CWA LOCAL 1298

Irene Storm Assessment

Assessment document

Double Pole

DPUC response to 2002 layoffs

CWA Job Loss

DPUC Testimony 08-07-15

Contractor accident Labor Day 2010

Communications
Workers of America
Local 1298
AFL-CIO

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CWA Irene Storm Assessment

- Storm assessment cut short by Engineering, so assessment was not completed and OPTs brought wrong pole sizes to job. Automated dispatching does not work during emergencies.

- Dispatch completely ineffective – showed obvious lack of training and knowledge of the situation locally

- Multiple dispatches to same location. Six techs at the same time and location for power outages as well as phone failure. Problem from Dispatch not being local. Multiple tickets dispatched to known outage sites delayed generator deployment to those sites.

- Repair tickets were signed off in error when commercial power came on resulting in artificial reduction in total troubles.

- Job loss year over year resulting in bare bones operation with limited resources for maintenance

- Tree Trimming – trees should be trimmed routinely on a regular basis. The lack thereof was a contributing factor for the overwhelming power and phone outages from "Irene."

- Overwhelming breakdown in coordination between the power and telephone companies. The massive power outages impacted the phone service and repairs.

- Issues surrounding the dispatching of generators.

- Wrong size generators for the remote terminals – Vrads, Remote Terminal Sites

- Mismatched equipment – components were not compatible. Trucks not compatible for towing – Safety trailer lights not working deployed anyway were returned by tow trucks and flatbeds

- Equipment old – broke down frequently. Example: Franklin – pole carrier's wheel feel off.

- Cable Splicers sent on repair calls. However, Splicers were not allowed to go in to houses (no public service technician state license), therefore, couldn't complete job.

- Managers were overwhelmed – they were downsized along with employees in dealing with storm-related issues. Straw bosses eliminated who worked with lineman to restore broken poles. Line force diminished over years

- Contractors did shoddy work to compound the overall problems at hand. For 5 years we've been complaining about short poles not far enough into the ground and other old poles not being replaced – and after 5 years they had not been replaced resulting hundreds of broken poles

- AT&T did their usual dog and pony show – look good no matter how poor the service is. Work with a sense of urgency, but don't worry about fixing the problem.

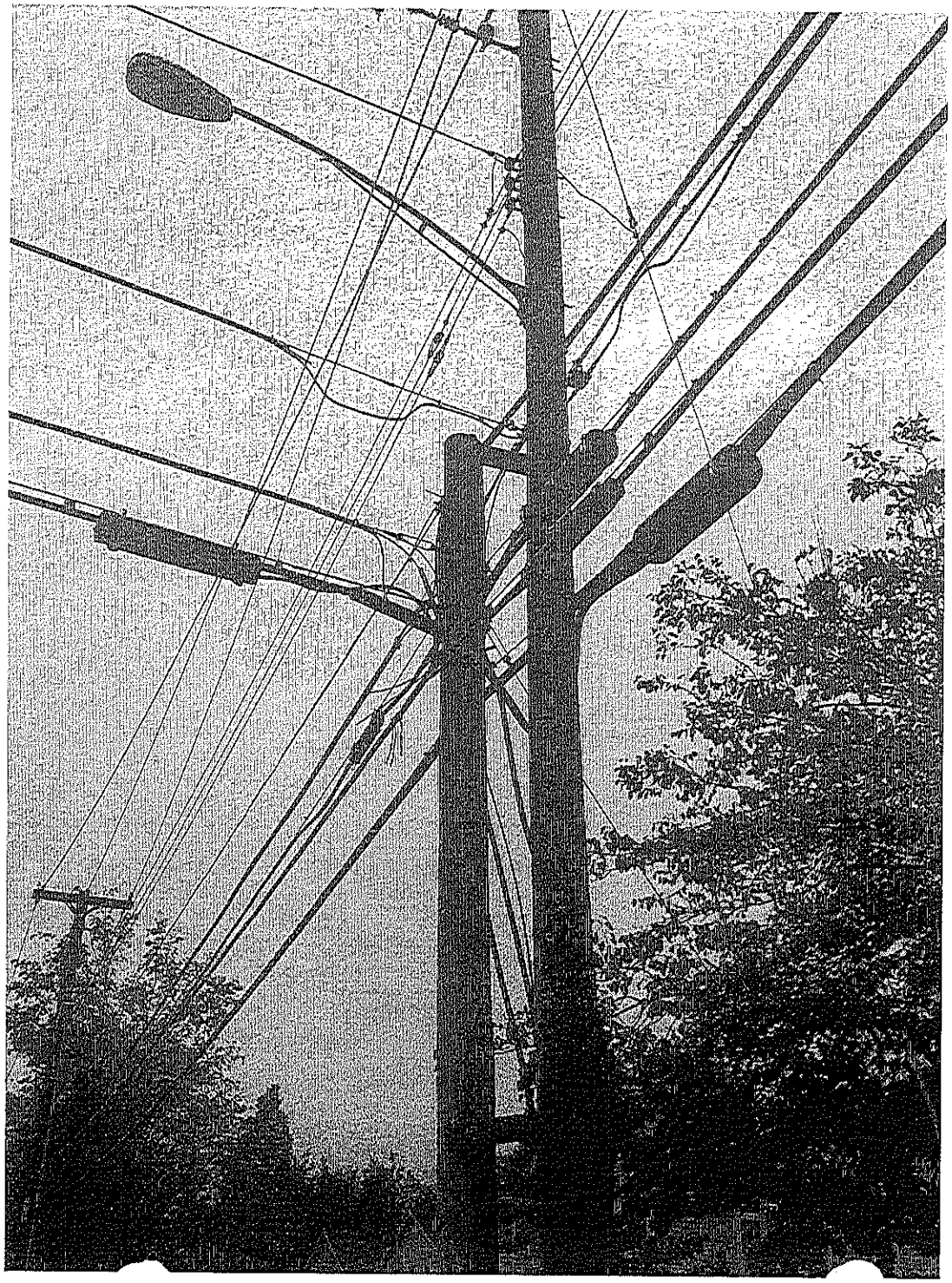
- De-regulated vs. regulated. Internet Protocol (VOIP) service is not regulated under the DPUC. Many customers didn't know they had VOIP – Worthy to note that Central Offices had immediate generator backup.

