

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

)	
IN RE: VERIZON SERVICE QUALITY IN)	D.T.C. 09-1
WESTERN MASSACHUSETTS)	
)	

PRE-FILED DIRECT TESTIMONY

OF

JOHN D. ROWLEY, SR.

BUSINESS MANAGER OF THE INTERNATIONAL BROTHERHOOD

OF ELECTRICAL WORKERS, LOCAL 2324

ON BEHALF OF

THE INTERNATIONAL BROTHERHOOD

OF ELECTRICAL WORKERS, LOCAL 2324

NOVEMBER 9, 2009

1 Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE
2 RECORD.

3 A: My name is John D. Rowley Sr. My business address is 281 Cottage Street,
4 Springfield, Massachusetts, 01104

5

6 Q: PLEASE STATE THE NAME OF YOUR EMPLOYER AND YOUR POSITION
7 TITLE.

8 A: I am the Business Manager of the International Brotherhood of Electrical
9 Workers, Local 2324.

10

11 Q: WHAT ARE YOUR RESPONSIBILITIES IN YOUR CURRENT POSITION?

12 A: As Business Manager, I am the bargaining agent for Local 2324 in contract
13 negotiations, grievances, mediations and arbitrations with Verizon New England, Inc.,
14 d/b/a/ Verizon Massachusetts (“Verizon MA” or “Verizon” or “the Company”), Avaya,
15 and AT&T workers within my jurisdiction. I am responsible for the day to day
16 operations for Local 2324 in all Company related matters.

17

18 Q: WHAT IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE
19 RELATIVE TO TELEPHONE SERVICE QUALITY?

20 A: In June 1989, I began employment with New England Telephone as a Central
21 Office Technician. Until approximately 1996, I performed “conversions” throughout
22 Massachusetts, upgrading Central Offices from electro-mechanical equipment to
23 electronic switching systems.

1 Around 1997, I was assigned to work full-time in Cambridge, in the Ware Street
2 Central Office. Around 1998, I transferred to Springfield, Massachusetts, and was
3 assigned the 4 p.m. to midnight shift in the Toll Department. In the Toll Department, I
4 worked with data transport equipment. My geographical responsibility was Western MA.
5 In 2000 or 2001, I transferred to the Equipment Installation department. My main
6 function was to build DC power plants within Central Office, to ensure that back-up
7 power would be available in the event of a commercial power failure.

8 In 2003, I was selected by the Business Manager of IBEW Local 2324 to serve as
9 an Assistant Business Manager. In 2006, I was elected to serve as Business Manager for
10 three years. I have been re-elected in 2009 to continue to serve as Business Manager for
11 three more years.

12

13 Q: WHAT IS YOUR UNDERSTANDING OF THE NATURE AND SCOPE OF
14 THE CURRENT PROCEEDING BEFORE THE DEPARTMENT OF
15 TELECOMMUNICATIONS AND CABLE (DTC)?

16 A: The investigation by the DTC is based on consumer complaints regarding basic
17 telephone service provided by Verizon in Western Massachusetts in Hampshire,
18 Hampden, Franklin and Berkshire Counties. The issues were raised in the towns of
19 Hancock, Egremont, Shutesbury, and Rowe. The DTC conducted public hearings at
20 four locations in Western MA. Both sworn and unsworn oral testimony was taken. The
21 DTC seeks to determine if Verizon is and has provided quality basic service to its
22 customers in the Western part of the state.

23

1 Q: WHAT MATERIALS DID YOU REVIEW IN PREPARATION FOR YOUR
2 TESTIMONY?

3 A: I have reviewed the Verizon responses supplied to date, the initial comments that
4 were filed, and the DTC Order opening this investigation. Additionally, I attended each
5 of the public hearings in the Western part of the state, and the customers who testified
6 included not only town officials but also business owners and residential customers. The
7 basic subject matter of the complaint targeted poor infrastructure and/or investment in the
8 area, prolonged outages, recurring humming or static, deteriorating plant, and delays in
9 obtaining the appropriate repairs from Verizon MA. Trouble events, meaning any service
10 affecting problem a customer has on a line, appeared to be predominantly weather-
11 related. Continuing service problems, such as static and hum, were believed to be the
12 result of old copper wires. When Verizon employees were mentioned it was to praise the
13 technicians for doing everything possible to fix the trouble.

14

15 Q: ON WHOSE BEHALF ARE YOU TESTIFYING TODAY?

16

17 A: I am testifying on behalf of the Members of IBEW Local 2324 who are employed
18 by Verizon MA. They are Splice Service Technicians (“SSTs”),¹ Outside Plant
19 Technicians (“OPTs”),² Administrative Assistants (“AAs”),³ Customer Service Assistants

¹ Materials from the Company describe the duties of the SSTs as the installation, removal, maintenance and replacement of cable, coin facilities and equipment. SSTs travel between work locations in Company vehicles, perform their work outdoors in all weather conditions, and interact with customers in order to meet the customer’s communication needs. They are knowledgeable in and abide by all National Electrical Safety Codes and Company Safety Practices.

² The duties of OPTs are placing, rearranging, repairing, and removing all outside plant structures. OPTs drive to and from each work location in Company vehicles, and perform their work out of doors in all

1 (“CSAs”),⁴ Operators, Central Office Technicians (“COTs”), Facility Assigners (“FAs”),⁵
2 and Equipment Installation Installers (“EITs”).⁶

3

4 Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

5 A: I am testifying to ensure that the DTC has the resource of information from IBEW
6 Local 2324, an entity closely tied to service quality. We seek to provide information and
7 insight that is not otherwise attainable, so that the DTC can fairly evaluate the evidence in
8 this case and render its decision.

9

10 Q: HOW IS YOUR TESTIMONY ORGNANIZED?

11 A: First, I briefly summarize my conclusions and recommendations regarding
12 Verizon MA’s level of service quality to Western MA. Second, I discuss the facts that
13 reasons that support my conclusions and recommendation: (a) my review of the public
14 input testimony; (b) the difference in level of trouble reports in Western MA compared to
15 Eastern MA; (c) Verizon MA’s flawed recording of out of service (“OOS”) events and
16 the Company’s practice of “scrubbing” troubles and deferring work on Forms 3722-19;
17 and (d) the trend of Verizon MA disinvesting in copper infrastructure and maintenance

weather conditions. Like SSTs, they must be knowledgeable in and abide by all National Electrical Safety Codes and Company Safety Practices.

³ AAs: This is a basic clerical job that may require external customer contact.

⁴ CSAs receive repair requests from customers and then use the Mechanized Loop Test and various other mechanized systems to screen, test and route these troubles to the appropriate fixer organization.

⁵ Verizon MA materials describe the duties of FAs. FAs work with Field and Central Office technicians to coordinate cable pair and possible line equipment changes on installation orders or repair tickets.

⁶ EITs install, upgrade, modify, repair and remove all types of telephone equipment in Verizon buildings and remote locations. Like SSTs, OPTs and COTs, they must be knowledgeable in and abide by all National Electrical Safety Codes and Company Safety Practices. Size of work group varies depending on location and assignment.

1 needed for basic local service in Western MA, while instead redirecting investment into
2 optional services like FIOS in other parts of the state.

3
4 Q: PLEASE SUMMARIZE YOUR CONCLUSIONS AND
5 RECOMMENDATIONS.

6 A: I would strongly recommend and encourage the DTC to implement a structured
7 plan similar to its April 30, 2008 order in D.T.C./D.T.E. 06-6, *Petition of the Board of*
8 *Selectmen of the Town of Middlefields, Massachusetts, pursuant to G.L. c. 159 § 24,*
9 *regarding the quality of Verizon Massachusetts' telephone service* ("Middlefield Order").

10 The Middlefield Order was a result of an investigation into the quality of service
11 provided to the residents of Middlefield. Similar to the complaints in this case, the
12 complaints raised in Middlefield were that Verizon MA was providing unreliable and
13 substandard telephone service. The complaints were that Verizon MA did not promptly
14 resolve longstanding problems; that deteriorated and antiquated equipment negatively
15 affected service quality; and that unreliable service affected communications in
16 emergencies. Middlefield Order at 2-3. The Department ordered corrective measures.
17 Middlefield Order at 18. I recommend that in this case, the Department order Verizon to
18 undertake similar corrective measures. I have described these measures at the end of my
19 testimony.

20 I additionally recommend that the Department require Verizon to devote adequate
21 resources of both staff and equipment to properly maintain its Western MA operations.

22 One major problem I have seen is that the Company's Installation and/Maintenance
23 ("I/M") Department has shifted its predominant directives between productivity (i.e.,

1 getting the job done fast) and quality (i.e., getting the job done right and making sure the
2 copper wire infrastructure is adequately maintained) and vice versa. As a result, service
3 quality has often suffered. Also, at the present time the Company does not have enough
4 SSTs who are assigned to the I/M department in Western MA. As a result, the SSTs who
5 work in Western MA have unreasonable time constraints placed upon them by
6 management that make it extremely difficult to perform all of the work necessary to both
7 take care of trouble reports concerning basic telephone service, which need to be
8 addressed promptly, and maintaining the infrastructure so service quality does not
9 decline. While in recent months, Area Manager Dave Walker has told me that SSTs may
10 have to work overtime to catch up on deferred maintenance items, this appears to be
11 solely in response to the pending DTC proceeding, and not part of a committed strategy
12 of maintaining the western Massachusetts infrastructure in the long run. Whatever
13 corrective measure the Department orders in this proceeding should account for the
14 current lack of resources that Verizon MA is directing towards Western MA. Corrective
15 measures should be adequately funded and supported by an adequate labor force.

