



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS and CABLE**

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SHARON E. GILLET
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December 7, 2007

Robert N. Werlin, Esq.
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RE: Petition of the Board of Selectman of the Town of Rowe, Massachusetts, pursuant to G.L. c. 159, § 24, regarding the quality of telephone service provided by Verizon New England, Inc. d/b/a Verizon Massachusetts
D.T.C. 07-5

Dear Attorney Werlin:

Enclosed please find the second set of information requests issued by the Department of Telecommunications and Cable ("Department"), to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") in the above-captioned matter. Please submit Verizon's responses to the Department and the service list on or before Friday, December 21, 2007. If you have any questions regarding the information requests, please contact me at (617) 305-3578.

Sincerely,

Tina W. Chin
Hearing Officer

Encs.

cc: D.T.C. 07-5 service list (w/encs.)

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

**SECOND SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO
VERIZON NEW ENGLAND, INC. D/B/A VERIZON MASSACHUSETTS
D.T.C. 07-5**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Verizon New England, Inc. d/b/a Verizon Massachusetts (“Verizon”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Town or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which

information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Catrice C. Williams, Secretary of the Department; (b) one copy to all parties on the service list; and (c) two copies to Tina W. Chin, Hearing Officer.

Information Requests

- DTC-VZ 2-1: Refer to Verizon's response to DTC-VZ 1-3. List all towns served by the Charlemont central office ("CO"), the total number of access lines served in each town by Verizon from the Charlemont CO, and the total number of access lines served by Verizon from the Charlemont CO.
- DTC-VZ 2-2: Refer to Verizon's response to DTC-VZ 1-3. In the response, Verizon indicates that the "remainder of the cables in the town have been placed at various time since 1960." Provide a list of all original cables in Rowe that have been replaced and when the replacement was completed.
- DTC-VZ 2-3: Refer to Verizon's response to DTC-VZ 1-3. What is the manufacturer's recommended life cycle or service life for each infrastructure component, including but not limited to switches, cables, and remote terminals, in the Town of Rowe. Does Verizon follow the manufacturer's recommendations? If the manufacturer does not propose recommended life cycles/service lives for its components, does Verizon maintain established replacement intervals for the infrastructure components? If so, what are they?
- DTC-VZ 2-4: Refer to Verizon's response to DTC-VZ 1-4. Describe in detail Verizon's policies, practices and procedures with regard to the growth and modernization/replacement project process, including the proposal, approval and implementation process.
- DTC-VZ 2-5: Refer to Verizon's response to DTC-VZ 1-4. Provide details of each growth and modernization/replacement project, including but not limited to the dates of completion, the location of the project, a description of the work, modification or rearrangement performed, the total cost of each project, whether the anticipated benefits of the project extended beyond the Town of Rowe, and all factors considered in the proposal and approval of each project.
- DTC-VZ 2-6: Refer to Verizon's response to DTC-VZ 1-4.
- (a) Provide a detailed description of the service issues that led to the modernization/growth project on Hazelton Road, including (1) how the service issues were identified, (2) how Verizon determined that the 1000 feet of cable that was replaced was the cause of, or a contributing factor for, the service issues, (3) how

Verizon determined that replacing the 1000 feet of cable at issue would remedy the service issues, (4) the age of the cable that was replaced, (5) when the cable replacement project was completed, (6) whether the cable replacement has resolved the service issues that necessitated the replacement, and, if not, what additional actions has Verizon taken to address the service issues?