- Uverse customers received generator deployment before landline customers

- AT&T more interested in $$$ than in providing reliable service. Cell towers didn't have generators due to zoning issues and cost cutting measures. Cell sites down – should have emergency power always available

- AT&T was more concerned with providing PR "lip service" than in expediting the resolutions of troubles.

- AT&T did not utilize the information provided by the Weather Bureau. After "Irene" hit the state, residents had to wait for help to get here from Wisconsin, Michigan, Ohio, Tennessee etc.



Double pole not shifted by ATT.

Power + CABLE SHIFTED.

HAMDEN. CT.

THIS HAS BEEN LIKE THIS FOR OVER 1 YEAR

December 12, 2002
In reply, please refer to:
UR&R:PAP

John S. Wright, Esquire
Assistant Attorney General
Ten Franklin Square
New Britain, Connecticut 06051

Re: Request of the Attorney General for an Investigation of the Southern New England Telephone Company's Proposed Layoffs and its Service Quality

Dear Mr. Wright:

The Department of Public Utility Control (Department) acknowledges receipt of the Attorney General's (AG) letters dated October 10, 2002, October 22, 2002 and November 22, 2002, requesting that the Department investigate the Southern New England Telephone Company's (Telco or Company) recent downsizing of its workforce and the effects that this downsizing will have on the Company's service quality. October 10, 2002 Letter, pp. 1 and 2; October 22, 2002 Letter, p. 2; and November 22, 2002 Letter, pp. 1 and 2.

Service quality standards have been a part of the Company's alternative regulatory framework (i.e., Price Cap Formula) since 1996 when they were adopted in the March 13, 1996 Decision in Docket No. 95-03-01, Application of the Southern New England Telephone Company for Financial Review and Proposed Framework for Alternative Regulation. In that Decision, the Department determined that adoption of various service standards provided the Department sufficient ability to monitor the Company's technology commitment, customer commitment and competitive response. March 13, 1996 Decision, Docket No. 95-03-01, p. 45. The Department also determined in Docket No. 95-03-01 that should the Telco's service performance fall below the minimum standard objective level for each measurement category for any five months within any rolling twelve consecutive month period, financial penalties would be imposed on that standard category and a negative adjustment, would be applied to the Company's Price Cap Formula. Id., pp. 48 and 49.

The Price Cap Formula was reaffirmed by the Department's May 16, 2001, Decision in Docket No. 00-07-17, DPUC Investigation of the Southern New England Company's Alternative Regulation Plan. The Department also incorporated the service quality levels adopted in Docket No. 99-07-28, Promulgation of Quality of Service Regulations for Connecticut Telephone and Certified Telecommunications Providers, in

the Price Cap Formula in the May 16, 2001 Decision in Docket No. 00-07-17.[1] Based on those service quality standards, the Department determined that any decrease in the allowed retail quality of service levels must be offset by an increase in the cost to the Telco for any failure to meet the stated standards. The Department further modified the manner in which local residential customers would be credited for the Telco's failure to meet the retail quality of service objectives. Specifically, the Department required that the Telco provide residential customers with a one-time monetary credit in those cases when the service quality standards for any five months within a twelve-month period are not met. Docket No. 00-07-17 May 16, 2001 Decision, pp. 30 and 31.

You have indicated that the Telco has consistently failed to meet its service quality performance objectives throughout the operation of its alternative regulation plan.[2] However, a review of the Telco's most recent performance reports (for 2001 and 2002-year to date)[3] indicates that with the exception of Out of Service Repair Cleared within 24 hours (OOS Repair),[4] the Company is either meeting or exceeding the remaining performance measures. The Telco's 2001 and most recent 2002 quality of service performance is as follows:[5]

	01 Target	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
›uble Reports Per Hundred Lines	2.25	1.97	2.25	2.25	1.88	2.22	2.58	2.12	2.71	2.06	1.91	1.58	1.71
Maintenance Appointments Met	90.0%	99.27.	99.17	99.17	99.27	99.34	99.14	99.04	99.14	99.02	99.24	99.43	99.27
Installation Appointments Met (Co.)	90.0%	92.7	94.3	94.3	93.6	90.6	89.6	94	92.5	93.1	93.8	94.3.	92.4.
Installation Interval (Completed W/I 5 Days)	95.0%	92.1	92.9	92.9	90.8	91.9	91	97.6	98.2	97.1	98.7	98.5	98
OOS Repair Cleared W/I 24 Hours	90.0%	64.4	59.2	65.5	66.3	55.6	45.6	56.4	53.4	59.8	74.4	52.8	62.6

[1] The regulations adopted in Docket No. 99-07-28 were subsequently codified at §§16-247g-1 through 16-247g-9 of the Regulations of Connecticut State Agencies (Conn. Agencies Regs.).

[2] November 22, 2002 Letter, p. 1.

[3] The Telco's semi-annual performance reports were filed in compliance with the requirements of Conn. Agencies Regs. §16-247g-2(b).

[4] The Department attributes the Company's inability to meet the 90% objective for the Out of Service Repair Cleared within 24 hours in part to the fact that those repairs requiring dispatch cannot be done during the overnight hours. Therefore, if a trouble report is received by the Telco during the evening or night-time hours, the Company cannot generally dispatch a technician until the morning, losing a number of hours of the 24-hour measurement period.

[5] Pursuant to the Conn. Agencies Regs.§16-247g-2(b), all telecommunications service providers are required to file their service quality performance report with the Department on January 31st and July 31st of each year. However, because the Telco has been unable to meet the Out of Service Repair Cleared Within 24 Hours objective, it has been required to submit an exception report on a monthly basis reporting its performance for this service category. Conn. Agencies Regs.§16-247g-2(c).

	02 Target	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV
Trouble Reports Per Hundred Lines	2.25	1.50	1.39	1.58	1.61	1.72	2.01					
Maintenance Appointments Met	90.0%	95.7	96.0	95.3	94.8	94.1	94.8					
Installation Appointments Met (Co.)	90.0%	99.44	99.48	99.44	99.39	99.44	99.42					
Installation Interval (Completed W/I 5 Days)	95.0%	97.8	97.7	97.4	98.1	96.7	97.7					
OOS Repair Cleared W/I 24 Hours	90.0%	79.7	75.1	69.6	65.8	54.6	55.2	61.2	59.6	53.3	49.3	52.8

The Department concurs that the Telco has failed to meet its OOS Repair objective over the last two years.[6] However, pursuant to the terms and conditions of the Price Cap Formula, the Company's inability to meet the OOS Repair objective will be addressed during the Telco's annual price cap filing with the Department and most likely result in the imposition of a financial penalty and a negative adjustment to the Telco's Price Cap Formula. The AG may participate in that proceeding when the Telco makes its Price Cap Formula filing with the Department.