16
17 Q: DO YOU HAVE ANY CONCERNS ABOUT THE SERVICE QUALITY OF
18 VERIZON NEW ENGLAND, INC., D/B/A/ VERIZON MASSACHUSETTS
19 (“VERIZON MA”)?

20 A: Yes. I have spoken to Jason Hnatonko, Selectman of the Town of Adams,
21 regarding the recent telephone service outage in Adams, Massachusetts. Mr. Hnatonko
22 was very concerned that Verizon waited until Friday to respond to an incident of
23 lightning striking a utility pole and causing a service outage on the prior Tuesday. I

1 understood from Mr. Hnatonko that he believed that Verizon MA did not respond to the
2 outage in Adams until a report about it appeared in a news article. Other utility
3 companies responded much more quickly to the service problems caused by the lightning
4 strike.

5 Verizon MA Regional Director for External Affairs Ellen Cummings, was quoted
6 in the article, saying the Company had not been notified. Verizon's "clock", or tracking
7 of response time, does not start until the reports are made to the Company. However, as
8 the article states, Mr. Hnatonko had promptly reported the troubles to Verizon.

9 In Verizon's response to Interrogatory IBEW 3-19, Verizon states that its
10 response time for all residents and general business troubles that it receives are calculated
11 by the receipt of the report, until the report is closed.⁷ But a problem can exist for some
12 time and be evident to the Company before a customer reports it. In the case of telephone
13 service outages from severe weather, some of this should be evident to the Company, and
14 the Company should not rely solely on customer reports to identify troubles.

16 **Review of Public Input Testimony**

17 Q: HOW ARE SERVICE TECHNICIANS RESPONDING TO CUSTOMER
18 COMPLAINTS?

19 A: The workforce is well trained and experienced and is providing quality service to
20 customers. Several customers testified that members of the workforce with face-to-face
21 contact with the customers have been very responsive. 6/23/09 Tr. 20; 8/2/09 Tr. 19.
22 These members of the workforce would be the field technicians, i.e., the SSTs, who

⁷ This measurement is known as "receipt to clear."

1 provide on-site repair service. The customers have praised the work of the SSTs, and
2 blame the service quality problems on Verizon MA's lack of investment and the resulting
3 need to replace physical plant and wires. I agree with this assessment.

4 However, there are certain factors that prevent the SSTs from fully resolving
5 some of the complaints as they would like. These factors include: (1) difficulty in
6 obtaining tools required to perform work; (2) inability to access the equipment necessary
7 to adequately improve service; (3) and lack of appropriate direction from management.

8 First, the workforce has difficulty in obtaining tools required to perform work.
9 Members have asked for tools and test equipment and these requests have been rejected
10 by management. Members have actually purchased tools from their own personal funds,
11 in order to get work done more quickly (e.g., an electric drill is faster than a hand drill).
12 In one case, the personally owned tools of one Member were destroyed during a vehicle
13 fire at Verizon MA's Brookdale Road garage. Other Members, at the direction of
14 management, had to use personal funds to purchase protective equipment (e.g. work
15 gloves), and then request reimbursement from management. The reimbursement is then
16 provided in their paychecks.

17 Second, the infrastructure of Verizon MA's copper plant and the materials, e.g.,
18 closures, are old and are constantly in need of repair. A closure is a cover for any
19 opening in a cable that would be open to the weather, i.e., a splice point. Although
20 Members have the experience to fix troubles effectively, they are directed by
21 management to (a) avoid working overtime; and (b) "make do" with what they have
22 when materials are unavailable.

1 Third, there is lack of appropriate direction from first level and second level
2 management, area operations managers (“AOMs”). Workers have identified “building”
3 problems, but are unable to resolve them, because of directives from management. For
4 example, a “building” problem is identified when a technician is working on a single
5 trouble, and he/she may discover through testing or physical examination of equipment
6 that a larger issue exists. The technician may see that other equipment is out of service
7 (“OOS”) or the technician may identify what will be an issue soon, such as observing a
8 closure after it has been removed from being submersed in water in a manhole. The
9 technician then reports the problem. In these cases, it is not uncommon for Managers to
10 direct technicians to leave the issue to be dealt with later, rather than take immediate
11 preventative measures.

12 Related to lack of appropriate direction from management is the pressure on front
13 line managers to meet productivity levels. Until recently, technicians were routinely told
14 to just get the customer service restored and move on to the next job, even if there were
15 other problems apparent to the technician. This type of directive is a clear
16 encouragement to put a bandage on problems, instead of fully resolving them and
17 preventing them from recurring.

18
19 Q: CAN YOU EXPLAIN WHAT WAS BEING DONE WHEN A CUSTOMER
20 TESTIFIED THAT HE WAS TESTING AN OUTERBOX WITH A PORTABLE
21 PHONE? SEE 8/3/09 TR. 9. WHAT IS THE CUSTOMER PHYSICALLY DOING,
22 AND HOW CAN HE DETERMINE WHETHER THE SERVICE PROBLEM BEING

1 COMPLAINED OF IS ON THE CUSTOMER OWNED LINE OR THE VERIZON MA
2 OWNED LINE?

3 A: The reason that a customer would perform this action is that he or she may have
4 been told by Verizon that the trouble is in the home. If the trouble is in the home,
5 Verizon would charge the customer a fee for maintenance. The customer may want to
6 check on whether Verizon's information, that the trouble is with the inside wiring, is
7 accurate. Customers can sometimes identify if the trouble lies within the customer's own
8 inside wiring or from company equipment.

9 Dial service would normally enter through a single point. The customer can
10 isolate their house from the street, if you will, by disconnecting all interior phones at an
11 available "jack" where the wires come into the house. By plugging in a single phone at
12 this outside location, a customer would reasonably be able to tell if there is a wiring issue
13 and/or bad telephone within their home on a customer owned line or outside the home on
14 a Company owned line. If the trouble 'clears' (i.e., does not show up) when checking
15 from the outside access jack, it would be reasonable to conclude the trouble is with
16 customer equipment. Assuming that the portable phone that the customer is using is not
17 defective, if there is no change in the condition and the trouble continues from the outside
18 access jack, it would be reasonable to conclude the trouble is with Verizon equipment.

19

20 Q: AT THE PUBLIC EVIDENTIARY HEARINGS, TESTIMONY WAS GIVEN
21 REGARDING DETERIORATION OF COPPER CABLE AS THE CAUSE OF
22 OUTAGES, DROPPED CALLS AND STATIC ON THE LINE. (8/3/09 Tr. 15, 22-23)

1 ARE YOU AWARE OF ANY INFORMATION THAT CORROBORATES
2 THIS PUBLIC TESTIMONY?

3 A: Yes. For the past six years I have been told by both Members and managers that
4 the copper within Western MA is old and poor condition. I discuss this topic in detail in a
5 later subsection of my testimony, Trend in Disinvestment.

6

7 Q: DO YOU HAVE ANY COMMENT ON THE EFFECT OF RUSTED WIRE ON
8 TELEPHONE SERVICE? (6/23/2009 Tr. 17)

9 A: Corroded wires could result in every possible OOS condition (i.e., no dial tone) as
10 well as service affecting condition, such as static, crossed lines, intermittent dial, etc.
11 Copper exposed to moisture can result in a short, when the positive and negative wires
12 that make up a “pair” come into contact with one another. If a corroded line is not
13 attended to for a period of time, the wire can be completely eaten away so that the only
14 thing left for the electricity to flow through is the corrosion.

15

16 Q: WHAT IS THE CAUSE OF STATIC ON LINES?

17 A: A common reason for static would be what is referred to as a “high resistance
18 open.” Some telephone cable is made up of copper wire, with plastic insulation over it
19 (other types of cable have paper, pulp and lead coverings). When it involves plastic
20 coverings in old or damaged cable, copper can be broken underneath the plastic. During
21 cold weather, the plastic shrinks onto copper; in hot weather, copper expands into the
22 plastic sheath. The result can be static on line.

23

1 Q: WHAT IS THE CAUSE OF THE FREQUENT OUTAGES THAT
2 CUSTOMERS COMPLAINED ABOUT IN PUBLIC TESTIMONY?

3 A: Frequent outages are likely a result of old cable and equipment being affected by
4 rain. When it rains the water collects in underground and aerial cables. The Company
5 uses an air pressure system in an attempt to keep cables dry. However, this is not always
6 successful. If the plant in Western MA were up-to-date, the water would not penetrate to
7 the same degree as it does now. The air pressure system might be more effective in
8 drying out an up-to-date plant, but can be ineffective with the older cable and equipment
9 that is currently in Western MA. Water and electricity usually are a poor mix and result
10 in conduction problems.

11

12 Q: WESTERN MASS CONNECT TESTIFIED THAT VERIZON DID NOT OPEN
13 ANY TICKETS IN THE CASE OF SOME OUTAGES BECAUSE VERIZON
14 ANTICIPATED SERVICE WOULD BE RESTORED AFTER LINES DRIED OUT
15 FROM INCLEMENT WEATHER. DO YOU HAVE ANY COMMENT ON THIS
16 PRACTICE OF NOT OPENING TICKETS TO REPORT OUTAGES? 8/3/20 TR. 16.

