

Charles Harak, Esq.
7 Winthrop Square, 4th Floor
Boston, Massachusetts 02110-1245
617-988-0600 • Fax: 617-542-8028
charak@nclc.org

September 15, 2009

Catatrice 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 III 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.

3-1: (a) Please explain the current policies and procedures a repair and installation technician ("SST" [splice service technician] or other similar job category) in western Massachusetts must follow in order to get such basic tools as hammers, staple guns and tone probes replaced, and also compare that to the policies and procedures that must be followed for technicians in the company's Metro/NE area. In your answer, include samples of any forms (if any) the technician must fill out and name the approvals that must be obtained (e.g., 1st level manager, 2nd level manager, 3rd level manager, etc.). If those forms, policies or procedures differ in western Massachusetts from the Metro/NE area, please note all differences.

(b) Please explain how long it currently takes for a repair and installation technician in western Massachusetts to obtain such basic tools as hammers, staple guns and tone probes, from the time the technician first makes the request until he or she receives the tool, and compare that to the time it would take a similar technician in the Metro/NE area. Include a range of times, from the shortest time it takes to the longest time it takes. In particular, does it take as long as one year, at least in some instances, for a technician in western Massachusetts to obtain a new hammer or staple gun?

(c) Please provide an answer to part (a), but for the policies and procedures that existed as of 2004.

(d) Please provide an answer to part (b), but for requests to replace tools made in 2004.

(e) Since January 1, 2009, has Verizon instituted any changes to the approval requirements to purchase or obtain basic tools such as hammers, staple guns, and tone probes, and, specifically, any changes to require higher-level approvals for any orders? If yes, please provide any documents (written, e-mail/electronic or otherwise) that reflect these changes.

(f) Is there a single department or group that is responsible for placing orders for basic tools that employees need? If so, please provide the name of that department, the name and title of the head of that department, and a copy of the memos or manuals that govern its operations.

3-2: (a) Please explain whether, at any time, the company maintained tool rooms or equipment rooms in western Massachusetts which were stocked with basic tools such as hammers, staple guns, tone probes, tone boxes, shears, and batteries, and from which front-line field employees (such as SSTs [splice service technicians] or OPTs [outside plant technicians]) could obtain the basic tools they needed? If so, please explain what levels of approval an employee would need to obtain tools or equipment from the tool or equipment room, e.g., 1st level, 2nd level, or 3rd level managers? If the company did maintain such tool rooms or equipment rooms, during what period of time, and where were they located?

(b) At the present time, are there any locations in western Massachusetts where front-line field employees (such as SSTs or OPTs) can obtain the basic tools they need, or do

employees only obtain their basic tools by putting in a request and waiting for a purchase order to be filled? Please explain the process by which field employees in western Massachusetts currently obtain basic tools, including any forms that must be filled out; any requisition process; etc.

(c) At the present time, are there any locations in the company's Metro/NE area where front-line field employees (such as SSTs or OPTs) can obtain the basic tools they need without putting in requests to 1st level or higher managers? If yes, please list those locations. If no, please explain the process by which field employees in the Metro/NE area currently obtain basic tools, including any forms that must be filled out; any requisition process; etc.

3-3: What is the "TRG" or telesector resource group department? Please explain its roles and functions, including any role it plays in ordering parts and equipment.

3-4: (a) Please explain whether, at any time, 1st level managers in western Massachusetts were provided credit cards (or approval to use their own credit cards, with any appropriate charges being reimbursed by the company) in order to purchase basic tools without themselves having to obtain approval from higher-level managers. If so, during what period of time? Also include any changes in such policies and practices, specifically answering whether 1st level managers currently can purchase basic tools without first obtaining approval from higher level managers.

(b) Please provide an answer for 3-4 (a), but for 1st level managers in the Metro/NE area.

(c) Please explain the circumstances, if any, in which a front-line employee could purchase relatively inexpensive equipment or tools (e.g., work gloves) with his or her own funds and then receive reimbursement from the company, and include with the answer any and all memos, guidance, or policies governing this practice and any forms the employee must fill out.

(d) For calendar year 2008 and 2009 to date, please list the monthly amounts of any reimbursements made to employees in western Massachusetts for purchases those employees made of any tools, equipment or supplies.