The Department also believes the AG's request to investigate the Telco's service quality performance in light of the Telco's employee layoffs at the present time is premature. While these layoffs have occurred during the current reporting period, the Department does not believe that a decision to conduct an investigation is appropriate since the Telco's most recent performance measures do not warrant such an investigation. Similarly, no evidence or data has been presented which demonstrates that the Telco's service quality and performance has been impaired due to the employee layoffs. The Department recognizes that the Company's performance relative to the OSS Repair has been less than stellar. Nevertheless, the Company's performance in this area has been consistent, and in the opinion of the Department, not the result of the recent layoffs of Telco employees.

You have also indicated that the AG has received complaints from Telco employees concerning the number of hours of overtime that they have been forced to work in order to meet the Company's regulatory obligations.[7] The Department attributes this overtime requirement to the level of importance that the Company has placed on customer service quality and the resulting financial impact it would experience should these objectives be missed (i.e., negative adjustments to the Company's Price Cap Formula and the imposition of financial penalties). Therefore, the Department believes that it would be disingenuous to investigate the Company's performance at this time when the Telco, with the exception of OOS Repair, is meeting all of the remaining

[6] October 10, 2002 Letter, p. 2.
[7] November 22, 2002 Letter, p. 1.

service quality measures. Accordingly, the AG's request to initiate a docket at this time is hereby denied. The Department will review the Telco's service quality performance report when it is filed on January 31, 2003. Immediately following that review, the Department will make a determination as to whether it will initiate a proceeding to investigate the Company's performance and the effects, if any, that the employee layoffs may have had on the Telco's service quality.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

CWA JOB LOSS 2001 - 2010 TOTAL 1642

JOB TITLE	2001	2002	2004	2005	2006	2007	2008	2009	2010	Total
CIRCUIT DESIGN TECH	5	3					20			28
CUSTOMER SERVICE TECH	9	18					32			59
SERVICE DELIVERY TECH	41	21						11		73
PUBLIC COMM SPECLST	4									4
SERVICE REP	22			12	17		54			105
NTWK TRANSLATOR	5	1					1	3	24	34
MAINT ADMINSRTR	14				7		160			181
NTWK ADMIN ASSC	3						23			26
DATA ASSUR TECH	2						1			3
GEN OFF ASSC	3	2	1		5	3	10	6	3	33
OPERATOR	32									32
SERVICE ORDER REVIEWER	10				1	1	2	2		16
SUPPORT SPECLST		8		3						11
ASSOC TEL SPECLST-COND		1								1
OUTSIDE NETWORK DESIGN		6	2							8
TELCOM SPEC-ONE		10	9				21			40
ASSIGNMENT ADMINSTR		13					38			51
CONSTR OFC ADM		2					4			6
FACILITY ASSGNR		15	5							20
SITE AQU AGT		2								2
TECH ASST-CPC		1								1
TECH ASST-GTAS		3								3
OFFICE ASST		1								1
PROV ASST-DFCC		2								2
NETWORK TECH-ELECTR		16				7	10	8		41
CENTRAL OFF ATTEDNT		14					21	20		55
SR FRAME ATTEDNT		1					1			2
CONDUIT INSPECTOR		1								1
NETWORK DELIVERY TECH		21								21
NETWORK DEPLOYMENT TECH		62					80			142

JOB TITLE	2001	2002	2004	2005	2006	2007	2008	2009	2010	Total
OUTSIDE PLANT TECHNICIAN		20					46			66
INSTALLATION REPAIR TECH		50							80	130
MAIL ADMIN ASST		1								1
MATL DIST DRIVER		1			1					2
SUPPLIES ATTENDANT		3					2		4	9
PUB COMM CONSULT PCS		1				1				2
PAY TELEPHONE TECH		1			4	3	6			14
COIN TEL COLLECTOR		1			3	2	1			7
BILLING INVEST REP			27				1			28
SVC NEG ANALYST			3							3
TREAS BOOKKEEPER-RPC			2							2
ADMIN SVCS REP-ITC			2			1				3
BALNCG ADMIN REP-RPC			10							10
BILL PAYMENT PROCESS-RPC			14							14
SVC ORDER REV-DBAC			1							1
INVEST ASST-DBAC			8							8
SALES ASSC					31					31
CASHIER					9					9
SERVICE CONSULT				2	5		2	2	2	13
SERVICE REP OCC					28		2	10	29	69
ENG ASST-BDLG-REAL ESTATE				1		5				6
SPEC SERVICES REP-CORP TLCM						1				1
NETWK TECH-MINI COMP										
PLACEMENT ASSTS						3				3
BIILING SERV REP							25			25
SR BILLING SERV REP							3			3
MAINT ADM -SPAN							2			2
PROCESS SUPPORT CNTR ADM			58				1			59
NETWK CONTROL ADM							5			5
SCHEDULING ADM							1			1
COIN TELE CONTRL SCHEDULER							1			1

JOB TITLE	2001	2002	2004	2005	2006	2007	2008	2009	2010	Total
COIN TELE TELLER							1			1
OFFICE ASST-COIN TEL							1			1
STATISTICAL ASST							1			1
REGULATORY OFFICE ASSC							1			1
FINANCIAL ASST							1			1
MOTOR EQPT INSP-MAIN			4							4
PUBLSHG SUPP ASST							10			10
ARTIST							10			10
SALES SUPP ASST							2			2
AD COPY EDITOR							3			3
CUST RELATIONS REP							6			6
TOLL ASSOCIATE							4			4
ALL DISTANCE SPECIALIST							2			2
SERVICE REP PSP							2			2
SERVICE REP SPAN							1			1
ADMIN ASSOCIATE IVR							1			1
OUTSIDE NETWORK ENG							8			8
TECH ASST-ONE							11			11
TELCOM SPEC-INE								4		4
TELEPHONE SALES SPEC								3	6	9
ACCESS SRVREQ CORR								1		1
TECH ASST- INE								1		1
DATA ASSUR TECH-911									2	
AUTO MESSENGER									1	1
MAIL SERVICE MESSENGER									4	4
MATERIAL&LOGISTIC ASSIST.									1	1
TELEMARKETING SPECIALIST								3		
ENG AIDE COMNLANG/ROUT COR								1		
TOTAL	**150**	**300**	**146**	**18**	**110**	**27**	**640**	**75**	**156**	**1622**

CWA Statement 2

BEFORE THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

Petition of the Office of Consumer Counsel	)	
For Enforcement of Quality of Service Standards	)	
For the Southern New England	)	Docket No. 08-07-15
Telephone Company	)	
d/b/a AT&T Connecticut	)	

PREFILED DIRECT TESTIMONY OF DAVID E. WEIDLICH, JR.

