

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

**In re Verizon Service Quality in
Western Massachusetts**

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D.P.U. 09-1

**ATTORNEY GENERAL'S SIXTH 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 "Verizon") 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 four (4) copies of all requested documents, including bulk responses. A response which does not provide the Attorney General with the responsive documents, but rather 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. With respect to requests for documents that the Company refuses to respond to, identify each such document.
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 the term Company or Verizon 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 submit responses in accordance with the procedural schedule issued by the Hearing Officer.

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**ATTORNEY GENERAL'S SIXTH SET OF
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- AG 6-1 Please refer to the Response to AG-VZ 1-1.
- 1) Please provide any and all documents which describe or discuss the results of the infrastructure evaluations completed in March and April 2009.
 - 2) Please identify specifically the type (if applicable), number and locations of:
 - a) each battery replaced
 - b) each open plant area that was closed
 - c) each area of lashing wire that was repaired or replaced
 including the length of the repair or replacement
 - 3) Please provide a statement as to whether the specific field investigations committed to by Verizon for Williamstown, Shutesbury and Leverett have been completed.
 - 4) Please provide any documentation that describes or discusses these specific field investigations.
- AG 6-2 With respect to the infrastructure evaluation described above, how much did it cost to do this work in these communities? Please provide the estimated costs to
- a) replace a battery, b) replace a cable, c) repair or replace lashing wire (in \$/ft)?
- AG 6-3 Who completed the infrastructure evaluation described above (identify the names, titles, and roles of all individuals involved in the infrastructure evaluation)?
- a) Please provide a copy of the evaluation.
 - b) Verizon MA indicates that it “completed a number of projects to correct potential trouble areas” – were there any projects that the evaluation recommended that Verizon MA did not undertake? If yes, please identify and provide the rationale for not undertaking the project.
 - c) What criteria did Verizon use to determine which projects to undertake?

- AG 6-4 In its response AG VG 1-1, Verizon states that “it repaired and replaced any lashing wire that did not meet standards.”
- Please provide the referenced standards.
 - How many feet of lashing wires in Western MA do not meet “the referenced standards”?
 - If a special study would be required to respond to this question, please provide the cost of such study, the person hours entailed, and the calendar time required.
 - Indicate the qualifications necessary for such an evaluation of lashing wire in western MA.
- AG 6-5 Please provide the cost, person hours and calendar time required to conduct an “infrastructure evaluation” for the entire Western Massachusetts region. Include any and all assumptions.
- Please set forth the necessary expertise and qualifications for the persons who could conduct such an evaluation.
- AG 6-6 Please provide the cost, person hours and calendar time to conduct the infrastructure evaluations that Verizon completed in March and April 2009 (which is discussed in response to AG-VZ 1-1).
- Provide the total cost to do the work that was done as a result of those specific infrastructure evaluations
- AG 6-7 Absent the towns’ specific and multiple complaints, when would Verizon conduct an infrastructure evaluation?
- What are Verizon’s standard practices regarding infrastructure inspection and evaluation?
 - Please provide all written policies, procedures, memoranda, manuals or other documents that describe the circumstances under which Verizon undertakes inspection and evaluation of its infrastructure.
- AG 6-8 Please list the ten most recent “infrastructure evaluations” that Verizon has undertaken and the outcome of each evaluations.
- AG 6-9 Has Verizon ever been able to meet the OOS target in Western Massachusetts?
- When was the last time over the past ten years that Verizon met the OOS target in Western Massachusetts?
 - If the target has not been met over the past ten years, why wasn’t it met?
 - What are the obstacles to achieving the target in Western Massachusetts?
 - Please explain any difficulties which make it impossible to achieve the target.
 - What resources would be required to meet the 60% OOS target level?
 - What additional resources would be required to meet the 70% target level?
 - In Verizon’s view is it possible for Verizon to meet the OOS target in Western Massachusetts?
- AG 6-10 Has Verizon ever been able to meet the OOS standard in Western Massachusetts?

- h) When was the last time over the past ten years that Verizon met the standard for OOS in Western Massachusetts?
- i) If the standard has not been met over the past ten years, why wasn't it met?
- j) What are the obstacles to achieving the standard in Western Massachusetts?
- k) Please explain any difficulties which make it impossible to achieve the standard.
- l) What resources would be required to meet the 60% OOS standard level?
- m) What additional resources would be required to meet the 70% standard level?
- n) In Verizon's view is it possible for Verizon to meet the OOS standard in Western Massachusetts?

AG 6-11 Has Verizon ever been able to meet the OOS target in Eastern Massachusetts?

- c) When was the last time over the past ten years that Verizon met the OOS target in Eastern Massachusetts?
- d) If the target has not been met over the past ten years, why wasn't it met?
- o) What are the obstacles to achieving the target in Eastern Massachusetts?
- p) Please explain any difficulties which make it impossible to achieve the target.
- q) What resources would be required to meet the 60% OOS target level?
- r) What additional resources would be required to meet the 70% target level?
- s) In Verizon's view is it possible for Verizon to meet the OOS target in Eastern Massachusetts?