3-5: Please provide a current organizational chart for all managers who report up to Frank Crosby in his role as a Director, including the name and title of each person currently serving underneath Mr. Crosby. Please include the name and description of the organization/department/group that Mr. Crosby directs.

3-6: Please provide a current organizational chart for all managers who report up to Jack Sordillo in his role as a Director, including the name and title of each person currently serving underneath Mr. Sordillo. Please include the name and description of the organization/department/group that Mr. Sordillo directs.

3-7: Please provide a current organizational chart for all managers who report up to John Puopolo in his role as a Director, including the name and title of each person currently serving underneath Mr. Puopolo. Please include the name and description of the organization/department/group that Mr. Puopolo directs.

3-8: Who is Joseph Bucciarelli? Include his job title and functions, and list the name and title of all of those who report directly to him, along with their roles and responsibilities. Also include the name and title of the person to whom Mr. Bucciarelli reports.

3-9: (a) Please explain the company's current policies regarding the number of ladders, sorted by ladder length, that it maintains, separately, for each SST and OPT (or per truck, if the policy is based on ladders per truck) in western Massachusetts (e.g., one 28' ladder for each employee (SST or OPT), or one 28' ladder for every two employees, or 1 ladder for each truck, etc.). If that ratio has changed over the period 2004 to 2009, please list the ratios for each relevant time period.

(b) Please provide the answer to part (a), but for employees in the company's Metro/NE area.

3-10: (a) For every garage or department in western Massachusetts, list the number of technicians per garage or department, for each 6 month period 2005 to date.

(b) For the same 6-month time periods sought in part (a), please list any target ratio of trucks to technicians (e.g., 1 truck for each technician; .9 trucks for each technician; etc.) and the actual ratio of trucks to technicians. Provide any written or electronic documents that reflect any such target ratios and any reports, summaries or other documents that reflect the actual ratios.

(c) Please either state, or provide documents that reflect, the number of trucks, vans and other vehicles sorted by type of vehicle and vintage (model year) of such trucks, vans and other vehicles (e.g., X trucks, 2005 model year; Y trucks, 2007; A vans, 2004 model year, B vans 2006; etc.). Provide this information separately for trucks/vans/vehicles in western Massachusetts and the company's Metro/NE area.

(d) Does the company "red line" or "red tag" trucks and vans it deems out of service and unavailable for use by technicians? Whether or not the company uses these terms, please separately list the percentage of trucks and vans in western Massachusetts that have been out of service at any time in 2009, and the percentage of trucks and vans out of service in Metro/NE at any time in 2009. In each instance, the denominator should be the total number of trucks and vans based in the region, and the numerator should be the total number of such vehicles out of service at any time.

3-11: (a) For the western Massachusetts region, and separately for each year 2004 to 2009, please provide the average numbers of trucks, by size or category, in service and available for use by technicians and other front-line employees (e.g., SSTs and OPTs, and

other similar employees), and the average number of technicians or other employees during that same year who use trucks for their regular work.

(b) Please provide the same information requested in 3-11 (a), but for the Metro/NE region.

3-12: (a) Does Frank Crosby play any role in the purchase of basic tools such as hammers, staple guns, tone probes, and tone boxes; if so, fully explain his role.

(b) At any time, did Verizon buy basic tools in bulk for its employees in western Massachusetts, and, if so, did it stock the basic tools so purchased in tool or equipment rooms accessible to front-line employees such as SSTs and OPTs? If so, please state the relevant time periods.

(c) At any time, did (or does) Verizon buy basic tools one at a time, on an as-needed basis, for its employees in western Massachusetts? If so, please state the relevant time periods.

3-13: For the all of 2008 and for 2009 to date, please provide all written memos, e-mails, and other communications from Frank Crosby to David Walker, and any memos, e-mails and other communications from David Walker to 1st level managers, regarding any of the following topics : stocking or purchase of any tools or equipment of any kind; purchase, maintenance, sale or lease of any trucks or vehicles; priorities or schedules for any repair, installation, construction or removal work; preparation of any reports (including any reports having to do with complaints or requests for service).

3-14: (a) Please define and describe what “FIOS” is.

(b) Is there any FIOS installed in the 413 area? If so, where is it located; what lengths are installed; and what purposes does it serve.