ON BEHALF OF THE
COMMUNICATIONS WORKERS OF AMERICA, LOCAL 1298

Filed: January 30, 2009

1 **Q: Please state your name, position, and business address.**

2 A: My name is David E. Weidlich, Jr. I am a Vice President of Communications Workers of
3 America, Local 1298 ("CWA"). My business address is CWA Local 1298, 3055 Dixwell
4 Avenue, Hamden, CT 06518.

5 **Q: Please summarize your work experience.**

6 A: I have worked at Southern New England Telephone Company ("SNET") or its successors since
7 1984, when I was hired as an installation repair technician. In 1989, I transferred to the job of
8 cable repair technician. I became active with SNET's labor union in 1994 when I became a
9 union steward with the Connecticut Union of Telephone Workers ("CUTW") (an independent
10 union prior to the union's merger with CWA). From 1999 to 2000, I was the president of my
11 CUTW union local (Conn. Union of Telephone Workers). In 2001, I became a Vice-President of
12 CWA Local 1298, primarily responsible for outside plant workers.

13 **Q: Have you previously testified in any type of legal or regulatory proceeding?**

14 A: I have been a witness in several labor arbitration hearings.

15 **Q: What is the purpose of your testimony?**

16 A: I will respond to several statements made by witnesses for Southern New England Telephone
17 Company d/b/a AT&T Connecticut ("AT&T") during the hearing on November 18, 2008, and
18 also to certain responses to data requests. Specifically, I will respond to statements made
19 primarily by Richard Hatch and Christopher Nurse concerning the operations of AT&T in
20 Connecticut.

21 **Q: On page 44 of the transcript, Mr. Hatch testifies that in September 2008 AT&T took steps**
22 **"to improve our dispatch philosophy" on a national basis. Based on your day-to-day**

experience in Connecticut, are you aware of any changes that took place in September in Connecticut?

A. AT&T converted to an automated system called Dispatch Interface and System Control ("DISC") that was fully implemented in Connecticut in September 2008. Prior to the full conversion, I believe that some parts of Connecticut were involved in the testing of DISC during the past two years.

Q: Do you have any data or experience to show the effect of that change on service in Connecticut?

A: Yes, I have both data and personal experience to show that any changes AT&T made in Connecticut in September 2008 have had little if any effect on its ability to promptly repair out-of-service ("OOS") reports from customers. First, I have attached as Schedule DEW-1 copies of AT&T's exception reports for the months of September 2007 through November 2007 and September 2008 through November 2008. Comparing AT&T's performance in September through November 2008 to the same months in 2007 shows that AT&T's performance in 2008 was worse than its performance in 2007. Specifically, in September 2007, AT&T repaired 77.5% of OOS reports within 24 hours. In contrast, in September 2008 – after AT&T supposedly made changes to improve its dispatch – it repaired only 50.9% of OOS reports within 24 hours. Its October performance was better in 2008 than in 2007 (but still well below the DPUC's standard): 69.0% in 2008 compared to 56.4% in 2007. But November performance again deteriorated compared to 2007: 66.7% repaired on time in 2008 compared to 73.0% in 2007.

My experience in Connecticut is consistent with AT&T's reported data. AT&T's response to OOS trouble reports has not changed very much under the new dispatch system.

Q: On page 47, Mr. Hatch describes the dispatch system used in Connecticut before September 2008. In that description, he says that service technicians would be given a list

of jobs at the beginning of the day and that those jobs "could pertain to out of service, affecting service and/or service orders, depending on their job responsibility." He then explains that a service technician might decide which job to do first, and that this could result in an out of service report not being handled first. Mr. Nurse has similar testimony on pages 83-84. Are their descriptions accurate?

A: No. For at least the past couple of years, technicians in Connecticut have not been able to change the order of their work. It is my understanding that the software may have had that capability, but that function was disabled in the technicians' computers.

Q: On page 48, Mr. Hatch testifies that under the system in effect before September 2008, the technician might not sign off on the job when it was completed, which would result in an inaccurate time being recorded for when the out-of-service report was cleared. Is that accurate?

A: No. To the best of my knowledge, technicians have always been asked to record a job as being completed when the customer was restored to service, even if there was still some work remaining to be done to complete the job.

Q: On pages 49 and 50, Mr. Hatch states that the new dispatch strategy uses an automated system that will "prioritize out-of-service tickets." Mr. Nurse has similar testimony on pages 84-85. Are these accurate descriptions of the system that has been in effect since September 2008?

A: Yes, this is accurate, but it does not tell the whole story. The technology that AT&T used before DISC, called WAFDO, had a similar ability to prioritize OOS calls, but the features were not used. It was an AT&T management decision – not a software problem – that prevented OOS calls from being the highest priority before September 2008.

1 **Q: How was dispatch prioritized before September 2008?**

2 A: Under the old system, OOS calls were not necessarily the highest priority. Instead, work was
3 organized by geography and the commitment time given to the customer.

4 **Q: How does that compare to DISC?**

5 A: Under DISC, OOS calls are supposed to be given the highest priority; but I understand that the
6 automated system is not working properly, so manual intervention is required by dispatchers to
7 properly prioritize the work.

