

**STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION**

**DT-20-111**

**Petition For Resolution of Dispute and Declaratory Ruling of  
Comcast of Maine/ New Hampshire, Inc.**

**CONSOLIDATED'S RESPONSES TO SET 1 DISCOVERY  
REQUESTS OF COMMISSION STAFF**

**August 28, 2020**

**I. Consolidated's General Objections**

1. Consolidated has attempted to identify every data request that seeks information and/or documents protected against discovery by the attorney-client privilege or the attorney work-product doctrine or any other applicable privilege. To the extent that any specific data request is intended to elicit such privileged information and/or documents, Consolidated objects and asserts the applicable privilege to the fullest extent permitted by law.

2. To the extent that Consolidated responds to these data requests, Consolidated does not concede the relevancy of the responses or documents to this action, nor does Consolidated concede that such responses or documents may be used for any purpose in this or any other actions, lawsuit or proceeding. Consolidated expressly reserves the right to object to further discovery into the subject matter of any of the responses or any portion thereof.

3. Consolidated objects to each data request to the extent that it seeks information and/or documents equally available to the requester as to Consolidated or that are not within Consolidated's possession, custody or control.

4. Consolidated objects to data requests that solicit information and/or documents that Consolidated has already made available to the requester in this docket.

5. Consolidated reserves the right to object that any data requests, in the aggregate, are overly burdensome and exceed reasonable limits of discovery.

6. Consolidated has attempted to respond to each data request based on the instructions and definitions provided. However, Consolidated reserves the right to object to such definitions and instructions to the extent that there are differences in them among the requesters.

7. Consolidated objects to the extent that the instructions and/or definitions seek to impose burdens on Consolidated that are greater than those imposed by applicable portions of N.H. Admin. Rules Part Puc 200, that impose undue burdens on Consolidated, and/or that have the effect of making the data requests overbroad. Consolidated will make a good faith effort to provide information responsive to the data requests subject to this objection, but Consolidated specifically objects to providing, among other things, drafts of documents, identical copies of documents, non-identical copies of documents that contain handwritten notes, and descriptions of responsive documents that once existed but cannot be produced due to loss or destruction.

8. Consolidated objects to all data requests to the extent they seek information that is proprietary, competitively and/or commercially sensitive, and subject to confidential treatment. Subject to specific instances where Consolidated considers information responsive to a particular data request to be highly proprietary and extraordinarily competitively and/or commercially sensitive, Consolidated will produce the requested information pursuant to a duly executed protective agreement.

## II. Consolidated's Specific Responses

<b>Respondent:</b> Glen Fournier <b>Title:</b> LAG Specialist
<b>Data Request:</b> Staff 1-1
<b>Date:</b> August 27, 2020
<b>Item:</b>  1-1 Please provide copies of the Telcordia Blue Book pages specifying how (a) riser conduit with inserted cable, and (b) riser u-guard or similar protective devices are to be attached to a pole.
<b>Reply:</b> Please see Attachment Staff 1-1.

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<b>Respondent:</b> Glen Fournier <b>Title:</b> LAG Specialist
<b>Data Request:</b> Staff 1-2
<b>Date:</b> August 27, 2020
<b>Item:</b> Please provide copies of all related Telcordia Blue Book references to size and type of such fasteners, including any requirement to use "through-bolts."
<b>Reply:</b> Please see Attachment 1-2.

<b>Respondent:</b> Glen Fournier <b>Title:</b> LAG Specialist
<b>Data Request:</b> Staff 1-3
<b>Date:</b> August 27, 2020
<b>Item:</b> Please provide a copy of the written policy with respect to conduit installed between Consolidated assets on which Glen Fournier relied as the basis for his email to Comcast dated October 30, 2019.
<b>Reply:</b>  The policy is as follows: CCI will only allow one point of access from our asset to a third party asset. Consistent with the rule, CCI will also not allow a second access point to an existing third party asset which already has access to a CCI asset. If the third party has a pull box/manhole they need service to then an additional conduit would come from either the pole or the manhole, but not both, and only that additional conduit may be placed by the third party.  There is no formal written document that Consolidated can find that states this policy although Consolidated believes this policy has been enforced since Verizon owned the Northern New England Operations. Please refer to Consolidated's response to Comcast 1-2.

