

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. D.T.C. 09-1

Respondent: William Wilson

Title: Area Manager

REQUEST: Attorney General to Verizon, Set #7

DATED: October 8, 2009

ITEM: AG-VZ 7-1

Please refer to AG-3-58. When does Verizon check these batteries? How often does Verizon check these batteries? Are the batteries checked on a routine basis? If not, why not? What are Verizon's procedures for checking these batteries? Are the batteries "tested and replaced" only "after they are unable to sustain an 8-hour power outage"? Does Verizon ever routinely check batteries? Please confirm that Verizon does not know how many remote distribution units in western MA could sustain an 8-hour power outage.

REPLY:

Verizon checks the batteries on a routine basis. A visual inspection is conducted whenever a technician or manager visits a remote distribution unit. The visual inspection includes examining for damage, corrosion or leakage. In addition to replacing batteries that are unable to sustain an 8 hour power outage, Verizon MA may replace batteries based on a visual inspection alone.

Based on Verizon MA's routine checks of these batteries and the tests conducted during the recent field evaluations referenced in response to Information Request AG-VZ 1-1, Verizon MA is unaware of any batteries in remote distribution units in the 413 area that are unable to sustain an 8 hour power outage.

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Respondent: Edward Gee
Title: Director

REQUEST: Attorney General to Verizon, Set #7

DATED: October 8, 2009

ITEM: AG-VZ 7-3

Please refer to AG-3-53. How many total feet of cable are in Western MA? How many total feet of cable are in Eastern MA? How many feet of defective cable are presently in the outside plant of Verizon in Eastern MA?

REPLY:

Objection: The request is vague and confusing, in that it fails to define cable that is “defective.” For purposes of responding to this request, Verizon MA takes the request to seek the number of feet of cable scheduled for replacement.

Subject to this objection, Verizon MA states the following:
See response to AG-VZ 3-48 for the total sheath kilometers of cable in Massachusetts and also stating that Verizon MA does not have the information separately by Eastern and Western Massachusetts.
Verizon MA is endeavoring to determine the number of feet of cable scheduled for replacement in Eastern Massachusetts. When the data is available, Verizon MA will provide it.

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ITEM: AG-VZ 7-4

Please refer to AG-3-56. How much will it cost Verizon to replace the 22,000 feet of cable? What criteria does Verizon use to determine where and when to replace defective cable? Please provide all documents, memoranda, policies, procedures, manuals that Verizon uses to determine when and where to replace defective cable. How many feet of cable is being replaced in Eastern MA? When will Verizon determine its plans for Western MA 2010? Why not replace all of the cable that is identified in response to 3-53 (i.e., the 92,334 feet of cable identified for replacement) in 2010?

REPLY:

Objection: The request is vague and confusing, in that it fails to define cable that is “defective.” For purposes of responding to this request, Verizon MA omits the term “defective” and takes the request to seek information regarding the replacement of cable.

Subject to this objection, Verizon MA states the following:
Verizon MA estimates that the total cost of replacing the cable noted in response to AG-VZ 3-56 is about \$500,000. For documents Verizon MA uses to determine when and where to replace cable, please see Proprietary Attachment AG-VZ 3-7. For additional information regarding this decision-making process, please see the responses to Information Requests AG-VZ 3-55, AG –VZ 3-7, IBEW-VZ 4-1, and IBEW-VZ 4-2.

As described in response to AG-VZ 7-3, Verizon MA is working to determine the amount of cable that has been identified for replacement in Eastern MA and will provide that when available.

The replacement of cable is an ongoing process. Verizon MA expects to replace the majority of the cable identified in AG-VZ 3-53 in 2009 and the remainder in 2010. The identification of cable to be replaced does not

necessarily mean that the cable is defective or is in need of immediate replacement.