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January 8, 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:

Enclosed please find the Set X 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", "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.

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.

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 X

1. Please clarify what is meant by “support” in Verizon MA’s Panel Testimony at p.3, line 18 through p. 4 line 3 in which the statement is made that “all three members of the panel support the testimony in its entirety.”
 - a. Please specify all specific pages of panel testimony and Verizon Exhibit 1 which Mr. Conroy adopts as his own.
 - b. Please specify all specific pages of panel testimony and Verizon Exhibit 1 which Mr. Sordillo adopts as his own.
 - c. Please specify all specific pages of panel testimony and Verizon Exhibit 1 which Mr. Vasington adopts as his own.
2. Regarding Verizon MA’s Panel Testimony at p. 13, lines 3 to p. 14, line 3, does “Troubles Cleared Within 24 Hours” include scrubbed calls?
3. Regarding note 2 of Verizon MA’s Panel Testimony, please provide Page 5 of the Verizon MA Alternative Regulation Plan.
4. Regarding Figure 2 at p. 10 of Verizon MA’s Panel Testimony:
 - a. Explain the method of calculation behind the RPHL numbers for 2007, 2008, and 2009.
 - b. Provide the data and documentation underlying those calculations
 - c. Identify all persons performing the calculations
 - d. Identify all persons who collected the data and documentation.
5. Regarding Figure 3 at p. 13 of Verizon MA’s Panel Testimony:
 - a. Explain the method of calculation of the Western MA Results.
 - b. Provide the data and documentation underlying those calculations.
 - c. Identify all persons performing the calculations
 - d. Identify all persons who collected the data and documentation.
6. Regarding Figure 4 at p. 15 of Verizon MA’s Panel Testimony:
 - a. For each, separately explain the method of calculation for the Statewide Results, E. MA Results, and W. MA Results
 - b. Provide the data and documentation underlying those calculations.
 - c. Identify all persons performing the calculations
 - d. Identify all persons who collected the data and documentation.
7. Regarding Figure 5 at p. 17 of Verizon MA’s Panel Testimony:
 - a. Explain the method of calculation used for each year of installation work results shown on the chart.

- b. Provide the data and documentation underlying those calculations.
 - c. Identify all persons performing the calculations
 - d. Identify all persons who collected the data and documentation.
- 8. Regarding Figure 6 at p. 18 of Verizon MA's Panel Testimony:
 - a. Explain the method of calculation used for repair results for each year of the chart.
 - b. Provide the data and documentation underlying those calculations.
 - c. identify all persons performing the calculations
 - d. identify all persons who collected the data and documentation.
- 9. Regarding Figure 7 at p. 26 of Verizon MA's Panel Testimony:
 - a. Explain the method of calculation used for RPHL
 - b. Provide the data and documentation underlying those calculations.
 - c. Identify all persons performing the calculations
 - d. Identify all persons who collected the data and documentation
- 10. Regarding the IBEW-VZ-2-5 that is referenced in note 13 of Verizon MA's Panel Testimony (please reference the updated version served on December 29, 2009):
 - a. Clarify whether the reference is to the update to that response, "Supplemental Attachment IBEW-Vz-2-5" that was served on Dec. 29, 2009.
 - b. Identify all persons performing the calculations contained in that response
- 11. Regarding p. 16, line 18 of Verizon MA's Panel Testimony that references an independent third party commissioned by Verizon MA:
 - a. identify the independent third party
 - b. provide the contract between the Company and the third party to conduct Customer Care Index ("CCI") surveys.
- 12. Regarding p. 17, lines 1 through page 10 line 19 in which CCI results are summarized:
 - a. provide a copy of each unique CCI surveys for Western Massachusetts that was used for every year since 2004 to 2009 YTD.
 - b. provide any and all reports by the independent third party to the Company regarding the CCI surveys for the time discussed, every year since 2004. For each survey, include information regarding the methodology for conducting the survey and calculating survey results, survey parameters, identify the specific population surveyed in number and nature, and month and date of the survey for each year, 2004 to 2009 YTD.
 - c. Provide a representative copy of a completed CCI survey for every year from 2004 to 2009 YTD.
- 13. Regarding p. 14, lines 7-8 of Verizon MA's Panel Testimony, explain what is meant by "evaluating overall service quality on a regional basis" and how that differs from "analyzing [service quality] on a regional basis."

