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Alexander W. Moore
Deputy General Counsel

January 4, 2012

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: Petition to Waive Retail Service Quality Plan Results for October and
November 2011

Enclosed for filing is the Petition of Verizon New England Inc. to Waive Certain
Results Under its Retail Service Quality Plan for October and November 2011.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alex Moore", written over a horizontal line.

Alexander W. Moore

Enclosure

cc: Karlen Reed, Director-Competition Division
Benedict Dobbs, Deputy Director-Competition Division
Paul Abbott, General Counsel

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Verizon New England Inc. to Waive Certain Results Under its Retail Service Quality Plan for October and November, 2011))))))
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**PETITION OF VERIZON NEW ENGLAND INC.
TO WAIVE CERTAIN RESULTS UNDER ITS RETAIL
SERVICE QUALITY PLAN FOR OCTOBER AND NOVEMBER, 2011**

Pursuant to Paragraph E of the Verizon Massachusetts Retail Service Quality Plan (“the Plan”), Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) hereby petitions the Department of Telecommunications and Cable (“Department”) for relief under the Plan due to a freak snow storm that hit the Commonwealth on October 29 and 30, 2011 (the “Halloween Blizzard”), bringing down thousands of telephone lines and poles and causing substantial damage to Verizon MA’s network across the state.

As demonstrated below, Verizon MA took substantial action before, during and after the Halloween Blizzard to mitigate its effect on service, and in fact, Verizon MA met the overall requirements of the Plan in both October and November. Despite the Company’s normal and reasonable preparations for and response to the Blizzard, however, this extraordinary Act of God drove a dramatic spike in the volume of customer calls to Verizon MA’s repair center, significantly affecting the Company’s ability to answer calls in its normal speedy fashion over the four-day period October 30 through November 2. As a result, Verizon MA turned in subpar performances on the Plan metric for Repair Resolution Center Average Speed of Answer (“CSB Speed of Answer”) in October and November. Further, because Verizon MA’s performance

under the Plan is measured on a 12-month rolling average, its performance over just these four days would unfairly impair the Company's ability to satisfy the Plan for many months to come, if it is not excluded from the calculations.

Accordingly, the Department should grant this petition and allow Verizon MA to exclude its performance during the period October 30 – November 2 from calculation of its scores on the CSB Speed of Answer metric for October and November, 2011.¹

I. The Halloween Blizzard

The Halloween Blizzard hit Massachusetts late on October 29, 2011. The Blizzard swept the Commonwealth with gale-force winds and heavy, wet snow, dumping more than 30 inches of it in some areas. The most extraordinary aspect of the Blizzard, however, was that it arrived in mid-Autumn. With leaves still abundant on the trees, the snow ripped down thousands of tree limbs and trees, which in turn helped bring down telephone and power lines across the state – even in areas receiving relatively small amounts of snow. At one point, over 539,000 customers in Massachusetts were without power as a result of the Blizzard.² The downed trees and lines

¹ Exhibit 1 hereto includes Section 1 of the monthly Service Quality Reports for October and November, originally filed with the Department on November 23 and December 28, 2011, respectively. Exhibit 2 hereto is Section 1 of the October report revised to exclude the results on CSB Speed of Answer for October 30 and 31. Building on that, Exhibit 3 is Section 1 of the November report, revised to exclude, in addition, the results on this metric through November 2. (In order to make the data meaningful, both Exhibits 2 and 3 use the adjusted data for August and September filed with the Petition of Verizon New England To Waive Certain Results Under Its Retail Service Quality Plan For August and September (“August/September Petition”) on November 14, 2011.)

² Massachusetts Emergency Management Agency, State Emergency Operations Center, *2011 October 29 Snowstorm Situation Report #4*, dated October 31, 2011, at 2, available at http://s3.amazonaws.com/files.posterous.com/kevinkuros/Nrfy5jepBp4uBg71usQOewWe0U581VHFx1skhCIIbdAVDvkWE2BNVaG0VntJ/MEMA_Situation_Report_4_Oct_29.pdf?AWSAccessKeyId=AKIAJFZAE65UYRT34AOQ&Expires=1324500316&Signature=lhuF0IM%2BeIXpKwKb%2FPngzW8%2BLBo%3D

also blocked many roads, hindering work crew's efforts to restore electrical and telephone service. The Massachusetts Congressional delegation has described the Blizzard as follows:

This extraordinary storm produced more than 30 inches of heavy, wet snow and generated storm force winds of up to 67 mph. The storm's impact was exacerbated by the fact that leaves are still on the trees, collecting snow and weight, and as a result, scores of trees were toppled by the storm, pulling down power lines and leaving more than half a million state residents without power. ... More than 48 towns have approximately 90 percent or more of their homes without power, with an additional 48 towns with approximately 50 percent of their homes without power. A total of 121 communities are without power in approximately 25 percent of their homes. The outages are expected to last for ... days, and in some cases, more than a week as approximately 1,500 utility crews work as quickly as possible to restore power while dealing with blocked roads strewn with debris. The storm contributed to the deaths of at least five individuals.³

Due to its unique timing, the Halloween Blizzard resulted in substantial damage to Verizon MA's network far exceeding the often-considerable damage resulting from "normal" snow storms in the middle of winter.

