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January 29, 2010

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

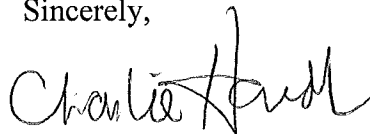
RE: Verizon Service Quality in Western
Massachusetts; D.T.C. 09-1

Dear Ms. Williams:

Attached please find Set XI of the Interrogatories of Local 2324, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW"), regarding the testimony filed by Verizon.

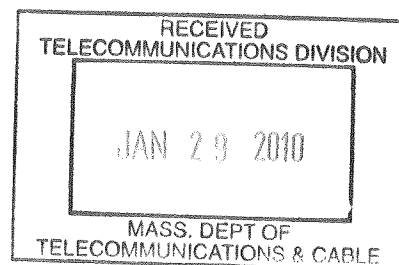
All parties have been served as indicated on the attached certificate of service. Please do not hesitate to contact me if you have any questions.

Sincerely,



Charlie 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 by 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 XI
Requests to Verizon**

Note: In this set of information requests, all page references are to Verizon's panel testimony.

IBEW-VZ 11-1

Regarding p. 49, line 14 to p. 50, line 9 of Verizon MA's panel testimony, are there any other purposes that a 3722-19 would be used for other than what has been described here?

IBEW-VZ 11-2

Regarding p.57, lines 6-17, and for the period of "late 2007" (testimony, p. 57, l. 6) to June 30, 2009:

- a. identify the number of technicians disciplined by month, and by local. For each technician disciplined, include a description of the job title, nature of the deviation, and the level, type and description of the discipline.
- b. identify the number of managers "held accountable" by month. For each manager held accountable, include a description of the job title, department to which the manager was assigned at the time, nature of the problem, and the level, type and description of how each was held accountable.

IBEW-VZ 11-3

Regarding p.57, lines 6-17, and for the period of July 1, 2009 to present:

- a. identify the number of technicians disciplined by month, and by local. For each technician disciplined, include a description of the job title, nature of the deviation, and the level, type and description of the discipline.
- b. identify the number of managers "held accountable" by month. For each manager held accountable, include a description of the job title, the department to which the manager was assigned at the time, nature of the problem, and the level, type and description of how each was held accountable.

IBEW-VZ 11-4

Regarding p. 59, lines 4-6, does Verizon MA acknowledge that, as result of a fire at its Brookdale garage in Springdale, MA on or around March 2008, employees submitted receipts to first level manager Anthony (Tony) Collier or second level manager David Walker for reimbursement for personal tools lost and/or damaged in that fire?

IBEW-VZ 11-5

Regarding p.62, lines 15-17, what percentage of time did Mr. Crosby's job tasks require him to have direct contact with the field technicians, specifically in settings where directives to the workforce would have been conveyed from Mr. Crosby to workers? Include any written documentation of directives from Mr. Crosby regarding the use of Form 3722-19.

IBEW-VZ 11-6

Regarding p. 64, lines 6 -13, provide the number of technicians assigned to resolve open plant issues in Western MA for each month, for calendar years 2007 to 2009.

IBEW-VZ 11-7

Regarding p.65, lines 5-8, Verizon states it will not dispatch a technician if the company is able to reach the customer's answering machine.

- a. Please clarify whether this answer encompasses the event when Verizon MA reaches a customers' voicemail on Verizon's software in the Company's central office.
- b. When Verizon calls and reaches a customer's voicemail service or answering machine, does Verizon leave a message for the customer? If yes, what is the complete content of that message?
- c. In what manner could a trouble resolve itself? If the company believes a trouble has resolved, without having sent a technician to the customer's premises, does it contact the customer to confirm that the customer agrees that the trouble has resolved? If the company is unable to reach the customer, does the company dispatch a technician?

IBEW-VZ 11-8

Regarding p. 66, lines 14-20, where Verizon states that reports of trouble are always followed by a call to the customer, please provide support for that statement with a log, by month, of all trouble reports for 1/1/2009 to present and include:

- a. how many trouble reports concerning the same complaint were made
- b. any and all results of the auto test(s) due to the trouble report
- c. whether Verizon MA provided a follow-up phone call
- d. whether the trouble report resulted in a dispatch of a technician

- e. a record with date and time of the customer calls initiated by Verizon to the customer in response to the trouble report.

IBEW-VZ 11-9

Regarding Verizon testimony at p 73, line 7 to p. 74, line 1, for 1/1/2007 through the present provide:

- a. the amount that Verizon MA has invested in Western MA for DSL, by month, and describe the nature of each specific category of investment including plant additions, and the cost of each additional investment;
- b. the amounts Verizon MA has invested in Eastern MA, and describe the nature of each specific category of investment including plant additions, and cost of each additional investment.