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March 18, 2010

Catrice Williams, Secretary
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, Massachusetts 02110

RE: **In re Verizon Service Quality in Western Massachusetts, D.T.C. 09-1**

Dear Secretary Williams:

Enclosed please find the Attorney General's Fourteenth Set of Document and Information Requests and Certificate of Service in the above referenced matter.

In accordance with the procedural schedule, discovery may be served upon Verizon concerning its rebuttal testimony until March 18, 2010. The Company is expected to respond to the attached information requests within seven (7) business days. Further, the Company is encouraged to respond to the attached information requests as their responses become available.

Sincerely,

/s/ Sandra Callahan Merrick

Sandra Callahan Merrick
Assistant Attorney General

Enclosures

cc: Kalun Lee, Hearing Officer
Robert Werlin
Service List

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

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding, dated at Boston this 18th day of March, 2010.

/s/ Sandra Callahan Merrick

Sandra Callahan Merrick
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**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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**ATTORNEY GENERAL’S FOURTEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General’s Instructions for the Information Requests in the above captioned proceeding.

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 Massachusetts (the “Company”) or to any individual or entity sponsoring testimony or retained by any of those entities 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 DATED 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 Request cannot be answered in full, and state what information or knowledge is in either of the companies' possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, the Company feels that any Request or definition or instruction applicable thereto is ambiguous, they shall set forth the language they feel is ambiguous and the interpretation they 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 4 copies of all requested documents, even bulk responses. 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 the Company refuses 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 relied upon to support the claim of privilege or the reason for refusing to respond.
14. Each request for information includes a request for all documentation which supports the response provided.

15. If the response contains attachments with confidential material and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
16. Unless the Request specifically provides otherwise, the use of Company or Verizon MA includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate three holed punched sheet of paper, beginning with a restatement of the question.
18. Please provide data in excel, machine-readable format. If, any instance, a special study would be required to provide a response, please indicate the person hours and calendar time necessary to complete such study.
19. Please submit responses within the timeframes required by the Procedural Notice issued by the Department on September 4, 2009.

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

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

- AG 14-1 Please refer to the Rebuttal Testimony of John Conroy, John E. Sordillo and Paul B. Vasington on Behalf of Verizon New England Inc., dated March 16, 2010 (“VZ Rebuttal Testimony”) at page 13, Footnote 3. Here, the witnesses refer to the breadth of the Department’s investigation of “...such issues as repeated service outages, poor signal quality, delays in repairing or restoring service and generally in responding to troubles, and deficiencies in network maintenance and replacement of aged facilities.” Please describe how investigation of these issues implicates service quality metrics other than the Troubles Cleared and reports per hundred line (RPHL) metric.
- AG-14-2 Please refer to VZ Rebuttal Testimony, page 29, lines 11-16 reiterating the Company’s response to AG-VZ 8-2 and referring the Attorney General to AG-VZ 9-18 in support of the Company’s arguments with respect to competition. Based on Attachment AG-VZ 9-18, are there any communities in Eastern Massachusetts without wireless coverage? Are there any communities in Western Massachusetts without wireless coverage? If yes, please identify the county or counties in which the community without wireless coverage is located based on Attachment AG-VZ 9-18.
- AG 14-3 Please refer to VZ Rebuttal Testimony, page 2, Footnote 1.
- a) Has the Department in any investigation, hearing or otherwise ever specifically reviewed Verizon’s performance relative to the timeliness of repair metric?
 - b) If so, when?
 - c) Is it your position that the Department lacks the authority to consider the timeliness of Verizon’s repair and the impact of such performance on consumers?
 - d) Is it your position that the Department may only consider whether Verizon satisfies the existing Service Quality Plan requirements?

AG 14-4 Please refer to VZ Rebuttal Testimony, page 3, lines 3 through 5 where the Company states, “Findings regarding individual wire centers, however, are not within the scope of this investigation of service quality at the regional level.”

- a) What is the basis of this statement?
- b) What recourse, if any, do communities have if service quality is inadequate?
- c) Is it Verizon’s position that individual wire centers are not to be considered within the larger geographic region of the 413 LATA?
- d) Please provide Verizon’s definition of the scope of the investigation docketed as DTC 09-1.

AG 14-5 Please refer to VZ Rebuttal Testimony, page 3, lines 9 through 12.

- a) Does Verizon intend to repair the outside plant that it describes as having surveyed in this sentence?
- b) If yes, when will Verizon make these repairs?
- c) If yes to (a), how much will it cost?
- d) When was this decision made?
- e) By whom?
- f) Why was the decision made?
- g) Does Verizon have a policy/procedure that calls for conducting surveys of the wire centers with the highest average RPHL?
- h) If not, why did Verizon MA “go[] ahead and survey[] its outside plant” in the 18 wire centers?
- i) If so, please provide all documents, memos, etc that communicate such policy.
- j) Is this statewide policy?
- k) If it is Verizon’s position that surveying outside plant in wire centers with high RPHL is standard statewide policy, please provide evidence of it being statewide policy. For example, for 2009 and 2010, please identify any ongoing surveys of outside plant in Eastern Massachusetts, the timing of such surveys, the basis for selecting such locations for the surveys, the RPHL of such wire centers, and the persons responsible for the decision to undertake such surveys.
- l) If it is Verizon’s position that surveying outside plant in wire centers with high RPHL is standard statewide policy, what is the demarcation point for the RPHL that leads to such surveys?
- m) If towns in Western Massachusetts had not submitted complaints to the Department, would Verizon nonetheless have done such surveying? If so, please provide evidence of such intentions.
- n) If the Department had not opened this regional investigation, would Verizon nonetheless have done such surveying? If so, please provide evidence of such intentions.

AG 14-6 Please refer to VZ Rebuttal Testimony at page 6, Figure 1. To what does Verizon attribute the improved performance, as shown in Figure 1? Does Verizon have any plans or commitments to maintain this level of performance? Does Verizon have any plans or commitments to improve this level of performance? What goals and objectives, if any, does Verizon have for these metrics for Western Massachusetts for 2010 and for 2011?

AG 14-7 Refer to VZ Rebuttal Testimony at page 7, lines 14-20.

- a) Please disaggregate the quantities of customers surveyed by wire center, separately for the installation and for the repair.
- b) For the approximate 20% that were not satisfied with the repair, please provide the reasons. Also, please rank the reasons by frequency and provide the corresponding quantities.
- c) For each year 2004 through 2009 and for each survey (repair and installation), how many customers were surveyed in Western Massachusetts? For 2009, please provide the “raw” results, that is, all the responses corresponding to each customer surveyed from Western Massachusetts.
- d) What percentage of Western Massachusetts customers whose service is repaired are surveyed?
- e) Please indicate the specific question in the survey (by quoting the question verbatim and citing the appropriate attachment to AG-VZ 8-4 and the specific question number) upon which the 81% figure is based.
- f) Please indicate the specific question in the survey (by quoting the question verbatim and citing the appropriate attachment to AG-VZ 8-4 and the specific question number) upon which the 93% figure is based.
- g) For each year since 2004, indicate the number of customers in Western Massachusetts that were surveyed separately for both installation and repair work performed.
- h) Please define “satisfied” and “more than satisfied” as used in line 16 and line 20 of page 7. For example, on a five point scale, what points/answers would be deemed satisfied, more than satisfied, or not satisfied. Please provide all data and calculations used to arrive at the 81% estimate.
- i) Please provide all data and calculations used to arrive at the 93% estimate.

