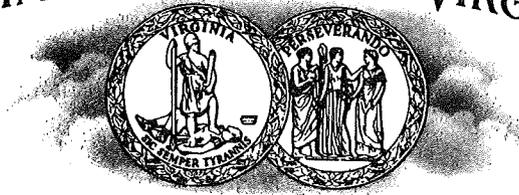


COMMONWEALTH OF VIRGINIA

OFFICE OF THE GENERAL COUNSEL
P.O. Box 1197
Richmond, Virginia 23218-1197



Telephone Number (804) 371-9671
Facsimile Number (804) 371-9240
Facsimile Number (804) 371-9549

STATE CORPORATION COMMISSION

July 31, 2011

Jennifer L. McClellan
Assistant General Counsel
Verizon Virginia LLC and
Verizon South Inc.
703 East Grace Street, 7th Floor
Richmond, Virginia 23219

RE: *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of investigating 911 emergency call service outages and problems*
Case No. PUC-2012-00042

Dear Ms. McClellan:

Enclosed please find "Interrogatories and Requests for the Production of Documents by the Staff of the State Corporation Commission (First Set)." Please provide the response to these interrogatories within ten (10) days of their receipt. If you have any questions about the interrogatories, please contact me at (804) 371-9671.

Thank you for your prompt assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raymond L. Doggett, Jr.'.

Raymond L. Doggett, Jr.
Associate General Counsel

RLD:nel
Enclosure

cc: Document Control Center
Gregory M. Romano, Esq. (via e-mail)
David W. Ogburn, Jr., Esq. (via e-mail)

COMMONWEALTH OF VIRGINIA
BEFORE THE
STATE CORPORATION COMMISSION

COMMONWEALTH OF VIRGINIA, *ex rel.*

STATE CORPORATION COMMISSION

CASE NO. PUC-2012-00042

Ex Parte: In the matter of investigating
911 emergency call service outages and problems

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS BY THE STAFF OF THE
STATE CORPORATION COMMISSION (FIRST SET)

Pursuant to Rule 260 of the Commission's Rules of Practice and Procedure, 5 VAC 5-20-260, and the Commission's Order Establishing Investigation issued July 3, 2012, the Staff of the State Corporation Commission requests that Verizon Virginia LLC and Verizon South Inc. (collectively, "Verizon" or "Company") answer the interrogatories and produce the documents as indicated below within ten (10) days of receipt of these interrogatories.

INSTRUCTIONS

(1) These interrogatories and requests are continuing and require further and supplemental responses if Verizon receives or generates additional information or documents within their scope after its initial response but before the hearing.

(2) With respect to any document or information related to any matter addressed in any question in the attached interrogatories and requests for document production, if the document is not in your possession, but you know or believe that it exists, you are requested to

identify and indicate to the best of your ability the present or last known location of the document and its custodian.

(3) If any document called for is withheld on a claim of privilege, identify the documents withheld and each and every person listed as an addressor, addressee, or indicated on blind copies; identify all persons to whom distributed, shown, or explained; and identify the nature and legal basis of the privilege asserted.

(4) If any document called for has been destroyed or transferred beyond the control of Verizon, (a) identify the person who destroyed it and the person authorizing destruction, and state the time, place, method of, and reason for its destruction; if destroyed or disposed of by operation of a retention policy, state the retention policy; and, if transferred, identify the person authorizing transfer and state the time, place, method of, and reasons for its transfer; and (b) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown, or explained. In addition, state or identify the date, subject matter, number of pages, attachments, and appendices of the document.

(5) If no documents containing the exact information requested exist, but documents exist that contain portions thereof or that contain substantially similar information, then the definition of "documents" to be identified shall include the documents that do exist.

(6) In responding to each question in the attached interrogatories and requests for production of documents, please provide information available from all corporate and individual files of the Company, of all affiliated companies, and of all companies over which the Company exercises control or that exercises control over the Company, as well as from all past and present board members, officers, and management level employees of any such companies.