AG 6-12 Has Verizon ever been able to meet the OOS standard in Eastern Massachusetts?

- t) When was the last time over the past ten years that Verizon met the standard for OOS in Eastern Massachusetts?
- u) If the standard has not been met over the past ten years, why wasn't it met?
- v) What are the obstacles to achieving the standard in Eastern Massachusetts?
- w) Please explain any difficulties which make it impossible to achieve the standard.
- x) What resources would be required to meet the 60% OOS standard level?
- y) What additional resources would be required to meet the 70% standard level?
- z) In Verizon's view is it possible for Verizon to meet the OOS standard in Eastern Massachusetts?

AG 6-13 What would Verizon consider to be a physical plant condition where its engineering practices would dictate that plant be replaced rather than repaired regardless of cost effectiveness?

AG 6-14 Regarding responses AG-VZ 1-3 and AG-VZ 1-5, there appear to be relatively higher trouble report rates and relatively lower clearance of OOS within 24 hours in summer months (see June through August 2008; see July and August 2009). Are there any seasonal factors that affect trouble report rates and Verizon's ability to restore service? Please explain fully.

- AG 6-15 Please describe fully the criteria used to distinguish between service affecting and OOS (e.g., at what point does, for example, cross-talk or static render a dial tone not usable).
- AG 6-16 Regarding response AG-VZ 1-4, please elaborate on the response provided.
- a) For example, in many or most instances aren't NIDs located on the outside of customers' homes?
 - b) Please describe and quantify the situations where NIDs are located inside of customers' houses.
 - c) For the past 12 months, how many troubles related to inside wire?
 - d) How many customers in Western Massachusetts subscribe to Verizon's inside wire maintenance program?
 - e) How many of the inside wire problems related to customers that subscribe to Verizon's inside wire maintenance program.
 - f) Are inside wire maintenance troubles included in the trouble report rate?
 - g) In addition to the example of when the trouble indication is in the Central Office, in what other instances would a customer not need to be home to correct an OOS situation: please provide a comprehensive list.
- AG 6-17 Please explain fully whether and in what instances customers need to be home for Verizon to address service affecting troubles.
- AG 6-18 Does Verizon track the data in any other manner such as, but not limited to, numbers of troubles that (1) can be addressed without technician's travel; (2) require technician to visit outside the customer's premises; (3) require technician to visit inside the customer's premises? Describe fully how Verizon does track data regarding the repair of OOS lines, as such repair relates to the dispatching of technicians.
- AG 6-19 Regarding the response AG-VZ 1-7, please provide any and all studies, analyses, data, documents, memoranda prepared by or on behalf of Verizon that analyze weather, geography, or other characteristics of (a) Western MA; (b) Eastern MA and (c) Massachusetts. Please identify any and all steps that Verizon takes for preventive maintenance for its outside plant to address problems associated with (a) moisture (e.g., rain, sleet, snow); (b) high winds; (c) general wear and tear.
- AG 6-20 Please refer to response AG-VZ 1-8. Does Verizon use any region smaller than the 413 area of the state for the purpose of performing any functions, assigning resources, or making decisions? If so, please describe fully.
- AG 6-21 Regarding response AG-VZ 1-11, Verizon indicates that in the states in which it operates as an incumbent local exchange carrier, "Massachusetts is the only state that has a regulatory metric for percentage of troubles cleared within 24 hours." Please confirm the accuracy of this response. For example, please refer to Connecticut Department of Public Utility Control Regulations, §16-247g-2. Please confirm that Verizon NY, in the two Connecticut exchanges in which it

operates as an ILEC, is subject to an OOS requirement of clearing 90% of troubles within 24 hours. If you disagree, please explain the basis of such disagreement.

- AG 6-22 Please refer to Florida Administrative Code, Commission Rules 25-4.070 and 25-4.066. Please confirm that these rules require 95% of out-of-service troubles to be cleared within 24 hours, to be measured monthly or quarterly based on size of exchange. If you disagree, please explain the basis of such disagreement.
- AG 6-23 Please set forth, for example, the OOS requirements that apply to Verizon in the various states it serves as an ILEC, including, but not limited to Illinois, Pennsylvania, Ohio, Oregon, Texas, Virginia.
- AG 6-24 Based on the foregoing, please respond again to AG-VZ 1-11. Please also include Verizon's performance for the last two years in meeting the established standards in each of the jurisdictions in which it operates.
- AG 6-25 Please refer to AG-VZ 2-4. Please define a "Code 4" trouble report. Please provide Attachment AG-VZ 2-4(b) in excel spreadsheet format. As requested originally in AG 2-4, please provide a separate alphabetical list of all municipalities and for each municipality list the wire center that serves that municipality. Please provide this list in excel spreadsheet format.
- AG 6-26 Please refer to AG-VZ 2-6. Please provide separately by month for each of the past 24 months for Western MA (1) quantity of Service Affecting Troubles and (2) quantity of Out-of-Service Troubles.
- AG 6-27 Please refer to IBEW-VZ 1-22. Please identify each "local engineering office throughout the state." Please identify the street address and the number and job classification of all employees at each "local engineering office throughout the state."

Dated: October 6, 2009