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September 15, 2009

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

RE: Verizon Service Quality in Western
Massachusetts; D.T.C. 09-1

Dear Ms Williams:

Attached please find Set II of the Interrogatories of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW"), directed to Verizon New England, Inc., d/b/a/ Verizon Massachusetts ("Verizon MA" or "the Company").

In accordance with the procedural schedule issued in this proceeding, the Company's responses to the following interrogatories are due within 14 business days. By copy of this letter, we encourage the Company to submit responses as they become completed, within that timeframe.

All parties have been served as indicated on the attached certificate of service. Please do not hesitate to contact me if you have any questions.

Sincerely,



Darlene R. Wong
Charles Harak
Counsel for IBEW

cc: Certificate of Service
John D. Rowley, Sr.

INTERROGATORY INSTRUCTIONS AND DEFINITIONS

- A. THESE INTERROGATORIES SHOULD BE CONSIDERED TO BE CONTINUING AND ARE SUBMITTED PURSUANT TO 220 CMR 1.06(C)(6). DURING THE COURSE OF THESE PROCEEDINGS, IF ANY INFORMATION RELATIVE TO THE SUBJECT MATTER INQUIRED INTO HEREIN SHOULD BE OBTAINED BY THE RESPONDENT TO THESE INTERROGATORIES OR RESPONDENT'S COUNSEL, SUCH ADDITIONAL INFORMATION MUST BE TIMELY PROVIDED TO THE UNDERSIGNED.
- B. For each response, include the name of the person responsible for the response, with date that the response was prepared.
- C. For purposes of these Interrogatories, the following definitions shall apply:
1. "The Company" means Verizon New England, d/b/a Verizon Massachusetts.
 2. "The Department" means the Massachusetts Department of Telecommunications and Cable, except where otherwise specifically defined in the text of the particular interrogatory.
 3. "Document" means any written, printed, typed, recorded or other graphic matter of any kind or nature, including drafts and copies bearing notations or marks not found on the original; including but not limited to all memoranda, reports, financial reports, notes, letters, envelopes, telegrams, e-mails, other electronic data, messages (including reports, notes and memoranda of telephone conversations and conferences), studies, analysis, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes of all other communications of any type, including inter- and intra-office communications, purchase orders, questionnaires and surveys, blueprints, plans, charts, graphs, tapes or other recordings, punch cards, magnetic tapes, discs, data cells, digital image/scan, print-outs and other data compilations from which information can be obtained (translated, if necessary, by Respondent into usable form).
 4. Except where otherwise specifically defined in the text of the particular interrogatory, the word "Identify" shall have the following meaning:
 - a. As used herein "identify" or "identity", when used in reference to a document means to state:
 - i. Date and author or address;
 - ii. Type of document (e.g., letter, memoranda, telegram, chart, etc.) or some other means of identifying it; and
 - iii. The recipients of all copies of said documents.
 - b. As used herein "identify" or "identity" used in reference to a firm, partnership, association or corporation means to state its business name and present address and telephone number, the names and

present addresses of principal owners, participants, partners, officers and/or employees.

- c. As used herein "identify" or "identity" used in reference to an individual person means to state his full name, current address and telephone number, occupation and place of employment.
 5. "Person" means any person or persons, business, company, partnership, firm, distributor or other entity.
 6. Except where otherwise specifically defined in the text of the particular interrogatory, the word "Respondent" means the responding person, company, or corporation to whom these interrogatories are directed.
 7. "Verizon MA" and/or "Verizon Massachusetts" means Verizon New England, d/b/a Verizon Massachusetts.
 8. "Western Massachusetts" or "Western MA" means the service territory and facilities of Verizon New England, d/b/a Verizon Massachusetts that is the subject of the Department's investigation in this proceeding. It includes the entire service territory of Verizon MA within which is included the Counties of Berkshire, Hampden, Hampshire, and Franklin, and the Towns of Hancock, Rowe, and Shutesbury.
- C. If any information requested by any interrogatory herein is withheld when a privilege is claimed, for each such written document or communication state:
- a. Its date and type (e.g., letter, memorandum, etc.)
 - b. Its author;
 - c. Identity of the addressee;
 - d. Identity of all other persons who have received, copied or otherwise have been permitted to see all or part of the original or any copy thereof;
 - e. A description of each subject matter discussed, described or referred to therein;
 - f. The identity of its present custodian.

**Interrogatories and Requests for Production of Documents of
Local 2324, International Brotherhood of Electrical Workers, AFL-CIO
In re: Verizon Service Quality in Western Massachusetts
D.T.C. 09-1**

Set II

- 2-1. Please identify the names and locations (by city and address) of all wire centers serving the Company's Western MA customers, the NNX (e.g. 413-734-XXXX, 413-737-XXXX) associated with each wire center, and the cables that serve customers from those locations.
- 2-2. Regarding the outage on Grove Street in Adams, MA, that occurred on Tuesday, August 18, 2009, please explain:
- a) The time and date that Verizon MA first became aware of the outage;
 - b) The means by which Verizon first became aware of the outage;
 - c) The length of duration of the outage;
 - d) The maximum geographic extent of the outage (i.e., addresses that lost service);
 - e) The time, date, and means by which service was restored to all affected customers;
 - f) The steps Verizon MA undertook to address the outage, once it became aware of the outage;
 - g) Please produce all logs, notes, and documents related to recording, logging, and servicing this outage.
- 2-3. Please identify, describe, and explain all categories or areas of Verizon MA's business. For example, does the business of Verizon MA include wireline, internet connection and FIOS products?
- 2-4. Please describe all policies and directives related to reducing expenditures associated with providing service to Verizon MA customers in Western MA, from 2005 to present. Additionally, indicate what date each policy measure was implemented or is planned to be implemented, and the length of time of implementation. Provide documentation of these policies and directives.
- 2-5. Please provide any and all service quality reports and documents from the period of 2006 to present that have been submitted to the Department and/or the Massachusetts Department of Public Utilities that are related to Verizon MA service in Western MA.
- 2-6. Does the Company make any guarantees, statements, or give indications to customers regarding its response time? For example, is there a guarantee of installation of service within a specified number of days? If yes, please explain:

- a) The nature of each guarantee, statement, and/or indication to customers regarding Verizon MA's response time;
 - b) For each calculation of response time, whether and how weekends and holidays are included in the calculation;
 - c) Whether and how changes, if any, have been made to these guarantees, statements and indications to customers regarding the Company's response time, for the period of 2006 to present.
- 2-7. For 2006 through the present, please provide all documents concerning directions, guidance, recommendations, or information for Verizon MA employees related to any and all of the following: stocking, inventory and replacement of tools and equipment.
- 2-8. Has Verizon MA made a decision to decrease planned operations and maintenance expenses in Western MA? If so, please explain the basis for this decision and provide all documents relating to that decision.
- 2-9. Has Verizon MA made a decision to decrease planned investment in Western MA? If so, please explain the basis for this decision and provide all documents relating to that decision.
- 2-10. Has Verizon hired any consultants to assist it with service quality issues in Western MA, from 2005 to present? If yes, please identify the consultants and provide all related contracts for consultant services and explain what work was done under those contracts. If consultants provided services outside of a contractual arrangement, please describe and explain.
- 2-11. Please explain Verizon MA's procedure for approving its capital budgets. Include the following information:
- a) At what level of the Company is the final decision for approving Verizon MA's capital budgets made?
 - b) Identify all persons and entities responsible for the approval of Verizon MA's capital budget, whether they are internal or external to Verizon MA. Explain whether here is such a person(s) or entity(ies) responsible for the approval of Verizon MA's capital budget as it relates to the Western MA service territory
- 2-12. Regarding expenses that do not need to go through Verizon MA's procedure for approving its capital budgets (e.g. tools, inexpensive supplies, etc.), please identify and describe:
- a) The expense account names and/or categories of expense;
 - b) The overall amounts associated with each account name and/or category of expense for Verizon MA for each year from 2006 to 2008 and 2009 to date;
 - c) The amount associated with each account name and/or category of expense for the Company's provision of service to Western MA customers for each year from 2006 to 2008 and 2009 to date;

- d) The process by which these expenditures are requested and approved;
- e) Who is responsible for approving these expenditures;
- f) Under what circumstances is a request to incur these expenditures disapproved;
- g) The percentage of such expenditure requests that are disapproved.

2-13. Please provide the amount of expenditures related to the Company's use and purchasing of the following in the provision of service to Western MA customers, for each year from 2006 to 2008 and 2009 to date:

- a) Basic tools
- b) Safety tools
- c) Personal Safety equipment

2-14. Does Verizon MA, its parent company, or holding company have any plans to sell any of Verizon MA's operations and/or facilities in Western MA?

2-15. Does Verizon MA keep track of its worst performing cables? If no, please explain why this information is not tracked. If yes, please provide:

- a) An explanation of how those records are kept;
- b) An explanation of what information is recorded;
- c) Identify who maintains these records;
- d) Indicate whether a summary of these records existed in the normal course of business prior to June 1, 2009. If yes, please provide any and all such summaries created and additions to these record entries from calendar year 2006 to the present.

2-16. Regarding Verizon's response to IBEW Set I-14(c), if a workforce reduction has been indicated, please indicate whether any employees that are part of this reduction will remain employees of Verizon MA, its parent company or holding company, or subsidiary in another capacity. If so, explain in what new capacity each employee will serve.

2-17. For each quarter of the period of 2004 through present, please provide the number of permanent employees, covered and categorized by each job title covered by the plant section of the union bargaining agreement. For each position, include the permanent reporting headquarters.

2-18. Explain under what circumstances complaints from Verizon MA's Western MA customers are handled by an automated process (i.e. a computerized process that does not necessarily include human interaction).

2-19. Explain under what circumstances complaints from Verizon MA's Western MA customers are handled by a live person.

- 2-20. Explain what a “trouble ticket” is and explain the automated test that is applied to a trouble ticket.
- 2-21. Explain in what circumstances is a trouble ticket cancelled.
- 2-22. Describe and explain all circumstances in which a trouble ticket results in the dispatch of a service technician.
- 2-23. Describe and explain all the ways in which a trouble ticket may be counted as resolved and/or closed. Include whether the trouble ticket could be resolved or closed without an employee speaking to the customer.
- 2-24. For the calendar years 2006, 2007, 2008, and 2009 to date, please provide the following information related to trouble tickets generated from problems in Verizon MA’s Western MA service territory:
- a) Number of trouble tickets;
 - b) Number of cancellations of trouble tickets;
 - c) Number of customer lines associated with repeated complaints generating trouble tickets that year.

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

Re: Verizon Service Quality in Western Massachusetts

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D.T.C. 09-1

CERTIFICATE OF SERVICE

I certify that I have, on this day, served upon each person below the foregoing Set II, Interrogatories of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO, by first class mail and/or email, as indicated.

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DATED: September 15, 2009

BY:



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International Brotherhood of*