17 A: I would disagree with the practice of not opening trouble tickets in areas known to
18 have problems when it rains. By doing so, the Company is masking problems due to old
19 infrastructure that needs to be repaired or replaced. Now, it is possible that the Company
20 considers certain areas of its western Massachusetts system to be known trouble areas.
21 For example, there may be historical reports and past experience for T1 Circuits that lead
22 managers to leave certain areas alone and dispatch technicians elsewhere. If the T1
23 Circuit in question operates on a cable known to have troubles associated with rain, the

1 Company might assume that once the cable ‘dried up,’ service would return. The
2 Company may decide not to dispatch technicians to resolve a problem, The apparent
3 presumption is that “when the sun comes out, the troubles go away.” I have heard that
4 expression or something similar to it used by Dispatch Resource Center (DRC) Area
5 Operations Manager Mike Callahan, I/M first level Manager Tony Collier,⁸ DRC
6 Director Jack Sordillo, and I/M Director Frank Crosby.⁹ While I have explained how the
7 Company might decide not to dispatch employees when troubles are reported on certain
8 circuits, I strongly disagree with the Company’s approach as it leaves customers to suffer
9 indefinitely with inadequate service. This is in fact why some customers continue to
10 experience telephone service quality problems in rainy weather.

11
12 Q: CUSTOMERS HAVE COMPLAINED OF OUTAGES LASTING SEVERAL
13 DAYS. ASIDE FROM INCLEMENT WEATHER, WHAT ARE THE
14 TECHNICAL REASONS THAT COULD BE BEHIND THE DELAY IN
15 RESTORATION OF SERVICE?

16 A: One reason is that troubles may have been scrubbed. I discuss scrubbing in more
17 detail, later in my testimony. A second reason may be that the priority matrix may have
18 placed residential customers behind business customers. Too few available technicians to
19 perform the work would be another factor. Fourth, the Company may assign only a
20 portion of the workforce to address troubles. On more than one occasion, technicians
21 have been assigned to work on new DSL projects and installation of new service due to
22 the Company not wanting to miss its own internal time lines. These projects, while

⁸ Tony Collier was formerly DRC AOM.

⁹ Frank Crosby was a former DRC Director.

1 important, left other customers out of service. One of the more recent times that this
2 happened was during weather related service difficulties that occurred around July 31,
3 2008 to August 16, 2008. I estimate that on a given day during this period of weather
4 related service problems, the Company assigned between 20% to 50% of SSTs not to
5 work troubles, but instead to install new service. The VZ response to IBEW 2-5 shows
6 many towns in Western MA exceeding threshold levels of trouble reports per hundred
7 lines during this time frame.

8
9 **Trouble Reports and Comparing Service Quality in Eastern MA with Service**
10 **Quality in Western MA**

11 Q: WHAT DO THESE CONSUMER COMPLAINTS INDICATE ABOUT
12 VERIZON MA'S SERVICE QUALITY?

13 A: Verizon is not giving its customers in Western MA the same level of service that
14 Eastern MA customers receive. Western MA customers are routinely subject to delayed
15 response, and unresolved problems, including outages lasting for several days. The
16 customers are frustrated and IBEW members are also frustrated at not being able to get
17 managerial approval to complete jobs and buy tools.

18 This can be demonstrated with Verizon's response to Interrogatory IBEW 2-5.
19 When viewing Quality of Service Report, Section 2 Wire Center Reports, we observe far
20 more instances when the "Threshold – 4.0 RPHL" levels are exceeded in Western MA
21 compared to the rest of Verizon MA. In the examples below with data that is taken from
22 Verizon MA's response to IBEW 2-5, Western MA reports far more instances of trouble

reports above the threshold of 4.0 RPHL than does Boston or Metro North. The information from that response is reproduced here:

December 2006

AREA

Boston - none, Metro North – none, Northeast – 15, Southeast – 34, Springfield – 48, and Marlboro – 16.

December 2007

AREA

Boston – 3, Metro North – none, Northeast – 8, Southeast – 25, Springfield – 36, and Marlboro – 11.

November 2008¹⁰

AREA

Boston – none, Metro North – none, Northeast – 3, Southeast – 26, Springfield – 67, and Marlboro – 13

Q: CAN YOU EXPLAIN IN MORE DETAIL WHAT IS MEANT BY A

“TROUBLE”?

A: Among other things, troubles include no dial tone (“NDT”), intermittent dial tone, static, hum, calls when one party can hear but cannot be heard and vice versa, cross-talk (i.e., customer can hear voices other than the caller and recipient of the call on the line), and inability to make a call (i.e., dial tone cannot be broken when customer dials phone). When a customer uses a dial-up internet provider, the customer is using his or her dial tone line to connect to the internet. In much the same way that a telephone conversation would be disrupted by a service quality problem, the connection to the internet would be broken off when the land line connection through Verizon MA service is disrupted. A trouble can also include a service affecting problem with voicemail, caller i.d., and other software features.

¹⁰ The interrogatory response does not include data for December 2008.

1 Q: DO YOU HAVE COMMENTS ABOUT THE WAY VERIZON MA
2 RESOLVES TROUBLE REPORTS?

3 A: Yes. Verizon states in its response to IBEW 2-21 that the only way a trouble
4 ticket is *cancelled* is by customer request, and that may be correct. However, the DTC
5 should be aware of how tickets are closed (i.e., considered resolved), which is a different
6 matter from cancellation of tickets. The Company states in its response to IBEW 2-23
7 that “Service technicians in the field or in central offices may close the ticket. The
8 automated system or up front call center representative may close a ticket. All customers
9 are notified when a reported trouble is closed.” The Company failed to state that
10 managers also have the capability of closing trouble reports as well.

11

12 Q: DTC SET 1-2 REQUESTS THAT VERIZON MA COMPARE EGREMONT’S
13 PERCENTAGE OF TROUBLE REPORTS TO THE STATEWIDE AVERAGES FOR
14 THE SAME TIME PERIOD. VERIZON MA RESPONDED THAT IT “DOES NOT
15 TRACK TROUBLE REPORTS BY MUNICIPALITY AND DOES NOT HAVE THE
16 INFORMATION REQUESTED.” CAN YOU COMMENT?

17 A: Yes. In Section 3 of Verizon MA’s response to Interrogatory IBEW 2-5, under
18 the title “wire center report,” the Company has provided data that shows reports for Great
19 Barrington. The Great Barrington Central Office is the wire center that serves several
20 towns, of which Egremont is one. Although the DTC’s question would not be answered
21 exactly, using the data provided in this proceeding can provide information analogous to
22 what the DTC is seeking.

1 The Company's response to Interrogatory IBEW 2-5 provides the 2006 - 2008
2 Monthly Actuals for the Statewide Average and Wire Center Report for Great Barrington
3 for 2006 - 2008, by month, as follows:

4			
5		Statewide	G. Barrington
6	2006		
7	Jan	1.63	3.53
8	Feb	1.24	1.93
9	Mar	1.10	1.48
10	Apr	1.14	1.73
11	May	2.18	2.67
12	Jun	2.21	3.44
13	Jul	2.08	3.18
14	Aug	1.67	2.90
15	Sep	1.54	3.13
16	Oct	1.40	2.70
17	Nov	1.56	1.97
18	Dec	1.23	1.77
19			
20	2007		
21	Jan	1.21	1.90
22	Feb	0.93	0.88
23	Mar	1.53	2.31
24	Apr	1.53	2.29
25	May	1.49	2.38
26	Jun	1.51	2.90
27	Jul	1.50	4.20
28	Aug	1.41	2.29
29	Sep	1.23	1.55
30	Oct	1.32	3.04
31	Nov	1.18	2.20
32	Dec	1.16	1.90
33			
34	2008		
35	Jan	1.29	1.86
36	Feb	1.37	2.68
37	Mar	1.18	2.27
38	Apr	1.11	1.45
39	May	1.09	1.65
40	Jun	1.45	4.93
41	Jul	1.92	4.47
42	Aug	1.52	3.83
43	Sep	1.52	2.50

1	Oct	1.43	2.81
2	Nov	1.11	2.04
3	Dec	n/a	n/a

4
5 In the chart above, the numbers represent RPHL, or trouble reports per hundred
6 lines. For every month but one of 2006 through 2008, the RPHL is higher (often,
7 substantially higher) for Great Barrington in Western MA than the statewide average for
8 Massachusetts.

9
10 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR
11 EGREMONT COMPARE TO BOSTON? (SEE DTC 1-3)

12 A: Again, while the Company responds that it cannot track this specifically for
13 Egremont, the answers lie within the numbers comprising the Great Barrington Wire
14 Center Reports. See Verizon response to Interrogatory IBEW 2-5. Information for
15 Boston can be culled from the reports for Wire Centers labeled “Boston.”

16 In Verizon MA’s response to IBEW 2-5, under wire center reports, the City of
17 Boston is made up of: Harrison Ave., Franklin St., Back Bay, and Bowdoin/Charlestown.
18 The line count associated with the City of Boston (C.O.B) is 166,951 lines in 2006,
19 158,928 lines in 2007, and 151,502 lines in 2008. At no time does the City of Boston
20 RPHL ever exceed 1.00. Therefore, the 4.0 RPHL threshold is never exceeded in these
21 reports for Boston. The Franklin Street location, which is the Verizon MA Headquarters,
22 never exceeds a RPHL of 0.21, and during 25 of the 35 months recorded, the rate is less
23 than 0.10. In 2007, the rate exceeded 0.09 only once. In 2008, the rate exceeded 0.09
24 only three times.

