising rights. Similar franchises already exist in other states and are expediting the delivery of next-generation technologies to families and businesses eager for the opportunities that super-fast broadband and fiber-based television bring. In the event that the legislative alternative were selected, however, we would ensure that municipalities receive fair compensation—at or greater than the amount they now receive from our competitors in the cable industry. But it is much too soon to be discussing the elements of what would be a complex piece of legislation.

I simply wanted to put you at ease that there has never been any intent on the part of Verizon to circumvent the appropriate municipal processes in this state. What you heard from Ms. Alexander—and what is represented as fact in those communications from the cable industry—are the rantings of a competitor that prefers to keep its monopoly intact.

I've taken the liberty of attaching the names, areas of responsibility and reach numbers for the Verizon New Jersey External Affairs directors around the state. Or, if you prefer, you can go to the Verizon New Jersey website at www.verizon.com/nj for information about our plans. Please do not hesitate to use these resources for information or questions on this matter. We would prefer you ask us about Verizon's plans instead of listening to those who would misrepresent our actions and intentions for their own gain.

Many thanks for all you do on behalf of the citizens of our state.

Sincerely,



Peter J. Ventimiglia
Attachment



ALLOWAY TOWNSHIP

P.O. BOX 425 / 49 SOUTH GREENWICH STREET
ALLOWAY, SALEM COUNTY, NEW JERSEY 08001-0425

Phone (856) 935-4080
Fax (856) 935-2993

Mary Lou Rutherford, *Clerk*

CERTIFIED MAIL #7006 0100 00043068 0164
RETURN RECEIPT REQUESTED

February 8, 2007

Dennis Bone, President
Verizon New Jersey
540 Broad Street
Newark, NJ 07102

Dear Mr. Bone:

I am the Mayor of Alloway Township, a small rural community in Salem County, and am sending this letter to request your help. The Alloway Township Committee has been contacted by several residents who complain about their land-line telephone service. The resounding complaint is that they frequently are without telephone service, particularly in times of rain. The phone lines either crackle so much as to render them unusable, or there is no telephone service at all. Residents have stated that they have been without telephone service for days – even up to a week!! This problem is experienced throughout the township, not in just one area. Many of the residents have been told by repairmen that the problems are in large part due to the age and deterioration of the telephone lines. Does Verizon have a plan to replace these old and deteriorated lines?

As the Mayor of Alloway, and as a member of the Township Committee, I am greatly concerned about this problem. Being without telephone service is more than just a nuisance. When residents are without their telephone service, they have no way to summon help in times of emergencies. Cell phone service is extremely spotty in our rural township, so this is not a reliable back up; rendering our residents, and your customers, helpless in times of emergency.

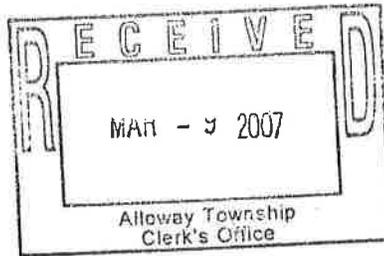
Needless to say, this is a serious public safety matter which must be addressed.

I respectfully request your response, in writing, detailing Verizon's action plan to remedy this serious problem. I will await your reply. Thank you for your cooperation.

Sincerely,

Joseph G. Fedora
Mayor

Dennis M. Bone
President
Verizon New Jersey Inc.



540 Broad Street, Floor 20
Newark, NJ 07101

Phone 973 649-2424
Fax 973 481-2660
dennis.m.bone@verizon.com

March 5, 2007

Mayor Joseph G. Fedora
Alloway Township
P.O. Box 425
49 South Greenwich Street
Alloway, New Jersey 08001-0425

Dear Mayor Fedora,

Thank you for your letter concerning Alloway Township residents' telephone service. I assure you that Verizon is working diligently to identify and address the service problems described in your letter.