8 **Q: On pages 51-52, Mr. Hatch testifies that AT&T in Connecticut only schedules "about 25 to**
9 **28 percent of our workforce on Saturdays and even less on Sundays and holidays, probably**
10 **about 10 percent." He then explains that this affects AT&T's ability to comply with out-of-**
11 **service reports that are received over the weekend. Is his description accurate?**

12 A: Not exactly. If more people are staffed to cover the weekends, then fewer people would be
13 available during the week. Our technicians work five-day weeks. Our contract with AT&T
14 allows AT&T the flexibility to schedule people for any five days during the week, except
15 Sundays, without having to pay any type of premium wage (Sunday work does involve a
16 premium). Overtime payments do not start until someone works more than 40 hours per week or
17 more than eight hours in a day, regardless of the day of the week. If AT&T moved people's
18 schedules so more of them worked on Saturday, it would simply move problems from the
19 weekends to other days of the week. The problem is that AT&T does not have enough
20 technicians in Connecticut to address OOS reports. It is not a scheduling problem.

21 **Q: Mr. Hatch also testifies that AT&T has tried to address this issue with CWA, but that it**
22 **"received pushback." What is CWA's position concerning technicians working on**
23 **weekends and holidays?**

A: As I said, our contract with AT&T does not have any restrictions on Saturday work. While many of our technicians don't like working on Saturday, AT&T is free to schedule people as it wants to. Up until November 2008, AT&T chose not to schedule more technicians to work on Saturdays – it had nothing to do with the union or our contract, it was an AT&T management decision.

Q: Has CWA ever brought concerns to AT&T's attention about the timeliness of repair?

A: Yes, we repeatedly raised this issue with AT&T since at least 2002. In 2002, we discussed this issue with the Attorney General and we supported the Attorney General's request that the DPUC open an investigation into AT&T's poor OOS repair record. In 2004, we had a labor arbitration where this was an important issue. In 2006, we filed a grievance against AT&T because we had so many customers complaining to our technicians about the amount of time it took to repair service. And, of course, in 2008, we intervened in this case to support OCC's petition.

Q: To your knowledge, did AT&T follow up on these concerns that CWA expressed?

A: To the best of my knowledge, AT&T did nothing in response to our concerns. Improving the response to OOS calls did not appear to be a priority for AT&T until this case was filed.

Q: In response to data request TE-13 (attached as Schedule DEW-2), AT&T states that it met with CWA after the November 18, 2008, hearing and that you agreed to provide more staffing during weekends. Is the description in that document accurate?

A: No, it is not accurate. We did meet with AT&T in November to discuss weekend staffing, but that meeting involved U-Verse installations and repairs. I was present at that meeting, and as best as I can remember, there was no discussion at all about increasing weekend coverage for POTS repair work.

1 **Q: In this and other ways, AT&T tried to make it seem that the union was somehow impeding**
2 **AT&T's ability to properly staff its operations to promptly restore service to customers.**
3 **Do you have a response?**

4 A: Yes, I strongly disagree with AT&T's attempt to make this sound like a union problem. We
5 meet with AT&T twice a year to discuss scheduling issues. As I stated above, there is nothing in
6 our contract that restricts AT&T's ability to schedule our technicians on weekends. I have
7 attended those meetings since 2001 and up until the end of 2008. I do not remember any
8 discussions during that time where AT&T focused on the need to change scheduling in order to
9 improve the response time to OOS reports. It simply has not been a priority for AT&T. Also, as
10 I explained earlier, shifting technicians to the weekend simply moves the problem to a different
11 day of the week.

12 **Q: In response to data request CWA-22 (attached as Schedule DEW-3), AT&T states:**
13 **"Installation and Repair technicians in Connecticut and U-verse deployment technicians do**
14 **not divide their work time between repair and U-verse deployment. They are in separate**
15 **organizations." In your experience, is this a complete and accurate description?**

16 A: No. It is true that there are separate organizations for <u>installation</u> of U-Verse and POTS. But
17 repair work is inter-related. For example, if there is a U-Verse installation and the technicians
18 finds a problem with the network, a POTS technician is called to remedy the problem. U-Verse
19 technicians work in the customer's premises, they do not work further out in the network.

20 **Q: If a customer with U-Verse service places an OOS report is that handled differently than if**
21 **a customer without U-Verse (a POTS customer) places an OOS report?**

22 A: Yes. In our experience, AT&T assigns a faster repair commitment to U-Verse OOS reports than
23 it gives to POTS OOS reports. U-Verse trouble reports go to a completely different dispatch
24 center and are assigned to a different work force than POTS trouble reports. If the U-Verse

1 trouble is in the home, a U-Verse installation / repair technician will be assigned. If the problem
2 is in the network, then a network technician (who works on both POTS and U-Verse reports) will
3 be assigned. For example, about a year ago, I received several complaints from our network
4 technicians complaining that they were being pulled off of POTS repair jobs to work on U-Verse
5 repair jobs.

6 **Q: To the best of your knowledge, are the U-Verse and POTS repair organizations in**
7 **Connecticut staffed differently, in terms of availability during nights, weekends, and**
8 **holidays?**

9 A: Yes. Up until this month, each U-Verse technician was required to work six days per week every
10 week (that is, mandatory overtime), with days that are often longer than eight hours. In contrast,
11 POTS repair technicians typically work five days per week, with only limited overtime. When I
12 started in 1984, we frequently worked overtime to make sure that customers had their basic
13 service repaired in a timely manner. Unfortunately, for the past ten years or more, I haven't seen
14 that kind of commitment from AT&T for POTS customers.

15 **Q: On pages 54-55, Mr. Hatch states that if a customer has a medical emergency "and I pick**
16 **the phone up and I talk to a maintenance administrator, human to human, and I indicate**
17 **that I have a medical problem ... we immediately make that an out of service. We**
18 **immediately expedite that and put it in the top of our pool so that the next technician gets**
19 **that ticket." He also testifies that AT&T has "done that for decades." Mr. Nurse also has**
20 **similar testimony on page 150. In your experience, is this consistent with AT&T's actual**
21 **practice in Connecticut?**

22 A: No. Until a year ago, when AT&T moved its 611 (repair) call center out-of-state, this was an
23 accurate statement. But during the past year, I have received several reports of customer with

medical priorities not having their troubles repaired in a timely manner. Recently, a technician reported to me that he had just been assigned a medical priority that was three days old.

Q: On pages 55-56, Mr. Hatch testifies that it does not matter where AT&T's dispatch center is located – that it makes no difference whether the center is in Meriden like it was until late 2008 or whether it is in Michigan, like it is now. Is he correct?