1 To compare the Boston area to the Town of Egremont, note that Egremont is fed
 2 from the Great Barrington Central Office, so the Great Barrington line can be examined
 3 to get a rough comparison of the Egremont area to the City of Boston. The Great
 4 Barrington line count for 2006 was 8,580. In 2007, the Great Barrington line count was
 5 8,385, and it was 8,051 in 2008.

6 The 4.0 RPHL was exceeded on several occasions for Great Barrington in June
 7 2007, June 2008 and July 2008. It is important to note that the numbers for Great
 8 Barrington may hide even higher rates of RPHL for Egremont. Just as a state-wide
 9 average RPHL will hide the higher RPHL of a small town within the state, Verizon MA's
 10 collection of data by wire center that includes data for more than one town can hide
 11 higher rates of RPHL for individual towns served by the wire center.

12 The following is from Verizon's response to IBEW 2-5 Wire Center reports 2006,
 13 2007 and 2008:

14						
15	2006					
16		Harrison Ave	Franklin St	Back Bay	Bowdoin/Charlestown	G. Barrington
17	Jan	0.55	0.05	0.69	0.60	3.53
18	Feb	0.37	0.07	0.54	0.46	1.93
19	Mar	0.37	0.11	0.47	0.45	1.48
20	Apr	0.36	0.07	0.49	0.45	1.73
21	May	0.49	0.15	0.67	0.71	2.67
22	Jun	0.58	0.12	0.67	0.56	3.44
23	Jul	0.47	0.08	0.55	0.66	3.18
24	Aug	0.48	0.05	0.52	0.52	2.90
25	Sep	0.41	0.07	0.63	0.53	3.13
26	Oct	0.51	0.21	0.55	0.41	2.70
27	Nov	0.93	0.17	0.50	0.45	1.97
28	Dec	0.54	0.14	0.36	0.37	1.77
29						
30	2007					
31	Jan	0.41	0.09	0.48	0.37	1.90
32	Feb	0.31	0.05	0.48	0.37	0.88

1	Mar	0.62	0.10	0.68	0.63	2.31
2	Apr	0.57	0.08	0.68	0.52	2.29
3	May	0.44	0.06	0.60	0.58	2.38
4	Jun	0.51	0.06	0.54	0.45	2.90
5	Jul	0.41	0.06	0.46	0.48	4.20
6	Aug	0.43	0.06	0.55	0.46	2.29
7	Sep	0.41	0.04	0.49	0.62	1.55
8	Oct	0.45	0.05	0.44	0.51	3.04
9	Nov	0.41	0.06	0.35	0.40	2.20
10	Dec	0.37	0.07	0.36	0.42	1.90
11						
12	2008					
13	Jan	0.41	0.09	0.35	0.54	1.86
14	Feb	0.73	0.06	0.43	0.49	2.68
15	Mar	0.38	0.11	0.44	0.41	2.27
16	Apr	0.37	0.05	0.40	0.43	1.45
17	May	0.45	0.05	0.40	0.38	1.65
18	Jun	0.57	0.07	0.43	0.42	4.93
19	Jul	0.55	0.06	0.58	0.53	4.47
20	Aug	0.43	0.12	0.57	0.45	3.83
21	Sep	0.43	0.13	0.57	0.53	2.50
22	Oct	0.48	0.05	0.44	0.83	2.81
23	Nov	0.34	0.06	0.35	0.58	2.04
24	Dec	n/a	n/a	n/a	n/a	n/a
25						

26 When one looks at the range of RPHL numbers or the averages, it is clear that the
27 Great Barrington line (i.e., Egremont and surrounding area) has a higher (often,
28 substantially higher) rate of reported troubles than the City of Boston. In every month
29 provided for 2006 to 2008, the trouble report rate for Great Barrington exceeds each of
30 the Boston areas.

31

32 Q: IN DTC 1-6, THE DEPARTMENT REQUESTED THAT VERIZON MA
33 PROVIDE A COMPARISON OF HANCOCK'S PERCENTAGE OF TROUBLE
34 REPORTS TO THE STATEWIDE AVERAGE. VERIZON ANSWERED THAT IT
35 DOES NOT HAVE THE INFORMATION. CAN YOU COMMENT? (SEE DTC 1-6)

1 A: Other data provided by Verizon in this proceeding can provide analogous
2 information to what the Department is requesting. The Town of Hancock is served by the
3 Pittsfield Central Office and Williamstown Central Office. Hancock customers are
4 served by either of the two Central Offices, so my response shows both Office rates.
5 Below is data from the Company response to IBEW 2-5, Statewide Actuals and Wire
6 Center Reports for Pittsfield and Williamstown Central Offices:

8		For 2006		
9				
10		Statewide	Pittsfield	Williamstown
11	Jan	1.63	1.45	2.49
12	Feb	1.24	0.99	1.23
13	Mar	1.10	1.04	1.97
14	Apr	1.14	0.93	1.93
15	May	2.18	1.06	2.80
16	Jun	2.21	1.52	3.41
17	Jul	2.08	1.32	3.03
18	Aug	1.67	1.92	2.67
19	Sep	1.54	1.16	2.30
20	Oct	1.40	1.13	2.98
21	Nov	1.56	1.06	1.43
22	Dec	1.23	1.35	2.65
23				
24		2007		
25	Jan	1.21	4.66	1.98
26	Feb	0.93	1.05	1.20
27	Mar	1.53	1.37	2.20
28	Apr	1.53	1.11	1.97
29	May	1.49	0.88	2.09
30	Jun	1.51	1.49	2.06
31	Jul	1.50	1.62	2.96
32	Aug	1.41	1.98	3.20
33	Sep	1.23	1.23	3.08
34	Oct	1.32	1.15	2.68
35	Nov	1.18	0.93	1.80
36	Dec	1.16	1.08	1.96
37				
38		2008		
39	Jan	1.29	0.94	1.56

1	Feb	1.37	0.97	2.44
2	Mar	1.18	0.90	1.49
3	Apr	1.11	1.09	1.91
4	May	1.09	1.95	2.04
5	Jun	1.45	1.57	2.65
6	Jul	1.92	2.00	2.48
7	Aug	1.52	1.11	2.73
8	Sep	1.52	1.09	2.40
9	Oct	1.43	0.86	2.23
10	Nov	1.11	0.74	1.42
11	Dec	n/a	n/a	

12
13 In the chart above, the numbers represent RPHL, or trouble reports per hundred
14 lines. The trouble reports for Pittsfield are mixed. However, the trouble reports per
15 month for Williamstown, that includes service to Hancock customers, is consistently
16 higher than the trouble report rate for the state for 2006 through 2008.

17

18 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR HANCOCK
19 COMPARE TO BOSTON? (SEE DTC 1-10)

20 A: For the reasons mentioned above, my response is to provide analogous
21 information using data from the Pittsfield and Williamstown wire centers. I have used the
22 Company's response to IBEW 2-5 Wire Center Reports: Pittsfield and Williamstown
23 CO's for Hancock information and Harrison Ave, Franklin St, Back Bay, and Bowdoin
24 Charlestown which make up the City of Boston. The following is from IBEW 2-5 Wire
25 Center reports 2006, 2007 and 2008:

26

27	2006						
28		Harrison	Franklin	Back Bay	Bowdoin	Pitts	Willtwn
29	Jan	0.55	0.05	0.69	0.60	1.45	2.49
30	Feb	0.37	0.07	0.54	0.46	0.99	1.23
31	Mar	0.37	0.11	0.47	0.45	1.04	1.97
32	Apr	0.36	0.07	0.49	0.45	0.93	1.93

1	May	0.49	0.15	0.67	0.71	1.06	2.80
2	Jun	0.58	0.12	0.67	0.56	1.52	3.41
3	Jul	0.47	0.08	0.55	0.66	1.32	3.03
4	Aug	0.48	0.05	0.52	0.52	1.92	2.67
5	Sep	0.41	0.07	0.63	0.53	1.16	2.30
6	Oct	0.51	0.21	0.55	0.41	1.13	2.98
7	Nov	0.93	0.17	0.50	0.45	1.06	1.43
8	Dec	0.54	0.14	0.36	0.37	1.35	2.65
9							
10	2007						
11	Jan	0.41	0.09	0.48	0.37	4.66	1.98
12	Feb	0.31	0.05	0.48	0.37	1.05	1.20
13	Mar	0.62	0.10	0.68	0.63	1.37	2.20
14	Apr	0.57	0.08	0.68	0.52	1.11	1.97
15	May	0.44	0.06	0.60	0.58	0.88	2.09
16	Jun	0.51	0.06	0.54	0.45	1.49	2.06
17	Jul	0.41	0.06	0.46	0.48	1.62	2.96
18	Aug	0.43	0.06	0.55	0.46	1.98	3.20
19	Sep	0.41	0.04	0.49	0.62	1.23	3.08
20	Oct	0.45	0.05	0.44	0.51	1.15	2.68
21	Nov	0.41	0.06	0.35	0.40	0.93	1.80
22	Dec	0.37	0.07	0.36	0.42	1.08	1.96
23							
24	2008						
25	Jan	0.41	0.09	0.35	0.54	0.94	1.56
26	Feb	0.73	0.06	0.43	0.49	0.97	2.44
27	Mar	0.38	0.11	0.44	0.41	0.90	1.49
28	Apr	0.37	0.05	0.40	0.43	1.09	1.91
29	May	0.45	0.05	0.40	0.38	1.95	2.04
30	Jun	0.57	0.07	0.43	0.42	1.57	2.65
31	Jul	0.55	0.06	0.58	0.53	2.00	2.48
32	Aug	0.43	0.12	0.57	0.45	1.11	2.73
33	Sep	0.43	0.13	0.57	0.53	1.09	2.40
34	Oct	0.48	0.05	0.44	0.83	0.86	2.23
35	Nov	0.34	0.06	0.35	0.58	0.74	1.42
36	Dec	n/a	n/a	n/a	n/a	n/a	n/a
37							

38 The above chart demonstrates that the Pittsfield and Williamstown wire centers
39 that serve Hancock customers each has more reports of trouble per hundred lines for each
40 month of 2006 through 2008, compared to the Boston area wire centers.
41

1 Q: IN DTC 1-10, THE DEPARTMENT REQUESTS THAT VERIZON MA
 2 COMPARE LEVERETT'S PERCENTAGE OF TROUBLE REPORTS TO THE
 3 STATEWIDE AVERAGE, VERIZON ANSWERED THAT IT DOES NOT HAVE THE
 4 INFORMATION. CAN YOU COMMENT?

