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December 29, 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:

Enclosed please find the responses Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW") to the first set of information requests by the Department of Telecommunications and Cable to IBEW. All responses have been provided to this set:

DTC-IBEW-1-1	DTC-IBEW-1-6
DTC-IBEW-1-2	DTC-IBEW-1-7
DTC-IBEW-1-3	DTC-IBEW-1-8
DTC-IBEW-1-4	DTC-IBEW-1-9
DTC-IBEW-1-5	DTC-IBEW-1-10

Copies are being served on the parties as indicated by the attached certificate of service. Please feel free to contact me if you have any questions.

Sincerely,



Darlene R. Wong
Charles Harak
Counsel for IBEW

cc: Service list
John D. Rowley, Sr.

**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 Responses of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO (“IBEW”) to the first set of information requests by the Department of Telecommunications and Cable to IBEW, by first class mail and/or email, as indicated.

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DATED: December 29, 2009

BY:



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Electrical Workers, AFL-CIO*

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-1

Referring to the IBEW's conversation with Jason Hnatonko discussed on page 6 of its Testimony, provide all documents, including any notes, from the conversation.

Response:

I do not have any notes or other documents relating to my conversation with Mr. Hnatonko.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-2

Referring to the IBEW's identification of "building problems" discussed on page 9 of its Testimony, provide all documents in the IBEW's possession identifying and/or discussing such problems.

Response:

I do not have any written documents identifying or discussing the "building" problems discussed on page 9 of my testimony.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-3

Referring to communications received by the IBEW from its members and managers regarding the condition of the telephone lines in Western Massachusetts discussed on page 9 of its Testimony, provide all documents in the IBEW's possession identifying and/or discussing those conditions.

Response:

On page 9 of my testimony, I discuss the lack of appropriate attention from first and second level managers, using "building" problems as an example. (See DTC-IBEW-1-2). On page 9 I also discuss the pressure on front line managers to meet productivity levels. I do not believe that I discuss the condition of telephone lines in Western Massachusetts on page 9. However, to the extent this information request is asking for any documents in IBEW's possession regarding the condition of telephone lines in Western Massachusetts, IBEW does not have any documents.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-4

Provide all Forms 3722-19 in the IBEW's possession.

Response:

Local 2324 does not have any of Forms 3722-19 in its possession.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-5

Referring to the IBEW's statement on page 36 of its Testimony regarding receiving reports that "many 3722-19s are either (1) not addressed for months or (2) not addressed at all[,] " provide all documents, including any notes, in the IBEW's possession regarding such reports.

Response:

There are no such documents in IBEW's possession.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-6

Referring to the meeting discussed on page 36 of the IBEW's Testimony between the IBEW, Dave Walker, and Frank Crosby regarding whether Forms 3722-19 are supposed to be created, provide all documents, including any notes, in the IBEW's possession regarding the meeting.

Response:

I have been unable to locate any notes or other documents regarding this meeting.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Objection, prepared by counsel

DTC-IBEW-1-7

Referring to the IBEW's statement on page 36 of its Testimony regarding its knowledge "that Area Manager William Wilson was aware of the fact that some managers have boxes of 3722s and others just throw them away[,] identify each individual who provided such information to the IBEW.

Response:

IBEW objects to the question, on the ground that any information that would be obtained (the mere names of individuals who provided such information to IBEW, all of whom are members of 2324) would be of extremely limited probative value to the Department, yet disclosing those names would place those individuals at risk of retaliation by Verizon.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-8

Referring to the IBEW's discussion on page 39 of its testimony regarding complaints from its members regarding the availability of resources from Verizon in Western Massachusetts, provide all documents in the IBEW's possession regarding such complaints.

Response:

IBEW does not have any documents in its position that are responsive to this request.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-9

Referring to the IBEW's statement on page 40 of its Testimony regarding Verizon's statement that it "will probably never go to Western MA with FIOS[,] provide all documents in the IBEW's possession, including any notes, regarding Verizon's strategy and investment plans in Western Massachusetts.

Response:

I have not yet located any documents that are responsive to this question. To the extent there may be such documents, they are in storage. However, I will continue to look and will supplement my answer if necessary.

Dated: December 29, 2009

Response of Local 2324, IBEW
In re: Verizon Service Quality in Western Massachusetts
DTC 09-01

Respondent: John D. Rowley, Sr.

DTC-IBEW-1-10

Referring to the IBEW's statement on page 42 of its Testimony that "Directors Frank Cosby and John Puopolo have indicated to Members that no investments would be made in the 413 area code[,]" provide all documents in the IBEW's possession, including any notes, regarding Messrs. Cosby's and Puopolo's statements to the members of IBEW.

Response:

I have not located any documents in IBEW's possession that are responsive to this request.

Dated: December 29, 2009