

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

**Commonwealth of Massachusetts**

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

**Respondent:** Counsel/Edward Gee  
**Title:** Director

**REQUEST:** IBEW Local 2324 to Verizon, Set #2

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ 2-1 Please identify the names and locations (by city and address) of all wire centers serving the Company's Western MA customers, the NNX (e.g. 413-734-XXXX, 413-737-XXXX) associated with each wire center, and the cables that serve customers from those locations.

**REPLY:** Objection: The request is overbroad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence, to the extent it seeks the identification and location of every cable Verizon MA uses to provide telephone service in Western Massachusetts.

Subject to and without waiving this objection, Verizon MA states the following: See Proprietary Attachment IBEW-VZ 2-1.

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

**REQUEST:** IBEW Local 2324 to Verizon, Set #2

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ 2-3

Please identify, describe, and explain all categories or areas of Verizon MA's business. For example, does the business of Verizon MA include wireline, internet connection and FIOS products?

**REPLY:**

Objection: The request is overbroad and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the objection, Verizon MA states the following: Verizon MA is an Incumbent Local Exchange Carrier as that term is defined in the 1996 Telecommunications Act. It provides telecommunications services, data services and television to customers in Massachusetts and Rhode Island.

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

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**ITEM:** IBEW-VZ 2-5 Please provide any and all service quality reports and documents from the period of 2006 to present that have been submitted to the Department and/or the Massachusetts Department of Public Utilities that are related to Verizon MA service in Western MA.

**REPLY:** See Attachment IBEW-VZ 2-5 provided on CD, which are the Service Quality reports filed with the Department for December, 2006, 2007 and 2008. Since the reports are cumulative, the December reports contain all the information presented for that year. See response to Information Request AG-VZ 2-4 for the Service Quality report filed with the Department on August 27, 2009.

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

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**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
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Please provide the amount of expenditures related to the Company's use and purchasing of the following in the provision of service to Western MA customers, for each year from 2006 to 2008 and 2009 to date:

- a) Basic tools
- b) Safety tools
- c) Personal Safety equipment

**REPLY:**

Objection: The request is vague and confusing, in that it is unclear what is meant by the reference to expenditures related to the "use" of tools, and seeks information that is not reasonably calculated to lead to the discovery of admissible evidence.

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

See response to Information Request IBEW 2-12. Tools and other work equipment expense is found in Account 6114. Data is not tracked for the specific categories of tools in the request.

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**Respondent:** Counsel  
**Title:**

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**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
2-14

Does Verizon MA, its parent company, or holding company have any plans to sell any of Verizon MA's operations and/or facilities in Western MA?

**REPLY:**

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