

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

Commonwealth of Massachusetts

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

Respondent: Counsel/William Wilson
Title: Area Manager

REQUEST: Attorney General to Verizon, Set #2

DATED: September 10, 2009

ITEM: AG-VZ 2-1

When VZ MA chooses how to address its customer service requests or trouble reports, please provide the hierarchy or order in which it responds to the following customer classes, including, for example: FIOS, business customer, residential customer, DSL, or a resold account.

a) In addition for each customer class identified above and any other the company ought to add, please identify the class of service and type of service provided and the timeframe set internally by the Company to clear the troubles.

b) Further, provide the contracts entered into by Verizon MA with its customers in Hampden, Hampshire, Franklin and Berkshire Counties.

REPLY:

Objection: Subpart (a) of the request is vague and confusing, in that it fails to define “class of service” and “type of service.” Subpart (b) is overly broad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA has entered into many contracts and service agreements with its customers, including for services other than telephone services. Producing all of those agreements would be extremely burdensome, and would not yield any information relevant to this investigation. Moreover, the terms of most of those agreements are consistent with the terms of Verizon MA’s retail tariff, D.T.C.. No. 10, which are available to the public. The remaining contracts are Customer-Specific Pricing (“CSP”) contracts, the terms of which are summarized in individual tariffs filed with the Department, and which are also available to the public.

Subject to and without waiving these objections, Verizon MA states the following: see response to IBEW-VZ 1-12 and Proprietary Attachment IBEW-VZ 1-12. In addition, Verizon MA maintains separate business and residence “clocks” with the business clocks generally having shorter durations than residence. This is in accordance with the Department-

mandated metric of clearing 85 percent of business troubles in 24 hours and 70 percent of residence troubles in 24 hours.

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

Respondent: Counsel/John Conroy

Title: Vice President-Regulatory

REQUEST: Attorney General to Verizon, Set #2

DATED: September 10, 2009

ITEM: AG-VZ 2-2

Please identify all telephone poles in western Massachusetts that are jointly owned by Verizon MA with an electric company. Also provide the following:

- a) The amount of money paid to electric companies and what it was paid for with respect to these poles.
- b) Provide all pole sharing agreements that cover the western Massachusetts municipalities.
- c) Identify all poles in Western Massachusetts that had to be replaced and repaired within the last 5 years.

REPLY:

Objection: The request is vague, overly broad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA has hundreds of thousands of jointly owned poles in Massachusetts. The identification of each such pole in Western Massachusetts (presumably by street and number) would require enormous time and effort by Verizon MA and would add no material information to this service-quality investigation. Likewise, the amount of money paid to electric companies (presumably by Verizon MA, for any purpose or reason and at any time) would require a burdensome special study by Verizon MA and would have no bearing on any issue in this investigation.

Subject to and without waiving these objections, Verizon MA states the following:

- (b) Copies of Verizon MA's agreements with joint owners of poles in the 413 LATA are attached as Proprietary Attachment AG-VZ 2-2. The attachment is voluminous and is therefore provided in electronic form only.
- (c) Many poles in Western Massachusetts are set by the local power company, not by Verizon MA. Among them, Verizon MA and the local power companies have set approximately 3900 poles in the

413 area since January 1, 2005.

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

Respondent: Counsel/Edward Gee
Title: Director

REQUEST: Attorney General to Verizon, Set #2

DATED:

ITEM: AG-VZ 2-3

Please provide any and all engineering plans concerning outside plant that have been written to address trouble spots identified in western Massachusetts (Berkshire, Hampden, Hampshire and Franklin counties) at any time in the last five years. Please indicate the date that each of these plans were written, the date they were completed and which plans have not been completed with an explanation of why they have not yet been completed. In addition, please provide all documentation of the engineering plans, including documentation of those plans that were not executed.

