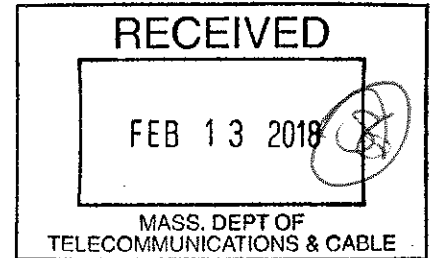




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February 13, 2018



Sara Clark, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118

Re: Docket No. 18-1, Town of Warwick

Dear Secretary Clark:

Enclosed for filing in the above-referenced matter is the Answer of Verizon New England, Inc. Thank you for your attention to this matter.

Sincerely,

Alexander W. Moore

cc: Courtney Hickson, Hearing Officer
Jeremia A. Pollard, Esq.

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

LAWRENCE PRUYNE, DAWN MAGI,)
JIM ERVITI, IN THEIR CAPACITY)
AS THE BOARD OF SELECTMEN OF)
THE TOWN OF WARWICK,)
Plaintiffs,)

DOCKET No. 18-1

v.)

VERIZON NEW ENGLAND INC.,)
Defendant.)

ANSWER OF VERIZON NEW ENGLAND INC.

Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA") hereby responds to the allegations of the Complaint filed in this docket dated January 19, 2018.

1. Verizon MA has insufficient information either to admit or deny the allegations in paragraph 1 of the Complaint.

2. Admitted, except that Verizon MA's address is now 6 Bowdoin Square, Boston, MA 02114.

3. Verizon admits that it provides telephone service to some residents of Warwick.

4. Verizon MA has insufficient information to admit or deny the allegations in paragraph 4 of the Complaint.

5. Verizon MA admits that 20 of its customers in Warwick lost service during the weekend before Christmas, 2017. Further answering, Verizon states that it restored service to all of these customers by Tuesday, December 26, 2017.

6. Verizon MA admits that one telephone line serving Warwick municipal offices lost service during the weekend before Christmas. Verizon MA denies all other allegations in paragraph 6 of the Complaint.

7. Verizon MA admits that some residents of Warwick have experienced loss of service, dropped calls or crossed lines from time to time. Further answering, Verizon MA states that the service issues in December of 2017 referenced in the Complaint were caused by faulty equipment in a single distribution box located on Orange Road in Warwick. Since receiving the initial reports of those service issues, Verizon MA has performed extensive work to repair or replace much of the equipment and wiring in that cabinet in order to restore and stabilize service to customers in Warwick.

8. Verizon MA denies that its service to residents of Warwick represent an unacceptable public safety risk.

9. Verizon admits that some of its customers in Warwick sometimes lose service. Verizon MA denies all other allegations in paragraph 9 of the Complaint, including the assertion that its service in Warwick is poor.

10. In response to the allegations contained in paragraph 10 of the Complaint, Verizon MA states that wireless service is available in Warwick and that many consumers in Massachusetts rely solely on wireless service to make telephone calls, including to emergency services. Verizon MA has insufficient information to admit or deny whether there are any residents of Warwick who cannot use a wireless phone to reach emergency services.

11. Denied. Further answering, Verizon MA states that its service quality in the Orange wire center serving Warwick has generally been good over the past five years. In addition, Verizon MA has repaired or replaced the equipment in the distribution box on Orange

Road that caused the great bulk of the outages and other service issues in Warwick in December of 2017.

12. Denied.

Count I – G.L. c. 159, § 24

13. Verizon MA repeats and re-alleges its responses to paragraphs 1 through 12 of the Complaint as if fully set forth here.

14. Verizon MA denies that it has failed to provide services to its customers. Verizon MA admits that it is subject to the jurisdiction of the Department of Telecommunications and Cable.

Count II – G.L. c. 159, § 24

15. Verizon MA repeats and re-alleges its responses to paragraphs 1 through 14 of the Complaint as if fully set forth here.

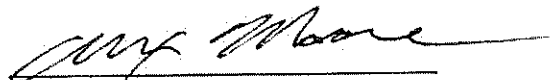
16. Verizon MA denies that it has failed to provide services to its customers. Verizon MA admits that it is subject to the jurisdiction of the Department of Telecommunications and Cable.

WHEREFORE, Verizon MA requests that the Department dismiss the Complaint.

Respectfully submitted,

VERIZON NEW ENGLAND INC.

By its attorney,



Alexander W. Moore
6 Bowdoin Square, 9th Floor
Boston, MA 02114
(857) 415-5130

Dated: February 13, 2018