(7) If a response to any of the attached interrogatories and requests for production of documents requires any calculations, analyses, assumptions, or studies, please identify and provide and identify copies of such calculations, analyses, assumptions, or studies, and include all work papers relating thereto.

(8) For each response made to Staff interrogatories or document requests, please identify by name the person making the response, pursuant to 5 VAC 5-20-260.

(9) In responding to any of the questions contained in the attached interrogatories and request for production of documents, please provide the name and title of the corporate officer who has the responsibility for the subject matter addressed therein.

(10) Verizon is requested to provide one copy of its responses to these interrogatories and requests to:

1. Raymond L. Doggett, Jr.
Associate General Counsel
Office of General Counsel
State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218
2. William Irby, Director
Division of Communications
State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218
3. Larry Kubrock, Senior Telecommunication Specialist
Division of Communications
State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218

DEFINITIONS

A. "You", "your", "the Company", means Verizon or any of its officers, directors, employees, attorneys, or agents.

B. The word "Commission" refers to the Virginia State Corporation Commission.

C. "Document" includes any written, recorded, or graphic matter however produced or reproduced, including but not limited to, correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, data processing cards or discs, computer tapes, and other computer-generated and stored information or database, work papers, calendars, minutes of meetings, or any other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing now or previously in your possession.

D. "Identify", "identity", or "identification", when used in reference to an individual person, means to state that person's full name and residence address, including zip code and phone number, if known, and present or last known business position and duties and business address, if known.

E. "Identify", "identity", or "identification", when used in reference to a document, means to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but is no longer, in your possession or subject to your control, state what disposition was made of it, and if destroyed or disposed of by operation of a retention policy, state the retention policy.

F. "Identify", "identity", or "identification", when used in reference to a business organization, means to state the corporation name or other names under which said organizations does business, and the location of its principal place of business.

G. The terms "describe in detail" and "explain in detail" mean describe and explain in detail each and every basis for the position taken or statement made and identify each and

every statement, study, and document relied on by you and provide a copy of all such identified studies and documents.

H. "June 29 storm" refers to the derecho storm that crossed the Commonwealth of Virginia on June 29, 2012.

INTERROGATORIES AND DOCUMENT REQUESTS

(1) Please provide a copy of any documents, including letters, reports, maps, or exhibits, provided to the Federal Communications Commission ("FCC"), or any staff member thereof, related to the disruption of 911 emergency call services occurring on or after June 29, 2012, as a result of the June 29 storm. Likewise, provide a copy of any such documents provided to any other local, state, or federal agency, council, committee, or board, or to any staff member or official thereof.

(2) Regarding full or partial disruption of 911 emergency call services occurring as a result of the June 29 storm, please provide a narrative statement describing the nature of the disruption; the network facilities involved; central office(s) involved; remote switches involved; each Public Safety Answering Point ("PSAP") affected; how each PSAP was affected; the geographic location affected; and the number of Verizon customers affected. Include in this response when telephone customers lost dial tone, if known, and were not able to call 911, and when telephone customers with dial tone were unable to be connected to a PSAP when dialing 911.

(3) For each day from June 29, 2012, until all 911 emergency call service operations were restored, please provide the number of 911 calls attempted; the number of 911 calls completed; the number of 911 calls that failed to be completed to the correct PSAP; the number

of 911 calls that were completed to the correct PSAP with Automatic Location Identification ("ALI"); the number of 911 calls that were completed to the correct PSAP without ALI; and the number of calls that were re-routed or misrouted, if any, to any entity other than the correct PSAP. To the extent available, please provide the information requested by local calling area, central office, PSAP, and geographic region of the Commonwealth.

(4) Please provide a copy of any internal report(s) prepared by or for Verizon regarding any aspect of the disruption of 911 emergency call services as a result of the June 29 storm, including, but not limited to, root cause analysis of any disruptions; coordination and communication procedures with PSAPs; and recommendations for changes to, and revisions to, current maintenance or operating procedures or preventative measures to be employed in the future.