On account of the Blizzard, Governor Patrick declared a State of Emergency for the Commonwealth on October 29, 2011, and activated the National Guard to clear trees in 30 communities. On November 1, President Obama responded to a request by Governor Patrick and declared a State of Emergency for Massachusetts, making federal disaster relief available to individuals, households, businesses, municipalities and state agencies in Berkshire, Essex, Franklin, Hampden, Hampshire, Middlesex, Norfolk and Worcester counties.⁴

Verizon MA had initiated contingency planning for the Blizzard before it hit and took reasonable and substantial action to prepare for it. Verizon MA:

- inventoried and tested all emergency generators that would be deployed to provide

³ See Letter dated November 1, 2011 from Senators John F. Kerry and Scott Brown and all ten Massachusetts congressmen to the President, at 1, attached hereto as Exhibit 4.

⁴ Government press releases concerning these actions are attached hereto as Exhibit 5.

power to remote electronic sites in the event of a commercial power loss;

- prioritized generator deployment to remote electronic sites based on the services provided from the location. (For example, Verizon MA gave first priority to locations that provided service to hospitals and E911 service to emergency response personnel.)
- increased its inventories of poles and moved additional stock of poles, service wire and general repair stock to garages in central and western regions of Massachusetts in anticipation of storm damage;
- ran a safety check on all of its motor vehicles and filled their fuel tanks;
- moved vehicles and equipment to protected locations and made efforts to protect its facilities;
- tested all central office generators and topped off their fuel tanks; and
- offered an engineer as a single point of contact to each of the NSTAR, NGRID and Western MA Electric "Storm Management Centers" across the state.

When the storm hit on October 29, Verizon MA activated its Emergency Operations Procedures. The EOP is a complete set of instructions for Verizon employees that provide the procedures to be followed in responding to and recovering from large-scale natural disasters. The EOP establishes necessary incident command and control authority to ensure a coordinated response and recovery effort. In addition, Verizon MA opened its regional control center in Taunton, to better manage priority planning, service crew assignments and overall communications for the entire state during the storm.

Although its field operations were curtailed during the storm itself, Verizon MA continued to respond to service issues during the Blizzard. In areas of downed power lines, Verizon MA field managers stayed in close contact with electric company field managers to determine if the area was safe for Verizon MA employees to begin repair efforts. Verizon MA took direction from the electric companies on priority pole restorations. Seventy-nine of Verizon MA's remote terminals in the central and western regions lost commercial power during the

storm. Of these, 27 were furnished with emergency generators which kicked in automatically, and Verizon MA had emergency generators providing power to another 49 remotes (thereby restoring service to customers) within three hours of the outage. Verizon MA's installation of generators at the three remaining remotes was delayed while local public works crews cleared access paths to the remotes. In addition, Verizon MA provided emergency power to three of its garages when commercial power failed. It also arranged for private petroleum delivery to fuel its fleet and electrical generators in areas of Western Massachusetts where gas stations were closed due to lack of power.

Immediately following the storm and as soon as areas were declared safe, Verizon MA dispatched crews to begin restoring service to customers. Verizon MA supplemented its usual workforce with extensive overtime and also reassigned technicians from the eastern area of the state to the central and western regions that were hardest hit by the Blizzard. Verizon MA replaced over 1,200 poles and more than 15,000 drop lines (the wire running from the customer's home to the cable in the street) that had been brought down or damaged by the Blizzard. This is approximately twice the number of poles and drops that were replaced following Hurricane Irene. Overall, Verizon MA technicians devoted more than 40,000 hours of overtime, over and above normal overtime volumes, to storm recovery activities and cleared more than **33,000** Blizzard-related service troubles during the period October 29 through November 11.

II. **Verizon MA Is Entitled To Exclude The Results For The CSB Speed Of Answer Metric For The Four-Day Period October 30 – November 2.**

Paragraph E of the Plan provides that Verizon MA may file for a waiver of service results due to events beyond its control, including severe weather, as follows:

Recognizing that service quality may be influenced by factors beyond Verizon MA's control, Verizon MA may file Exception of Waiver petitions with

the Department seeking to have monthly service quality results modified. Circumstances that would qualify for such consideration are limited to periods of emergency, catastrophe, natural disaster, severe storms, or other events beyond Verizon MA's control.

Any petition pursuant to this provision must demonstrate clearly and convincingly the extraordinary nature of the circumstances involved, the impact that the circumstances had on Verizon MA's service quality, why Verizon MA's normal, reasonable preparations for difficult situations proved inadequate, and the specific days affected by the event.

