

**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 #3

DATED: September 11, 2009

ITEM: AG-VZ 3-3 Please provide copies of Verizon's annual maintenance budgets at the smallest geographic level that includes Western Massachusetts for the period 2004 to the present, including supporting schedules and work papers.

REPLY: In 2006 and 2007, the smallest geographic level that included the 413 area for installation and maintenance budgets was the Northeast/Central/West area. The Northeast region includes areas North of Boston and the Merrimack Valley. The Central region includes areas West of Boston. The West area is all of the 413 area code. In 2008 and 2009, the smallest geographic level that included the 413 area for installation and maintenance budgets was the Central/West area.
Budget data is only available back to 2006, and includes both installation and maintenance. Budget totals were extracted from a proprietary database named VFrame, therefore, there are no supporting schedules or work papers to provide. Below is a table of the annual installation and maintenance budgets for the area in which Western Massachusetts resided during that year.

Begin Proprietary

End Proprietary

**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 #3

DATED: September 11, 2009

ITEM: AG-VZ 3-4

Please provide copies of Verizon's annual maintenance budgets at the smallest geographic level that includes Eastern Massachusetts for the period 2004 to the present, including supporting schedules and work papers.

REPLY:

In 2006 and 2007, the smallest geographic area that included Eastern Massachusetts installation and maintenance budgets was Metro/Southeast/Rhode Island. Budget data is only available back to 2006 and includes both installation and maintenance. Budget totals were extracted from a proprietary database named VFrame, therefore, there are no supporting schedules or work papers to provide

Begin Proprietary

End Proprietary

**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 #3

DATED: September 11, 2009

ITEM: AG-VZ 3-17

Please provide organization charts reflecting the total authorized year end head count for operations for the years 2001 through 2009 in:
a. Eastern Massachusetts; and
b. Western Massachusetts.

REPLY:

Objection: The request is overbroad and unduly burdensome, in that the time period for which records are sought - nine years - is excessive and unnecessary to any reasonable analysis of the issues in this proceeding.

Subject to and without waiving this objection, Verizon MA states the following:

Data is not available prior to 2007. There are no organization charts reflecting head count. Following are totals for Eastern and Western Massachusetts. Numbers below reflect total actual headcount in Core Operations. This includes Installation and Maintenance ("I&M"), Construction ("CXM"), and the Dispatch Resource Center ("DRC").

Begin Proprietary

End Proprietary

**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 #3

DATED: September 11, 2009

ITEM: AG-VZ 3-44

Separately for each of the past five years, provide the number of Verizon employees or contractors (provide the number of Verizon employees separately from the number of contractors) assigned to perform installations, repairs, and general maintenance, excluding FiOS and DSL in:

- a. Eastern Massachusetts; and
- b. Western Massachusetts.

REPLY:

Please see response to IBEW-VZ 2-17.