A: No, he is not correct. Let me first explain how it used to work. Until late 2007, our 611 center (repair calls) and our dispatch center were in the same building in Meriden. If a call came into 611 about a medical priority or a hazardous condition, a repair operator would call the dispatch center and immediately relay that information. Sometimes, the repair operator would skip even that formality and just hand-carry the trouble ticket to the dispatch center (they were located on adjacent floors of the same building).

In late 2007 / early 2008, AT&T moved the 611 center to Ohio. In late 2008 / early 2009, AT&T moved the dispatch operations to Michigan. The people handling the calls and dispatching the work rarely talk to each other and certainly can't hand-carry high-priority requests to each other. They don't know Connecticut and don't understand issues associated with travel time, especially in bad weather. For instance, I frequently receive reports from our technicians about someone from say New Haven being assigned a trouble report in Hartford. I guess the software or the dispatcher in Michigan says it's the next report in the queue, but it makes no sense to have that kind of travel time. We have 20 repair technicians in Hartford, and it's a good bet that one of them will finish up a job before the New Haven technician will get there.

Q: On page 112, Mr. Nurse states that AT&T has enough skilled technicians in Connecticut and that "the preventive maintenance techniques are working." Do you agree?

A: No, AT&T does not have a commitment to doing preventive maintenance in Connecticut. We simply do not have enough people to do preventive maintenance. Our technicians spend their time responding to trouble reports – there is almost no time left over to do preventive maintenance.

Q: Has it always been that way?

A: No, when I started with SNET, preventive maintenance was a routine part of the job responsibilities of cable technicians. Our job was to maintain the network in a certain area, and if trouble reports came in, we responded to them. Basically, we knew the area we were responsible for – we responded to calls to locate underground cables, we dealt with trouble calls, and we maintained the network to minimize the number of trouble calls.

It no longer happens this way. Our technicians are no longer responsible for a certain area. Instead, they travel all over their district and, as I discussed above, sometimes to other parts of the state - sending them to areas they don't know very well. They spend very little, if any, time on preventive maintenance. Instead, we just wait for something to fail, then we'll go out and fix it.

Q: Mr. Nurse also testifies (pages 114-116) that he knows AT&T has enough technicians in Connecticut because all trouble reports are cleared over the course of a month. Do you agree that this is a reasonable way to determine whether the workforce is appropriately sized?

A: No, I do not agree with Mr. Nurse. We are not responding to trouble reports the way we should be. Service is not being repaired in a timely manner. Our goal is not supposed to be clearing all OOS reports by the end of the month, but to do it quickly to provide customers with reliable service and to keep the customer satisfied.

1 Over the course of a month, there is usually a stretch of a few days when the weather is
2 dry and there are relatively few OOS reports. If we had the right number of technicians, these
3 would be the kinds of days when we would perform preventive maintenance. But because of the
4 backlog of trouble reports, these days are used to clear trouble reports that came in several days
5 earlier. If we had more technicians, we would be able to improve the quality of the POTS
6 network, reduce trouble reports, and improve the service that customers receive.

7 **Q: On page 166, Mr. Nurse testified concerning maintenance activities that can "minimize the**
8 **effect of wet weather outages" such as pressurizing underground cable with air. Is this**
9 **type of preventive maintenance work performed by AT&T in Connecticut?**

10 A: Not very often. The air pressure system still exists, but it has deteriorated significantly in the
11 past ten years. This is a prime example of what I was talking about with the lack of preventive
12 maintenance today. I have seen many service outages and other problems because there is no
13 longer a commitment to maintaining the air pressurization system. AT&T places a very low
14 priority on this work, where before SBC and AT&T took over, this was high-priority work. For a
15 time, we even had a group of technicians who were dedicated to work on the air pressurization
16 system and that is all they were assigned to unless there was an emergency or a high workload.

17 **Q: When a customer calls AT&T with a repair call – let's say the customer has no dial tone –**
18 **is that call answered by a live person or by an interactive voice response (IVR) system?**

19 A: The call is answered by an IVR system.

20 **Q: To the best of your knowledge, does the IVR system ask the customer if there is any type of**
21 **medical condition or medical facility (such as a Life Alert system) that requires an**
22 **immediate repair?**

1 A: No, the IVR system does not ask the customer about any medical condition or medical
2 emergency. The customer has to know to ask to speak to a live operator and explain the nature of
3 the medical condition. AT&T acknowledged this in response to data request TE-17, a copy of
4 which is attached as Schedule DEW-4.

5 **Q. So if a customer follows the instructions provided by the IVR system, would the customer**
6 **know that he or she is supposed to do something else if there is a medical reason that**
7 **requires a faster repair?**

8 A: No.

9 **Q: To the best of your knowledge, does the IVR system ask the customer if the customer has**
10 **any other way of making and receiving telephone calls while the line is out of service?**

11 A: No, to the best of my knowledge, the IVR system does not ask if the customer has a cellular
12 telephone or another functioning wired telephone. The IVR system does ask if there is a phone
13 number where the customer can be reached, but that could be the phone of a neighbor or relative
14 who would only take a message for the customer.

15 **Q: To the best of your knowledge, does AT&T have a system in place to prevent the**
16 **disconnection of service to customers with a documented medical need for telephone**
17 **service?**

18 A: No, AT&T's computer system does not permit dispatch or service technicians to see whether the
19 customer has a documented medical condition. It is my understanding, on advice of counsel, that
20 AT&T must have a process in place to prevent the disconnection of service to customers with a
21 documented medical need for service. But that information is never given to service technicians
22 or dispatchers. AT&T acknowledged this in response to data request CWA-54, a copy of which
23 is attached as Schedule DEW-5.

