

**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 to Verizon, Set #8

DATED: October 8, 2009

ITEM: IBEW-VZ 8-1

Regarding the Company's response to AG Set 4-16, please provide the SABIT reports and associated raw data for each vehicle working in the Western MA service territory for any and all of the last twelve months available. If the data is produced in a form other than monthly, please provide the data in the form that it can be produced.

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 Service Assurance Business Intelligence Toolkit (SABIT) is a database that contains millions of data points and is capable of producing many different reports.

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ITEM: IBEW-VZ 8-2

Regarding the Company's response to IBEW 2-24, the response references "repeaters" which are equipment. To clarify, please provide the number of customer complaints or trouble reports that have a subsequent trouble within 30 days, and which is associated with the same telephone number. Please provide this information for calendar years 2006, 2007, 2008 and 2009 to date.
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REPLY:

In Verizon MA's response to Information Requests IBEW-VZ 2-24, the term "repeaters" means trouble reports submitted within 30 days of a prior report concerning the same phone number. Thus, that response provides the data sought in this request.
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