

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

**Commonwealth of Massachusetts**

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

**Respondent:** William  
**Title:** Wilson

**REQUEST:** IBEW to Verizon, Set #6

**DATED:** October 8, 2009

**ITEM:** IBEW-VZ 6-3

Regarding the Company's response to IBEW 1-3 and IBEW I-5

- a. Please confirm whether 1-866-745-3741 is the number provided on the customer care card.
- b. Please confirm whether 1-866-745-3741 is the number for the Verizon Repair Resolution Center (VRRC) at 1 Corporate Drive in Andover, MA. If no, please provide the number for VRRC.
- c. Are residence or business repair requests and trouble reports are ever handled by personnel from any office other than the VRRC located at 1 Corporate Drive in Andover, MA?
- d. If subsection (c) of this interrogatory is answered in the affirmative, for each office, please provide the name, location, and primary function of the office, along with the percentage of all residence and business repair requests and trouble reports that are handled by the office.

**REPLY:**

- a. Yes, that is the number provided on the customer care card
- b. Yes, that number reaches the VRRC at 1 Corporate Drive in Andover, MA
- c. Yes.
- d. In certain circumstances the New England Verizon Order Inquiry Center ("VOICe") located at 365 State Street, Springfield, MA could enter a trouble report for a customer that has recently completed an installation. The percentage of calls answered regarding specific repair issues is not measured since the center's primary function is to answer installation related calls.

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

Respondent: William Wilson  
Title: Area Manager

**REQUEST:** IBEW to Verizon, Set #6

**DATED:** October 8, 2009

**ITEM:** IBEW-VZ 6-17 Regarding the Company's Proprietary response to IBEW 1-12, underlying documents are referenced but not provided. Please provide all documents referenced, including but not limited to the following (NOTE: documents were not accessible on the web by using the web address provided on page 3 of Proprietary Attachment IBEW-VZ-1-12):

**\*\*\*BEGIN PROPRIETARY\*\*\***

**\*\*\*END PROPRIETARY\*\*\***

**REPLY:**

Objection: The request is overbroad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. The request simply seeks all documents that are referenced in Proprietary Attachment IBEW-VZ 1-12, without any consideration of whether such documents have any bearing on this proceeding, and many of them do not. For example, the documents listed in parts a, b and c of this request concern regulatory matters in Pennsylvania (some dating from 1990) with which Proprietary Attachment IBEW-VZ 1-12 complies. Likewise, the document sought in part f, M&P Doc. No. 2001-00544-MDP, concerns the priority provisioning and restoration of National Security Emergency Preparedness (NSEP) telecommunications services. The documents sought in part g and in parts m and n (since superseded) concern Verizon MA's FiOS. The document

sought in part (l) addresses Verizon MA's policies in response to a customer request to move or to bury a drop wire or NID, usually due to end-user construction, renovation or demolition. None of these documents has any bearing on any issue of service quality in this proceeding. Moreover, as noted in Proprietary Attachment IBEW-VZ 1-12, at 3, the documents requested in parts d - j are available to employees of Verizon MA, including members of the IBEW, on the company website. The documents sought in parts k -n are also available on that website.

Subject to the objection, Verizon MA states the following:

- o. The National Response Plan has been superseded by the National Response Framework. This publication of the federal government is available at <http://www.fema.gov/NRF>.

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Respondent: William Wilson  
Title: Area Manager

REQUEST: IBEW to Verizon, Set #6

DATED: October 8, 2009

ITEM: IBEW-VZ 6-19 Regarding the Company's response to IBEW 1-14, please clarify:

- Whether each number provided indicates an active, permanent employee on the date indicated (opposed to an open position)
- Whether the number of employees includes employees with permanent job titles other than AAs (Administrative Assistants) or CSAs (Customer Service Assistants)
- Whether the number of employees includes managerial and director positions for the \*\*\***BEGIN PROPRIETARY**\*\*\*  
\*\*\***END PROPRIETARY**\*\*\* If not, please provide managerial and director data in the same format as the current response to IBEW 1-14.
- Whether the numbers provided include managers and directors of Verizon's Order Inquiry Center? If not, please provide in the same format as the current response to IBEW 1-14.

REPLY:

- The attachment is for active, permanent employees.
- Yes.
- No. Please see response below.

	2006	2007	2008	2009
Director	1	1	1	1
Area Manager	1	1	1	1
Supervisor	5	5	5	6

d. No. Historical data is not available, but in 2009 the Verizon Order Inquiry Center has 1 Area Manager and 5 Supervisors. In addition, the Director of the DRC, identified above in part c, also has responsibility for the Order Inquiry Center.

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Respondent: William Wilson  
Title: Area Manager

**REQUEST:** IBEW to Verizon, Set #6

**DATED:** October 8, 2009

**ITEM:** IBEW-VZ 6-20

Regarding the Company's response to IBEW 1-15(b), please explain:

- a. What is happening and what has taken place in the "ongoing" process of workforce reductions
- b. What is meant by "surplus"
- c. What is meant by "non-surplus"
- d. What supports Verizon's determination that a "surplus" of SSTs exists?

**REPLY:**

Objection: The request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the IBEW has stated its intent to challenge Verizon's surplus declaration for SSTs and/or subsequent, related processes, and this request seeks information to use in that, unrelated dispute.

Subject to the objection, Verizon MA states the following:

- b. As used in response to Information Request IBEW-VZ 1-15.B, the term "surplus" has the meaning given to it in the Collective Bargaining Agreement ("CBA") between the IBEW and Verizon MA, as informed by relevant precedent and decades of past practices by the company and the union.
- c. Verizon MA did not use the term "non-surplus" in its response to IBEW-VZ 1-15.B.
- d. Verizon's declaration of a surplus in the SST title is supported by current business conditions.