

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

Commonwealth of Massachusetts

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

Respondent: John Conroy
Title: Vice President-Regulatory

REQUEST: Department of Telecommunications and Cable, Set # 2

DATED: October 6, 2009

ITEM: DTC-VZ 2-8

List all plant and equipment that are partly or wholly responsible for the trouble tickets identified in (2.7.a) and (2.7.d) above. For each unique plant or equipment, provide the following information along with supporting documentation:

- a. Name of asset;
- b. Description;
- c. Name of manufacturer;
- d. Number of years in use;
- e. Description of internal policies / practices for technical maintenance and replacement;
- f. Information on all instances in which internal maintenance policies / practices were not followed for the particular piece of plant / equipment; and
- g. Describe differences, if any, between Verizon's policies / practices and the manufacturer's recommendations for technical maintenance and replacement of this particular piece of plant / equipment.

REPLY:

Objection: The request is overbroad and unduly burdensome. Verizon MA does not track the data in the manner requested and

would have to devote a considerable amount of time to a special study to gather that data. In response to Information Request DTC-VZ 2-7, Verizon MA identified 316 trouble reports associated with 48 customer phone numbers. Each of the 316 entries includes a disposition code and narrative that need to be researched to identify any plant or equipment that may have been responsible for each trouble ticket. To the extent such plant or equipment can be identified (and such plant or equipment belonged to Verizon MA), Verizon MA would then research the identity, manufacturer, age and maintenance requirements of each such piece of equipment. Due to the volume of phone numbers and reports, Verizon MA estimates this would require at least 80 man-hours at a cost of about \$7,500.00.