

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

Commonwealth of Massachusetts

Docket No. D.T.C 09-1

Respondent: Edward Gee
Title: Director

REQUEST: Attorney General to Verizon, Set #3

DATED: September 11, 2009

ITEM: AG-VZ 3-5

Please identify the individuals and their titles who are responsible for determining which capital investments to undertake in:
a. Western Massachusetts; and
b. Eastern Massachusetts.

REPLY:

All first and second level managers in the Engineering Department have authority to determine which capital investments to undertake in their specific geographic area, up to certain spending limits depending on the management level. In the 413 area there are 15 first level managers and 1 second level manager. In the remainder of Massachusetts there are about 200 first level managers and 5 second level managers. All of these managers report to Edward Gee, Director, who also has responsibility for determining which capital investments to undertake in the state. In addition, William Wilson also has such responsibility with respect to infrastructure improvement projects.

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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 3-31

Please identify by name and title the individuals responsible for monitoring the quality of basic local exchange service and those responsible for remedying any service quality lapses for Verizon in:
a. Eastern Massachusetts; and
b. Western Massachusetts.

REPLY:

Statewide

William Wilson
John Sordillo

Area Manager PPM MA/RI
Director Customer Operation MA/RI

a.) Eastern Massachusetts

Frank Crosby
Robert Glynn
Lance Cummings
Mary McPartland
Edward Prunty
Arthur Cannon
Lazaro Lopez
Edmund Daher
Priscilla Anderson
Patricia Regan
Debbie Kidder

Director Central MA
Director Metro/Northeast MA
Southeast MA & Rhode Island
Area Manager Northeast MA
Area Manager Metro MA
Area Manager Metro MA
Area Manager Metro MA
Area Manager Northeast MA
Area Manager Southeast Cape MA
Area Manager Southeast MA
Area Manager DRC Metro/Northeast MA

Andrew Andrianopoulos
David Deihl
Thomas Marini

Area Manager DRC Southeast/RI
Area Manager RI
Area Manager Central MA

Paul Betune
Robie McLaughlin

Area Manager Central MA
Area Manager Metro-Boston

b.) Western Massachusetts

Frank Crosby
David Walker
Mike Callahan

Director Western MA
Area Manager Western MA
Area Manager DRC Western MA

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Respondent: William Wilson
Title: Area Manager

REQUEST: Attorney General to Verizon, Set #3

DATED: September 11, 2009

ITEM: AG-VZ 3-50

Please define and describe the purpose of Verizon preventive maintenance orders.

REPLY:

Preventative maintenance orders are directives to Verizon MA personnel to perform work on the network. They are the result of a proactive process designed to provide for the investigation and resolution of potential trouble areas in Verizon MA's network before they become significant customer service-affecting issues. This proactive system analyzes closed network troubles, the corresponding source(s) of the trouble, any patterns of service issues and the results of tests Verizon MA may perform on the facilities at issue. Verizon MA issues preventative maintenance orders based on the results of these analyses. These orders, also known as work packages, are then implemented by field managers and technicians to resolve the network concern at issue.

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Respondent: William Wilson
Title: Area Manager

REQUEST: Attorney General to Verizon, Set #3

DATED: September 11, 2009

ITEM: AG-VZ 3-72

Separately for each of the past five years, please identify all garages by location that serve Western Massachusetts.

REPLY:

The below Installation and Maintenance garages have served Western Massachusetts throughout the past five years, except that in June of 2009 Albany St. in Springfield was consolidated into Brookdale Dr.

Type	City/Town	Address	ST
Core	GREAT BARRINGTON	11 CRISSEY RD	MA
Core	HATFIELD	111 N HATFIELD RD	MA
Core	NORTH ADAMS	464 CURRAN HWY	MA
Core	PITTSFIELD	1899 EAST ST	MA
Core	SPRINGFIELD	370 ALBANY ST	MA
Core	SPRINGFIELD	95 BROOKDALE DR	MA
Core	WESTFIELD	323 LOCKEHOUSE RD	MA

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

Respondent: Counsel
Title:

REQUEST: Attorney General to Verizon, Set #3

DATED: September 11, 2009

ITEM: AG-VZ 3-80

Separately for Eastern and Western Massachusetts, provide comprehensive billing determinant data (i.e. based on Verizon's actual sales of its offerings for the most recent time period, the quantities of units sold) for intrastate regulated services in an excel machine readable format, or working spreadsheet model where all the cell references and formulas are intact, for any business services for which more than 5% percent of business lines subscribe (e.g., complete name of product and quantity of lines subscribing).

REPLY:

Objection: The request is overbroad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence.