

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

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<i>In re Verizon Service Quality in Western Massachusetts</i>)	D.T.C. 09-1
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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 17th day of September, 2009.

M. Katherine Eade
Assistant Attorney General
Office of the Attorney General
Office of the Ratepayer Advocacy
1350 Main Street
Springfield, MA 01103
(413) 523-7714

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.

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In re Verizon Service Quality in Western Massachusetts)
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D.T.C. 09-1

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

- AG 4-1. Please describe any communications and provide copies of any and all documents relating to service quality issues including, but not limited to, emails, notes, worksheets or other correspondence between elected or appointed Town or City officials within Verizon MA's Western Massachusetts service area including, but not limited to, the towns of Windsor, Cheshire, Rowe, Hancock, New Ashford, Otis, Middlefield and Shutesbury from 2005 through 2009.
- AG 4-2. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Lake Shore Drive in Cheshire, MA from 2005 through 2009. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Lake Shore Drive in Cheshire, MA.
- AG 4-3. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Old State Road in Otis, MA from 2005 through 2009. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Old State Road in Otis, MA.
- AG 4-4. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from any community Council on Aging within Verizon MA's Western Massachusetts Service area.
- AG 4-5. Please specifically describe the problem of telephone service issues experienced by the Windsor Council on Aging including the resolution of the problem. Please provide all documentation pertaining to this issue. If the problem has not been remedied, please explain why. Please provide dates associated with each event relating to the Windsor Council on Aging issue. Please provide the cable type/size, length and year placed in service of the plant supporting the service to the Windsor Council on Aging in Windsor, MA.

- AG 4-6. Please provide any information relating to Verizon's knowledge of the so-called "Windsor Hum" including but not limited to the following:
- a. If Verizon has knowledge of the so-called "Windsor Hum" please explain why and how often it has occurred and what has been done to resolve this condition.
 - b. Please also provide information on how many calls were received relating to this condition before it was resolved.

Please provide dates associated with each event relating to this issue.

AG 4-7 Please provide copies of all documentation of complaints including, but not limited to, letters, e-mail messages, complaints received through the company's website, call center records and petitions, that the company has received from customers relating to service quality issues within its Western Massachusetts service area from 2005 through 2009.

AG 4-8 Please refer to the September 27, 2007 public hearing transcript from D.T.C. 07-02 to the testimony of Hancock Police Chief Sherman Derby on page 6.

- a. Is it industry standard for emergency phone systems, such as Verizon's 911 system in Hancock, to be made out of copper wire?
- b. If not industry standard, please explain what the industry standard is and whether Verizon has attempted or planned to upgrade the Hancock system.
- c. Please provide the cable type/size, length and year placed in service of the plant supporting the 911 system in Hancock.

AG 4-9 Please describe any documents including, but not limited to, emails, documents, and other correspondence, received from any fire departments, police departments, departments of public works or emergency service providers within Verizon MA's Western Massachusetts service territory that Verizon has received from 2005 through 2009.

AG 4-10 Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Cold Spring Road in Hancock, MA from 2005 through 2009. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Cold Spring Road in Hancock, MA.

AG 4-11 Please refer to the October 17, 2007 public hearing transcript from D.T.C. 07-05 to the testimony of Mr. McKee on page 30.

- a. Please describe the type of wire (e.g. copper, fiber optic) that are used in and around Steel Brook Road and please indicate whether these are up to industry standards.
- b. If these wires are not up to industry standards, please explain what the industry standard is and explain whether Verizon has attempted or planned to upgrade the wires in the area.
- c. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Steel Brook Road in Rowe, MA from 2005 through 2009.
- d. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Steel Brook Road in Rowe, MA.

AG 4-12 Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Ford Hill Road in Rowe, MA from 2005 through 2009. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Ford Hill Road in Rowe, MA.

AG 4-13 Please describe Verizon's procedure for how complaints or requests for service are handled and please provide all documents and reports associated with these procedures from when the complaint is received through when the complaint is remedied.

- a. Please provide copies of all forms (for example trouble reports or tickets or whatever nomenclature is used by Verizon) used by employees to document complaints or requests for service
- b. Please define "complaint" and "requests for service".