- AG 14-8 Refer to VZ Rebuttal Testimony at page 11, lines 17-19, which states, “Likewise, Verizon MA’s work closing open plant in Western Massachusetts in 2008 contributed to a significant reduction in the number of trouble reports in the region in 2009.”
- a) Identify the open plant that was closed by municipality and wire center.
 - b) Does Verizon have any goals or objectives for the volume of trouble reports for Western Massachusetts for 2010?
 - c) Does Verizon have any goals or objectives for the volume of trouble reports for Western Massachusetts for 2011? If so, please provide. If not, why not?
 - d) Please describe fully the circumstances, if any, associated with Verizon no longer needing to close open plant in Western Massachusetts. When in Verizon’s view will it have done “enough” work on closing open plant in Western Massachusetts? Please explain fully.
- AG 14-9 Refer to VZ Rebuttal Testimony at page 13, lines 5-6: “An overall evaluation of the type the Department teed up in this case requires a review of all metrics.” How does Verizon reach this conclusion? Is Verizon relying on Department precedent in making this statement?
- AG 14-10 Refer to VZ Rebuttal Testimony at page 13, lines 10-13: “Indeed, because of Verizon MA’s excellent RPHL in Western Massachusetts, the total percentage of its customer base that had to wait more than 24 hours for repair is smaller *than it may have been* if Verizon MA had met the Troubles Cleared - Residence metric but merely met the standard for the RPHL report rate.” (emphasis added)
- a) Please provide any analyses, workpapers and data that support this statement.
 - b) Would it be reasonable for the Department to expect Verizon to take steps to reduce the trouble report rate *and also* to improve the timeliness of repair? If not, why not?
 - c) What percentage of residential trouble reports does Verizon seek to clear in Western Massachusetts in 2010? What percentage of residential trouble reports does Verizon seek to clear in Western Massachusetts in 2011?
 - d) Does Verizon have any intention of seeking to clear at least 60% of residential troubles in Western Massachusetts within 24 hours during 2010? Does Verizon have any intention of seeking to clear at least 60% of residential troubles in Western Massachusetts within 24 hours during 2011? If not, why not?
 - e) Has Verizon conducted any customer surveys of the level of timeliness that would make customers content for the repair of service? If so, please provide. Does Verizon have any internal objective or goal for clearing residential troubles within 24 hours in Western Massachusetts

- AG 14-11 Refer to VZ Rebuttal Testimony at page 36, lines 19-20, which states: “but the factors described above make it extremely difficult for Verizon MA to meet the Troubles Cleared standard in Massachusetts on a consistent basis.” This statement implies that Verizon meets the standard on an inconsistent basis, i.e., some of the time. Please identify which months in 2009 and 2010, if any, that Verizon met the standard for residential customers.
- AG 14-12 Refer to VZ Rebuttal Testimony at page 38, lines 8-10, which states: “Verizon MA must adapt to the business realities brought by changes in technology and competition and must attempt to meet ever-changing customer expectations.” Please provide any and all surveys and studies that Verizon has conducted (or that have been conducted on behalf of Verizon) of customer expectations. In addition, provide any and all surveys and studies that Verizon relies upon in making this statement concerning customer expectations.
- AG 14-13. Refer to VZ Rebuttal Testimony at page 40, lines 6-9, which states: “Competition has changed the structure of the industry in fundamental ways that give Verizon MA greater incentives to meet customer expectations, while undermining the Company’s ability to meet the standards in the Service Quality Plan.” Please provide any and all studies, surveys, and analyses of customer expectations conducted by or on behalf of Verizon. Please provide any and all studies, surveys and analyses prepared by or on behalf of Verizon that compare the standards in the Service Quality Plan with customer expectations.
- AG 14-14 Refer to VZ Rebuttal Testimony at page 46, lines 2-4, which states: “And Verizon MA has already performed Middlefield-style surveys of the 18 remaining wire centers as well in Hancock, Rowe, Williamstown, Leverett, Egremont and Shutesbury.” Please provide an updated wire center-specific summary of the recommendations of the surveys and Verizon’s plans to follow through on those recommendations, including the timing of the implementation of any recommended follow through. What factors or circumstances precipitated Verizon’s decision to perform these surveys? What, if any factors or circumstances, would cause Verizon to conduct Middlefield-style surveys of any other wire centers in Western Massachusetts in 2010, 2011 or 2012? Explain fully.
- AG 14-15 Refer to VZ Rebuttal Testimony at page 50, lines 12-15, which states: “Finally, Ms. Baldwin’s table shows the objective for West Virginia as