3-15: (a) Please explain the monitoring systems the company employs in western Massachusetts to determine whether there are problems such as equipment failures, service interruptions, loss of dial tone, etc. Please name and describe any such systems, including any so-called “surveillance” reports.

(b) Please describe any warning, alarm or other notification systems the company employs to alert staff who monitor system operations that there are problems on the system, including problems that interrupt service and those that do not interrupt service. If there are any tiers or levels within these warning or alarm systems (such as more major alarms for situations that interrupt service and more minor alarms for situations that do not actually interrupt service), please describe these warning or alarm levels in detail.

3-16: To the extent that the company produces periodic or summary reports on the information gathered via any of the monitoring systems discussed in the answer to 3-15, please provide all such summaries or reports for calendar year 2008 and 2009 to date.

3-17: (a) Please provide a copy of any of the current written policies or protocols addressing how promptly Verizon responds to any of the alarms or warnings generated in western Massachusetts by the monitoring systems discussed in the answer to 3-15. If there are no written policies or procedures, explain why not, and provide an explanation of how the company prioritizes its response to various levels or warnings or alarms.

(b) To the extent any of the policies, protocols or timelines described or discussed in 3-17 (a) would have been different in 2004, please provide an answer to the question in 3-17 (a), but as to calendar year 2004.

3-18: Please explain whether Verizon prioritizes its field work in western Massachusetts as follows. (To the extent the summary below is not an accurate summary, please provide a full explanation of how work priorities are established regarding these types of service, and include any memos, policies, guidance or documents [including e-mails] that explain these priorities):

First priority: DSL business customers/service.

Second priority: Wireline business customers/service.

Third priority: DSL residential customers/service.

Fourth priority: resold accounts (e.g., Choice Communications)

Fifth priority: "POTS" – residential customers/service (excluding DSL).

3-19: (a) For purposes of calculating its response time to service requests from customers, please identify at what point Verizon starts the clock running. In particular, does the clock always start running at the time of the customer's first contact with Verizon about the problem or complaint, or is there ever a circumstance when the clock is started (or re-started) at some other point? If the latter, please explain those circumstances.

(b) How does the company measure time for lines "out of service"?

(c) Does the company ever "stop the clock" when tracking response time to trouble calls or complaints, or when tracking time to install service from time of request? If so, what events or conditions would result in the clock being stopped?

3-20: (a) Please explain what "MLT" or "mechanized loop test" is and the circumstances when it is employed.

(b) Please explain the type and vintage of the equipment used to do mechanized loop testing.

(c) Please list the number of pieces of MLT equipment currently deployed in western Massachusetts, separately listing the number of such pieces of equipment that are operative and in service, versus those that are inoperative or out of service for any reason.

(d) For each piece of MLT equipment, please state the date it was last tested for accuracy.

(e) For each year 2004 to 2009, please list the number of Verizon technicians on staff who were trained and capable of testing MLTs.

(f) What percentage of the time does MLT equipment register false positives (that is, shows that a line is working when it may not be working).

(g) What circumstances can lead an MLT to register a false positive?

3-21: If a customer makes a complaint about lack of dial tone or any other service problem, and the MLT or other testing equipment shows that the line is in fact working, please explain the actions the company then takes, including: (a) Does the company remove the complaint or service request from the list of open or pending complaints or service requests? (b) Does the company treat the complaint or service request as resolved or closed? (c) Does the company stop the clock on how quickly it has responded to that complaint or service request? (d) Does it inform the customer, by phone call or other means, that from the company's perspective the complaint or service request has been resolved?

3-22: For the years 2008 and 2009 to date, how many (and what percentage) of complaints or requests for service were deemed resolved, cleared or closed due to the results of the use of MLT or other remote testing of the line?

3-23: On or around the period May 23-25, 2009, did customers in the Town of Peru experience any problems with their telephone service? If so, please state or explain:

(a) When and how the company first learned of any service problems (including both calls from any affected customers, and the date and time of any alarms produced by the company's alarm reporting system);

(b) When service technicians were first dispatched, and when those problems were completely resolved;

(c) The underlying cause of the service problem;

(d) The number of customers affected;

(e) Whether there is cell service/reception in the town;

(f) Whether the police department's phone service was affected, and whether any 911 calls would not have gone through during the time the service was out.