14. Regarding p. 17, line 5 through line 8, clarify whether installation “satisfaction” numbers include:
 - a. installation of basic dial tone service (i.e., dial tone only, no optional services);
 - b. installation of DSL
 - c. installation of FIOS
 - d. identify any other installations included in the satisfaction numbers
15. Regarding p. 45, line 23 through p. 46, line 5 of Verizon MA’s Panel Testimony, of the managers referenced, what percentage of them are:
 - a. first level managers
 - b. second level managers
 - c. third level managers
 - d. higher than third level managers
16. Regarding p. 62, lines 2-4 of Verizon MA’s Panel Testimony in which it is stated that “the mere fact that Verizon MA does not always perform the work proposed on a Form 3722-19 does not mean that management has ignored the suggestion,” please clarify:
 - a. the historical process and medium (e.g., paper and/or electronic?) by which 3722-19 forms have historically been maintained in records, if at all, and for what length of time;
 - b. whether deferred work (“DW”) tickets are always based upon 3722-19 forms and whether they can originate from something else. If DW tickets originate from sources other than 3722-19 forms, please identify those sources.
17. Regarding note 22 at p. 50 of Verizon MA’s Panel Testimony:
 - a. Will Form 3722-19s will be maintained in records under Verizon MA’s new automated process? If yes, for how long?
 - b. Who will maintain the 3722-19 records?
 - c. Who will make the decisions of whether and when a 3722-19 must be acted upon?
18. Regarding p. 71, lines 14-15 of Verizon MA’s Panel Testimony:
 - a. Is it Verizon MA’s position that trouble reports do not exist for T1 circuits?
 - b. Please confirm whether T1 circuits carry service for internet capability.
19. Regarding p. 71, line 19 of Verizon MA’s Panel Testimony, clarify all persons encompassed by “our” in the statement that “to our knowledge, no manager with responsibility....”
20. Regarding p. 72, lines 18-22 of Verizon MA’s Panel Testimony, provide supporting documentation showing all instances that Verizon MA has transferred technicians into Western Massachusetts from 2007 to present. For each instance, include:
 - a. the number of technicians so transferred;
 - b. the dates for which the transfer was in effect;
 - c. the trouble (identify nature and extent) to which the transferred technicians have responding
 - d. the number of customers affected by the trouble

21. Regarding p. 73, lines 19-21 of Verizon MA's Panel Testimony in which the statement is made that deployment of DSL has no bearing on regulated telephone service quality, does Verizon MA agree that its provision of DSL service currently utilizes equipment, plant, copper cable or facilities which have been paid for through customer rates set by the Department of Telecommunications and Cable or its predecessor agency?
22. Regarding p. 74, lines 11-14, of Verizon MA's Panel Testimony, provide the supporting documentation regarding the four trouble reports and Verizon MA's response to the trouble reports.
23. Regarding p. 74, line 22 through p. 75, line 8, please provide the supporting documentation for the March 27, 2009 trouble report and Verizon MA's response to the report.
24. Regarding Verizon MA's Exhibit 1, attached to the Panel Testimony, please identify, describe and explain any substantive differences between this Exhibit and that which was provided as "Supplemental Attachment IBEW-VZ-2-5" that was served on December 29, 2009.

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

Re: Verizon Service Quality in Western Massachusetts)	
)	D.T.C. 09-1
)	

CERTIFICATE OF SERVICE

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

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DATED: January 8, 2010

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