The local Verizon maintenance supervisor responsible for your area, James McGowan, has had discussions with the Alloway Township Clerk, Mary Lou Rutherford, in an attempt to identify the customer locations in the Township experiencing service degradation. We are also searching through repair records to further identify where there may be specific problems with our facilities. Identifying the telephone numbers or customer names referenced in your letter would greatly expedite this process, as Alloway Township covers quite a large geographical area. Once we are able to identify defective facilities, we will formalize a corrective action plan to remedy the situation.

Again, thank you for bringing this issue to our attention. Nancy Matt of my Staff will contact you once we have identified the cause of the service issues. If you obtain any information concerning the telephone numbers experiencing the service problems, or have any questions, please feel free to contact her. She can be reached on 973-649-4422.

Sincerely,

cc: Nancy Matt
James McGowan

ATTACHMENT C

RANCH HILLS FIRE DEPT. 1984

AL. ELIZABETH HEADSTEEH SCHOOL 1986

ALLOWAY TOWNSHIP AMBULANCE CORPUS 1984

ALLOWAY TOWNSHIP FIRE COMPANY 1927

ALLOWAY TOWNSHIP ELEMENTARY SCHOOL 1925



ALLOWAY TOWNSHIP

P.O. BOX 425 / 49 SOUTH GREENWICH STREET
ALLOWAY, SALEM COUNTY, NEW JERSEY 08001-0425

Phone (856) 935-4080
Fax (856) 935-2993
Mary Lou Rutherford, Clerk

JOHN DAVENSON HOUSE 1761

UPPER ALLOWAYS CREEK TOWNSHIP formed with 30,000 acres 1760

ALLOWAY TAVERN 1790

REVER BROTHERS SERRVARD 1800 - 1880

JOHN H. DAVIS TOWN OF TOWNSHIP 1821

Via fax # 973-648-2836 and certified mail, return receipt requested

January 28, 2009

New Jersey Board of Public Utilities
Division of Customer Assistance
2 Gateway Center, 8th Floor
Newark, NJ 07102

Re: Verizon Telephone Service to Alloway Residents

To Whom It May Concern:

Residents of the Township of Alloway have been experiencing difficulty in resolving Verizon land-line telephone service problems. As you can see from the Township's initial letter (copy enclosed) sent to Verizon President Dennis Bone in 2007, we've been trying to remedy this problem for some time. A reply letter was received (copy enclosed) from Mr. Bone, and Nancy Matt and James McGowan of his staff did contact our Municipal Clerk, Mary Lou Rutherford, to further identify the problem. Residents advised that Verizon did send out repair trucks, and that for a while their telephone service was better, only to worsen again with any kind of precipitation. Our residents continue to experience telephone outages, or if they do have service, loud static and buzzing noises on their telephones which renders them useless.

Several complaints were received again from residents in October 2008. Municipal Clerk Rutherford conveyed the names, addresses and telephone numbers of those residents to Nancy Matt who assured that service jobs were scheduled in that area. Those same residents and others continue to complain of service problems. Residents state that they have been told by Verizon repair persons that the problems are due to the fact that the telephone lines are old and need to be replaced. The Township Committee requested that Verizon send a representative to its November 20, 2008 Township Committee meeting to discuss these problems in person. The Clerk contacted Nancy Matt with this request and was told that an area representative would be in touch. The area representative, Jennifer Young advised the Clerk by telephone that she did not know if she would be able to attend the meeting. No representative from Verizon attended the meeting as requested.

Residents continue to complain about their telephone service throughout the Township. Due to the rural nature of Alloway, telephone service is a critical necessity.

Cell phone service is spotty at best in the township, so without a land-line telephone, in the event of an emergency our residents have no means of summoning help.

This is a matter of public health and safety. Whatever assistance you can offer in helping the Township to resolve this serious communication problem would be greatly appreciated.

Sincerely,



Edwin P. Masker
Mayor

Encs.