(5) Please provide the location of each ALI database that is used to provide 911 emergency call services within the Commonwealth of Virginia. Describe how the ALI function is provided to Virginia PSAPs and through which route(s).

(6) Please describe how the Automatic Number Identification ("ANI") function is provided to Virginia PSAPs and through what route(s).

(7) Please provide a copy of the Verizon central office and remote switch battery maintenance policies, practices, and procedures.

(8) Please provide a copy of the Verizon central office and remote switch generator maintenance policies, practices, and procedures.

(9) Please provide a copy of the battery maintenance records for the preceding twelve (12) months for each central office and remote switch referenced in the response to Interrogatory No. 2.

(10) Please provide a copy of the generator maintenance records for the preceding twelve (12) months for each central office and remote switch referenced in the response to Interrogatory No. 2.

(11) Please identify each Verizon central office and remote switch involved in the provisioning of 911 emergency call services in Virginia that lost commercial power as a result of the June 29 storm. Include with this response, the name and location of each central office and remote switch; the date and time commercial power was lost; how and when Verizon became aware of the loss of power; and the reason (if known) for the loss of power.

(12) For each central office and remote switch identified in the response to Interrogatory No. 11, describe the power back-up facilities in place for each.

(13) For each central office and remote switch identified in response to Interrogatory No. 11 that has battery power back-up facilities, state whether the central office and remote switch batteries have alarms and whether these alarms are monitored. If so, please describe the process for the monitoring of such alarms and provide any manuals documenting such procedures.

(14) For each central office and remote switch identified in response to Interrogatory No. 11 that has generator power back-up facilities, state whether the central office and remote switch generators have alarms and whether those alarms are monitored. If so, please describe the process for the monitoring of such alarms and provide any manuals documenting such procedures.

(15) For each central office and remote switch referenced in the response to Interrogatory No. 11, provide the date and time at which Verizon's network monitoring location

received a battery alarm and/or generator alarm. Include in this answer the Verizon response, or action taken, and the time of the action taken, after receiving each alarm.

(16) From the list of central offices and remote switches identified in the response to Interrogatory No. 11, identify by name and location each central office and remote switch that has a battery as back-up source of power that experienced any problem wherein the battery failed to function properly, failed to continue functioning, or failed to fully power the central office or remote switch, until the commencement of generator back-up power or the restoration of commercial power to the central office or remote switch.

(17) From the list of central offices and remote switches identified in the response to Interrogatory No. 11, identify by name and location each central office and remote switch that has a generator as a back-up source of power that experienced any problem wherein the generator failed to function properly, failed to continue functioning, or failed to fully power the central office or remote switch, until the restoration of commercial power to the central office or remote switch.

(18) For each central office and remote switch identified in response to Interrogatory Nos. 16 and 17, please describe the electrical configuration in use for that central office or remote switch, including the number of batteries and/or generators present at the central office or remote switch; the number of batteries and/or generators necessary to run the central office or remote switch; the watt rating for each generator; and the watt load requirement of the central office or remote switch.

(19) For each central office and remote switch identified in the response to Interrogatory No. 16, please describe the problem with the battery; how the problem was

resolved; the date and time battery power to the central office or remote switch was restored; and the date and time the central office or remote switch was fully functioning.

(20) For each central office and remote switch identified in response to Interrogatory No. 17, please describe the problem with the generator; how the problem was resolved; the date and time generator back-up power was restored; the date and time commercial power was restored; and the date and time the central office was fully functioning.

(21) For each central office and remote switch identified in response to Interrogatory Nos. 16 and 17, please state the extent to which the loss of back-up power affected the provisioning of 911 emergency call services.

(22) Please provide a copy of any written communication (*e.g.*, e-mail) to any PSAP regarding the status of 911 emergency call service operations relating to the June 29 storm.

(23) Provide a listing of all non-written communications to any PSAP regarding the status of 911 emergency call service operations relating to the June 29 storm. Such listing should identify the PSAP contacted; the name of the person contacted; the job responsibility of the person contacted; the time and method of the communication; and a description of the information communicated.