The Halloween Blizzard satisfies these requirements and supports the limited exclusion sought herein. Any blizzard is an act of God beyond Verizon MA's control, but a blizzard in October is extraordinary, and this one wreaked extraordinary havoc on the outside plant infrastructure of Verizon MA and the power companies across Massachusetts.

Verizon MA took all reasonable steps to mitigate the impact of the Halloween Blizzard on its service to customers – before, during and after these events. As explained above, Verizon MA properly prepared and responded to the Blizzard – checking and preparing its equipment in advance of the storm, maintaining service to the extent possible during the storm and coordinating its efforts with other utilities and applying its full resources and workforce to restore service as quickly as possible after the storm. As a result of these aggressive measures, Verizon MA was able to meet the general requirements of the Plan for October and November and is not in a penalty situation.

Nevertheless, the Blizzard negatively and significantly affected the Company's performance on the CSB Speed of Answer metric despite its best efforts. The exceptional number of downed poles, cables and drop wires loosed an avalanche of customer calls to the Enhanced Verizon Repair Center ("EVRC") beginning on October 30 shortly after the Blizzard hit and continuing through November 2. Whereas daily call volume typically varies between 1,000 and 3,300 calls and averaged 2,700 calls during the rest of November, volume on October

30 skyrocketed to over 7,500 calls and averaged 6,671 over the four-day period. Call volume then tapered off quickly, falling to 2,500 on November 5, for example, well within the normal range. As a result of this massive surge, CSB Speed of Answer for the four-day period was 339 seconds and was 43 seconds for October as a whole and 35 seconds for November as a whole. These monthly results are substantially higher than Verizon MA's average over the 12 months prior to October, which was only 19 seconds. Other than the four days affected by the Halloween Blizzard, Verizon MA's performance on CSB speed of Answer in these months was very good, only 16 seconds in October and 15 in November, indicating that the high monthly scores were caused by the Blizzard.

The following chart shows the impact of the Halloween Blizzard on Verizon MA's performance on the CSB Speed of Answer metric. It states the threshold and standard performance objectives under the Plan and the rolling average of Verizon MA's performance for the twelve months preceding October, 2011.⁵ That is followed by Verizon MA's actual result for October and then by its October result excluding October 30 and 31. The next two columns provide the actual and adjusted results for November. Finally, the column on the far right shows the number of months out of the 60 months prior to October, 2011, in which Verizon MA's actual monthly performance did not meet the standard (*i.e.* lower) objective in the Plan.

	SQI Objective Threshold, Standard	12-month Rolling avg.	Oct. monthly results	Results w/Oct. Dates Excluded	Nov. monthly results	Results w/Nov. Dates Excluded	Number of misses in last 60 Months
CSB Avg. Speed of Answer	T = 15, S = 20	19	43	16	35	15	6

⁵ The rolling average figure excludes the dates in August and September, 2011, affected by the strike of Verizon MA's unionized employees in August and Hurricane Irene in August and September, as described in the August/September Petition.

The chart demonstrates that Verizon MA's performance on the CSB Speed of Answer metric in October and November was significantly and negatively affected by the Halloween Blizzard and was entirely out of line with its consistently strong performance on this metric over many years, confirming that the Company would have turned in similarly strong results in these months but for the Blizzard.

III. Conclusion

As demonstrated above, the Halloween Blizzard was an extraordinary event beyond the control of Verizon MA. The storm significantly and adversely affected Verizon MA's service quality as measured by the CSB Speed of Answer metric, despite Verizon MA's extensive and reasonable preparations and appropriate responses to the storm. Accordingly, the Department should grant this petition and allow Verizon MA to exclude its performance on this metric during the period October 30 through November 2 from calculation of its scores for October and November, 2011.

Respectfully submitted,

VERIZON NEW ENGLAND INC., d/b/a
VERIZON MASSACHUSETTS

By its attorney



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Dated: January 4, 2012

Massachusetts

Service Quality Index 2010 /2011 Statewide Results (Monthly Actuals)