Attach Staff 1-1

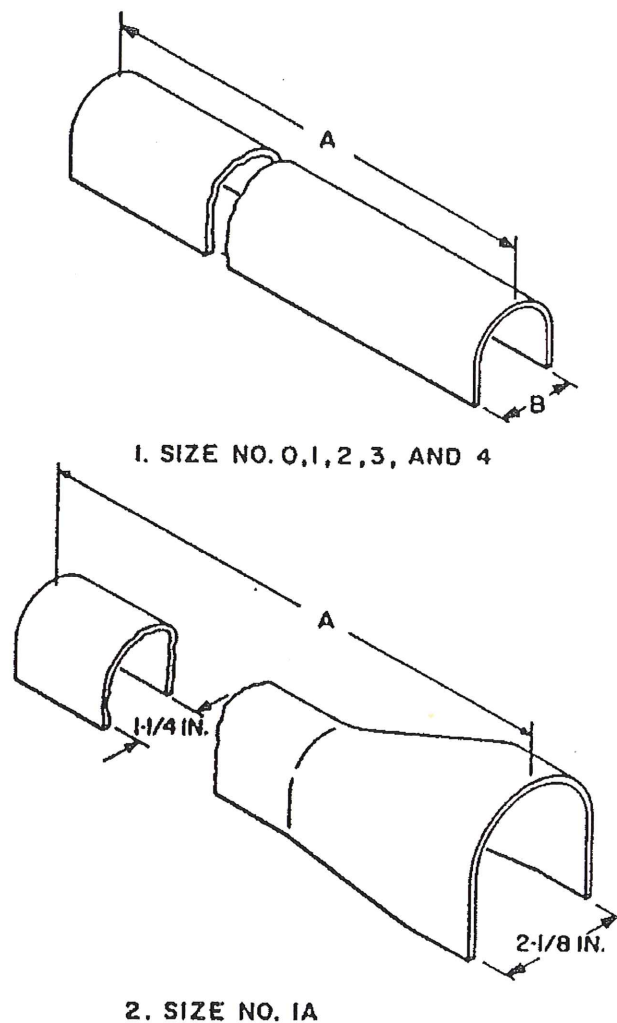
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## 25 Placing Cable Guards at Subsidiary Conduit Locations

When cable is placed in telephone-company-owned conduit or licensee-owned conduit and is run on telephone-company-owned poles or run on building walls, U-type cable guards and cast iron or G plastic caps are used to provide mechanical protection for the cable. Refer to Figure 25-1 and Table 25-1 for information concerning U cable guards. The relationship among conduit sizes, cast iron or G plastic caps, U cable guards, and cable sizes is shown in Table 25-2.

Figure 25-1 Cable Guard

**NOTE:** For A and B dimensions, see Table 25-1.



**NOTE:** For A and B dimensions, see Table 21-1.



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**Table 25-1** U Cable Guards, Straps, and Material Required for Installing U Cable Guards

Size No.	Length A (Feet)	Inside Diameter B (Inch)	U Cable Guard Strap Size No.	Drive Screw for Use on Poles (Inch)	Hammer Drive Anchor for Use on Solid Masonry (Inch)	Toggle Bolts for Use on Hollow Masonry (Inch)
0 [Note 1]	5 or 8	3/4	0	1/4 x 2-1/2	1/4 x 1	1/4 x 4
1 [Note 1]	5 or 8	1-1/8	1	1/4 x 2-1/2	1/4 x 1	1/4 x 4
1A	5 or 8	1-1/4	1A	1/4 x 2-1/2	1/4 x 1-1/4	1/4 x 4
2	5 or 8	2-3/16	2	1/4 x 2-1/2	1/4 x 1-1/4	1/4 x 4
3	5 or 8	3-3/16	3	5/16 x 3	5/16 x 1-1/4	1/4 x 4
4	8	3-11/16	4	5/16 x 3	5/16 x 1-1/4	1/4 x 4

**NOTE:** [1] Sizes 0 and 1 cannot be used with cast iron or G plastic caps.

**Table 25-2** Case Iron Caps, G Plastic Caps, U Cable Guard Sizes, and Cable Diameters

Cap Size [Note 1]		Used With	Cable Diameter Up To And Including
Cast Iron	G Plastic		
2 x 2 inch		2-inch Conduit and No. 1A U Guard 2-inch Conduit and No. 2 U Guard	1-1/8-inch 1-5/8-inch
2 x 3-1/2 inch		3-1/2-inch Conduit and No. 2 U Guard	1-5/8-inch
3 x 3-1/2 inch		3-1/2-inch Conduit and No. 3 U Guard	2-5/8-inch
	2 x 4 inch	4-inch Conduit and No. 2 U Guard	1-5/8-inch
	2 x 4 inch	4-inch Conduit and No. 2 U Guard	1-5/8-inch
	4 x 4 inch	4-inch Conduit and No. 4 U Guard	3-1/8-inch

**NOTE:** [1] The first number of the size designation gives the associated U Guard number. The second number gives the conduit size.