Cc: Dennis M. Bone, President, Verizon (via fax number 973-481-2660 and certified mail, return receipt requested)



State of New Jersey
BOARD OF PUBLIC UTILITIES
TWO GATEWAY CENTER
NEWARK, NJ 07102



Jeanne M. Fox
President

Anthony Centrella
Director
Tel: (973) 648-7865
Fax: (973) 624-9453

February 25, 2009

The Honorable Edwin Masker
Mayor of Alloway Township
P.O. Box 425/49 South Greenwich Street
Alloway, New Jersey 08001-0425

Dear Mayor Masker:

Thank you for bringing to the attention of the Board of Public Utilities, the service difficulties that have concerned the people of your township. Your concern was forwarded to Verizon who in response has assigned one of their managers, Jim McGowan, to be in charge of service improvement projects in your township. We understand that Mr. McGowan has been in touch with Ms. Rutherford of your office in this regard.

Should you have any additional concerns, or any future problems which are not resolved by Verizon, please contact Bruce Gallagher of my staff at (973) 648-7994.

Sincerely,

Anthony Centrella, Director
Division of Telecommunications

AC/BG/sm

ATTACHMENT E

Mary Lou Rutherford

From: "Mary Lou Rutherford" <allowayclerk@comcast.net>
To: <dennis.m.bone@one.verizon.com>; <dennis.m.bone@verizon.com>
Cc: <ulises.e.diaz@one.verizon.com>
Sent: Wednesday, April 25, 2012 4:23 PM
Subject: Alloway Township - Poor land-line telephone service

Dear Mr. Bone:

On behalf of the Alloway Township Committee, I am writing to you regarding the continuing complaints regarding poor land-line telephone service in Alloway Township. Our correspondence with Verizon dates back to 2007 regarding the same problems. In 2009 I wrote to the Board of Public Utilities regarding these service difficulties. As I have stated in my letters, due to the rural nature of Alloway, reliable telephone service is a matter of health and safety to our residents. At our most recent meeting on April 19, 2012, a resident of Remsterville Road advised that he and his neighbors still experience loud buzzing, crackling noises in the lines making them unusable. When will these lines be replaced? What are Verizon's plans for upgrade to the telephone lines in Alloway Township?

The courtesy of a detailed response to this serious matter will be greatly appreciated.

Sincerely,
Joseph G. Fedora, Mayor
Alloway Township



BOROUGH OF BAY HEAD

MAYOR WILLIAM W. CURTIS

March 19, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue
P. O. Box 350
Trenton, New Jersey 08625-0350

Re: In the Matter of Verizon New Jersey Inc's Alleged Failure
To Comply With Opportunity New Jersey Commitments
Docket No. T012020155

Dear Ms. Izzo:

Since Super Storm Sandy wiped out copper wire lines through a good portion of the town of Bay Head, NJ, one of the Barrier Island towns in Ocean County stretching from Point Pleasant Beach to Island Beach State Park, we had expected that, at the very least, what was destroyed would be replaced in kind.

Instead we have been repeatedly told that this was not going to happen and residents and businesses of Bay Head affected by this loss would be switched over to Voice Link.

This is not acceptable by any stretch. It adversely affects every household and business and our children. Verizon is not living up to its earlier pledge to make fiber optic service available to every home and business in the State.

The Borough of Bay Head respectfully requests the Board of Public Utilities to mandate Verizon to deploy the most modern technology available to our residents and businesses as they do elsewhere.

Sincerely,

William W. Curtis
Mayor, Borough of Bay Head

cc: Congressman Christopher Smith
Senator James Holzapfel
Assemblyman McGuckin & Wolfe
Borough Council
New Jersey State League of Municipalities

HOPEWELL TOWNSHIP

856-455-1230 : Fax 455-3080

590 Shiloh Pike, Bridgeton, N.J. 08302

February 19, 2014

Via Regular Mail & E-mail
board.secretary@bpu.state.nj.us

New Jersey Bd. of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Fl.
Post Office Box 350
Trenton NJ 08625-0350

RE: IN THE MATTER OF VERIZON NEW JERSEY, INC.'S ALLEGED FAILURE TO
COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS
DOCKET NO.: T012020155

Dear Ms. Izzo:

We ask that the Board please consider the following comments of Hopewell Township in Cumberland County to the proposed Stipulation of Agreement between Board Staff and Verizon New Jersey relating to alternate plan for regulation ("PAR-2") and Verizon's compliance with Opportunity New Jersey ("ONJ").