EXH. 6.1 #1

T = Target Level
S = Standard Level

	Thresholds	
	T	S
Maintenance Service Items	1.90	2.25
Network Trouble Report Rate	70	60
% Trbs Cld w/ 24 hrs-Res	85	75
% Trbs Cld w/ 24 hrs-Bus		
Installation Service Items		
% Appls Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.15	1.25
Company Facilities (CF)	5.5	6.0
% Installation Trouble Reports		
Service Response Items		
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
Maintenance Service Items	1.05	0.98	1.23	1.00	1.24	1.10	1.27	1.71	1.30	1.63	2.10	1.52
Network Trouble Report Rate	42	56	39	38	41	48	40	35	36	34	31	32
% Trbs Cld w/ 24 hrs-Res	78	79	75	75	79	83	80	78	78	54	71	77
% Trbs Cld w/ 24 hrs-Bus												
Installation Service Items												
% Appls Missed for Co. Reasons	0.9	1.1	1.0	1.0	1.0	0.9	0.9	1.1	1.1	1.3	1.7	1.3
Total Customers	0.7	0.9	0.8	0.8	0.8	0.7	0.7	0.9	0.9	1.2	1.4	1.1
Residence Customers	0.12	0.12	0.09	0.08	0.09	0.10	0.12	0.13	0.15	0.08	0.10	0.16
Company Facilities (CF)	4.0	3.6	3.6	3.7	3.8	4.1	4.8	5.7	5.1	5.1	4.7	4.4
% Installation Trouble Reports												
Service Response Items												
DA Avg. Speed of Answer	3.4	3.5	3.5	3.4	3.5	3.6	3.6	3.6	3.7	6.4	3.3	3.8
Toll & Assist Speed of Answer	2.9	2.5	2.3	2.5	2.3	2.1	1.9	2.4	2.8	2.6	2.3	2.7
CSB Avg. Speed of Answer	10	38	24	15	13	14	18	18	17	155	69	43
Residence Service Level	59	60	52	67	58	63	64	61	58	57	53	63
Business Service Level	59	72	53	89	75	94	93	80	76	72	82	77

Massachusetts

Service Quality Index 2010/2011 Statewide Results (Monthly Actuals)

Exhibit #1

T = Target Level
S = Standard Level

Thresholds
T S

Maintenance Service Items	1.90	2.25
Network Trouble Report Rate	70	60
% Trbls Crd w/ 24 hrs-Res	85	75
% Trbls Crd w/ 24 hrs-Bus		
Installation Service Items		
% Apts Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.15	1.25
Company Facilities (CF)	5.5	6.0
% Installation Trouble Reports		
Service Response Items		
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Maintenance Service Items	0.98	1.23	1.00	1.24	1.10	1.27	1.71	1.30	1.63	2.10	1.52	2.18
Network Trouble Report Rate	56	39	38	41	48	40	35	36	34	31	32	30
% Trbls Crd w/ 24 hrs-Res	79	75	75	79	83	80	78	78	54	71	77	76
% Trbls Crd w/ 24 hrs-Bus												
Installation Service Items												
% Apts Missed for Co. Reasons	1.1	1.0	1.0	1.0	0.9	0.9	1.1	1.1	1.3	1.7	1.3	1.1
Total Customers	0.9	0.8	0.8	0.8	0.7	0.7	0.9	0.9	1.2	1.4	1.1	0.9
Residence Customers	0.12	0.09	0.08	0.09	0.10	0.12	0.13	0.15	0.08	0.10	0.16	0.15
Company Facilities (CF)	3.6	3.6	3.7	3.8	4.1	4.8	5.7	5.1	5.1	4.7	4.4	4.8
% Installation Trouble Reports												
Service Response Items												
DA Avg. Speed of Answer	3.5	3.5	3.4	3.5	3.6	3.6	3.6	3.7	6.4	3.3	3.8	3.3
Toll & Assist Speed of Answer	2.5	2.3	2.5	2.3	2.1	1.9	2.4	2.8	2.6	2.3	2.7	3.2
CSB Avg. Speed of Answer	38	24	15	13	14	18	18	17	155	69	43	35
Residence Service Level	60	52	67	58	63	64	61	58	57	53	63	60
Business Service Level	72	53	89	75	94	93	80	76	72	82	77	85

Mass State

T = Target Level
S = Standard Level

**Service Quality Index
2010/2011 Statewide Results
12 Month Rolling Average**

Exhibit #1
Page 1 of 4

2010 2011

Thresholds
T S

Maintenance Service Items	1.90	2.25
Network Trouble Report Rate	70	60
% Trbls Cld w/ 24 hrs-Res	85	75
% Trbls Cld w/ 24 hrs-Bus		
Installation Service Items		
% Apts Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.15	1.25
Company Facilities (CF)	5.5	6.0
% Installation Trouble Reports		
Service Response Items		
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

Points for Response Items	7	7	6	7	6	7	7	7	7	7	7	5	5	6	6
Sub-Total Points for SBU's	33	33	33	33	33	33	33	33	33	33	33	32	32	32	32
Total SCL Points for Mass.	40	40	39	40	40	40	40	40	40	40	40	37	37	38	38