85% of OOS cleared within 48 hours. The current objective is 75% in 48 hours (which increases to 80% by July 1, 2010 and 85% by January 1, 2011), as we pointed out in our Direct Testimony at 94-95.” Has Verizon conducted any analysis of Verizon’s financial ability to comply with these West Virginia requirements? If so, please provide.

- AG 14-16 Refer to VZ Rebuttal Testimony at page 54, lines 3-5 which state: “It is beyond the scope of this case, and *no* additional reporting requirement is warranted here in any event because service quality across Western Massachusetts is good.” (emphasis in original). (See also, page 2, lines 4-6, which states: “In our Direct Testimony, we provided substantial evidence demonstrating that Verizon MA provides very good service quality to its customers across the Western Massachusetts region.”) Excluding any public hearings, have any of the Panel members spent any time in Western Massachusetts since the Department opened this investigation for any reasons including, but not limited to, site visits, to discuss service quality with Verizon managers in Western Massachusetts, to discuss service quality issues with outside plant technicians in Western Massachusetts or to discuss service quality directly with customers in Western Massachusetts. If so, please describe fully.
- AG 14-17 Refer to VZ Rebuttal Testimony at page 30, lines 4-8. Please explain how Ms. Baldwin’s determination that competitors do not supply unbundled basic local exchange service as competitive alternatives to Verizon’s MA’s unbundled local exchange service differs from the Department’s finding in D.T.E. 01-31 that “all residence service except basic exchange service are sufficiently competitive.” (Verizon Rebuttal testimony page 29 at lines 19-20).
- AG 14-18 Refer to VZ Rebuttal Testimony at page 35, lines 8-13. Isn’t it also true that over the same time period Verizon has developed new products and services that are provided over the same network?
- AG 14-19 Refer to VZ Rebuttal Testimony at page 35, lines 17-24. If not for carrier-of-last resort obligations, would Verizon MA choose not to serve some customers? Why or why not? If not, how would the decision be made? What are Verizon MA’s costs associated with carrier-of-last-resort obligations?
- AG 14-20 Refer to VZ Rebuttal Testimony, at page 47, lines 1-4. Please provide the survey reports, documents detailing the work needed to reduce trouble reports, and the plans Verizon MA has made to perform the work, including an estimate of timeline.
- AG 14-21 Refer to VZ Rebuttal Testimony at page 47, lines 19-21. Is the identification of network infrastructure described in this sentence the same

as the survey described in lines 1-4? If not, please explain. To the extent not provided in the previous question regarding lines 1-4, please provide all reports related to the identification of network infrastructure work as well as a timeline for the work to be completed.

- AG 14-22 Refer to Verizon rebuttal testimony at page 50 lines 11-12 wherein Verizon MA states that “In Texas, service quality metrics are only required to be reported for exchanges that are deemed non-competitive.” Please provide a cite to the relevant statute or Commission Order. Also, does Verizon MA know what percentage of exchanges have been deemed non-competitive? If so, please provide the percentage.
- AG 14-23 Refer to Verizon rebuttal testimony at page 7, lines 14 through 20. With respect to the Customer Care Index surveys, please explain the discrepancy between Verizon’s response to AG-VZ 8-4 which states “Although there isn’t a specific entity allocated for Western Massachusetts, the CCI metrics are included in the New England region which currently includes Massachusetts and Rhode Island” and the Western Massachusetts statistics quoted in the rebuttal testimony and provided in response to AG-VZ 3-37.

Dated: March 18, 2010