In the Stipulation of Settlement, Verizon proposes, under the "BFRR" process, to make broadband service available to

"A minimum of thirty-five (35) single-line or business or residential customers (in any combination) located in a Census Tract..."

Hopewell Township in Cumberland County is a mostly rural community with a large amount of preserved open space, a large Agri-business farming community, a relatively compact residential area bordering the City of Bridgeton and a business corridor, along State Highway 49, between the City of Bridgeton and Shiloh Borough.

Hopewell Township shares a Census Tract with neighboring Shiloh Borough. The population of Shiloh Borough is approximately 500 individuals which Shiloh has roughly 10 businesses. The population of Hopewell Township in Cumberland County is roughly 4600 individuals plus roughly 300 businesses of which 192 are farms engaged in Agri-business. Agriculture is Hopewell's core business sector. It provides sustenance that every resident of our state needs to survive.

Information recently assembled by Hopewell Township's Economic Development Committee indicates that only 30 percent of Hopewell non-farm businesses and only 20 percent of Hopewell Agri-business farms presently have broadband service. Meanwhile, only 40 percent of Hopewell households have broadband service.

HOPEWELL TOWNSHIP

New Jersey Board of Public Utilities

February 19, 2014

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The proposed Verizon extension of broadband service to a minimum of only 35 single line customers in the entire Hopewell-Shiloh Census Tract, amounts to less than a drop in the bucket.

Without high speed internet, Hopewell citizens and particularly the Hopewell Township Agri-business community are unable to comply with Federal and State requirements calling for online submission of reports, tax returns, time sensitive financial filings and the like.

A majority of Hopewell households, including the children living in those homes, are being deprived the same opportunities afforded to most other New Jersey children because of the present unavailability of broadband internet access.

Hopewell Township is, in effect, being penalized because it has taken appropriate measures to insure that urban sprawl never engulfs our township.

Under PAR-1, the citizens and elected officials of Hopewell Township expected to have broadband service throughout the Township by the end of 2010. Obviously, this has not occurred and Verizon doesn't seem to be anxious to fulfill its earlier pledge to make fiber optic service available to every home and business in the State.

It is imperative to the academic and economic competitiveness of Hopewell's children, Hopewell's households and Hopewell's Agri-business farms that Verizon be required to promptly implement full deployment of broadband service throughout Hopewell Township.

Hopewell Township in Cumberland County respectfully requests relief through the Board of Public Utilities to address the needs of our community by mandating deployment of modern technology to the residents and businesses of Hopewell Township who are doing their part to maintain open space and to provide food for the other residents of this state.

Cordially,



BRUCE R. HANKINS

Mayor, Hopewell Township

BRH:mdy

cc: Will Daddario, Clerk
Barb Stratton
Senator Jeff Van Drew
New Jersey State League of Municipalities
Attn: Edward W. Purcell, Associate Legal Counsel
Salmon Ventures

HOPEWELL TOWNSHIP

856-455-1230 : Fax 455-3080

590 Shiloh Pike, Bridgeton, N.J. 08302

March 21, 2014

Via Regular Mail & E-mail
board.secretary@bpu.state.nj.us

New Jersey Bd. of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Fl.
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RE: IN THE MATTER OF VERIZON NEW JERSEY, INC.'S ALLEGED FAILURE TO
COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS
DOCKET NO.: T012020155

Dear Ms. Izzo:

This follows up a meeting with Verizon representatives, convened by Senator VanDrew, in Millville, New Jersey, on March 6, 2014. I am also supplementing my letter to you dated February 19, 2014.

The Hopewell Township (Cumberland County) Committee has met again and discussed the terms of the proposed BPU Stipulation of Settlement.