	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov											
	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts	Pts										
1.23	2	1.25	2	1.26	2	1.21	2	1.19	2	1.21	2	1.23	2	1.22	2	1.25	2	1.33	2	1.34	2	1.44	2
49	0	47	0	45	0	45	0	45	0	43	0	42	0	42	0	41	0	40	0	39	0	38	0
80	1	79	1	79	1	79	1	79	1	79	1	78	1	78	1	77	1	76	1	76	1	75	1
0.9	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.1	2	1.1	2	1.1	2
0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.9	2	0.9	2	0.9	2
0.16	2	0.15	2	0.14	2	0.14	2	0.13	2	0.13	2	0.13	2	0.13	2	0.12	2	0.11	2	0.11	2	0.11	2
4.0	2	4.0	2	4.0	2	4.0	2	4.0	2	4.1	2	4.2	2	4.2	2	4.3	2	4.4	2	4.4	2	4.5	2
3.6	2	3.6	2	3.7	1	3.6	2	3.7	1	3.6	2	3.5	2	3.5	2	3.8	1	3.7	1	3.8	1	3.8	1
2.3	2	2.3	2	2.5	2	2.5	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2	2.5	2
18	1	18	1	18	1	17	1	17	1	17	1	17	1	17	1	29	0	33	0	36	0	38	0
69	1	67	1	67	1	66	1	66	1	65	1	64	1	63	1	62	1	60	1	60	1	60	1
64	1	63	1	67	1	67	1	68	1	69	1	70	1	72	1	72	1	74	1	77	1	79	2

3 or More Standard Misses	No	No	No	No	No	No	No	No	No	No	No	No	No
Monthly Service Penalty	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Service Penalty	0.00 %												

Massachusetts

Service Quality Index 2010 /2011 Statewide Results (Monthly Actuals)

Exhibit #2

T = Target Level
S = Standard Level

Thresholds
T S

Maintenance Service Items:	1.90	2.25
Network Trouble Report Rate	70	60
% Trbs Clrd w/ 24 hrs-Res	85	75
% Trbs Clrd w/ 24 hrs-Bus		
Installation Service Items:		
% Apts Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.15	1.25
Company Facilities (CF)	5.5	6.0
% Installation Trouble Reports		
Service Response Items:		
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

	2010	2011	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
Maintenance Service Items:	1.05	0.98	1.23	1.00	1.24	1.10	1.27	1.71	1.30	1.63	2.10	1.52		
Network Trouble Report Rate	42	56	39	38	41	48	40	35	36	34	31	32		
% Trbs Clrd w/ 24 hrs-Res	78	79	75	75	79	83	80	78	78	54	71	77		
% Trbs Clrd w/ 24 hrs-Bus														
Installation Service Items:														
% Apts Missed for Co. Reasons	0.9	1.1	1.0	1.0	1.0	0.9	0.9	1.1	1.1	1.3	1.7	1.3		
Total Customers	0.7	0.9	0.8	0.8	0.8	0.7	0.7	0.9	0.9	1.2	1.4	1.1		
Residence Customers	0.12	0.12	0.09	0.08	0.09	0.10	0.12	0.13	0.15	0.08	0.10	0.16		
Company Facilities (CF)	4.0	3.6	3.6	3.7	3.8	4.1	4.8	5.7	5.1	5.1	4.7	4.4		
% Installation Trouble Reports														
Service Response Items:														
DA Avg. Speed of Answer	3.4	3.5	3.5	3.4	3.5	3.6	3.6	3.6	3.6	3.6	3.7	6.4	3.3	3.8
Toll & Assist Speed of Answer	2.9	2.5	2.3	2.5	2.3	2.1	1.9	2.4	2.4	2.6	2.3	2.7		
CSB Avg. Speed of Answer	10	38	24	15	13	14	18	18	17	155	69	16		
Residence Service Level	59	60	52	67	58	63	64	61	58	57	53	63		
Business Service Level	59	72	53	89	75	94	93	80	76	72	82	77		

Mass State

**Service Quality Index
2010/2011 Statewide Results
12 Month Rolling Average**

T = Target Level
S = Standard Level

2010 2011

Maintenance Service Items:	Thresholds	T	S
Network Trouble Report Rate	1.90	2.25	
% Trbls Cld w/ 24 hrs-Res	70	60	
% Trbls Cld w/ 24 hrs-Bus	85	75	
Installation Service Items:			
% Apprs Missed for Co. Reasons	1.5	2.5	
Total Customers	1.5	2.5	
Residence Customers	1.5	2.5	
Company Facilities (CF)	1.15	1.25	
% Installation Trouble Reports	5.5	6.0	
Service Response Items:			
DA Avg. Speed of Answer	3.6	4.0	
Toll & Assist Speed of Answer	3.6	4.0	
CSB Avg. Speed of Answer	15	20	
Residence Service Level	75	60	
Business Service Level	75	60	

Points for Response Items	8
Sub-Total Points for SBU's	33
Total SQI Points for Mass.	41

