

Charles Harak, Esq.

7 Winthrop Square, 4th Floor
Boston, Massachusetts 02110-1245
617-988-0600 • Fax: 617-542-8028
charak@nclc.org

2009 AUG 13 PM 3:39
TELECOMMUNICATIONS & CABLE

August 13, 2009

Catatrice C. Williams, Secretary
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110

RE: D.T.C. 09-1; Investigation by the Department of Telecommunications and Cable on its own motion, pursuant to General Law Chapter 159, Section 16, of the telephone service quality of Verizon New England Inc., d/b/a Verizon Massachusetts, in Berkshire, Hampden, Hampshire, and Franklin Counties

Dear Ms. Williams:

Enclosed for filing in this case please find the original and three (3) copies of the Appearance of Counsel and the Revised Petition to Intervene, by counsel on behalf of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("Local 2324").

On or around August 12, 2009, Local 2324 filed a Petition to Intervene with the Department of Telecommunications and Cable, as a pro se participant. Shortly after submitting that filing, Local 2324 has obtained representation by counsel, and now submits the attached Revised Petition to Intervene.

All parties have been served as indicated on the attached certificate of service. Please feel free to contact me if there are any questions about this filing or if the Department requires any additional copies.

Sincerely,



Darlene R. Wong

cc. Kalun Lee, Hearing Officer
Charles Harak, Esq.

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

**Re: Investigation by the Department of Telecommunications)
and Cable on its own motion, pursuant to General Law)
Chapter 159, Section 16, of the telephone service quality)
of Verizon New England Inc., d/b/a Verizon Massachusetts,)
in Berkshire, Hampden, Hampshire, and Franklin Counties)**

D.T.C. 09-1

APPEARANCE OF COUNSEL

Please enter our appearances on behalf of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("Local 2324"), in the above-captioned proceeding.

Respectfully submitted,



Darlene R. Wong
darlenewong@nclc.org
Charles Harak
charak@nclc.org
7 Winthrop Square, 4th Floor
Boston, MA 02110-1245
(617) 988-0600

DATE: August 13, 2009

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

**Re: Investigation by the Department of Telecommunications)
and Cable on its own motion, pursuant to General Law)
Chapter 159, Section 16, of the telephone service quality)
of Verizon New England Inc., d/b/a Verizon Massachusetts,)
in Berkshire, Hampden, Hampshire, and Franklin Counties)**

D.T.C. 09-1

**REVISED PETITION TO INTERVENE
OF LOCAL 2324, INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, AFL-CIO**

Pursuant to 220 CMR § 1.03, Local 2324, International Brotherhood of Electrical Workers, AFL-CIO (“Local 2324”) hereby petitions to intervene in the above-captioned Investigation by the Department of Telecommunications and Cable (“DTC” or “the Department”) into the telephone service quality of Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”). Local 2324 sets forth the below averments in support of its Revised Petition to Intervene¹:

1. Local 2324 is the collective bargaining representative for approximately 570 employees of Verizon MA in western Massachusetts. Local 2324 maintains an office at 281 Cottage Street, Springfield, MA 01104. The members of Local 2324 work for Verizon MA in the areas of accounting, traffic, plant and sales units.

¹ This Revised Petition to Intervene is submitted by counsel for Local 2324, and replaces the Petition to Intervene served and filed by Local 2324 as a pro se participant, on or around August 12, 2009.

2. Many members of Local 2324 live in Verizon's service territory in Berkshire, Hampden, Franklin and Hampshire counties and are Verizon MA customers.

3. The Department's directives regarding service quality as a result of this proceeding are likely to directly impact the tasks that members of Local 2324 are asked to perform for Verizon MA, and may impact their livelihoods, health and safety.

4. Members of Local 2324 are substantially and specifically affected by Verizon's operational policies and practices on a daily basis.

5. Additionally, the DTC's directives regarding service quality as a result of this proceeding are likely to directly impact members of Local 2324 as customers affected by any changes in Verizon's service quality.

6. Local 2324 has unique interests in this proceeding, stated above, that are not otherwise represented by any current party to the case.

7. Local 2324 is in a position to provide knowledge or information that may assist the DTC in reaching a decision in this matter.

8. As an Intervenor, Local 2324 intends to conduct discovery, cross-examine witnesses, file briefs, and may offer first-hand knowledge through testimony on issues relevant to this proceeding. In particular, Local 2324 will explore and address Verizon MA's decreased staffing levels and their effect upon quality of service to Verizon MA customers.

9. Local 2324 seeks all reasonable and appropriate relief as may appear necessary upon the conclusion of hearings, in accordance with G.L. c. 159, § 16 and all other applicable statutes, rules and regulations.

For all of the above reasons, Local 2324 respectfully requests that the Department grant this Revised Petition to Intervene.

Respectfully submitted,



Darlene R. Wong
Charles Harak
7 Winthrop Square, 4th Floor
Boston, MA 02110
Counsel for: IBEW Local 2324

DATE: August 13, 2009

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

**Re: Investigation by the Department of Telecommunications)
and Cable on its own motion, pursuant to General Law)
Chapter 159, Section 16, of the telephone service quality) D.T.C. 09-1
of Verizon New England Inc., d/b/a Verizon Massachusetts,)
in Berkshire, Hampden, Hampshire, and Franklin Counties)**

CERTIFICATE OF SERVICE

I certify that I have, on this day, served upon each person below the foregoing Appearance of Counsel and Revised Petition to Intervene, by first class mail.

Alexander W. Moore, Esq.
185 Franklin Street — 13th Floor
Boston, MA 02110-1585

Patrick J. Tarmey, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108

Robert N. Werlin, Esq.
Keegan Werlin LLP
265 Franklin Street
Boston, MA 02110-3113

Sandra Callahan Merrick, Esq.
R.J. Ritchie
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108

Martin O'Malley
185 Franklin Street — 13th Floor
Boston, MA 02110-1585


M. Katherine Eade, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108

Susan Baldwin
48 Franklin Street
Watertown, MA 02472

Lance J.M Steinhart, Esq.
The Law Office of Lance J.M. Stenhardt, P.C.
1720 Windward Concourse
Suite 250
Alpharetta, GA 30005

DATED: August 13, 2009

BY:



Darlene R. Wong
7 Winthrop Square, 4th Floor
Boston, MA 02110-1245