- (b) Provide the reasons that led to the cable replacement on Mohawk Trail, including but not limited to whether service issues were a factor. If service issues were a factor in the decision to replace the cable on Mohawk Trail, provide a detailed description of the service issues that led to cable replacement, including (1) how the service issues were identified, (2) how Verizon determined that the 325 feet of cable that was replaced was the cause of the service issues, (3) how Verizon determined that replacing the 325 feet of cable at issue would remedy the service issues, (4) the age of the cable that was replaced, (5) when the cable replacement project was completed, and (6) whether the cable replacement has resolved the service issues that necessitated the replacement, and, if not, what additional actions has Verizon taken to address the service issues?
- (c) Explain what a commercial power outage is, how such an outage affects residential telephone service and how Verizon determined that battery replacements in the Digital Loop Carrier systems would maintain telephone service during commercial power outages.
- (d) Despite the modernization and growth projects completed by Verizon since 2005 in Rowe, the Charlemont CO, which includes Rowe, reported RPHL rates well above the statewide RPHL for the January through September 2007 period, including five months in which the Charlemont RPHL exceeded 4.0. What does Verizon attribute as the cause(s) of the continuing service quality issues in the Charlemont CO, as a whole, and in the Town of Rowe.

DTC-VZ 2-7:

Refer to Verizon's response to DTC-VZ 1-5 regarding the fiber optic cable placement from the serving Charlemont CO.

- (a) Provide details of the fiber optic cable placement, including the implementation schedule, expected completion date, cost, the length of the cable facilities to be replaced with fiber optic cable, the total length of the cable facilities from the serving Charlemont

CO to the Hazelton Road remote terminal, and a description of the modifications to be performed on the remote terminal.

- (b) Explain in detail the basis for the cable placement, including whether service quality issues was a factor.
- (c) Explain how the cable placement, once completed, will address service quality issues in Rowe.
- (d) Has the implementation schedule for this project been, or can it be, expedited to address service quality issues in Rowe?

DTC-VZ 2-8: Refer to Verizon's response to DTC-VZ 1-5 regarding the replacement of the main cable feed to Rowe on Zoar Road in Charlemont and the replacement of the local distribution cable providing service to customers in the northeast section of Rowe.

- (a) When did Verizon determine that these two projects were the cause of service reports?
- (b) Explain what the issue(s) is/are with the existing cable feed and local distribution cable that led to service reports and the nature of these service reports and how the completion of these projects will address service quality issues in Rowe.
- (c) What is the implementation schedule for these projects and the expected completion date?
- (d) Has the implementation schedule for these projects been, or can it be, expedited to address service quality issues in Rowe?

DTC-VZ 2-9: Refer to Verizon's response to DTC-VZ 1-8. Provide the monthly network trouble reports per 100 lines ("RPHL") for the Town of Rowe, disaggregated from the Charlemont RPHL, for the past two years (*i.e.*, January 2006 through the present).

DTC-VZ 2-10: For the past two years (*i.e.*, January 2006 through the present), provide on a monthly basis:

- (a) the percent of troubles cleared within 24 hours for residential and business customers in the Town of Rowe;
- (b) the percent of missed installation appointments for company reasons, both total and residential in the Town of Rowe;
- (c) the percent of missed installation appointments for company facilities in the Town of Rowe;
- (d) the percent installation troubles in the Town of Rowe; and,
- (e) compare the Town results for the service and maintenance metrics

listed in (a)-(d) with those from the Charlemont CO and the statewide average for the same period.

DTC-VZ 2-11: In service quality proceedings before the Department (*see e.g.*, Town of Middlefield, D.T.C./D.T.E. 06-6), Verizon articulated a 4.0 RPHL threshold that is distinct from the target and standard thresholds contained in Verizon's Service Quality Index ("SQI") Plan for the network trouble report metric.

- (a) Explain the origin of the 4.0 RPHL threshold, how the threshold is used by Verizon, the basis for the threshold, how the threshold is used by Verizon, including but not limited to whether it is used for internal monitoring purposes, the basis for the level of the threshold, and when the level of the threshold was last reviewed;
- (b) Has Verizon established threshold levels for the remaining six service and maintenance metrics in the SQI Plan that are distinct from the target and standard thresholds contained in the SQI Plan? If so, list all threshold levels for each service and maintenance metric and explain the origin of the threshold, how the threshold is used by Verizon, including but not limited to whether it is used for internal monitoring purposes, the basis for the level of the threshold, and when the threshold level was last reviewed;
- (c) Describe Verizon's policies, practices and procedures for review, analysis, and corrective action of any service and maintenance metric that exceeds the threshold (not the SQI Plan's standard and target threshold) for that metric (*i.e.*, if the RPHL exceeds 4.0, what action does Verizon take, such as placing the CO on a "hot spot" list etc.).