1 **Q: So even though AT&T is not allowed to disconnect that customer for nonpayment of a bill,**
2 **there is nothing in AT&T's computer systems that prioritizes the restoration of service to**
3 **that customer?**

4 A: That is correct, unless the customer speaks with a live operator and explains the problem.

5 **Q: Does this conclude your direct testimony?**

6 A: Yes, it does.

EXCEPTION REPORT FOR SEPTEMBER, 2007 – NOVEMBER, 2007

SERVICE CATEGORY: OOS REPAIR CLEARED W/I 24 HOURS

STATEWIDE	OBJ	SEP	OCT	NOV
COMPANY	90.0%	77.5	56.4	73.0
ADMIN. AREA				
NH/Berk		74.2	55.7	73.6
Bpt/Gtwy		75.4	53.2	73.0
Capitol		78.5	48.7	68.9
East		86.8	70.9	76.1

Explanation: The Telco did not meet the OOS Repair Cleared Within 24 Hours objective of 90.0% from August, 2007 through November, 2007. There was a strong rebound in November, however, as both OOS Mean Time to Repair and OOS troubles decreased significantly from October. The October decline was due in large measure to rain events during the first half of the month; this was not the case in November as the statewide total rainfall average was approximately one-third below the monthly historical average. Cumulatively, the statewide year-to-date result for this measure is 73.2% compared to 52.7% for the same period last year. (Note: the Administration Area breakout was modified to reflect the merging of the Central region results into other regions effective with September, 2007 data)

EXCEPTION REPORT FOR September, 2008 – November, 2008

SERVICE CATEGORY: **OOS REPAIR CLEARED W/I 24 HOURS**

STATEWIDE	OBJ	SEPTEMBER	OCTOBER	NOVEMBER
COMPANY	90.0%	50.9	69.0	66.7
ADMIN. AREA				
NH/Berk		51.0	77.7	71.1
Bpt/Gtwy		55.7	76.0	61.5
Capitol		41.1	60.0	64.6
East		59.3	55.9	63.5

Explanation: Excessive rain both increased the number of OOS reports and hindered technicians from completing assigned repairs on November 6, 15, 16, 25 and 30. November was the fourth wettest month with precipitation of 3.64 inches, high winds, humidity and bringing us our first snow. We are beginning to see improvements from the new dispatch strategy balanced to some extent by the impact of early winter weather.

DEPARTMENT OF PUBLIC UTILITY CONTROL
Interrogatories to The Southern New England Telephone Company
d/b/a AT&T Connecticut

REALIGN SCHEDULES

Witness Responsible: Richard Hatch

TE-13: Reference Late Filed Exhibit No. 4. AT&T states that it is working to realign schedules to adjust to customer need. Explain how the Company intends to realign its schedules. Will it schedule repairs on Saturday evenings and Sundays? Will additional technicians be required? Has the Company entered into negotiations with the union to discuss the possibility of weekend repairs? How do the Company's technician work schedules compare with its affiliates in other states?

Answer: After the November 18, 2008 hearing, AT&T met with the CWA to discuss the realignment of work schedules of Installation and Repair and Network Delivery Technicians to increase the outside repair field personnel staffing on Saturdays and Sundays. As a result of those negotiations, effective January 11, 2009, the Saturday workforce for these job titles will increase 30% and for Sunday, the workforce will increase 50%. The scheduling changes made for weekends were determined by the same scheduling methods used by AT&T in the Midwest.

COMMUNICATIONS WORKERS OF AMERICA , LOCAL 1298
Interrogatories to The Southern New England Telephone Company
d/b/a AT&T Connecticut

DIVIDED WORK TIME

Witness Responsible: Chris Nurse/Richard Hatch

CWA-22: How many, if any, of AT&T employees in Connecticut divide their time between work on repair of basic dial-tone and deployment of U-verse?

Answer: AT&T Connecticut objects to this interrogatory as it seeks documents or information which are neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. AT&T further objects as it seeks information which is proprietary or confidential. Moreover, AT&T objects to this interrogatory inasmuch as it seeks information regarding matters which are not subject to the Department's jurisdiction.

Subject to this objection, none. Installation and Repair technicians in Connecticut and U-verse deployment technicians do not divide their work time between repair and U-verse deployment. They are in separate organizations.

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DEPARTMENT OF PUBLIC UTILITY CONTROL
Interrogatories to The Southern New England Telephone Company
d/b/a AT&T Connecticut

IVR - MEDICAL

Witness Responsible: Richard Hatch

TE-17: Reference the Transcript, p. 190. Does the IVR system determine if a call is designated a "medical"? If so, when was this change made? How is this designation accomplished by the IVR? What are the computer prompts? After speaking with an AT&T representative, does the AT&T employee have the authority to change the code?

Answer: No, the 611 IVR system does not determine if a call is designated as medical. The customer must speak to a live agent and request an expedited repair due date due to the medical condition. The AT&T employee has authority to put through an expedited repair date when the customer asserts a medical need for an expedited repair.