Include with this answer a copy of all complaints of any kind lodged by any customer in Peru, or by any other person, regarding this service problem.

3-24: Please explain whether Verizon customers in western Massachusetts pay the same rates for wireline service as customers in the rest of the state. If not, provide please summarize all of the differences in rates.

3-25: (a) Please provide the average price the company pays for the following basic tools: hammers, staple guns, tone probes, tone boxes.

(b) Please list the basic tools that SSTs and OPTs need to do their jobs.

3-26: Please explain what a breakdown set is, and what it is used for.

3-27: (a) Are SSTs and OPTs provided with their own lockers to store their basic tools, personal safety equipment, and other tools or equipment needed to perform their jobs and that are expected to be in the employee's control and possession on a day-to-day basis?

(b) If personal lockers are not provided, what is the company's expectation as to where these items of personal safety equipment/tools are to be safely stored when the employee is off duty?

(c) If employees are expected to store their own tools/personal safety equipment in company trucks, are employees assigned their own trucks, or do employees rotate through a number of different trucks on a daily or weekly basis?

3-28: (a) Does the company offer its residential customers any type of service contract that covers any telephone equipment, lines, inside wiring, etc?

(b) If yes, please provide a copy of the standard form agreement offered to customers.

(c) If the service or other agreements cover inside wiring on the customer's premises, please explain how the customer is informed that the agreement covers inside wiring, both at the time the agreement is signed and at the time a customer might call for service.

3-29: Please provide a copy of any J. D. Powers survey of customer satisfaction, or any other customer satisfaction survey, performed either by a third party or the company itself, that includes western Massachusetts customers in the survey, for the period 2004 to 2009.

3-30: Please provide cable layouts or schematics for all cables in western Massachusetts.

3-31: Please describe in detail what a "WFA" or "workforce dispatch" report is; the types of information contained in it; and when employees would use this report. Please provide 5 sample WFA or workforce dispatch reports. Also state whether these reports currently show prior complaints from a customer.

3-32: (a) Please describe in detail what a "V-repair" report is; the types of information contained in it; and when employees would use this report. Please provide 5 sample V-repair reports. Also state whether these reports currently show prior complaints from a customer.

(b) If neither the V-repair reports nor WFA/work dispatch reports show prior complaints from a customer, where would any record of prior complaints be maintained, and which types/categories of employees would have access to this information?

3-33: Please explain when, if at all, the company would provide the DTC copies of either V-repair reports or WFA/workforce dispatch reports.

3-34: Please explain what a form 3722 is, including when it is utilized and for what purposes.

3-35: (a) Please provide any and all memos, e-mails and other communications regarding the use of 3722s, drafted or distributed in the period 2004 to date, and include any written or oral communications to employees as to how promptly they are to address any problems identified by 3722s.

(b) When an employee fills out a 3722, where is that employee supposed to file or send the original, and, separately, file or send any copies? Where are the original and any copies stored?

(c) To the extent not included in documents provided in response to part (a) of this question, please explain how 3722s are processed: who initially reviews them; how are problems identified on 3722s turned into work or dispatch orders; how does the company track whether and how quickly problems identified in 3722s are addressed?

3-36: As of September 2009, how many unresolved 3722s are there in western Massachusetts, and how many 3722s have been resolved in 2009? How many 3722s were resolved for each year 2004 through 2008?

3-37: Please state whether Frank Crosby, Chris Creager, John Puopolo, Joseph Bucciarelli or any other manager at any time made a statement to the effect that the company is reluctant to replace old or poorly functioning cables or lines in western Massachusetts because the company does not have enough money to do so, or would not earn enough money to cover the cost of replacement; or to the effect that "there is no money out here" (referring to western Massachusetts); or to the effect that "we're not investing in western Massachusetts."

3-38: For the period 2005 to date, have any employees based in any Verizon area other than western Massachusetts (referring to the geographic divisions Verizon uses to organize its operations such as southeast MA, central MA, Metro/NE, etc.) been assigned or transferred to work in western Massachusetts? If so, please list each such instance of

any assignment or transfer, including the relevant dates; the number of people so assigned; and the reason for the assignment.