3 Or More Standard Misses
Monthly Service Penalty 0.00 %
Total Service Penalty 0.00 %

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Pts										
1.24	2	1.23	2	1.25	2	1.25	2	1.21	2	1.19	2	1.21	2	1.23	2	1.22	2	1.25	2	1.33	2	1.34	2
49	0	49	0	47	0	45	0	45	0	45	0	43	0	42	0	42	0	41	0	40	0	39	0
81	1	80	1	79	1	79	1	79	1	79	1	79	1	78	1	78	1	77	1	76	1	76	1
1.0	2	0.9	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.1	2
0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.9	2	0.9	2
0.17	2	0.16	2	0.15	2	0.14	2	0.14	2	0.13	2	0.13	2	0.13	2	0.12	2	0.12	2	0.11	2	0.11	2
4.0	2	4.0	2	4.0	2	4.0	2	4.0	2	4.0	2	4.1	2	4.2	2	4.2	2	4.3	2	4.4	2	4.4	2
3.6	2	3.6	2	3.6	2	3.7	1	3.6	2	3.7	1	3.6	2	3.5	2	3.5	2	3.8	1	3.7	1	3.8	1
2.2	2	2.3	2	2.3	2	2.5	2	2.5	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2	2.4	2
15	2	18	1	18	1	17	1	17	1	17	1	17	1	17	1	17	1	29	0	33	0	34	0
70	1	69	1	67	1	67	1	66	1	66	1	65	1	64	1	64	1	62	1	60	1	60	1
65	1	64	1	63	1	67	1	67	1	68	1	69	1	70	1	72	1	72	1	74	1	77	2
No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

8	7	7	6	7	7	6	7	7	7	7	7	7	5	5	6
33	33	33	33	33	33	33	33	33	33	33	33	33	32	32	32
41	40	40	39	40	40	39	40	40	40	40	37	37	37	38	

Exhibit #2

Massachusetts

Service Quality Index 2010 /2011 Statewide Results (Monthly Actuals)

Exhibit #3

T = Target Level
S = Standard Level

Thresholds
T S

Maintenance Service Items	T	S
Network Trouble Report Rate	1.90	2.25
% Trbls Cird w/ 24 hrs-Res	70	60
% Trbls Cird w/ 24 hrs-Bus	85	75

Installation Service Items	T	S
% Apprs Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.5	2.5
Company Facilities (CF)	1.15	1.25
% Installation Trouble Reports	5.5	6.0

Service Response Items	T	S
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

	2010	2011	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Network Trouble Report Rate	0.98	1.23	1.00	1.24	1.10	1.27	1.71	1.30	1.63	2.10	1.52	2.18		
% Trbls Cird w/ 24 hrs-Res	56	39	38	41	48	40	35	36	34	31	32	30		
% Trbls Cird w/ 24 hrs-Bus	79	75	75	79	83	80	78	78	54	71	77	76		
% Apprs Missed for Co. Reasons	1.1	1.0	1.0	1.0	0.9	0.9	1.1	1.1	1.3	1.7	1.3	1.1		
Total Customers	0.9	0.8	0.8	0.8	0.7	0.7	0.9	0.9	1.2	1.4	1.1	0.9		
Residence Customers	0.12	0.09	0.08	0.09	0.10	0.12	0.13	0.15	0.08	0.10	0.16	0.15		
Company Facilities (CF)	3.6	3.6	3.7	3.8	4.1	4.8	5.7	5.1	5.1	4.7	4.4	4.8		
% Installation Trouble Reports														
DA Avg. Speed of Answer	3.5	3.5	3.4	3.5	3.6	3.6	3.6	3.7	6.4	3.3	3.8	3.3		
Toll & Assist Speed of Answer	2.5	2.3	2.5	2.3	2.1	1.9	2.4	2.8	2.6	2.3	2.7	3.2		
CSB Avg. Speed of Answer	38	24	15	13	14	18	18	17	155	69	16	15		
Residence Service Level	60	52	67	58	63	64	61	58	57	53	63	60		
Business Service Level	72	53	89	75	94	93	80	76	72	82	77	85		

Mass State

**Service Quality Index
2010/2011 Statewide Results
12 Month Rolling Average**

T = Target Level
S = Standard Level

2010 2011

Thresholds
T S

Maintenance Service Items	1.90	2.25
Network Trouble Report Rate	70	60
% Ttrb Cird w/ 24 hrs-Res	85	75
% Ttrb Cird w/ 24 hrs-Bus		

% Apts Missed for Co. Reasons	1.5	2.5
Total Customers	1.5	2.5
Residence Customers	1.15	1.25
Company Facilities (CF)	5.5	6.0
% Installation Trouble Reports		

Service Response Items:		
DA Avg. Speed of Answer	3.6	4.0
Toll & Assist Speed of Answer	3.6	4.0
CSB Avg. Speed of Answer	15	20
Residence Service Level	75	60
Business Service Level	75	60

Points for Response Items	7	7	6	7	7	6	7	7	7	5	5	6	6
Sub-Total Points for SBU's	33	33	33	33	33	33	33	33	33	32	32	32	32
Total SQI Points for Mass.	40	40	39	40	39	40	40	40	40	37	37	38	38

