



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

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March 8, 2012

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: Verizon New England, Inc.; D.T.C. 01-31-Phase III

Dear Secretary Williams:

Enclosed for filing please find the Attorney General's First Set of Information and Document Requests in the above-captioned matter. Please contact me should you have any questions.

Sincerely,

/s/ Charlynn R. Hull

Charlynn R. Hull
Assistant Attorney General

Enclosure

cc: Service List
Lindsay DeRoche, Hearing Officer

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Verizon New England, Inc.

D.T.C. 01-31-Phase III

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England, Inc. (the "Company" or "Verizon") and any affiliates, including its corporate parent, or to any individual or entity sponsoring testimony or retained by them to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the

- input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
 9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
 10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
 11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
 12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
 13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
 14. Each request for information includes a request for all documentation which supports the response provided.
 15. Provide three copies of each response on three-hole punched paper.
 16. The term "Company" refers to Verizon New England, Inc. (the "Company" or "Verizon"). Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Pursuant to the Department's currently established procedural schedule, Verizon's responses to these requests are due on or before **March 16, 2012**.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Verizon New England, Inc.

D.T.C 01-31-Phase III

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

- AG 1-1 Please provide detailed organization charts that show Verizon's complete corporate structure, including titles and names.
- AG 1-2 Please provide complete copies of any and all complaints received regarding Verizon's wireline operations in Massachusetts since January 1, 2011 through the most recent date for which information is available.
- AG 1-3 Please provide complete copies of any and all complaints received regarding Verizon's operations during the work stoppage in 2011.
- AG 1-4 Please provide complete copies of any and all complaints received regarding Verizon's operations during, and in the aftermath of, Hurricane Irene.
- AG 1-5 Please provide any and all memoranda, reports, presentations, and analyses prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding the way in which Verizon responded to Hurricane Irene.
- AG 1-6 Please provide any and all memoranda, reports, presentations, and analyses prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding lessons learned regarding Hurricane Irene.
- AG 1-7 Since Hurricane Irene, has Verizon Corporate or Verizon Massachusetts modified in any way its policies and procedures for: (a) preparing for and (b) responding to natural disasters, such as hurricanes? If so, please describe fully such modifications in detail and the modifications that were made.
- AG 1-8 Please provide a complete copy of all internal documents prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding preparation for and response to natural disasters, such as hurricanes.
- AG 1-9 Please provide any and all memoranda, reports, presentations, and analyses prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding the way in which Verizon responded to the work stoppage in 2011.

- AG 1-10 Please provide any and all memoranda, reports, presentations, and analyses prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding lessons learned regarding the work stoppage in 2011.
- AG 1-11 Since the work stoppage in 2011, has Verizon Corporate or Verizon Massachusetts modified in any way its policies and procedures for: (a) preparing for and (b) responding to work stoppages. If so, please describe fully such modifications.
- AG 1-12 Please provide a complete copy of all internal documents prepared by, or on behalf of, Verizon Corporate or Verizon Massachusetts regarding preparation for and response to work stoppages.
- AG 1-13 Please describe fully the way in which Verizon Massachusetts communicated and communicates with other utilities and with municipalities: (a) during Hurricane Irene; (b) the work stoppage in 2011; and (c) as a matter of general policy and procedure.
- AG 1-14 Among the exclusions that Verizon seeks to exclude from the calculation of its performance metrics, is the metric “Troubles Cleared Within 24 Hours – Business.” Why does Verizon not seek to exclude from the calculation of its performance metrics “Troubles Cleared Within 24 Hours – Residence”? Please explain fully.
- AG 1-15 Please describe fully the policies and procedures for assigning and allocating resources (*e.g.*, technicians) for clearing troubles within 24 hours between residence and business customers: (a) during hurricanes; (b) during work stoppages; and (c) during normal operations. In the description, identify by title and name the individual(s) responsible for determining the allocation of resources between repairing residential and business dial tone.
- AG 1-16 Please describe fully the internal objectives, goals, measurements regarding the repair of: (a) business customers; and (b) residence customers. Include any documents, manuals, or other written material relied upon to guide the scheduling of residence and business repairs, and that are used to convey such scheduling priorities to outside plant technicians.
- AG 1-17 Please refer to Verizon’s Petition, filed November 14, 2011, page 14. Please provide the chart that is shown on this page and include an additional row of data for percent (%) of troubles cleared within 24 hours – residence. Please include workpapers and source data in this response.
- AG 1-18 Verizon’s Petition and Attachments to its Petition include data regarding percent of troubles cleared. Separately for each of the periods of time for which Verizon seeks to exclude its performance, provide the following for business customers: (a) total quantity of troubles reported; (b) total quantity of out-of-service troubles reported; and (c) total quantity of service affecting troubles reported.

AG 1-19 Verizon's Petition and Attachments to its Petition include data regarding percent of troubles cleared. Separately for each of the periods of time for which Verizon seeks to exclude its performance relative to business customers, provide the following for *residence* customers: (a) total quantity of troubles reported; (b) total quantity of out-of-service troubles reported; and (c) total quantity of service affecting troubles reported.

AG 1-20 Please identify by title and name the individuals at Verizon Massachusetts and Verizon Corporate responsible for managing Verizon's response to: (a) the work stoppage, and (b) Hurricane Irene as that response concerned: (i) percent of business troubles cleared within 24 hours; (ii) repair resolution center speed of answer; and (iii) directory assistance average speed of answer.

DATED: March 8, 2012

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Verizon New England, Inc.

D.T.C. 01-31-Phase III

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 C.M.R. 1.05(1) (Department's Rules of Practice and Procedure). Dated at Boston this 8th day of March, 2012.

/s/ Charlynn R. Hull

Charlynn R. Hull
Assistant Attorney General
Office of the Attorney General
Office of Ratepayer Advocacy
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