3-39: For the period 2005 to date, have any employees based in western Massachusetts been assigned or transferred to work in any other area served by Verizon (referring to the geographic divisions Verizon uses to organize its operations such as southeast MA, central MA, Metro/NE, etc.) ? If so, please list each such instance of any assignment or transfer, for the period 2005 to date, including the relevant dates; the number of people so assigned; and the reason for the assignment.

3-40: Provide a copy of any communication (written, electronic/e-mail, or other communication) regarding the policies, practices or procedures for transferring or temporarily assigning SSTs or OPTs from their usual work location to other work locations.

3-41: Please list any and all locations where cables or drop wires are still lying on the ground, on customer lawns or on fences as a result of the ice storm of December 2008. Please provide a list and printout of all complaints by customers or public safety officials regarding these downed lines.

3-42: Please define the roles and responsibilities of an "SST" (service splice technician) and an "OPT" (outside plant technician).

3-43: For the period 2008 and 2009 to date, please list:

(a) the amounts of money obtained by Verizon from any "Joint Users" on poles where Verizon is the pole owner, and the reason for these payments to Verizon;

(b) the amounts of money paid by Verizon to any "Joint Users" on poles where Verizon is the pole owner, and the reason for such payments to any joint user;

(c) the amounts of money obtained by Verizon from any "Joint Users" on poles where Verizon is not the pole owner (e.g., an electric company is the pole owner), and the reason for these payments to Verizon; and

(d) the amounts of money paid by Verizon to any "Joint Users" on poles where Verizon is not the pole owner, and reason for such payments to any joint user.

3-44: For 2008 and 2009 to date, and for all use of outside contractors retained for installation, repair, maintenance or construction work, list the name of the outside contractor; a description of the type of work done by that contractor; and the amount paid to that contractor.

**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 III, Interrogatories of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO, by first class mail and/or email, as indicated.

Alexander W. Moore, Esq.
185 Franklin Street — 13th Floor
Boston, MA 02110-1585
alexander.w.moore@verizon.com
Electronic copy only

Patrick J. Tarmey, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
Patrick.tarmey@state.ma.us

Robert N. Werlin, Esq.
Keegan Werlin LLP
265 Franklin Street
Boston, MA 02110-3113
rwerlin@keeganwerlin.com

Sandra Callahan Merrick, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
sandra.merrick@state.ma.us

Susan Baldwin
48 Franklin Street
Watertown, MA 02472
smbaldwin@comcast.net
Electronic copy only

M. Katherine Eade, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
Katherine.eade@state.ma.us

Kajal Chattopadhyay
Acting General Counsel
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110
kajal.chattopadhyay@state.ma.us
benedict.dobbs@state.ma.us

Michael Isenberg
Director, Competition Division
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110
mike.isenberg@state.ma.us

Benedict Dobbs
Asst. Director, Competition Division
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110
Benedict.dobbs@state.ma.us

Jeremia Pollard
Hannon Lerner
184 Main Street
Lee, MA 01238
jpollard.hannonlerner@gmail.com

Karen M. Melanson, Sr. Consultant
Verizon
185 Franklin Street, 17th Floor
Boston, MA 02110
karen.m.melanson@Verizon.com
Electronic copy only

R.J. Ritchie, Esq.
Office of the Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
ronald.ritchie@state.ma.us

Christopher E. Bean, Sr. Consultant
Verizon
185 Franklin St, 17th floor
Boston, MA 02110
Christopher.e.bean@verizon.com

Peter D'Errico
Leverett Board of Selectmen
Town of Leverett
9 Montague Road
Leverett, MA 01054
derrico@legal.umass.edu

Patricia Cantor
Kopelman and Paige
101 Arch Street
Boston, MA 02110
PCantor@k-plaw.com

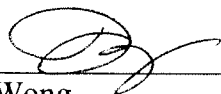
George C. Jordan III, Editor and Publisher
The Berkshire Beacon
P.O. Box 312
Lenox Dale, MA 01242
george@berkshirebeacon.com

Catrice C. Williams
Department Secretary
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110
dtcefiling@state.ma.us
Catrice.williams@state.ma.us

Kalun Lee
Hearing Officer
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110
Kalun.lee@state.ma.us

DATED: September 15, 2009

BY:



Darlene R. Wong
Charles Harak
7 Winthrop Square, 4th Floor
Boston, MA 02110-1245

*Counsel for Local 2324,
International Brotherhood of
Electrical Workers, AFL-CIO*