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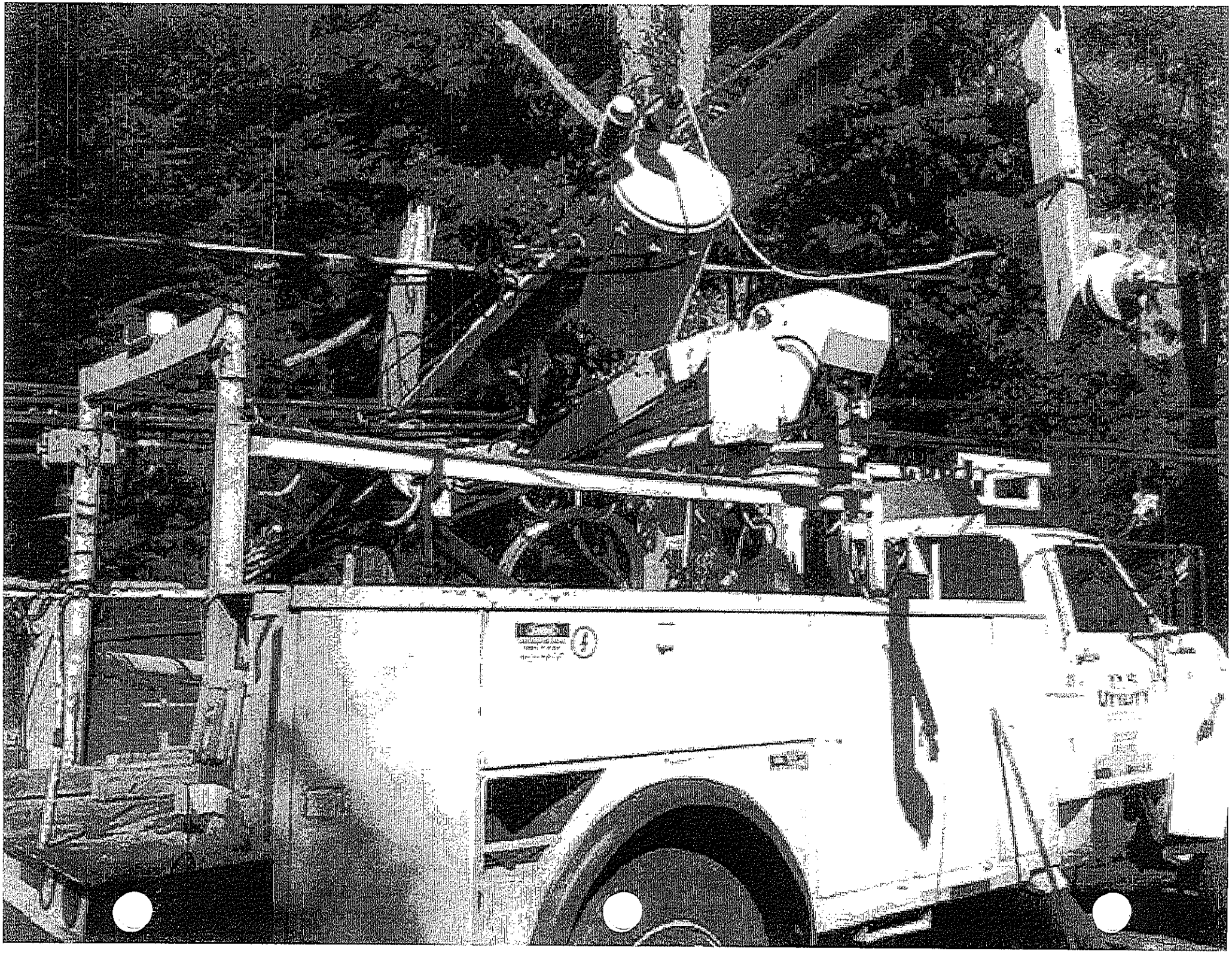
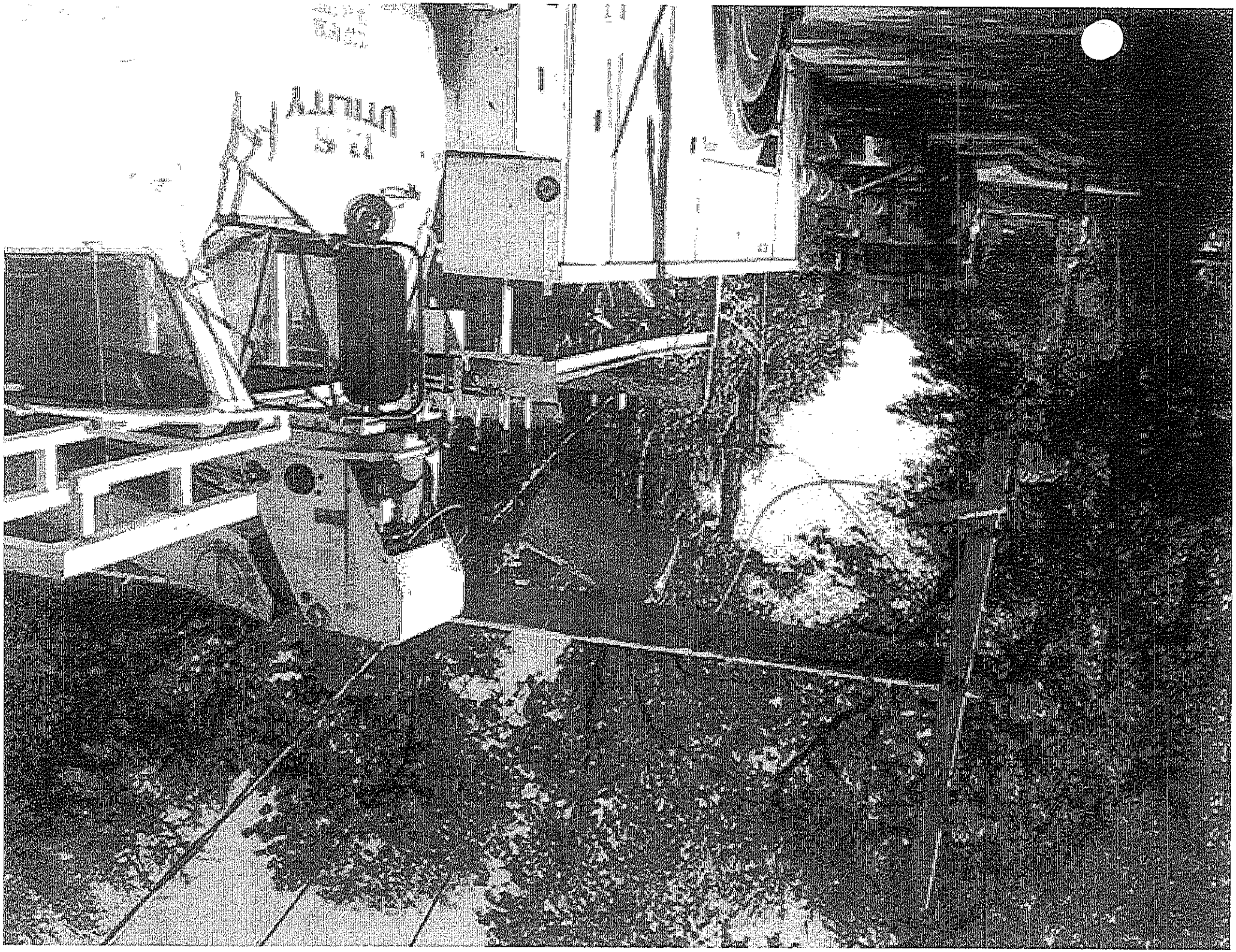
COMMUNICATIONS WORKERS OF AMERICA , LOCAL 1298
Interrogatories to The Southern New England Telephone Company
d/b/a AT&T Connecticut

MEDICAL RECORDS IN ADVANCE

Witness Responsible: Richard Hatch

CWA-54: Are any customer records flagged in advance with medical priority (that is, even before a trouble is reported)?

Answer: No, customer records are not "flagged" in advance with a "medical priority" notation. Indeed, AT&T has no way of knowing in advance whether the customer has a medical condition or the nature of the medical condition (i.e. is it chronic or temporary). A medical priority is established when the customer mentions the condition at the time he/she reports the repair trouble.