AG 4-14 Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Zoar Road in Rowe, MA from 2005 through 2009. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Zoar Road in Rowe, MA.

AG 4-15 Please refer to IR AG 3-53. How many feet of defective cable are presently located in the outside plant of Verizon in Eastern Massachusetts?

- a. What is the standard the company uses to determine if a copper cable is defective?
- b. What standards are used for each type of cable?

- AG 4-16 Please refer to IR AG 3-73. Has the Company implemented a Global Positioning System (GPS) to track service technicians' vehicles? If the answer is yes, please provide a copy of the report generated by the GPS for each vehicle working in the Western Mass service territory by month for the past twelve months.
- AG 4-17 Please provide excerpts from any power point presentations, speeches or any written material provided by Verizon MA, Verizon Communications or any affiliate, subsidiary or holding company to the investment community including, but not limited to, financial analysts, securities analysts, rating agencies and utility groups from January 1, 2006 to the present that comment on Verizon's plans for traditional copper land line telephone service. Please include in your response the address made by Verizon Communications Chief Executive Ivan Seidenberg to the Goldman Sachs investor conference the week of September 14, 2009.
- AG 4-18 Please provide any written documentation discussing the implementation of the strategy identified in Verizon's response to AG 4-17 which is in the possession of Verizon MA.
- AG 4-19 Please provide copies of all speeches or presentations or communications made by Verizon MA or Verizon Communications to its shareholders and or employees from January 1, 2006 to the present in which the future of traditional copper land line telephone service is mentioned.
- AG 4-20 Please refer to the June 23, 2009 public hearing transcript from D.T.C. 09-1 to the testimony of Mr. Doerner on page 12.
- a. Please describe the type of wire (e.g. copper, fiber optic) that are used in and around Long Plain Road in Leverett, MA and please indicate whether these are up to industry standards.
 - b. If these wires are not up to industry standards, please explain what the industry standard is and explain whether Verizon has attempted or planned to upgrade the wires in the area.
 - c. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Long Plain Road in Leverett from 2005 through 2009.
 - d. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Long Plain Road in Leverett, MA.

AG 4-21 Please refer to the June 24, 2009 public hearing transcript from D.T.C. 09-1 to the testimony of Mr. Arduser on page 12.

- a. Please describe the type of wire (e.g. copper, fiber optic) that are used in and around East Guinea Road in Conway and Williamsburg, MA and please indicate whether these are up to industry standards.
- b. If these wires are not up to industry standards, please explain what the industry standard is and explain whether Verizon has attempted or planned to upgrade the wires in the area.
- c. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from East Guinea Road in Conway and Williamsburg, MA from 2005 through 2009.
- d. Please provide the cable type/size, length and year placed in service of the plant supporting the service to East Guinea Road in Conway and Williamsburg, MA.

AG 4-22 Please refer to the June 30, 2009 public hearing transcript from D.T.C. 09-1 to the testimony of Mr. Dellea on page 26.

- a. Please describe the type of wire (e.g. copper, fiber optic) that are used in and around East Road in Alford, MA and please indicate whether these are up to industry standards.
- b. If these wires are not up to industry standards, please explain what the industry standard is and explain whether Verizon has attempted or planned to upgrade the wires in the area.
- c. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from East Road in Alford, MA from 2005 through 2009.
- d. Please provide the cable type/size, length and year placed in service of the plant supporting the service to East Road in Alford, MA.

AG 4-22 Please refer to the August 3, 2009 public hearing transcript from D.T.C. 09-1 to the testimony of Ms. Perkins on page 12-13.

- a. Please describe the type of wire (e.g. copper, fiber optic) that are used in and around Corser Hill Road in New Marlboro, MA and please indicate whether these are up to industry standards.

- b. If these wires are not up to industry standards, please explain what the industry standard is and explain whether Verizon has attempted or planned to upgrade the wires in the area.
- c. Please describe any communications and provide copies of any and all documents pertaining to Service Quality issues, complaints or requests for service received from Corser Hill Road in New Marlboro, MA 2005 through 2009.
- d. Please provide the cable type/size, length and year placed in service of the plant supporting the service to Corser Hill Road in New Marlboro, MA.

Dated: September 17, 2009