

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

**Commonwealth of Massachusetts**

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

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

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ 3-5

Please provide a current organizational chart for all managers who report up to Frank Crosby in his role as a Director, including the name and title of each person currently serving underneath Mr. Crosby. Please include the name and description of the organization/department/group that Mr. Crosby directs.
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**REPLY:**

See attachment IBEW-VZ 3-5. Mr. Crosby is Director-Operations and as such leads the Operations team in central and western Massachusetts
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**Respondent:** John Conroy  
**Title:** Vice President-Regulatory

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ 3-6 Please provide a current organizational chart for all managers who report up to Jack Sordillo in his role as a Director, including the name and title of each person currently serving underneath Mr. Sordillo. Please include the name and description of the organization/department/group that Mr. Sordillo directs.

**REPLY:** See attachment IBEW-VZ 3-6. Mr. Sordillo is Director-Operations and as such leads the Operations team responsible for installation and maintenance centers

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

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

**DATED:** September 15, 2009

<b>ITEM:</b> IBEW-VZ 3-7	Please provide a current organizational chart for all managers who report up to John Puopolo in his role as a Director, including the name and title of each person currently serving underneath Mr. Puopolo. Please include the name and description of the organization/department/group that Mr. Puopolo directs.
<b>REPLY:</b>	See attachment IBEW-VZ 3-7. Mr. Puopolo is Director-Construction and as such leads the Construction department for Massachusetts.

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

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

**DATED:** September 15, 2009

<b>ITEM:</b> IBEW-VZ 3-8	Who is Joseph Bucciarelli? Include his job title and functions, and list the name and title of all of those who report directly to him, along with their roles and responsibilities. Also include the name and title of the person to whom Mr. Bucciarelli reports
<b>REPLY:</b>	<p>Mr. Bucciarelli is Vice President - Region Operations for the New England Region. He is responsible for Installation, Repair, Construction and Customer Service for customers in Massachusetts and Rhode Island. Reporting to Mr. Bucciarelli are:</p> <p>Carmen Bermudez, Director Operations Frank Crosby, Director Operations Lance Cummings, Director Construction James Dacey, Manager Operations Carol Fallon Senior Consultant Operations Gary Giard Senior Consultant Operations Barbara Manning Executive Assistant Donna Powers Senior Consultant, Fian'l Planning John Puopolo Director Construction John Sordillo Director Operations Francis Tierney Director Operations Kristen Waller Director Operations</p> <p>Mr. Bucciarelli reports to Christopher Creager, Area President</p>

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

**Respondent:** Counsel/William Wilson

**Title:** Area manager

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
3-18

Please explain whether Verizon prioritizes its field work in western Massachusetts as follows. (To the extent the summary below is not an accurate summary, please provide a full explanation of how work priorities are established regarding these types of service, and include any memos, policies, guidance or documents [including e-mails] that explain these priorities):

First priority: DSL business customers/service.

Second priority: Wireline business customers/service.

Third priority: DSL residential customers/service.

Fourth priority: resold accounts (e.g., Choice Communications)

Fifth priority: "POTS" – residential customers/service (excluding DSL).

**REPLY:**

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

Subject to this objection, Verizon MA states the following. No, this request does not correctly characterize how Verizon MA prioritizes its field work in Massachusetts. All Dispatch Centers in the Verizon footprint including the center that dispatches technicians for western Massachusetts use a priority matrix. In general terms, business customers are provided a five-hour appointment window based on a rolling clock. Residence customers are offered next-day appointments and often are given same-day appointments. Medical emergencies are given first priority. Out of service conditions generally take priority over service affecting conditions. Please refer to the response to Information Request IBEW-VZ 1-12 and Proprietary Attachment IBEW-VZ 1-12 for the Dispatch Priority Matrix. DSL customers in most cases are given the same appointment window as residence voice customers. In addition, it should be noted that these

priorities almost always overlap, so that technicians will be dispatched in response to residence trouble reports at the same time that other technicians may be working on trouble reports from business customers. The same priority matrix used for Verizon MA retail accounts is used for resold accounts.

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**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  
3-22

For the years 2008 and 2009 to date, how many (and what percentage) of complaints or requests for service were deemed resolved, cleared or closed due to the results of the use of MLT or other remote testing of the line?
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**REPLY:**

The requested data does not exist.
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**Respondent:** John Conroy

**Title:** Vice President - Regulatory

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

**DATED:** September 15, 2007

**ITEM:** IBEW-VZ  
3-24

Please explain whether Verizon customers in western Massachusetts pay the same rates for wireline service as customers in the rest of the state. If not, provide please summarize all of the differences in rates.

**REPLY:**

Verizon customers pay the same rates for basic exchange service in western Massachusetts as they do in the rest of the state.



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**Respondent:** William Wilson

**Title:** Area Manager

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
3-26

Please explain what a breakdown set is, and what it is used for.

**REPLY:**

A breakdown test set is a device used by Verizon MA technicians to locate reported troubles in cables. It produces 600 volts AC power to “breakdown” resistive faults in Verizon MA’s paper/pulp insulated conductor cables. This enables the technician to take accurate measurements to pinpoint the trouble location in a section of cable. The breakdown test set produces an audible tone that the technician uses to trace the location of the fault using an amplified listening device. Proper safety precautions must be followed by the technician when using the breakdown test. The Breakdown test set is not to be used in PIC (Plastic Insulated Conductor) cable.

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

**Respondent:** Edward Gee  
**Title:** Director Engineering

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

**DATED:** September 11, 2009

**ITEM:** IBEW-VZ  
3-30

Please provide cable layouts or schematics for all cables in western Massachusetts.

**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 and without waiving this objection, Verizon MA will make specific plats available for inspection in the office in which they are maintained, upon request and at a mutually agreeable time.

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

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
3-37

Please state whether Frank Crosby, Chris Creager, John Puopolo, Joseph Bucciarelli or any other manager at any time made a statement to the effect that the company is reluctant to replace old or poorly functioning cables or lines in western Massachusetts because the company does not have enough money to do so, or would not earn enough money to cover the cost of replacement; or to the effect that “there is no money out here” (referring to western Massachusetts); or to the effect that “we’re not investing in western Massachusetts.”

**REPLY:**

Verizon MA constantly reviews its service quality performance across Massachusetts to identify areas of our network, including our outside plant, which may be in need of replacement or repair. Our focus is to provide high quality service while, like any company, operating with a finite amount of resources. To this end, we replace cables where necessary and repair cables where wholesale replacement would be inefficient or wasteful. Verizon MA’s policies for the replacement or repair of cables are uniform throughout Massachusetts. Verizon MA targets solutions to those issues that appear in various portions of the network whether they are terminals, specific sections of cables or electronics in the outside plant or the central offices. Messrs. Crosby, Creager, Puopolo and Bucciarelli do not recall making the above statements with respect to maintenance of the network. However, in the very different context of evaluating potential network upgrades or deployment of new services and facilities, such as High Speed Internet, Verizon managers will properly consider and discuss the demand for the new services and the economics of investing in those new services throughout Massachusetts.

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**Respondent:** William Wilson

**Title:** Area Manager

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

**DATED:** September 15, 2009

**ITEM:** IBEW-VZ  
3-41

Please list any and all locations where cables or drop wires are still lying on the ground, on customer lawns or on fences as a result of the ice storm of December 2008. Please provide a list and printout of all complaints by customers or public safety officials regarding these downed lines.
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**REPLY:**

The Company has no outstanding requests or trouble reports regarding wire still down from the past ice storm
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