



February 17, 2009

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

RE: Proposed Regional Service Quality Investigation

Dear Ms. Williams:

Berkshire Connect, Inc. and Pioneer Valley Connect ("the Connects") are regional organizations whose mission is to support the creation of an advanced telecommunications landscape that will provide affordable, reliable and redundant high capacity broadband services throughout Berkshire, Franklin, Hampden and Hampshire Counties. We understand that this proposed investigation focuses on basic telephony service quality and will not address broadband service complaints. However, through our efforts over the past ten years, we have repeatedly heard from residents, businesses and local officials throughout western Massachusetts about their poor telephony service quality.

(1) Is there a reasonable basis for the Department to conclude that there may be a significant or widespread problem with Verizon's service quality in western Massachusetts, so as to justify opening a regional service quality investigation covering Berkshire, Hampden, Hampshire and Franklin counties?

Connects' Comment:

The Connects have heard from residents, businesses, and local officials from several western Massachusetts communities regarding poor telephone service quality. Such complaints have come from throughout western Massachusetts and have not been centralized in one region or sub-region. Service complaints conveyed include an insufficient number of quality phone lines available for existing and new residents, as well as static, clicking, humming, and noise during periods of wet weather. Many of these complaints are indicative of a deteriorating copper cable plant.

(2) If there is sufficient evidence of a possible significant or widespread service quality problem in western Massachusetts is a regional investigation the best approach for investigating the matter, and if not, what would be a better process for addressing the issues?

Connects' Comment:

Given the distribution of complaints heard by the Connects over the years, we believe that there is sufficient evidence of significant or widespread service quality problems in western Massachusetts. We also believe a regional investigation would be the best approach for addressing this issue in a timely and efficient manner. Attempting to investigate this issue on an individual community or county basis could take an extensive amount of time and resources, and would needlessly duplicate efforts, given the interconnectedness of this telecommunications system. For example, in rural western Massachusetts many communities are served by Central Offices or Remote Terminals located in neighboring towns.

(3) If the Department determines to open a regional Verizon service quality investigation, is it reasonable and appropriate for the Department to consolidate the existing town-specific investigations for the towns of Hancock and Rowe and the pending Shutesbury complaint into the new regional investigation?

Connects' Comment:

The Connects support the consolidation of the town-specific investigations for Hancock, Rowe and the pending complaint for Shutesbury into the new regional investigation, if the municipal officials of these communities also believe it is reasonable and appropriate. Once again, the Connects believe a regional approach would be the most timely and efficient manner to conduct this investigation.

We appreciate the opportunity to submit comments regarding the proposed regional service quality investigation of Verizon's services in western Massachusetts. For clarification of our comments or for additional information, please contact Sharon Ferry, Business Manager for Berkshire Connect, Inc. at 413-496-9606 or sferry@bconnect.org, or Jessica Atwood, Economic Development Planner for the Franklin Regional Council of Governments and Pioneer Valley Connect, at 413-774-1194 x101 or jatwood@frcog.org.

Sincerely,

Donald Dubendorf

President

Berkshire Connect, Inc.

Linda Dunlavy

Co-Chair

Pioneer Valley Connect Steering Committee