	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	
1.23	2	1.25	2	1.25	2	1.21	2	1.19	2	1.21	2	1.23	2
49	0	47	0	45	0	45	0	45	0	43	0	42	0
80	1	79	1	79	1	79	1	79	1	79	1	78	1
0.9	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2	1.0	2
0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2	0.8	2
0.16	2	0.15	2	0.14	2	0.14	2	0.13	2	0.13	2	0.13	2
4.0	2	4.0	2	4.0	2	4.0	2	4.0	2	4.1	2	4.2	2
3.6	2	3.6	2	3.7	1	3.6	2	3.7	1	3.6	2	3.5	2
2.3	2	2.3	2	2.5	2	2.5	2	2.4	2	2.4	2	2.4	2
18	1	18	1	18	1	17	1	17	1	17	1	17	1
69	1	67	1	67	1	66	1	66	1	65	1	64	1
64	1	63	1	67	1	67	1	68	1	69	1	70	1
No	No	No	No	No	No	No	No	No	No	No	No	No	No
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3 or More Standard Misses

Total Service Penalty 0.00 %

Exhibit #3

Exhibit #4

Congress of the United States
Washington, DC 20515

November 1, 2011

The President
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

Dear Mr. President:

We are writing to you in strong support of Governor Deval Patrick's request for an emergency declaration for the Commonwealth of Massachusetts as a result of major damage caused by severe weather across many areas of the state. The magnitude, scope and severity of the storm that began on October 29th and ended on October 30, 2011 are beyond the response capabilities of the Commonwealth and affected local governments. Accordingly, we are seeking the approval of Governor Patrick's request for Federal Assistance, Category B, including direct Federal assistance for the counties of Berkshire, Essex, Franklin, Hampden, Hampshire, Middlesex, Norfolk and Worcester.

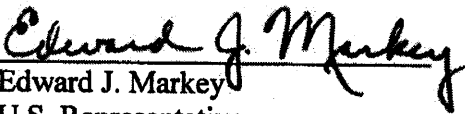
This extraordinary storm produced more than 30 inches of heavy, wet snow and generated storm force winds of up to 67 mph. The storm's impact was exacerbated by the fact that leaves are still on the trees, collecting snow and weight, and as a result, scores of trees were toppled by the storm, pulling down power lines and leaving more than half a million state residents without power. Approximately 43,000 of these outages have been suffered by municipal power companies. More than 48 towns have approximately 90 percent or more of their homes without power, with an additional 48 towns with approximately 50 percent of their homes without power. A total of 121 communities are without power in approximately 25 percent of their homes. The outages are expected to last for take days, and in some cases, more than a week as approximately 1,500 utility crews work as quickly as possible to restore power while dealing with blocked roads strewn with debris. The storm contributed to the deaths of at least five individuals.

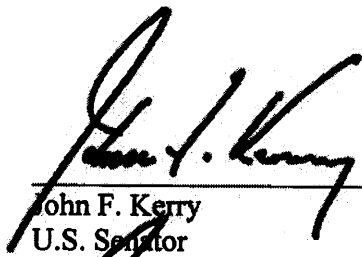
The Governor has activated the National Guard to clear trees in 30 communities, and the Massachusetts Department of Conservation & Recreation has 11 crews clearing trees with an additional 10 crews to be assigned. Despite these efforts, significant road closures persist in many communities, including 140 roads closed in the City of Springfield and dozens of roads closed in the City of Westfield. Due to fallen power lines, broken branches, and power outages throughout the Town of Lexington, residents have been forced to stay indoors for days after the storm.


This storm arrived while parts of western parts of Massachusetts are still recovering from Hurricane Irene in late August and a destructive tornado in early June. Since the beginning of this year, three federal disasters have been declared in Massachusetts, including a hurricane and tornadoes.


The Massachusetts Congressional Delegation respectfully requests an emergency declaration for the Commonwealth of Massachusetts as a result of the severe storm of October 29th and October 30, 2011 under the provisions of Section 501(a) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. We strongly support Governor Patrick's request for federal funding for this major disaster.

