

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 2324

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JOHN D. ROWLEY SR.

August 13, 2009

BY E-MAIL: Catrice.williams@state.ma.us

BY HAND DELIVERY:

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

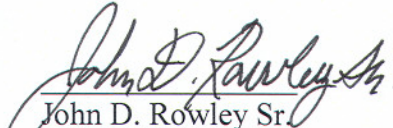
Re: D.T.C. 09-01 Investigation by the Department of Telecommunications and Cable on its own motion, pursuant to General Law Chapter 159, Section 16, of the telephone service quality of Verizon New England Inc., d/b/a Verizon Massachusetts, in Berkshire, Hampden, Hampshire, and Franklin Counties.

Dear Secretary Williams,

Pursuant to 220 CMR § 1.03, please find the following:

- a) Petition of International Brotherhood of Electrical Workers Local 2324 To Intervene and Participate in Proceedings; and
- b) Certificate of Service

Very truly yours,


John D. Rowley Sr.

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

**RE: INVESTIGATION OF VERIZON
TELEPHONE SERVICE QUALITY**

PETITION TO INTERVENE

Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("Local 2324") hereby petitions to intervene in this docket regarding Verizon. In support of this motion:

1. Local 2324 states that with, its sister locals, it is the collective bargaining representative for employees of Verizon in Western Massachusetts including Berkshire, Hampden, Franklin and Hampshire counties. Its office is at 281 Cottage Street, Springfield, MA 01104. Local 2324's members work for Verizon in accounting, traffic, plant and sales units.

2. Many of Local 2324's members live in Verizon's service territory in these counties and are Verizon customers. These members will be directly and personally affected by any changes in Verizon's service quality.

3. Local 2324's members are substantially and specifically affected by Verizon's operational policies and practices on a daily basis and have first hand knowledge or information that may assist the Department in reaching a decision in this matter.

4. Local 2324 intends to conduct discovery; cross-examine the Verizon's witnesses; file briefs; and may offer testimony on issues relevant to this matter. In particular, Local 2324 intends to use discovery, cross-examination and, possibly, even direct testimony to explore and address Verizon's decreased staffing levels and their effect upon service of customers.

5. Local 2324's members have knowledge of the service offered by Verizon to its customers and will assist the Department in obtaining relevant information.

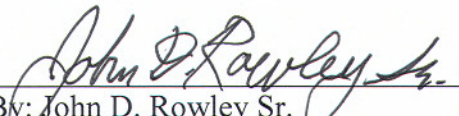
6. Local 2324 cannot specify at this time whether it seeks relief or what relief it seeks but it reserves the right to seek relief, if appropriate.

7. Local 2324 reserves whatever rights it may have, including the right to file a memorandum in support of this petition should Verizon or any other party object.

For these and other reasons, Local 2324 asks that the Department grant its petition to intervene.

Respectfully submitted,

International Brotherhood of Electrical Workers
Local 2324


By: John D. Rowley Sr.
Business Manager, IBEW Local 2324

Dated: August 13, 2009

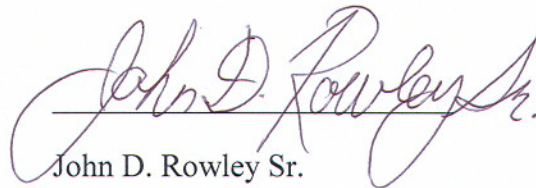
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 09-01

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 22CMR 1.05(1) (Department's Rules of Practice and Procedure)

Dated at Boston, Massachusetts this 13th day of August, 2009


John D. Rowley Sr.