Before placing the U cable guard, secure the cable to the pole or wall with cable straps, except for the length of cable that will be covered by the cable guard. Place the U cable guard as shown in Figure 25-2. The material required to attach the U cable guard to the pole or wall is listed in Table 25-1.

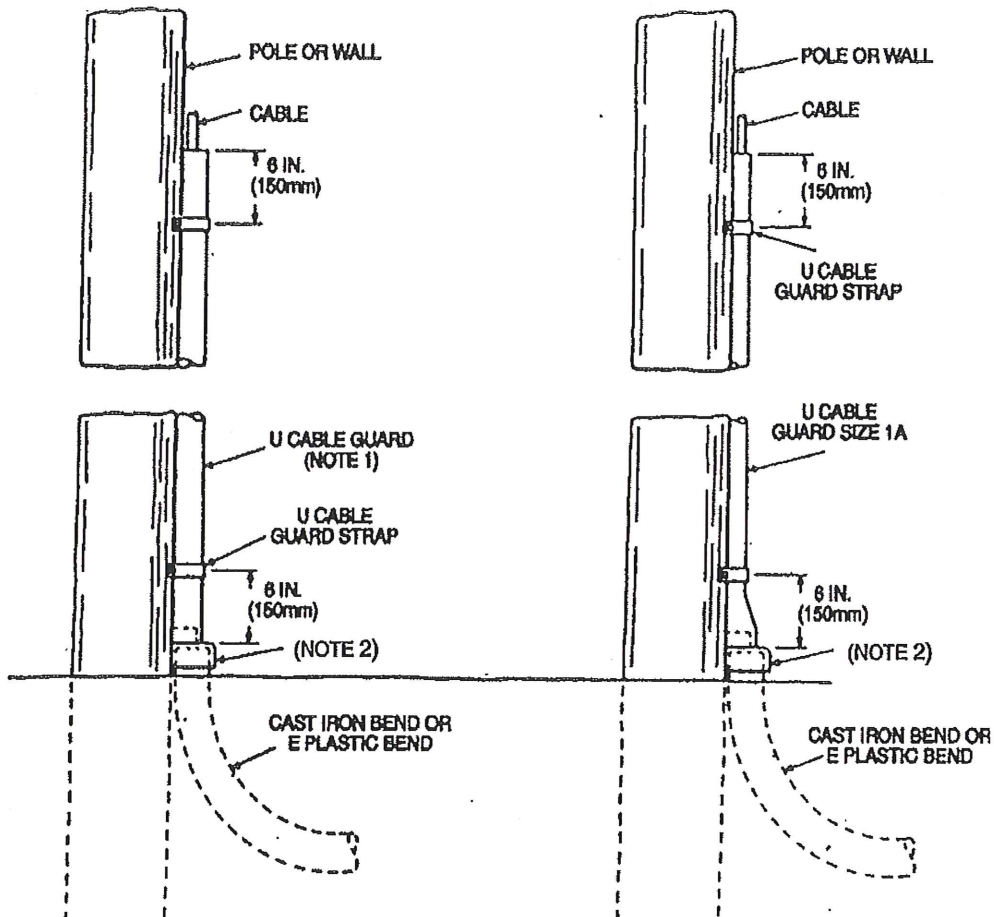
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Standard practice is to use an 8-foot U cable guard on a pole and a 5-foot U cable guard on a wall. When it is necessary to provide mechanical protection for a height greater than the height covered by one U cable guard, a second one can be placed overlapping the first one for a distance of about 5 inches. Place U cable guard straps 6 inches from the top and bottom of the second U cable guard and 6 inches from the bottom of the first U cable guard.