(24) Describe how Verizon's network facilities and operations are configured to provide 911 emergency call services in the Commonwealth of Virginia. Please include in this response the particular central office and the use of switches, trunks, tandems, databases, etc., necessary for the successful routing of a 911 emergency call to the appropriate PSAP. Provide network schematics or maps documenting the design, layout, or use of Verizon's network to provide 911 emergency call services. Please provide such schematics, maps, etc., on a statewide and regional basis.

(25) Please identify the specific component of the network facilities, be it central office, switch, trunk, tandem, database, etc., that was lost, damaged, or impaired as a result of the June 29 storm, which caused, or contributed to, the disruption of 911 emergency call services. Include in this response the specific network component affected, whether the component was damaged directly by the storm, whether the component was affected by the loss of commercial power, whether the component failed to operate or experienced a degradation in operation, when that loss and/or degradation occurred, and whether any central office facility listed was staffed at the time of the disruption.

(26) For each component described in the response to Interrogatory No. 25, please state when personnel were dispatched to begin diagnostics and repair; when such dispatched personnel arrived at the assigned location; when the repair was completed and the network component was returned to service; and the employee group or contractor that diagnosed and repaired the problem. With this response, please designate whether a Verizon employee or independent contractor was utilized.

(27) For each component described in the response to Interrogatory No. 25, please state when it was determined that the loss or degradation of the component could affect 911 emergency call services to PSAPs and when the affected PSAP was notified of the potential effect on operations.

(28) Provide a copy of Verizon's current disaster recovery plan, business continuity plan, emergency response plan, or other similar document, related to 911 emergency call services.

(29) Please describe any plans employed or steps taken to prepare for the June 29 storm with regard to emergency response preparedness and 911 emergency call services reliability.

(30) Was a Verizon emergency operations center opened and staffed in preparation for, or as a result of, the June 29 storm? If so, please state when and where the center was opened and staffed?

(31) Please provide the amount for each of the last five (5) years budgeted by Verizon for 911 emergency call services operations, including both capital and maintenance costs.

(32) Please provide the amount for each of the last five (5) years expended by Verizon for 911 emergency call services operations, including both capital and maintenance costs.

Where the amount expended is different from the amount budgeted, explain why.

(33) Please provide the projected budget for 911 emergency call services operations, including both capital and maintenance costs for each of the next three (3) years.

(34) Please provide the level of staffing for monitoring and maintaining the facilities on which 911 emergency call services are provided, including the number of technicians and managers, for each of the past five (5) years. Include in this response whether, and if so the extent to which, personnel are dedicated exclusively to 911 emergency call services operations, or whether, and the extent to which, the responsibility for 911 emergency call services are shared among Verizon personnel.

(35) With regard to Next Generation 911 ("NG911"), please provide the status of any NG911 deployment or planned deployment by Verizon within the Commonwealth of Virginia. Include in this response whether, and the extent to which, utilization of NG911 will improve 911 services reliability.

Respectfully submitted,

The Staff of the State
Corporation Commission

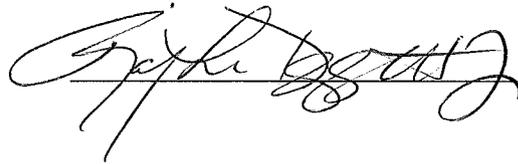
By 
Counsel

Raymond L. Doggett, Associate General Counsel
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State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218
Phone: (804) 371-9671
Fax: (804) 371-9240

Dated: July 31, 2012

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing "Interrogatories and Requests for the Production of Documents by the Staff of the State Corporation Commission (First Set)" was e-mailed and sent U.S. mail, first class, postage prepaid, this 31st day of July, 2012 to:
Jennifer L. McClellan, Assistant General Counsel, Verizon Virginia LLC, and Verizon South Inc., 703 East Grace Street, 7th Floor, Richmond, Virginia, 23219.

A handwritten signature in black ink, appearing to read "John D. Scott", written over a horizontal line.