Hopewell Township now understands that 35 or more single line business or residential customers, located anywhere in Hopewell Township, and not presently served with broadband, and who have no access to 4G based wireless would be provided with service, under the Stipulation. Each new customer must agree to sign a Contract for one year service and pay a \$100.00 deposit to be credited towards their service.

There is no doubt that Hopewell Township could satisfy the "BFRR" minimum of 35 or more new Hopewell Township customers.

One of the Hopewell Township Committee's ongoing concerns is the cost, to Township residents, if the new Hopewell customers are provided their service by 4G based wireless instead of FIOS, since the Township understands that 4G is much more expensive than FIOS.

Hopewell Township is bordered by the City of Bridgeton on the East, Upper Deerfield Township in the North and Northeast, Stow Creek Township on the West and Northwest, and Greenwich Township on the Southwest.

Stow Creek and Greenwich are now close to being completely wired with Verizon fiber optic wire.

Upper Deerfield is already completely covered (by another service provider) with wire based broadband infrastructure, as is the entire City of Bridgeton.

New Jersey Bd. of Public Utilities
Kristi Izzo, Secretary
March 20, 2014
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Therein lies the dilemma. The farms, businesses and school students in the municipalities on Hopewell's borders presently have a distinct competitive advantage over those located in Hopewell Township.

Meanwhile, Hopewell Township's successful commitment to farmland preservation is resulting in an unintended penalty for being good stewards. Because of farmland preservation, Hopewell will never have the population density to cost-justify telecommunications infrastructure buildout. Nearly 75 percent of the Township is zoned for agricultural use. Of that, 32 percent has already been enrolled in permanent Farmland Preservation and more farms are in the pipeline.

Municipalities, such as Hopewell Township, that accord a high priority to farmland and open space preservation, should receive some *quid pro quo* consideration built into every state/service provider agreement affecting deployment of current technologies. Otherwise, the State will inadvertently subvert the public's significant investment in farmland and open space preservation, by not insuring that farm businesses remain viable over the long term. Hopewell farmers must have the ability to compete locally with the farmers in Greenwich, Stow Creek and Upper Deerfield Townships, all of whom have broadband wire service available at pricing much more favorable than 4G based wireless.

Accordingly, the Hopewell Township Committee is requesting that Verizon be ordered, by the Board of Public Utilities, to provide fiber optic wire service to all of Hopewell Township in the same manner that Verizon has recently wired our next door neighbors in Stow Creek and Greenwich Townships. It is only in this way that Hopewell Township businesses, farmers and students can compete with their peers on level economic and academic playing fields.

Cordially,



BRUCE R. HANKINS
Mayor, Hopewell Township

cc: Eugene Daddario, Clerk
Committeeman Greg Facemyer
Senator Jeff VanDrew
Robert G. Brewer, County Planner
Barbara Stratton, Rural Infrastructure Committee
Eugene Purcell, NJ League of Municipalities
Christopher Smith, Esq., Office of Rate Counsel
Jennifer Young, Verizon

LOWER ALLOWAYS CREEK TOWNSHIP
PO BOX 157
501 LOCUST ISLAND ROAD
HANCOCK'S BRIDGE, NEW JERSEY 08038
(856) 935-1549 ext #623 (856) 935-7666 Fax
clerk@lowerallowayscreek-nj.gov

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

Re: IN THE MATTER OF VERIZON NEW JERSEY, INC.'s ALLEGED FAILURE TO
COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS
DOCKET NO. T012020155

Dear Ms. Izzo,

We asked that the Board please consider the following comments of the Lower Alloways Creek Township Committee, Salem County to the proposed Stipulation of Agreement between Board Staff and Verizon New Jersey relating to alternate plan for regulation ("PAR-2") and Verizon's compliance with Opportunity New Jersey ("ONJ") and the proposal to make broadband services available to areas with "A minimum of 35 (thirty-five) single-line customers located in a given "census tract".