5 A: Yes. Using the same approach as above, I note that Leverett is served by the
 6 Montague Central Office, and both Amherst Central offices. Again, referring to Verizon
 7 MA's response to IBEW-VZ 2-5, an analogous answer to the DTC's question can be
 8 determined. Note that NPAWFRs 413285 and 413287 are associated with the Amherst
 9 Central Offices:

	Statewide	Montague	413285	413287
10				
11	Jan 1.63	2.57	2.29	2.31
12	Feb 1.24	1.12	1.49	0.96
13	Mar 1.10	0.84	1.58	1.37
14	Apr 1.14	1.48	1.18	1.12
15	May 2.18	2.05	1.76	1.96
16	Jun 2.21	2.71	3.33	2.31
17	Jul 2.08	4.21	4.06	2.68
18	Aug 1.67	2.86	3.49	2.90
19	Sep 1.54	2.79	3.19	3.04
20	Oct 1.40	1.65	3.77	1.49
21	Nov 1.56	2.80	1.54	1.60
22	Dec 1.23	2.10	1.69	1.58
23				
24	2007			
25	Jan 1.21	2.88	1.87	1.38
26	Feb 0.93	0.65	0.90	1.13
27	Mar 1.53	1.74	2.46	1.40
28	Apr 1.53	1.31	1.54	1.65
29	May 1.49	2.70	1.94	2.14
30	Jun 1.51	1.97	2.83	1.60
31	Jul 1.50	3.72	2.60	2.30
32	Aug 1.41	3.08	2.75	1.83
33	Sep 1.23	3.30	2.89	1.87
34	Oct 1.32	3.02	2.56	1.94
35	Nov 1.18	1.62	1.53	2.02
36	Dec 1.16	1.92	2.10	1.52
37				

1	2008				
2	Jan	1.29	1.71	1.27	1.67
3	Feb	1.37	2.01	2.37	2.19
4	Mar	1.18	2.02	1.12	1.26
5	Apr	1.11	1.28	1.31	1.13
6	May	1.09	6.04	1.38	1.60
7	Jun	1.45	5.05	3.69	3.68
8	Jul	1.92	6.11	5.02	3.32
9	Aug	1.52	5.41	2.72	2.63
10	Sep	1.52	3.01	2.39	3.62
11	Oct	1.43	2.72	2.66	2.03
12	Nov	1.11	2.81	1.76	2.26
13	Dec	n/a	n/a	n/a	n/a
14					

15 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR LEVERETT
16 COMPARE TO BOSTON? (SEE DTC 1-11)

17 A: Leverett is served by the Montague CO, and both Amherst CO's.

18 The City of Boston consists of CO's located at Harrison Ave., Franklin St., Back Bay,
19 and Bowdoin/Charlestown. The following is from Verizon MA's response to IBEW 2-5,
20 Wire Center reports 2006, 2007 and 2008:

21

22	2006							
23		Har	Frank	B.Bay	Bowdoin	Montague	413285	413287
24	Jan	0.55	0.05	0.69	0.60	2.57	2.29	2.31
25	Feb	0.37	0.07	0.54	0.46	1.12	1.49	0.96
26	Mar	0.37	0.11	0.47	0.45	0.84	1.58	1.37
27	Apr	0.36	0.07	0.49	0.45	1.48	1.18	1.12
28	May	0.49	0.15	0.67	0.71	2.05	1.76	1.96
29	Jun	0.58	0.12	0.67	0.56	2.71	3.33	2.31
30	Jul	0.47	0.08	0.55	0.66	4.21	4.06	2.68
31	Aug	0.48	0.05	0.52	0.52	2.86	3.49	2.90
32	Sep	0.41	0.07	0.63	0.53	2.79	3.19	3.04
33	Oct	0.51	0.21	0.55	0.41	1.65	3.77	1.49
34	Nov	0.93	0.17	0.50	0.45	2.80	1.54	1.60
35	Dec	0.54	0.14	0.36	0.37	2.10	1.69	1.58
36								
37	2007							
38	Jan	0.41	0.09	0.48	0.37	2.88	1.87	1.38

1	Feb	0.31	0.05	0.48	0.37	0.65	0.90	1.13
2	Mar	0.62	0.10	0.68	0.63	1.74	2.46	1.40
3	Apr	0.57	0.08	0.68	0.52	1.31	1.54	1.65
4	May	0.44	0.06	0.60	0.58	2.70	1.94	2.14
5	Jun	0.51	0.06	0.54	0.45	1.97	2.83	1.60
6	Jul	0.41	0.06	0.46	0.48	3.72	2.60	2.30
7	Aug	0.43	0.06	0.55	0.46	3.08	2.75	1.83
8	Sep	0.41	0.04	0.49	0.62	3.30	2.89	1.87
9	Oct	0.45	0.05	0.44	0.51	3.02	2.56	1.94
10	Nov	0.41	0.06	0.35	0.40	1.62	1.53	2.02
11	Dec	0.37	0.07	0.36	0.42	1.92	2.10	1.52
12								
13	2008							
14	Jan	0.41	0.09	0.35	0.54	1.71	1.27	1.67
15	Feb	0.73	0.06	0.43	0.49	2.01	2.37	2.19
16	Mar	0.38	0.11	0.44	0.41	2.02	1.12	1.26
17	Apr	0.37	0.05	0.40	0.43	1.28	1.31	1.13
18	May	0.45	0.05	0.40	0.38	6.04	1.38	1.60
19	Jun	0.57	0.07	0.43	0.42	5.05	3.69	3.68
20	Jul	0.55	0.06	0.58	0.53	6.11	5.02	3.32
21	Aug	0.43	0.12	0.57	0.45	5.41	2.72	2.63
22	Sep	0.43	0.13	0.57	0.53	3.01	2.39	3.62
23	Oct	0.48	0.05	0.44	0.83	2.72	2.66	2.03
24	Nov	0.34	0.06	0.35	0.58	2.81	1.76	2.26
25	Dec	n/a	n/a	n/a	n/a	n/a	n/a	n/a
26								

27 Viewing Leverett's RPHL experience in the context of the Montague and
28 Amherst central offices, the lowest level recorded in 2006 is 0.96 (413287) and the
29 highest is 4.21(M). The monthly average for 2006 is 2.21. The lowest RPHL recorded in
30 2007 is 0.90(413285) and the highest is 3.72(M). The average for 2007 is 2.07. The
31 lowest level recorded in 2008 is 1.12(413285) and the highest 6.04(M). The average for
32 2008 is 2.70.

33

34 Q: CAN YOU COMPARE ROWE'S PERCENTAGE OF TROUBLE REPORTS
35 TO THE STATEWIDE AVERAGES FOR THE SAME TIME PERIOD? (see DTC 1-
36 14)

1 A: The Town of Rowe is served by the Charlemont central office, and an answer can
2 be approximated by reviewing the trouble reports for the Charlemont from Verizon MA's
3 response to IBEW 2-5:

4

5		Statewide	Charlemont
6	Jan	1.63	1.95
7	Feb	1.24	1.57
8	Mar	1.10	4.37
9	Apr	1.14	1.17
10	May	2.18	2.73
11	Jun	2.21	3.68
12	Jul	2.08	6.19
13	Aug	1.67	2.89
14	Sep	1.54	2.33
15	Oct	1.40	4.34
16	Nov	1.56	3.31
17	Dec	1.23	3.62
18			
19	2007		
20	Jan	1.21	2.99
21	Feb	0.93	1.43
22	Mar	1.53	4.80
23	Apr	1.53	2.87
24	May	1.49	4.67
25	Jun	1.51	4.60
26	Jul	1.50	8.03
27	Aug	1.41	7.49
28	Sep	1.23	3.05
29	Oct	1.32	7.10
30	Nov	1.18	1.95
31	Dec	1.16	1.70
32			
33	2008		
34	Jan	1.29	2.29
35	Feb	1.37	2.36
36	Mar	1.18	1.90
37	Apr	1.11	2.11
38	May	1.09	5.00
39	Jun	1.45	6.66
40	Jul	1.92	5.38
41	Aug	1.52	3.85
42	Sep	1.52	3.13

1	Oct	1.43	3.19
2	Nov	1.11	3.15
3	Dec	n/a	n/a
4			

5 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR ROWE
6 COMPARE TO BOSTON? (SEE DTC 1-15)

7 A: The City of Boston consists of central office wire centers that are located at
8 Harrison Ave., Franklin St., Back Bay, and Bowdoin/Charlestown. Comparing the
9 Charlemont data and City of Boston data provides a comparison or the wire center
10 serving Rowe with those serving Boston. The following is from Verizon MA's response
11 to IBEW 2-5, the Wire Center reports 2006, 2007 and 2008:

12

13 2006

14		Harrison Ave	Franklin St	Back Bay	Bowdoin/Charlestown	Charlemont
15	Jan	0.55	0.05	0.69	0.60	1.95
16	Feb	0.37	0.07	0.54	0.46	1.57
17	Mar	0.37	0.11	0.47	0.45	4.37
18	Apr	0.36	0.07	0.49	0.45	1.17
19	May	0.49	0.15	0.67	0.71	2.73
20	Jun	0.58	0.12	0.67	0.56	3.68
21	Jul	0.47	0.08	0.55	0.66	6.19
22	Aug	0.48	0.05	0.52	0.52	2.89
23	Sep	0.41	0.07	0.63	0.53	2.33
24	Oct	0.51	0.21	0.55	0.41	4.34
25	Nov	0.93	0.17	0.50	0.45	3.31
26	Dec	0.54	0.14	0.36	0.37	3.62

27

28 2007

29	Jan	0.41	0.09	0.48	0.37	2.99
30	Feb	0.31	0.05	0.48	0.37	1.43
31	Mar	0.62	0.10	0.68	0.63	4.80
32	Apr	0.57	0.08	0.68	0.52	2.87
33	May	0.44	0.06	0.60	0.58	4.67
34	Jun	0.51	0.06	0.54	0.45	4.60
35	Jul	0.41	0.06	0.46	0.48	8.03
36	Aug	0.43	0.06	0.55	0.46	7.49
37	Sep	0.41	0.04	0.49	0.62	3.05

1	Oct	0.45	0.05	0.44	0.51	7.10
2	Nov	0.41	0.06	0.35	0.40	1.95
3	Dec	0.37	0.07	0.36	0.42	1.70
4						
5	2008					
6	Jan	0.41	0.09	0.35	0.54	2.29
7	Feb	0.73	0.06	0.43	0.49	2.36
8	Mar	0.38	0.11	0.44	0.41	1.90
9	Apr	0.37	0.05	0.40	0.43	2.11
10	May	0.45	0.05	0.40	0.38	5.00
11	Jun	0.57	0.07	0.43	0.42	6.66
12	Jul	0.55	0.06	0.58	0.53	5.38
13	Aug	0.43	0.12	0.57	0.45	3.85
14	Sep	0.43	0.13	0.57	0.53	3.13
15	Oct	0.48	0.05	0.44	0.83	3.19
16	Nov	0.34	0.06	0.35	0.58	3.15
17	Dec	n/a	n/a	n/a	n/a	n/a
18						

19 For Charlemont, that includes data for the Town of Rowe, the RPHL is frequently
20 above the 4.0 threshold and consistently above the RPHL for the Boston area wire
21 centers. The lowest RPHL recorded for Charlemont in 2006 was 1.17 and the highest
22 was 6.19. The monthly average for 2006 was 3.18. The lowest RPHL recorded in 2007
23 was 1.43, the highest was 8.03, and the average for 2007 was 4.22. The lowest level
24 recorded in 2008 was 2.11, the highest RPHL was 6.66, and the average was 3.55.

25

26 Q: CAN YOU COMPARE SHUTESBURY'S PERCENTAGE OF TROUBLE
27 REPORTS TO THE STATEWIDE AVERAGES FOR THE SAME TIME PERIOD? (see
28 DTC 1-18)

29 A: The Town of Shutesbury is served by the Montague central office, and both
30 Amherst central offices. This is the same situation as the Town of Leverett. Please see
31 the Leverett statewide comparison, above.

32

1 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR
2 SHUTESBURY COMPARE TO BOSTON? (SEE DTC 1-19)

3 A: This is the same situation as the Town of Leverett. Please see Leverett and City
4 of Boston comparison above.

5

6 Q: IN DTC 1-22, THE DEPARTMENT REQUESTED THAT VERIZON MA
7 COMPARE NORTHFIELD'S PERCENTAGE OF TROUBLE REPORTS TO THE
8 STATEWIDE AVERAGES FOR THE SAME TIME PERIOD. VERIZON MA
9 ANSWERED THAT "VERIZON MA DOES NOT TRACK TROUBLE REPORTS BY
10 MUNICIPALITY AND DOES NOT HAVE THE INFORMATION REQUESTED."
11 CAN YOU COMMENT?

12 A: Yes. When viewing the Company response to IBEW 2-5, we can compare
13 Northfield to Statewide RPHL averages provided.

14 The 2006 Monthly Actuals for the Statewide Average and Wire Center Report for
15 Northfield for 2006 by month are as follows:

16

	Statewide	Northfield
17 Jan	1.63	2.47
18 Feb	1.24	1.63
19 Mar	1.10	1.30
20 Apr	1.14	1.11
21 May	2.18	1.54
22 Jun	2.21	2.11
23 Jul	2.08	2.07
24 Aug	1.67	1.66
25 Sep	1.54	2.54
26 Oct	1.40	1.10
27 Nov	1.56	1.92
28 Dec	1.23	0.37

30

1	2007		
2	Jan	1.21	0.97
3	Feb	0.93	0.30
4	Mar	1.53	0.60
5	Apr	1.53	2.28
6	May	1.49	1.75
7	Jun	1.51	1.69
8	Jul	1.50	1.78
9	Aug	1.41	2.49
10	Sep	1.23	2.13
11	Oct	1.32	1.35
12	Nov	1.18	1.92
13	Dec	1.16	0.81
14			
15	2008		
16	Jan	1.29	1.62
17	Feb	1.37	1.96
18	Mar	1.18	2.38
19	Apr	1.11	1.48
20	May	1.09	1.91
21	Jun	1.45	1.01
22	Jul	1.92	3.91
23	Aug	1.52	2.39
24	Sep	1.52	2.50
25	Oct	1.43	2.35
26	Nov	1.11	1.32
27	Dec	n/a	n/a
28			

29 Q: HOW DOES THE PERCENTAGE OF TROUBLE REPORTS FOR
30 NORTHFIELD COMPARE TO BOSTON? (SEE DTC 1-23)?

31 A: We can compare Northfield to Boston. Northfield has its own serving central
32 office and the City of Boston consists of CO's located at Harrison Ave., Franklin St.,
33 Back Bay, and Bowdoin/Charlestown. The following is from IBEW 2-5 Wire Center
34 reports 2006, 2007 and 2008:

35

36	2006				
37		Harrison Ave	Franklin St	Back Bay	Bowdoin/Charlestown Northfield
38	Jan	0.55	0.05	0.69	0.60 2.47

1	Feb	0.37	0.07	0.54	0.46	1.63
2	Mar	0.37	0.11	0.47	0.45	1.30
3	Apr	0.36	0.07	0.49	0.45	1.11
4	May	0.49	0.15	0.67	0.71	1.54
5	Jun	0.58	0.12	0.67	0.56	2.11
6	Jul	0.47	0.08	0.55	0.66	2.07
7	Aug	0.48	0.05	0.52	0.52	1.66
8	Sep	0.41	0.07	0.63	0.53	2.54
9	Oct	0.51	0.21	0.55	0.41	1.10
10	Nov	0.93	0.17	0.50	0.45	1.92
11	Dec	0.54	0.14	0.36	0.37	0.37
12						
13	2007					
14	Jan	0.41	0.09	0.48	0.37	0.97
15	Feb	0.31	0.05	0.48	0.37	0.30
16	Mar	0.62	0.10	0.68	0.63	0.60
17	Apr	0.57	0.08	0.68	0.52	2.28
18	May	0.44	0.06	0.60	0.58	1.75
19	Jun	0.51	0.06	0.54	0.45	1.69
20	Jul	0.41	0.06	0.46	0.48	1.78
21	Aug	0.43	0.06	0.55	0.46	2.49
22	Sep	0.41	0.04	0.49	0.62	2.13
23	Oct	0.45	0.05	0.44	0.51	1.35
24	Nov	0.41	0.06	0.35	0.40	1.92
25	Dec	0.37	0.07	0.36	0.42	0.81
26						
27	2008					
28	Jan	0.41	0.09	0.35	0.54	1.62
29	Feb	0.73	0.06	0.43	0.49	1.96
30	Mar	0.38	0.11	0.44	0.41	2.38
31	Apr	0.37	0.05	0.40	0.43	1.48
32	May	0.45	0.05	0.40	0.38	1.91
33	Jun	0.57	0.07	0.43	0.42	1.01
34	Jul	0.55	0.06	0.58	0.53	3.91
35	Aug	0.43	0.12	0.57	0.45	2.39
36	Sep	0.43	0.13	0.57	0.53	2.50
37	Oct	0.48	0.05	0.44	0.83	2.35
38	Nov	0.34	0.06	0.35	0.58	1.32
39	Dec	n/a	n/a	n/a	n/a	n/a
40						

41 As in the case of other wire centers serving Western MA and elsewhere in the
 42 state, it should be noted that the Northfield line count is decreasing. For 2006, the line
 43 count is 1,343, 1,242 in 2007, and 1,136 in 2008. The lowest RPHL recorded in 2006 is

1 0.37 and the highest is 2.54 The monthly average RPHL for 2006 is 1.65. The lowest
2 RPHL recorded in 2007 is 0.30 and the highest is 2.49 and the average for 2007 is 1.50
3 The lowest level record in 2008 is 1.01 and the highest 3.91. The average RPHL in 2008
4 was 2.07. Again, like the other areas of Western MA that the Department is reviewing,
5 the RPHL for Northfield is consistently above the RPHL for the Boston area.