Figure 25-2 Cable Guard Installations



Notes:

1. U Cable Guard size 2, 3 or 4.
2. Solvent weld this joint when G plastic cap is used with plastic bend.



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Table 5-10 Hardware Types and Applications (Sheet 1 of 2)

Hardware Type	Function	Non-Wood Poles		
		Fiberglass (Tubular)	Steel (Tubular)	Concrete (Solid)
Suspension Clamp	Supports strand on pole	Can be used. It is recommended that through bolts be used to attach the clamp to pole.		Note [1]
Corner Suspension Clamp	Supports strand on pole where pull is 10-50+ feet	Can be used. It is recommended that through bolts be used to attach the clamp to pole.		Note [1]
Cable Clamp (self support cable)	Secures cable or jacketed strand	Can be used. It is recommended that through bolts be used to attach the clamp to pole.		Note [1]
Suspension Bolts (A and B Type)	Secure suspension and other clamps to pole	Can be used although bolts should be used with the larger size curved washers to distribute load.		Note [1]
Suspension Screws	Driven screw to secure suspension and other clamps to pole	Do Not use	Do Not use	Do Not Use
Reinforcing or Support Straps	Prevent the bending of suspension bolts or screws that support suspension clamps hardware	Only use 10 inch or longer straps	Only use 10 inch or longer straps	Do Not Use
Drive Screws	Driven screw to secure strap or other support hardware to pole	Do Not use	Do Not use	Do Not Use
Reinforcing Links (S and L Type)	Alternative reinforcing hardware where support straps are not practical.	Do not use since drive screws are required to attach to pole.	Avoid use since reliability of screw attachment is uncertain.	Do not use
Guy Hooks (B and C Type)	Terminate strand or guy strand	Guy hooks with spurs should not be used since spurs are designed to dig into wood and will not work well on other materials.  It is recommended that through-bolts be used to attach guy hook		Note [1]
Thimble Eye Bolts (Angled and Straight)	Terminate guy strand	Can be used as an alternative to guy hooks with spurs.		Note [1]
Guy Straps	Reinforcing thimble eye bolts	The longer (9 inch or longer) guy straps preferred.		Note [1]
Pole Flanges	Attachment point for iron pipe to wood pole in sidewalk anchor guy arrangement	Do not use if drive screws are used to attach to pole.		Note [1]

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Table 5-10 Hardware Types and Applications (Sheet 2 of 2)

Hardware Type	Function	Non-Wood Poles		
		Fiberglass (Tubular)	Steel (Tubular)	Concrete (Solid)
Guy Clamps (1-, 2- and 3- Bolt Types)	Terminate strand and guy strand.	Can be used with all pole types since hardware item is not directly attached to pole.		
Guy Grips ("B" Strand grips)	Terminate guy or suspension strands on guy hooks, strain insulators and eye type hardware.	Can be used with all pole types since hardware item is not directly attached to pole.		
Strandvises	Used to terminate aerial support strand messenger, and at the top and bottom ends of down guys.	Can be used with all pole types since hardware item is not directly attached to pole.		
Guy Strain Insulators	For elimination of power cross hazards and metallic corrosion risks in specific locations.	Can be used with all pole types since hardware item is not directly attached to pole.		
Anchors and Guy Rods - Expanding, Screw and Toggle Anchors	To provide physical support and balance load on poles.	Can be used with all pole types since hardware item is not directly attached to pole.		
Bonding/Grounding Connectors	Support screws/staples for attaching grounding/bonding wire to pole.	Screws only. Driven fasteners or staples should not be used.		
	Low resistance connector for attachment to MGN			
Banded Straps	Metallic band for attachment to concrete and steel poles.	Can be used (see notes)	Can be used (see notes)	Can be used (see notes)

**NOTE: 1.** Since on-site drilling of concrete poles for through bolts is not feasible, clamps will need to be attached with banded products. The long term reliability of banded attachments is unknown at present.

**NOTE: 2.** Early version of steel bands with aluminum brackets failed because of overstressing of the steel band and concentrations of high stress in the crevices or creases adjacent to the bracket. Dissimilar metal galvanic corrosion occurred with early (1980s) band products. Any banded attachments need to maintain their attachment grip over many years of cyclic day/night all-weather stresses. The chief problem is how to obtain maximum initial tension without overstressing the metallic band of the band and straining the metal material into its in-elastic zone where slow relaxation and creep behavior will lead to a premature failure of the band. With the wide diurnal and seasonal temperature swings expected for climates across the country, the repeated day/night cycles can induce significant differential expansion and contraction behavior between poles and hardware as well as between different metal components of the hardware.

**NOTE: 3.** Saddle brackets and flat faced hardware can be used to achieve effective, strong and reliable bonds to the pole; particularly if the pole is both tapered and has polygonic cross section. However, the interdependencies between pole material, pole shape, band hardware shape, design and materials will require that any candidate banded hardware needs to meet stringent and full stress/strain criteria under exposure conditions.