DTC-VZ 2-12: Refer to DTC-VZ 1-4 and 1-5. Describe in detail all factors considered (*e.g.*, age of facilities, service life of facilities, trouble report history, etc.) in determining whether modernization and replacement projects are needed and how each factor is weighed when making decisions to implement a modernization and replacement project.

DTC-VZ 2-13: Refer to the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at pp. 18, 19-21.

- (a) Describe Verizon's policies, practices and procedures regarding responding to trouble reports. .

- (b) What are Verizon's policies, practices and procedures regarding trouble reports received from a person other than the customer with a service issue, *i.e.* a neighbor, workman
- (c) Are trouble reports received on weekends handled differently than those received Monday through Friday, and, if so, how?
- (d) Describe Verizon's policies, practices and procedures regarding repairs on the weekends.

DTC-VZ 2-14: Refer to the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at pp. 22-23. A Rowe resident complained about the "swapping" of lines where technicians apparently resolve a service complaint by switching the problem line with a line without the complained-of problem.

- (a) Has Verizon ever engaged in the practice of "swapping" lines?
- (b) Describe in detail Verizon's policies, practices and procedures on "swapping" of lines, including when and where "swapping" of lines is done?

DTC-VZ 2-15: Refer to Verizon's response to DTC-VZ 1-4 and the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at pp. 22, 27, 31 and 44. Explain in detail how the weather (*i.e.*, heavy rains, snow and wind) affect service quality and what actions has Verizon taken to minimize the effect of weather conditions on the service quality in the Town of Rowe in the past two years?

DTC-VZ 2-16: Describe in detail Verizon's policies, practices and procedures regarding bill credits to consumers due to outages and poor service quality.

DTC-VZ 2-17: Refer to the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at p. 32. Do Verizon's policies, practices and procedures for responding to trouble reports differ when multiple lines in a single neighborhood (*i.e.*, neighborhood outage) are involved? What are Verizon's policies, practices and procedures for customer follow-up after repairs are completed when multiple lines are involved?

DTC-VZ 2-18: Refer to the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at p. 41. Have Verizon repairmen made requests for Verizon to upgrade the lines in Rowe? If so, provide details of these requests.

- DTC-VZ 2-19: Refer to the transcript of the public hearing held in Rowe, Massachusetts on October 17, 2007, at pp. 45-46. Is there a minimum time period, i.e. 24 hours, before an outage is tallied or reported? If so, please explain.
- DTC-VZ 2-20: Refer to Verizon's response to DTC-VZ 1-7. Provide the most recent Remote Terminal Activity Record Report and Remote Terminal Equipment Inventory report for the two remote terminals that service the Town of Rowe.
- DTC-VZ 2-21: Refer to Verizon's response to DTC-VZ 1-7. Provide copies of the most recent reports involving cables in the Town of Rowe that were generated by the Proactive Cable Maintenance Process.
- DTC-VZ 2-22: Refer to Verizon's response to DTC-VZ 1-8. Describe in detail how Verizon budgets for network upgrades, repair and maintenance. What is the most granular level (e.g. wire center, regional, statewide) at which Verizon budgets for network upgrades, repair and maintenance?
- DTC-VZ 2-23: Provide the most recent upgrade, repair and maintenance budgets at the most granular level available that includes the Town of Rowe.
- DTC-VZ 2-24: Refer to Verizon's response to DTC-VZ 1-10. The response indicates that from April 2007 through September 2007 there were approximately 250 trouble reports requiring a Verizon dispatch. Were these trouble reports from only Rowe customers?



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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Petition of the Board of Selectman of the Town of Rowe, Massachusetts, pursuant to G.L. c. 159, § 24, regarding the quality of telephone service provided by Verizon New England, Inc. d/b/a Verizon Massachusetts.

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