

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

Commonwealth of Massachusetts

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

Respondent: John Conroy
Title: Vice President-Regulatory

REQUEST: Department of Telecommunications and Cable, Set # 3

DATED: January 15, 2010

ITEM: DTC-VZ 3-1

Referring to page 11 of the Testimony in which Verizon states that the “RPHL for Western Massachusetts was only 1.57 for the 12 months ended September 2009, meaning that, on average, more than 98.4% of Verizon MA’s customers in Western Massachusetts had no reported service issue in any given month during that 12 month period – clear attestation of the high quality of service Verizon MA is providing to its Western Massachusetts customers”:

- a. State whether the 1.57 RPHL is calculated using a rolling average.
- b. Following Verizon’s reasoning, an average of approximately 1.6% of the company’s customers reported a service issue during each month of the referenced 12-month period. Does it follow that, cumulatively, approximately 19.2% of Verizon’s customers in Western Massachusetts reported a service issue during the referenced 12-month period? If not, explain in narrative form why not.
- c. State whether Verizon considers a 12-month performance whereby approximately 19.2% of customers report a service issue to be “clear attestation” of high service quality.

REPLY:

- a. The 1.57 RPHL is the average number of trouble reports per 100 lines for the 12 months ending September, 2009. The 1.57 RPHL was calculated by dividing the total reports by the total lines in the 413 area code for the 12 month period ending September 2009, multiplying the result by 100 and

then dividing it by 12. So it is both the actual 12 month average and the “rolling average” as used in the Department’s Service Quality Plan

- b. The statement on page 11 of Verizon MA’s Panel testimony was based on the Department’s and industry’s longstanding standard of evaluating RPHL on a monthly basis. It is certainly possible to look at the RPHL metric over another time period, *e.g.* 6 months, 12 months, or 60 months. However, it would also be necessary to change the evaluation criteria. For example, the Department’s Service Quality Plan sets 2.25 RPHL as the monthly standard. A comparable annual RPHL would be 27.0 RPHL. Verizon MA’s Panel testimony used the Department’s monthly RPHL to reflect the percent of customers who do not have a trouble in that month, *i.e.* if there are 1.57 reports per 100 lines then at least 98.43 out of every 100 lines did not report a trouble. Evaluation of the metric on an annual basis is possible, but it is not standard industry practice and would not be consistent with the Department’s longstanding evaluation criteria. Using the data presented in Verizon MA’s Panel testimony, evaluation of the RPHL on an annual basis would show that there would have been 18.84 trouble reports per 100 lines for the 12 months ending September 2009. Assuming there were no lines that had more than one report during that 12 month period, it would mean that about 81.1 out of every 100 lines did not report a trouble. However, using the same logic, measuring reports per 100 lines for a decade would yield 188.4 reports per 100 lines, meaning every line reported 1.88 troubles over that time period. That would not reflect actual service, in which many customers never experience a service problem over many years.
- c. Yes. As noted above, the Department’s standard level for the RPHL metric is 2.25 RPHL per month, which would translate to 27.0 RPHL annually. Likewise, the Department’s target level for RPHL of 1.9 RPHL would translate to an annual figure of 22.8 RPHL. Verizon MA’s actual RPHL for Western Massachusetts of 1.57 would translate to only 18.84 RPHL on an annual basis, well below even the most stringent Department standard of 22.8, and it would be clear attestation of high quality service.

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ITEM: DTC-VZ 3-2

Referring to pages 10 and 11 of the Testimony in which Verizon states that the 2.25 RPHL standard was exceeded in Western Massachusetts in July 2008 and explains that severe weather contributed to this performance, specifically citing a series of rainstorms:

- a. State whether the 2.25 RPHL standard was also exceeded in Central and Eastern Massachusetts.
- b. State whether the severe rainstorms were isolated to Western Massachusetts, or whether the total monthly rainfall also exceeded the average rainfall in Central and Eastern Massachusetts.

REPLY:

- a. Verizon MA does not track RPHL by the areas requested. However, the RPHL for each SBU for July 2008 was; Mass Bay - 1.89, North/Northeast - 1.80 and BayPath (which includes Western Massachusetts) - 2.16.
- b. Verizon MA does have comprehensive data that would allow it to respond to the request. However, rainfall in July 2008 in North Adams was 8.63 inches, in Westfield it was 9.95 inches, in Worcester it was 7.97 inches and in Boston it was 6.0 inches.

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ITEM: DTC-VZ 3-3

Referring to pages 10 and 11 of the Testimony in which Verizon states that the 2.5 RPHL standard was exceeded in Western Massachusetts in December 2008 and explains that severe weather contributed to this performance, specifically citing a massive ice storm that, among other events, led to a federal declaration of a state of emergency ("State of Emergency"), provide the December 2008 RPHL for each of the nine Massachusetts counties for which a State of Emergency was declared.

