

EXHIBIT A

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATION AND CABLE
CABLE DIVISION**

Petition Of Verizon New England Inc. For
Amendment Of The Cable Division's Form
500

AFFIDAVIT OF SHAWN M. STRICKLAND

Shawn Strickland hereby deposes and says the following:

1. I am Vice President for Video Solutions for Verizon Communications, Inc., parent company to Verizon New England Inc. ("Verizon MA"), the petitioner in this proceeding. Among other things, I am responsible for Verizon's marketing of its FiOS TV services, including in Massachusetts. This affidavit is based on my own personal knowledge and the books and records of Verizon, except as to those matters alleged on information and belief, which I believe to be true.

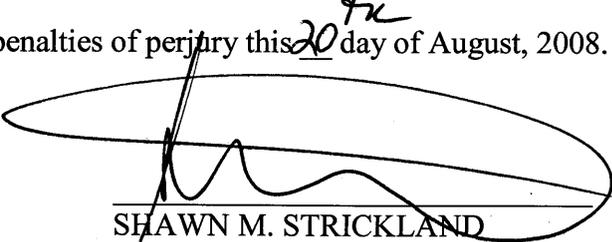
2. I file this affidavit in support of the Petition of Verizon New England Inc. ("Verizon MA") for Amendment of the Cable Division's Form 500 to eliminate the requirement that Verizon MA report annually the number of its subscribers by individual municipality.

3. As Verizon MA brings new services, consumer choice, and effective competition to the cable market in Massachusetts, such subscriber data becomes extremely valuable to incumbent operators that seek to frustrate Verizon's efforts to gain a foothold in the cable television market. This data paints a detailed picture of Verizon MA's market performance, including market penetration, broken down by municipality

and throughout the state. Access to this data provides Verizon MA's competitors with critical insight into Verizon MA's business success within individual cities and towns – free and extremely valuable market research that they otherwise could not obtain without significant expenditure of time and resources. Such free research provides the incumbent cable providers a powerful tool to more precisely target their competitive responses – including direct mail, door-to-door solicitation, local advertising and promotions and pricing strategies – to the specific communities where Verizon MA's Form 500 reports show Verizon MA making the most inroads on the former monopoly's customer base. An incumbent can also deploy or upgrade facilities or services in those towns or seek to tie customers down with long-term contracts, while simultaneously reducing its marketing, investments and promotions in towns with a comparatively low number of Verizon MA subscribers.

4. The disclosure of subscribership data as currently required by Form 500 thus gives the dominant providers of cable television service in Massachusetts a competitive edge against Verizon MA as it introduces cable television competition to many municipalities for the first time.

Signed under the pains and penalties of perjury this ^{7th} 20 day of August, 2008.


SHAWN M. STRICKLAND

Subscribed and sworn to before me this 20th day of August, 2008.

Linda M. Lloyd
Notary Public

**LINDA M. LLOYD
A NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES JUNE 7, 2010**