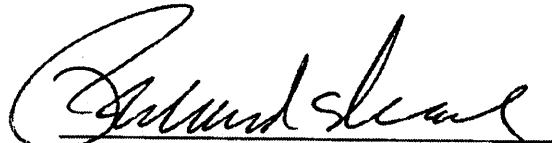
Sincerely,



Edward J. Markey
U.S. Representative

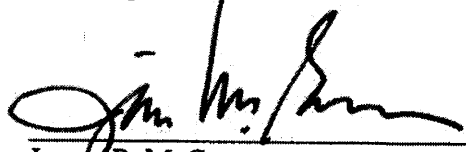

John F. Kerry
U.S. Senator

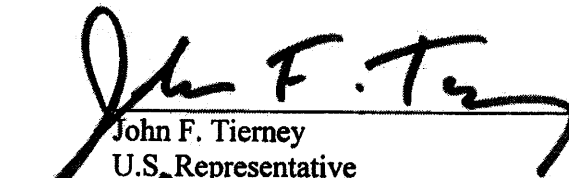

Scott Brown
U.S. Senator

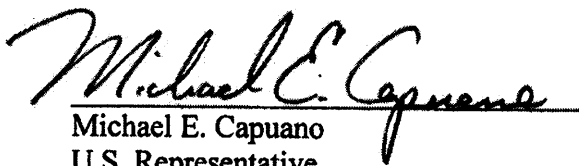

Barney Frank
U.S. Representative

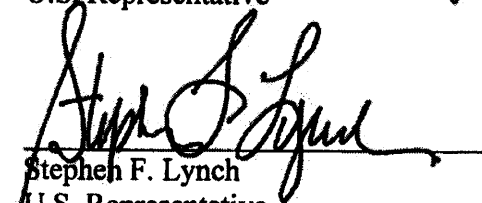

Richard E. Neal
U.S. Representative


John W. Olver
U.S. Representative


James P. McGovern
U.S. Representative


John F. Tierney
U.S. Representative


Michael E. Capuano
U.S. Representative


Stephen F. Lynch
U.S. Representative

Niki Tsongas

Niki Tsongas
U.S. Representative

William R. Keating

William R. Keating
U.S. Representative



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF PUBLIC SAFETY & SECURITY



Deval L. Patrick
Governor

MASSACHUSETTS EMERGENCY MANAGEMENT AGENCY

400 Worcester Road Framingham, MA 01702-5399

Tel: 508-820-2000 Fax: 508-820-2030

Website: www.mass.gov/mema

Kurt N. Schwartz
Director

Timothy P. Murray
Lieutenant Governor

Mary Elizabeth
Heffernan
Secretary

FOR IMMEDIATE RELEASE
October 29, 2011

Peter Judge, MEMA PIO
(508) 820-2002

GOVERNOR PATRICK DECLARES STATE OF EMERGENCY

Early Winter Storm Causes Power Outages

FRAMINGHAM, MA – Governor Deval Patrick has declared a State of Emergency in response to the impacts of the severe winter storm. Heavy wet snow combined with significant wind conditions has caused significant power outages across much of the Commonwealth.

The declaration of a State of Emergency will enable the Governor to take the appropriate steps to mobilize many of the Commonwealth's assets, such as the National Guard, and conduct other emergency business to assist local communities in their response to and recovery from the many impacts from this winter storm.

The Massachusetts Emergency Management Agency (MEMA) is the state agency responsible for coordinating federal, state, local, voluntary and private resources during emergencies and disasters in the Commonwealth of Massachusetts. MEMA provides leadership to: develop plans for effective response to all hazards, disasters or threats; train emergency personnel to protect the public; provide information to the citizenry; and assist individuals, families, businesses and communities to mitigate against, prepare for, and respond to and recover from emergencies, both natural and man made. For additional information about MEMA go to www.mass.gov/mema.

Exhibit #5



President Declares An Emergency For Massachusetts

Release Date: November 1, 2011

Release Number: HQ-11-209

» More Information on Massachusetts Severe Storm

» En Español

WASHINGTON -- The U.S. Department of Homeland Security's Federal Emergency Management Agency announced that federal disaster aid has been made available to the Commonwealth of Massachusetts and ordered federal aid to supplement commonwealth and local recovery efforts due to the emergency conditions resulting from a severe storm during the period of October 29-30, 2011.

The President's action authorizes FEMA to coordinate all disaster relief efforts which have the purpose of alleviating the hardship and suffering caused by the emergency on the local population, and to provide appropriate assistance for required emergency measures, authorized under Title V of the Stafford Act, to save lives and to protect property and public health and safety, and to lessen or avert the threat of a catastrophe in the counties of Berkshire, Essex, Franklin, Hampden, Hampshire, Middlesex, Norfolk, and Worcester.

Specifically, FEMA is authorized to identify, mobilize, and provide at its discretion, equipment and resources necessary to alleviate the impacts of the emergency. Emergency protective measures, limited to direct federal assistance, will be provided at 75 percent federal funding.

Mark H. Landry has been named as the Federal Coordinating Officer for federal recovery operations in the affected area.

Follow FEMA online at blog.fema.gov, <http://www.fema.gov/goodbye/goodbye.jsp?url=http://www.twitter.com/fema>, <http://www.fema.gov/goodbye/goodbye.jsp?url=http://www.facebook.com/fema>, and <http://www.fema.gov/goodbye/goodbye.jsp?url=http://www.youtube.com/fema>. Also, follow Administrator Craig Fugate's activities at <http://www.fema.gov/goodbye/goodbye.jsp?url=http://www.twitter.com/craigatfema>.

The social media links provided are for reference only. FEMA does not endorse any non-government websites, companies or applications.

FEMA's mission is to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.