

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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September 5, 2008

Donald Talka
Senior Vice President Chief Engineer
Underwriters Laboratories Inc.
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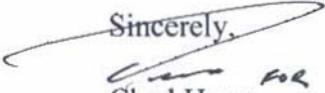
Dear Mr. Talka,

The purpose of this letter is to clarify the request originally outlined in staff's letter of August 21, 2008. The threshold question for UL to address is whether the National Electrical Code, specifically Articles 770, 800, and 820, apply to the fiber-to-the-premises system as described more fully in the August 21, 2008 letter, specifically an inside installation of the ONT where the coaxial cable is also wholly inside the single family or multiple dwelling unit and has no external appearance.

In addition, we further request UL then assume compliance with Articles 770, 800, and 820 of the National Electrical Code (NEC) is required for grounding and bonding a fiber-to-the-premises system where the Optical Network Terminal is installed wholly within either a single-family unit or multiple dwelling unit, inclusive of telecommunications or coaxial cables, television receiving equipment, and other devices that may be expected to be attached to the ONT in such a system specifically where any coaxial cables part of the system are also wholly within the single family unit or multiple dwelling unit. Given that assumption, we ask whether the methods described in the Verizon M&Ps previously provided, specifically options 1) and 2) below, provide a means of grounding/bonding that is compliant with those articles of the NEC or offer an equivalent level of protection:

1. A "three-prong" electrical cord built into the ONT, plugged into a grounded AC outlet or
2. A TII-442 Signal Grounding Module plugged into a grounded AC outlet that includes a 10 AWG equipment grounding conductor run from the grounding lug of the TII-442 to the grounding lug of the ONT.

Sincerely,


Chad Hume

Acting Director, Office of Telecommunications