REPLY:

Verizon MA does not track trouble reports by municipality or county and does not have the information requested. However, much of the nine county area referenced in the request is encompassed by the BayPath SBU. The RPHL for that SBU for December, 2008, was 3.57.

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ITEM: DTC-VZ 3-4

Referring to pages 16 through 19 of the Testimony in which Verizon states that it conducts customer surveys from time to time and explains that scores in Eastern Massachusetts were “not quite as high as the scores handed down by Western Massachusetts customers[,]” state whether the survey results include Verizon’s Eastern Massachusetts FiOS customers. If yes, is it Verizon’s contention that customer satisfaction surveys in Western and Eastern Massachusetts are measuring customer satisfaction with the same products?

REPLY:

Installation “satisfaction” numbers include the results of surveys taken for the voice portion of a customer’s service. Verizon MA did not offer FiOS voice service to customers in Massachusetts (other than through a limited trial) during the time period of the surveys referenced in the Panel Testimony. Moreover, Verizon MA only started its upgrade to FiOS in or about 2004, and deployment of FiOS data and TV services has been progressive. Therefore, the surveys in Western and Eastern Massachusetts were measuring customer satisfaction comparably.

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

Respondent: John Sordillo
Title: Directory-Operations

REQUEST: Department of Telecommunications and Cable, Set # 3

DATED: January 15, 2010

ITEM: DTC-VZ 3-5

Produce all Forms 3722-19 created by Verizon technicians in Western Massachusetts between October 2005 and October 2009.
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REPLY:

The Forms 3722-19 for Western MA that have been collected to date are provided as Attachment DTC-VZ 3-5 provided on CD due to its volume. A supplemental response will be filed when the remainder of the forms have been collected.
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Verizon New England Inc.
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Commonwealth of Massachusetts

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

Respondent: John Sordillo
Title: Director

REQUEST: Department of Telecommunications and Cable, Set # 3

DATED: January 15, 2010

ITEM: DTC-VZ 3-6

Produce any and all summaries, analyses, recaps, reports, tracking, and/or correspondence discussing the Forms 3722-19 referenced in Request DTC-3-5, and/or the information contained therein.

REPLY:

See response to IBEW-VZ 10-16 explaining the process used for evaluating and processing Form 3722-16's. Verizon MA does not have the documents requested.

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Commonwealth of Massachusetts

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

Respondent: John Sordillo
Title: Director-Operations

REQUEST: Department of Telecommunications and Cable, Set # 3

DATED: January 15, 2010

ITEM: DTC-VZ 3-7

Provide a description of Form 3722-19 in narrative form regarding:

- a. Its purpose;
- b. The circumstances in which one is created;
- c. Verizon's policies, procedures, and practices in addressing and/or resolving the issues identified in such forms;
- d. Verizon's policies, procedures, and practices in tracking the issues identified in such forms; and,
- e. Verizon's policies, procedures, and practices in the retention, storage, and archiving of such forms, including whether they are ever purged from Verizon's records prior to the resolution of the issues identified therein and whether and how the forms are stored during the pendency of a governmental investigation.

REPLY:

Objection: Part c of the request is vague, in that it does not describe or specify the type of governmental investigation at issue.

Subject to this objection, Verizon MA states the following:

a, b, c and d.) Please see Verizon MA's Panel Testimony, at 48-50 and 60-63, discussing Form 3722-19. Also see the response to Information Requests IBEW-VZ 10-16 and IBEW-VZ 10-17.

e. See response to Information Request IBEW-VZ 10-16.
Generally, Verizon MA does not treat the forms differently merely due to a pending governmental investigation.

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

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DATED: January 15, 2010

ITEM: DTC-VZ 3-8

Provide a copy of any and all documents regarding Verizon's document retention policies, including but not limited to handbooks, policies, memoranda, and correspondence.

REPLY:

Proprietary Attachment DTC –VZ 3-8(a) is the Corporate Policy Statement regarding document retention. Proprietary Attachment DTC-VZ 3-8(b) is the Records Retention Schedule referenced in the Corporate Policy Statement.
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D.T.C. Docket No. 09-1

Respondent: Counsel/John Conroy
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DATED: January 15, 2010

ITEM: DTC-VZ 3-9

Referring to page 61 of the Testimony which, in turn, responds to pages 37 and 38 of the Pre-Filed Direct Testimony of John D. Rowley, Sr., Business Manager of the International Brotherhood of Electrical Workers ("IBEW"), Local 2324, On Behalf of the IBEW, Local 2324, in which Mr. Rowley states that to the best of his knowledge, Forms 3722-19 kept at the North Hatfield garage were "thrown away" on or around August 2009, state whether Verizon has purged from its records *any* document concerning issues relevant to issues raised or anticipated to be raised in this proceeding.