WHEREAS, the Township of Lower Alloways Creek suffers from an inadequate and aging copper wire telephone communications infrastructure, that routinely fails during damp and wet weather, leaving residents with no means of land line communication; and,

WHEREAS, the Township of Lower Alloways Creek suffers from fair to no cellular phone service, and whereas the population density of the Township of Lower Alloways Creek does not meet the criteria set forth in the stipulation of settlement for additional improvements by Verizon to address these matters; and

WHEREAS, in addition to telephone voice land line communication problems, one third of the Township or approximately 600 residents have no opportunity for broadband internet service as the copper wiring is inadequate to support such communications, depriving the school aged children in this area the opportunities others have, who happen to live on a street with enough homes to be granted those services; and

WHEREAS, the Township of Lower Alloways creek lies entirely within the 10 mile Emergency Management Zone of the Salem and Hope Creek Nuclear Power Plants making communication with residents and other agencies critical; and,

WHEREAS, residents of the Township of Lower Alloways Creek as well as the Office of Emergency Management and Public Safety Departments of the Township suffer from the inadequate and aging copper telecommunications provided by Verizon, making reverse 911 and global connect routinely fail during inclement weather and emergencies when getting information to residents is essential.

THEREFORE BE IT RESOLVED by the Township Committee of the Township of Lower Alloways Creek that it hereby does vehemently object to this proposed stipulation of settlement between Verizon and the BPU regarding additional changes and another scaled back compromise to Verizon's compliance with Opportunity New Jersey ("ONJ").

Sincerely,

Mayor, Timothy W. Bradway

Cc: Committee

March 5, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: Docket No. TO12020155
In the Matter of Verizon New Jersey, Inc.'s Alleged Failure to Comply with
Opportunity New Jersey Commitments

Dear Ms. Izzo:

Pilesgrove Township has reviewed the information provided by the Board of Public Utilities on this topic. As a rural municipality, Pilesgrove Township residents have limited internet access, and as you can imagine, the slow speed of telephone dial up service is problematic. Verizon FIOS is not available in any part of Pilesgrove Township. In this age of extensive internet usage by our population, particularly the student population, any expansion or enhancement to those services is a necessity. Broadband access through mobile devices is not an acceptable solution; the speed and size of the internet service provided by cable or FIOS is far superior to anything available on a mobile device.

It is in the best interests of Pilesgrove residents that Verizon provide fiber optic service to the municipality.

Sincerely,

Kevin Eachus, Mayor

CC: John G. Hoffman, Esq.
Edward W. Purcell, Esq., NJSLOM

UPPER PITTSBORO TOWNSHIP

Jack Cimprich, Mayor

PO BOX 786
Elmer, N.J. 08318

email: Cimprichj@aol.com

Phone: (856) 358-2763

Fax: (856) 358-8773

March 12, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 So. Clinton Ave., 9th fl.
PO Box 350
Trenton, NJ 08625-0350

RE: VERIZON'S FAILURE TO PROVIDE FIOS

Dear Ms. Izzo:

As Mayor of Upper Pittsgrove Township in Salem County, I am deeply concerned about Verizon's unwillingness to provide high-speed, cost-effective phone and internet service to our residents and businesses. As a retired professor of Computer Science at Rowan University I understand the value and the necessity of quality communication technology.

It is my understanding that Verizon, in return for receiving a state-wide franchise to provide telephone and internet services, has an obligation to all townships in the state. Just as every home in New Jersey had been provided with electrical and phone connections in the last century, it is critical that today these homes be provided with cable or FIOS. Today, government forms, school assignments, family entertainment all require decent internet access. It is no longer a luxury but a necessity.

I ask the Board of Public Utilities to ensure that Verizon meets its obligations to all of its customers and residents in New Jersey and, in particular, here in Upper Pittsgrove Township.

Sincerely,

Jack Cimprich, Mayor

cc John Hoffman, Upper Pittsgrove Township Solicitor (via email)
Edward W. Purcell, Esquire, NJSLOM (via email)