

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

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

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

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

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

20 A: Yes, this is accurate, but it does not tell the whole story. The technology that AT&T used before
21 DISC, called WAFDO, had a similar ability to prioritize OOS calls, but the features were not
22 used. It was an AT&T management decision – not a software problem – that prevented OOS
23 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?**

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

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

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

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

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

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

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

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

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

6 A: No, he is not correct. Let me first explain how it used to work. Until late 2007, our 611 center
7 (repair calls) and our dispatch center were in the same building in Meriden. If a call came into
8 611 about a medical priority or a hazardous condition, a repair operator would call the dispatch
9 center and immediately relay that information. Sometimes, the repair operator would skip even
10 that formality and just hand-carry the trouble ticket to the dispatch center (they were located on
11 adjacent floors of the same building).

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

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

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

5 **Q: Has it always been that way?**

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

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

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

20 A: No, I do not agree with Mr. Nurse. We are not responding to trouble reports the way we should
21 be. Service is not being repaired in a timely manner. Our goal is not supposed to be clearing all
22 OOS reports by the end of the month, but to do it quickly to provide customers with reliable
23 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.

Docket No. 08-07-15
Request No. TE-13
January 14, 2009
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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.

Docket No. 08-07-15
Request No. CWA-22
January 14, 2009
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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.

Docket No. 08-07-15
Request No. TE-17
January 14, 2009
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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.

Docket No. 08-07-15
Request No. CWA-54
January 14, 2009
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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.