6
7 Q: WHAT DO YOU MAKE OF THE MAJOR OUTAGES REPORTED IN
8 SECTION 3 OF VERIZON'S SERVICE QUALITY REPORTS? (SEE VERIZON MA
9 RESPONSES TO AG 2-4, IBEW 2-5)

10 A: The major outages that Verizon MA reported reflect only a portion of outage
11 reports and are incomplete. For example, the Company declared a State of Emergency
12 during the Ice storm in December 2008. There should have been many outage reports
13 associated with that ice storm, but they are not included in the Company's service quality
14 reports.¹¹

15 In IBEW 6-45, IBEW requested that Verizon provide the additional reports
16 missing from Verizon's service quality reports. The Company's response to IBEW 6-45
17 included a CD with 283 outage reports that are identified as Major Service Outages
18 (MSOs). I have isolated outages in Western MA from the territory-wide reports. From
19 2006 to August 2009, 29% of all Major Service Outages in Verizon MA territory
20 occurred in Western MA.

¹¹ In the Company's response to IBEW 7-5 (b), the Company states that: "In its Monthly Service Quality Report to the Department, Verizon MA provides information concerning any outage affecting more than 200 lines but lasting less than 48 hours, any outage lasting more than 48 hours but affecting fewer than 200 lines and any other outage that, based on that criteria including number of lines affected, duration and location, Verizon MA believes that would be of interest to the Department."

1 Thirty-nine outages were recorded in 2006, of which 17 (or 44%) were in Western
2 MA. Sixty-nine outages were reported in 2007 of which 12 (or 17%) were in Western
3 MA. One hundred and eight outages were reported in 2008, of which 33 (or 31%) were
4 in Western MA. And as of August of this year, 20 of 67 (or 30%) outages were in
5 Western MA.

6 What is important to realize, however, is that Western MA access lines total only
7 *****BEGIN PROPRIETARY***** ¹² *****END PROPRIETARY*****
8 of all Verizon MA access lines in the state. See Verizon MA Proprietary Response to
9 AG 1-10. Western Massachusetts is experiencing a disproportionate percentage of
10 outages, for the number of access lines it has, compared to Eastern Massachusetts.

11

12 Q: DO THE VERIZON SERVICE QUALITY REPORTS ACCURATELY
13 REFLECT SERVICE QUALITY ACTUALLY EXPERIENCED?

14 A: I question the answers provided by the Company because they seem incomplete
15 and unreliable. First of all, there is nothing in these Verizon responses that creates an
16 accurate picture of the outages resulting from the Ice Storm in December 2008. It
17 appears the Ice Storm of December 2008 is not included in these MSO reports to the
18 Department. With the number of broken poles, downed cables and wires, and the number
19 of customers out of service for weeks and longer during that time period, how does

¹² The percentage of Verizon MA access lines that are in Western MA can be calculated based upon the data provided in response to the Company's Proprietary Response to AG 1-10. Dividing the total number of access lines for Western MA in 2006 by the total number of Verizon MA access lines results in the percentage of access lines in Western MA. So, for example, in 2008, *****BEGIN PROPRIETARY*****
.
*****END PROPRIETARY*****

1 Verizon MA label that event if not as an ‘outage’? I have to wonder what reasoning the
2 Company uses to characterize an ‘outage’ for its internal purposes.¹³.

3 During the Ice Storm, Verizon MA did two things. First, it transferred SST’s and
4 Outside Plant Technicians from throughout the rest of MA and RI into Western MA to
5 aid in repairing the damage. Second, it declared an “Emergency” one or two days later
6 on December 12, 2008 and invoked contractual language that suspended overtime
7 limitations. This meant Verizon MA would require more than usual amounts of
8 overtime, and require overtime to be worked by SSTs, OPTs CSAs, certain COTs, and
9 AAs in the Dispatch/Fiber Resource Centers and Taunton, MA Customer Care Center.
10 The Company did not lift the suspension of overtime limitations until December 29,
11 2008. The total amount of hours spent restoring service was tremendous. Clearly, a large
12 amount of resources was directed here, but the Company did not report any outage in its
13 service quality reports to the Department.

14

15 Q: WHAT IS A FORM 3722-19 AND HOW IS IT USED?

16 A: The Form 3722-19 is filled out by technicians to have an issue fixed at a later
17 date. The Form 3722-19 allows workers to identify areas that may eventually lead to a
18 trouble. Once the installation is completed or service has been restored, technicians note
19 on the Form 3722-19 what other issue(s) should be addressed at a later time. For
20 example, workers may describe a tree limb resting on cable or low hanging cable. The

¹³ In the Company response to IBEW 7-5 (b), the Company states that: “In its Monthly Service Quality Report to the Department, Verizon MA provides information concerning any outage affecting more than 200 lines but lasting less than 48 hours, any outage lasting more than 48 hours but affecting fewer than 200 lines, based on that criteria including number of lines affected, duration and location Verizon MA believes that would be of interest to the Department.”

1 forms are then given to first level managers in garage locations, with a copy for managers
2 to send to the DRC where it should be stored. The technician will also retain a copy.

3 The Company states that this 3722-19 work is not crucial. However, during the
4 current DTC investigation, Area Manager Dave Walker issued a directive that, going
5 forward, no issue should be left unaddressed. This means, more or less, that 3722-19
6 forms should no longer be filled out. All work, whether or not it should be deferred, will
7 not be deferred and must be addressed on the spot. This new policy is opposite of the
8 policy that immediately preceded it. It is unclear whether all managers are implementing
9 this new policy.

10

11 Q: HOW ARE SERVICE QUALITY PROBLEMS REFLECTED BY VERIZON
12 MA'S USE OF A FORM 3722-19?

13 A: Every garage location in Western MA has reported to me that many 3722-19s are
14 either (1) not addressed for months or (2) not addressed at all.

15 During a meeting that I had with Dave Walker and Director Frank Crosby (a third
16 level manager), Dave Walker plainly stated that SSTs should not be filling out 3722-19
17 forms, but that they should do all work, including preventative and service affecting
18 work. However, Crosby contradicted Walker and said that SSTs should be filling out
19 3722-19 forms. The fact that the second and third level Verizon managers responsible
20 for Installation and Maintenance for Western MA could not agree on procedure speaks
21 volumes. The inconsistency and confusion from management in direction and goals for

1 SSTs reflects what I have been hearing from Local 2324 members for the past four to five
2 years.

3 Verizon MA has at times given technicians conflicting directions on a daily basis.
4 SSTs are told to meet productivity standards. If the worker informs the manager that he
5 cannot get to an appointment loaded to him¹⁴ in order to ensure all quality items are cared
6 for (i.e., a Form 3722-19 will not be filled out), the worker is informed that he/she is not
7 meeting productivity standards. However, in the North Hatfield garage, an entire wall
8 was covered with the SST copies of 3722s that had accumulated for over a year. I saw
9 this wall, and it was referred to as the Wall of Shame. After Verizon MA Vice President
10 Bucciarelli went through the location in the first or second week of August 2009, he
11 ordered that all the 3722s to be removed. To the best of my knowledge those forms have
12 been thrown away. It is not known if the copies that are provided to management were
13 kept. Additionally, I learned that Area Manager William Wilson was aware of the fact
14 that some managers have boxes of 3722s and others just throw them away.

15 Poor service quality is inextricably tied to Verizon MA's use, or failure to follow-
16 up on the Form 3722-19. The Company's failure to have enough SSTs in Western MA
17 for the past five years has compounded the problem. Area Manager Walker confided to
18 me approximately four to six months after he had taken the job that he thought it was
19 impossible to get all the work done with number of employees he had under him, and the
20 problem was compounded when he had to send his technicians to supplement areas
21 outside Western MA while SSTs from those areas worked on FIOS issues.

¹⁴ "Loaded" refers to the fact that SSTs usually will be pre-assigned three or more jobs at the beginning of each day. The jobs are pre-assigned by the Dispatch Resource Center (DRC).

1 FIOS is not installed in Western MA. FIOS is the name Verizon has assigned to
2 its Fiber Optic Network. It is also referred to as FTTP (Fiber to the Premise, i.e., fiber to
3 the home). The FIOS network carries basic dial tone, high speed internet, and televised
4 programming.

5
6 Q: WHAT DOES THE TERM, “SCRUBBING” MEAN AND HOW IS IT USED?

7 A: Scrubbing is a process by which customer reports of trouble are tested by either
8 an automated system or a live person making a test call to the subscriber. If the customer
9 is reached in person or if the test call reaches an answering machine, the trouble can then
10 be considered as “test o.k” or “no trouble found” and then be closed out in the system.

11 However, the automatic test may be an inaccurate test for the trouble actually being
12 experienced. Verizon Directors Jack Sordillo (currently in charge of the Dispatch
13 Response Center) and Frank Crosby (former director of the DRC) have stated that they
14 know troubles will “clear up” after a rain storm, once the cables dry out. My reaction to
15 that has been, yes, the troubles will clear up until the next rain storm, and the longer it
16 rains, the longer the customers are out of service. The response by these directors has
17 been they are not going to receive funds for Western MA to tend to copper. The
18 Company began calling work on copper lines, “core work,” as opposed to FIOS work,
19 about 4 years ago.