REPLY:

Objection: This request is vague, overly broad and unduly burdensome. Verizon MA has written almost 2,000 asset-restoration and service-improvement jobs in the 413 area code since 2005, and providing engineering plans and documentation for each job would require a manual search that would require at least 2,000 person hours.

Subject to and without waiving this objection, please refer to Attachment AG-VZ 2-3, which provides the location, date and status of all asset restoration and service improvement jobs written in the 413 area code since 2005.

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Respondent: Counsel/John Conroy

Title: Vice President-Regulatory

REQUEST: Attorney General to Verizon, Set #2

DATED: September 10, 2009

ITEM: AG-VZ 2-4

Please provide all service quality metrics that Verizon reports to the Department as part of the Service Quality Index and that Verizon uses for internal purposes separately for each wire center in western Massachusetts (Berkshire, Hampden, Hampshire and Franklin counties). Also provide one alphabetical table of all wire centers in the four counties (Berkshire, Hampden, Hampshire and Franklin counties). Separately, provide for each wire center the list of municipalities that each wire center serves and then a separate alphabetical table of all municipalities and separately for each municipality, the wire center that serves that municipality.

REPLY:

Objection: The request is vague, in that it is unclear whether it seeks a listing of the metrics that Verizon MA reports to the Department or, in contrast, Verizon MA's actual performance results with respect to those metrics. If the request seeks the latter, it fails to specify a time frame for the data it seeks.

Subject to and without waiving this objection, Verizon MA states the following: Attachment AG-VZ 2-4(a) hereto is the most recent monthly Service Quality report filed by Verizon MA with the Department, showing the metrics that Verizon MA reports and the results for those metrics. Verizon MA uses many metrics in monitoring its service quality performance. Including for example, Code 4 trouble reports, troubles reported within 7 days of new installations, repeat reports, and subsequent reports.

In addition, Attachment AG-VZ 2-4(b) lists each wire center serving the 413 area and, for each such wire center, the municipalities it serves. On the attachment the first line displays the wire center name and then the subsequent lines display the municipality served by that wire center. For example, the Adams Wire Center serves the municipalities of Adams,

Cheshire, Savoy, Plainfield, Hawley and Windsor.

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Respondent: **John Conroy**
Title: Vice President-Regulatory

REQUEST: Attorney General to Verizon, Set #2

DATED:

ITEM: AG-VZ 2-5

Please provide all service quality metrics by each municipality in Berkshire, Hampden, Hampshire and Franklin counties.

REPLY:

Verizon MA does not have the information sought in this request.
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Docket No. D.T.C. 09-1

Respondent: William Wilson
Title: Area Manager

REQUEST: Attorney General to Verizon, Set #1

DATED:

ITEM: AG-VZ 2-6

Please refer to AG 1-5, IBEW 1-4 and IBEW 1-5. For each trouble report cleared within 24 hours, provide the final disposition of the trouble and how that conclusion was reached. Provide the ticket number for each trouble report. In addition, for each trouble report, describe whether there was a repeat trouble report and any and all repeat requests for service for each trouble report. For each trouble report, provide all documentation of how many times the customer called to report the trouble or receive service.

REPLY:

Objection: This request is vague, overly broad and unduly burdensome. The Company received over 85,000 OOS reports for the 413 area in the past twenty-four months. In order to provide the disposition code for each OOS report cleared within 24 hours during this time period, Verizon would have to develop specialized software to ask the database to identify the Out of Service troubles cleared in under 24 hours vs. total Out of Service troubles and to identify the disposition code for each OOS report cleared in under 24 hours. As to how the disposition code was determined, see response to IBEW VZ 1-8. To respond to the remainder of this request, Verizon would have to develop additional programming to identify those reports with repeat calls and subsequent calls. Verizon MA estimates that responding to this request would require approximately \$10,000 in programming expenses to create the required system queries and, in addition, approximately 200 man-hours of work by Verizon managers to extrapolate the requested data, and that this work would take a minimum of 90 days to complete.