REPLY:

Objection: Mr. Rowley did not testify that Verizon MA threw away Forms 3722-19 after removing them from the wall in the North Hatfield garage. Rather, he testified that the forms on the wall were "SST copies of 3722s," Rowley Direct at 37, meaning copies of Forms 3722-19 that technicians had retained for themselves and for their own purposes. Thus, Mr. Rowley's speculation, of which he disclaims any personal knowledge, is that Verizon MA discarded *copies* of some Forms 3722-19. As explained in response to Information Request IBEW-VZ 10-16, technicians submit Forms 3722-19 to their managers, and in triplicate. Although Verizon MA managers regularly and properly discard Forms 3722-19 after use, there is no allegation or evidence that Verizon MA "purged" or purposely discarded a large number of Forms 3722-19 during the pendency of this proceeding or at any other point in time.

Subject to this objection, Verizon MA states the following: Contrary to the allegations made by Mr. Rowley, Mr. Bucciarelli was not in the North Hatfield garage during the first two weeks of August,

2009, nor at any other time during 2009. Mr. Rowley's additional allegation that Mr. Bucciarelli "ordered that all 3722s be removed" (Rowley Direct at 37) is also incorrect. In fact, Mr. Bucciarelli ordered that all garages in Massachusetts be inspected and updated for cleanliness, compliance with company policies and professionalism. In the course of conducting such an inspection and updating, local management removed all unauthorized materials from Company bulletin boards, including the unauthorized posting of 3722-19 forms. However, contrary to Mr. Rowley's speculation, the 3722 forms that had been inappropriately placed on the wall by the SSTs were not thrown away. In fact, those forms are included as part of the response to DTC-VZ 3-5. Verizon MA has not purged any documents from its records that are relevant to any issues raised or which Verizon MA anticipated to be raised in this proceeding.

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ITEM: DTC-VZ 3-10

Referring to Request DTC-3-9, if a relevant document has been purged from Verizon's records, state the date of the document's purge, identify the individual(s) directing that document's purge, and that individual's title, years of service with Verizon, and job description.

REPLY:

See objection and response to Information Request DTC-VZ 3-9.

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

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REQUEST: Department of Telecommunications and Cable, Set # 3

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ITEM: DTC-VZ 3-11

Provide all documents created between October 2005 and October 2009 that discuss Verizon's short, medium, and long-term business and strategic plans for Western Massachusetts (<i>i.e.</i> , the 413 LATA), including any documents that discuss Verizon's plans for Western Massachusetts relative to Eastern Massachusetts (<i>i.e.</i> , the 128 LATA). The term "business and strategic plans" includes, but is not limited to, projections of profitability; investment plans for Western Massachusetts; cost/benefit analyses; and examinations, analyses and decisions concerning changes in ownership or control of assets in Western Massachusetts.

REPLY:

<p><u>Objection:</u> The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence, to the extent it seeks (1) documents concerning Verizon MA's investment plans for Western Massachusetts for services other than telephone service; and (2) documents "concerning changes in ownership or control of assets in Western Massachusetts." Verizon further objects to this request to the extent it seeks production of any documents protected by the attorney-client privilege or the work-product doctrine.</p> <p>Subject to these objections, Verizon states the following: See response to AG-VZ 3-41.</p>

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Respondent: Counsel
Title:

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ITEM: DTC-VZ 3-12

Referring to page 81 of the Testimony, in which Verizon states that it “operates in a highly competitive market where the vast majority of customers have the option of taking their telecommunications business to other providers, and where many of these customers already have done so[,]” provide for each annual period between 2007 and 2009:

- a. The number of successful number ports for which Verizon was the old service provider; and,
- b. The number of successful number ports from Verizon to Verizon Wireless

For both a. and b. above, summarize the data at both the area code and rate center levels for the following area codes: 339, 351, 413, 508, 617, 774, 857, and 978.

REPLY:

Objection: Part b of the request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence

Subject to this objection, Verizon MA states the following: See Proprietary Attachment DTC-VZ 3-12. Number ports to Verizon Wireless represent the loss of lines and revenue that is no longer available to Verizon MA, in the same manner as lines lost to AT&T, Comcast, or any other alternative do. Verizon Wireless is an affiliate of Verizon MA that is only partially owned by Verizon Communications, Inc., and it is not permissible for state regulators

to consider revenues of corporate affiliates as being available for investment in the regulated telephone operating company.