20 I have heard the term, “scrubbing,” used by Area managers, including DRC
21 Director Jack Sordillo, current I/M Director Frank Crosby,¹⁵ DRC Area Manager Mike
22 Callahan, and former DRC Area Manager Anthony Collier use the term. They direct
23 Administrative Assistants to call a telephone number that has reported a trouble, and to

¹⁵ Crosby also was the DRC Director and I/M Director simultaneously until approximately 2-3 years ago.

1 close out the trouble ticket as completed, by noting if no trouble was found or noting a
2 “test ok” result. The problem is that a significant percentage of troubles, that have been
3 scrubbed and have been inaccurately assessed with a “test ok” result, will remain
4 unresolved problems for the customer(s).

5
6 **Trend of Verizon MA Disinvesting in Western MA and Reallocating Western MA**
7 **Resources for Core Service into Non-Basic Service Options for Other Regions.**

8
9 Q: DO YOU HAVE ANY CONCERNS ABOUT THE LEVEL OF RESOURCES
10 AND ECONOMIC INVESTMENT THAT VERIZON MA IS ALLOCATING TO ITS
11 WESTERN MA SERVICE TERRITORY?

12 A: Yes. With the onset of FIOS in MA (and New England), the Company began
13 building its new technology in areas identified by the Company marketing department as
14 ‘viable.’ Viability was explained as an ability of the company to turn profits within 24 to
15 36 months. In mid-2004, the Company began building FIOS. Almost immediately, the
16 Company began transferring SSTs and OPT to other parts of MA to help build FIOS.
17 Approximately 8 OPTs out of 32 for my entire local were assigned on long term
18 transfers. As many as approximately 35 out of 270 SSTs were similarly situated. Until
19 recent months, this was business as usual in Western Massachusetts. Prior to this DTC
20 investigation into Verizon MA service quality in Western MA, the issue of service
21 quality was never this large of an issue.

22 As basic funding shifted to the rest of Massachusetts and away from the western
23 part of the state, getting complaints from my Members became the norm. Many times, I

1 would meet with the Company, and the issue was FIOS. The company had objectives
2 such as “number of homes or premises passed” where FIOS was made available.¹⁶ At
3 nearly every meeting between the Union and the Company, the Union questioned when
4 would Verizon MA build FIOS for Western MA? The Company in 2004 indicated that it
5 was unsure, but that the issue would be looked at. By 2006, the Company directly
6 informed us that it had no idea and that it was concentrating on areas where FIOS is
7 already in place. Over the past year, it Vice President Bucciarelli has stated that Verizon
8 MA will probably never go to Western MA with FIOS.

9 As part of Verizon MA’s cost cutting measures, everything from hand tools to
10 classroom training were allocated primarily to FIOS areas and to employees permanently
11 assigned to work in FIOS areas. Areas such as Western MA that rely on basic telephone
12 service and do not have FIOS suffered as a consequence.

13 When I visited garage locations, I learned that the first level managers did not
14 have basic items on hand to supply the SSTs. I recently learned from Area Manager
15 Walker that he was denied items and had to canvass other managers throughout
16 Massachusetts for materials such as cable closures. A cable closure is a piece of
17 equipment intended to cover cable openings, such as a location where splices are made
18 into the cable. If a closure is not placed, the cable would be open to the elements.
19 Apparently, Walker could not even get toilet paper and paper towels without Verizon
20 MA’s Vice President Bucciarelli giving approval, and Bucciarelli was not giving
21 approval on many items.

¹⁶ “Number of homes or premises passed” refers to the Verizon goal of making FIOS available to run past a certain number of homes to meet a Verizon target.

1 While the Company may allege that its policies are the same across
2 Massachusetts, many new vehicles that have been purchased or leased are based in areas
3 where FIOS is available. Verizon MA, as part of its marketing strategy, has “wrapped”
4 vehicles in these areas with special paint and emblems advertising FIOS. Money is
5 budgeted around FIOS work. It is not distributed in a uniform manner.

6

7 Q: WHAT SPECIFIC EXAMPLES SHOW THAT VERIZON MA IS NOT
8 INVESTING SUFFICIENT RESOURCES INTO BASIC TELEPHONE SERVICE
9 WITHIN ITS WESTERN MA TERRITORY?

10 A: I have been told directly by current Construction (“CXM”) Department Director
11 John Puopolo and retired CXM Directors Mary Ann Ryan and Bruce Bader that there
12 was very minimal or no funding for Western MA. The saying used by all of these
13 managers was that the budget has been decided and little or no money was allocated to
14 Western MA. They said that Company is heading in the direction of building a fiber
15 network for FIOS. They said there was no money for copper work. But I would note that
16 copper is what is in the basic infrastructure of wires necessary to provide basic local
17 telephone service. All of these Directors also stated they realized there was need for
18 replacing the copper cable. They acknowledged that some of the copper jobs have been
19 written up for months, but that when the budget came in, no money was available for
20 work on copper. Because the funding was allocated to FIOS, this was why so many SSTs
21 and OPTs were transferred to work in FIOS areas, and diverted from work in Western
22 MA where the work needed is on copper cable.

1 At meetings conducted throughout garages in Western Massachusetts, Directors
2 Frank Crosby and John Puopolo have indicated to Members that no investments would be
3 made in the 413 area code. This policy of directing investment outside of Western MA
4 rather than into Western MA has been the status quo for the past four to five years.
5 During a recent meeting within the last two to four months at the Brookdale garage in
6 Springfield, MA, Vice President Bucciarelli stated that no money is coming to Western
7 Massachusetts and that all available funding was going to continue to be targeted toward
8 FIOS. Mr. Bucciarelli further stated that FIOS would never come to Western MA. It
9 should be noted that the Union believes budget expenditures are made above Director
10 level and are made at the corporate Headquarters in Basking Ridge, NJ.

11 Several managers have retired and not been replaced, and this has adversely
12 affected service quality.¹⁷ Over the last four to five years, within the I/M department, the
13 Company has gone from approximately one manager for every twelve to fifteen workers,
14 to approximately one manager for every twenty to thirty workers.

15

16 Q: DO YOU HAVE ANY CONCERNS ABOUT RESOURCES ALLOCATED BY
17 VERIZON MA FOR WESTERN MA?

18 A: Yes. I would like to point out the Company's response to IBEW 3-39. The
19 Company states that technicians from the Western part of the state have been periodically
20 assigned to work in other areas, mainly to Central MA to help with heavier workloads.
21 This is the FIOS backfill issue. Backfill is a term used by managers to describe the
22 process of assigning technicians to perform work for others while they have been placed

¹⁷ Most of the managers who retired were asked to do so through the Company's RIF (Reduction in Force) program.

1 on another assignment. For example, Springfield SSTs will be transferred to Central MA
2 locations to do core work because the Central MA technicians are assigned FIOS related
3 duties or jobs. Western MA technicians (as many as 35-40 at a time) have been
4 transferred out of my Local for the past 5 years to do core work outside of Western MA.
5 "Core" is how the Company describes the old copper network. The reason for these
6 transfers is due to the fact that Central MA technicians have been assigned to FIOS
7 operations.

8

9 **Conclusion**

10

11 Q: CAN YOU SUMMARIZE YOUR CONCERNS AND RECOMMENDATIONS
12 FOR THE DEPARTMENT?

13 A: I recommend that in this case, the Department order Verizon MA to undertake
14 similar corrective measures as it did in the Middlefield case, D.T.C./D.T.E. 06-6, *Petition*
15 *of the Board of Selectmen of the Town of Middlefields, Massachusetts, pursuant to G.L. c.*
16 *159 § 24, regarding the quality of Verizon Massachusetts' telephone service.* The
17 complaints in Middlefield were similar to the complaints in this case and concerned
18 Verizon MA's delay in addressing longstanding service quality problems, deteriorated
19 and antiquated infrastructure, and unreliable telephone service that is a concern for
20 communicating in the event that any emergencies should arise.

21 My first recommendation is that, as in Middlefield, the DTC should order Verizon
22 MA to conduct an analysis of the service quality and infrastructure for Western MA.
23 Verizon MA should report on same to the DTC, with a proposed timeline for corrective

1 action. The report should include the extent of proactive maintenance and be submitted to
2 the DTC within 60 days of an Order in this case;

3 Second, also as in Middlefield, the DTC should order Verizon to report on the
4 number of customer troubles, at town or municipal level in Western MA, and compare
5 their trouble reports per hundred lines (“RPHL”) with the regional and statewide average
6 each month. A threshold of 4.0 RPHL or lower should be implemented and trouble
7 reports that exceed that threshold should result in immediate analysis and a report to the
8 Department for an order of corrective action. Verizon MA should report for an 18 month
9 period.

10 Additionally, I recommend that an independent source evaluate all parts that make
11 up the infrastructure within Western MA. The independent party should issue a report
12 that includes an analysis of the condition of infrastructure in Western MA and provides
13 recommendations that will improve the infrastructure and alleviate the customer
14 complaints that include no dial tone, dropped calls, humming, static, and one-way calling.
15 The source should be acceptable to the DTC, the Complainants, and the Intervenor in
16 this proceeding.

17 Lastly, the Department should monitor Verizon’s service quality. While the
18 Company appears to have recently taken some steps to improve the amounts of work
19 performed and improve the funding that the company directs toward Western MA, I am
20 concerned that without any ongoing active observation by the state, the Company will
21 quickly return to the practice of disinvestment and disinterest in Western Massachusetts
22 that has resulted in the poor service quality that is being investigated in this case.

23

1 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

2 A: It does, at this time. However, I reserve the right to supplement my testimony
3 after adequate time to review outstanding and late discovery responses from Verizon
4 MA.

5