

**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: IBEW Local 2324 to Verizon, Set #3

DATED: September 15, 2009

ITEM: IBEW-VZ
3-10

(a) For every garage or department in western Massachusetts, list the number of technicians per garage or department, for each 6 month period 2005 to date.

(b) For the same 6-month time periods sought in part (a), please list any target ratio of trucks to technicians (e.g., 1 truck for each technician; .9 trucks for each technician; etc.) and the actual ratio of trucks to technicians. Provide any written or electronic documents that reflect any such target ratios and any reports, summaries or other documents that reflect the actual ratios.

(c) Please either state, or provide documents that reflect, the number of trucks, vans and other vehicles sorted by type of vehicle and vintage (model year) of such trucks, vans and other vehicles (e.g., X trucks, 2005 model year; Y trucks, 2007; A vans, 2004 model year, B vans 2006; etc.). Provide this information separately for trucks/vans/vehicles in western Massachusetts and the company's Metro/NE area.

(d) Does the company "red line" or "red tag" trucks and vans it deems out of service and unavailable for use by technicians? Whether or not the company uses these terms, please separately list the percentage of trucks and vans in western Massachusetts that have been out of service at any time in 2009, and the percentage of trucks and vans out of service in Metro/NE at any time in 2009. In each instance, the denominator should be the total number of trucks and vans based in the region, and the numerator should be the total number of such vehicles out of service at any time.

REPLY:

(a) Verizon MA does not have the historical information. Currently the number of technicians assigned to each garage is as follows:

Great Barrington	7	Westfield	13
Pittsfield	47	North Hatfield	64
North Adams CO	7	Springfield	107

- (b) Verizon MA does not have the information requested for Western MA.
- (c) Verizon MA does not have the information requested by Western MA or Metro/NE areas.
- (d) Verizon MA does note trucks and vans that it deems out of service and unavailable for use by technicians. Verizon MA does not have the information requested by Western MA or Metro/NE areas.

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Respondent: John Conroy
Title: Vice President-Regulatory

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ITEM: IBEW-VZ
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For the all of 2008 and for 2009 to date, please provide all written memos, e-mails, and other communications from Frank Crosby to David Walker, and any memos, e-mails and other communications from David Walker to 1st level managers, regarding any of the following topics : stocking or purchase of any tools or equipment of any kind; purchase, maintenance, sale or lease of any trucks or vehicles; priorities or schedules for any repair, installation, construction or removal work; preparation of any reports (including any reports having to do with complaints or requests for service).

Tools

Trucks

Schedules/priorities for repair, installation construction

Preparations of any reports

REPLY:

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

Subject to this objection, Verizon MA states the following:

Mr. Crosby has no emails or written memos to David Walker that would be responsive to this request. Mr. Walker provides his first level managers with several reports on a daily, weekly or monthly basis regarding a myriad of issues for the topics requested.

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Provide a copy of any communication (written, electronic/e-mail, or other communication) regarding the policies, practices or procedures for transferring or temporarily assigning SSTs or OPTs from their usual work location to other work locations.

REPLY:

Objection: The request is unduly burdensome; to the extent it seeks all communications about the broad subject matter of temporary assignments, and is unlimited as to time.

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

Verizon MA makes permanent and temporary transfers of associates in accordance with the provisions of Article 14 of the current contract between Verizon and the IBEW for the New England area.

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ITEM: IBEW-VZ
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Please define the roles and responsibilities of an “SST” (service splice technician) and an “OPT” (outside plant technician).

REPLY:

Depending on the context, the term “SST” and “OPT” are sometimes used interchangeably. However, in the context of responses to IBEW Set 1, the term “OPT” means a technician who places new poles, cable and equipment in the field. An “SST” is described in response to IBEW-VZ 1-15.