

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

Commonwealth of Massachusetts

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

Respondent: Counsel/John Conroy

Title: Vice President-Regulatory

REQUEST: DTC to VZ-FO, Set #1

DATED: October 22, 2009

ITEM: DTC-VZ-FO-1-1

Referring to Verizon's statement that "Verizon MA does not record or report trouble report data by municipality" in DTC-VZ-1-1, DTC-VZ-1-5, DTC-VZ-1-9, DTC-VZ-1-13, DTC-VZ-1-17, and DTC-VZ-1-21, identify each individual at Verizon who has knowledge and/or information regarding the process by which trouble report data is created, recorded, reported, collected, reviewed, analyzed, presented, retained, and/or archived, and that individual's title, years of service with Verizon, and job description.

REPLY:

Objection: The request is unduly burdensome. Thousands of Verizon employees have knowledge of the creation, use and/or recording of trouble report data, including most or all of the agents in the VRRRC and Verizon MA's Installation and Maintenance SSTs, their supervisors and many others. Identifying all of those people here would be a major undertaking.

Subject to this objection, Verizon MA states the following:

The following people are knowledgeable regarding the recording of trouble report information and how that data is tracked and used by Verizon MA:

John Sordillo, Director - Operations, has 39 years of service with Verizon MA and its predecessors.

(Mr. Sordillo filed an affidavit relevant to this subject in docket D.T.C. 07-5, which has been consolidated into this proceeding.)

William Wilson, Area Manager, has 26 years of service with Verizon MA and its predecessors

Edward Gee, Director-Engineering, has 21 years of service with Verizon MA and its predecessors

John Conroy, Vice-President, Regulatory, has 37 years of service with Verizon MA and its predecessors.

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REQUEST: DTC to VZ-FO, Set # 1

DATED: October 22, 2009

ITEM: DTC-VZ-FO-1-2

Referring to DTC-VZ-1-1, DTC-VZ-1-5, DTC-VZ-1-9, DTC-VZ-1-13, DTC-VZ-1-17, and DTC-VZ-1-21, identify each local manager referenced therein, the local manager's years of service with Verizon and job description.

REPLY:

Walker, David A	Area manager	40 years service
Collier, Anthony	Local Manager	30 years service
Ulm, David L	Local Manager	35 years service
Gilligan, Randy T	Local Manager	23 years service
Brantley, Dennis L	Local Manager	24 years service
Sullivan, Margaret	Local Manager	11 years service.

A Local Manager is a management employee directly responsible for the supervision of technicians.

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ITEM: DTC-VZ-FO-1-3

Referring to DTC-VZ-1-1, DTC-VZ-1-5, DTC-VZ-1-9, DTC-VZ-1-13, DTC-VZ-1-17, and DTC-VZ-1-21, provide all documents created, recorded, reported, collected, reviewed, analyzed, presented, retained, and/or archived by each local manager regarding customer concerns in Egremont, Hancock, Leverett, Rowe, Shutesbury, and Northfield.

REPLY:

Objection: The request is unduly burdensome.

Subject to this objection, Verizon MA states the following: The local managers identified in response to Information Request DTC-VZ- FO 1-2 review and use on a daily basis documents regarding customer concerns in multiple municipalities, including but not limited to Egremont, Hancock, Leverett, Rowe, Shutesbury and Northfield. In order to produce the documents requested, each Verizon MA local manager in the 413 area would have to review *all* such documents he or she may have used, reviewed, created etc. in order to identify those that include information on customer issues in the towns specified. For example, Attachment DTC-VZ-FO 1-3 includes a recent activity report showing a number of trouble reports by wire center and street address. To determine whether this particular report includes any troubles from the towns listed in the request, a Verizon MA manager would have to review the wire center information and street address in each line of the report. Moreover, local managers also use other documents that are specific to a given customer address but which are not searchable by municipality. For example, also included in Attachment DTC-VZ-FO 1-3 is a Chronic Repeater Report Closed Date document showing work by Verizon MA to resolve a chronic report situation in Northampton (Verizon MA has redacted the customer's name in the interests of customer privacy). This document and others like it are stored electronically, but Verizon MA

cannot search its database for all such reports for work in, say, Egremont.

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REQUEST: DTC to VZ-FO, Set #1

DATED: October 22, 2009

ITEM: DTC-VZ-FO-1-4

Referring to DTC-VZ-1-28, identify each individual who was responsible for notifying the Shelburne Falls Public Safety Answering Point ("PSAP") of the 911 outage in Northfield, and that individual's title, years of service with Verizon, and job description.

REPLY:

No one individual was responsible for notification. The 911 Customer Care Center (CCC) located in Lawrence, MA was responsible to notify the Shelburne Falls Public Safety Answering Point (PSAP) of the 911 outage in Northfield. The 911 CCC is staffed with 1 Manager, 3 Supervisors and 20 Central Office Technicians. These 24 individuals have years of service ranging from 10 to 43 years. The manager of the CCC is E. Roberta Chapin.

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ITEM: DTC-VZ-FO-1-5

Referring to DTC-VZ-1-28, explain how human error that resulted in Verizon's failure to notify the PSAP occurred.

REPLY:

The 911 Customer Care Center ("CCC") should have been advised of the outage in Northfield by the Verizon National Switching Control Center (NSCC), at which point, the 911 CCC would have notified the Shelburne Falls PSAP. However, a technician in the NSCC inadvertently failed notify the CCC.

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ITEM: DTC-VZ-FO-1-6

REPLY:

Referring to DTC-FO-1-5, describe any and all actions taken by Verizon to ensure that such human error is not repeated in the future.
The National Switching Control Center (“NSCC”) has distributed a “flash” to all of its technicians as a reminder to adhere to the documented Central Office isolation notification process that includes notification being made to the 911 Customer Care Center (“CCC”). A “flash” is a notification to affected personnel sent with high importance to explain a process modification or provide a process reminder.

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ITEM: DTC-VZ-FO-1-7

Identify any and all instances since October 2004 in which Verizon failed to notify, or was delayed in notifying, a PSAP regarding disruptions to a municipality's 911 service and the reason(s) for such failure.

REPLY:

Other than the Northfield incident explained in response to AGG-VZ 1-25, since October, 2004, there have been no instances in which Verizon MA failed to notify, or was delayed in notifying a PSAP regarding a disruption to 911 service.

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ITEM: DTC-VZ-FO-1-8

Referring to DTC-VZ-1-29, provide Ellen Cummings' title, years of service, and job description.

REPLY:

Ellen Cummings is the Regional Director External Affairs, Central – Western Massachusetts. She has 13 years of service with Verizon MA.

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ITEM: DTC-VZ-FO-1-9

Referring to DTC-VZ-1-29, identify each individual authorized by Verizon to speak with a municipality regarding a disruption to its 911 service, and that individual's title, years of service, and job description.

REPLY:

Many Verizon MA managers and associates are authorized to speak with representatives of a municipality regarding a disruption to 911 service. The key personnel assigned to meet the needs of the State 911 Board are:

David Goscila – Services Operations AOM - 22 years of service

Carol Clancy – 911 Customer Services Manager -30 years of service

John Adams – Tier 3 technical support - 23 years of service

Tyrone Hicks – 911 Service Management - 12 years of service

Dick Peterson – Tier 2 Project and Maintenance Support - 25 years of service

Mary Reavey - 911 Service Management – 10 years of service