New Hampshire Public Utilities Commission Verizon New England, Inc. Docket No. DT 07-011

Answers of Labor Intervenors To Data Requests of FairPoint Communications Inc., Set 1

FP: Labor-47: Please refer to Dr. Peres's testimony at page 29, line 16 through page 30, line 2. Dr. Peres states with regard to current Verizon employees:

Union officials state that they cannot recall any pension eligible worker they have contacted who is not considering retirement if the transaction is approved. In addition, some workers who are pension eligible but who would incur a penalty if they retire are considering retirement even with the penalty. Other workers are seeking assignments and transfers to Verizon's operations in Massachusetts or other states. Conversely, fewer workers in other states bid on jobs in Maine, New Hampshire and Vermont which previously obtained many such bids.

- a. Identify, describe, and list all communications and documents related to Dr. Peres's statement that "union officials state they cannot recall any pension eligible worker they have contacted who is not considering retirement if the transaction is approved."
- b. Identify, describe, and list all communications and documents related to Dr. Peres's statement that "Other workers are seeking assignments and transfers to Verizon's operations in Massachusetts or other states."
- c. Identify, describe, and list all communications and documents related to Dr. Peres's statement that "fewer workers in other states bid on jobs in Maine, New Hampshire and Vermont which previously obtained many such bids."
- d. State whether or not such documents indicate the causes for such alleged, expected retirements.
- e. Produce all documents identified in subparts a. to d. above.

Answer:

This portion of the testimony was based on conversations about the situation in New Hampshire with two IBEW officials: Robert Erickson, IBEW Telecommunications New England Coordinator and Glenn Brackett, Business Agent for IBEW Local 2320.

Mr. Erickson is in daily and weekly contact with members throughout the three-state region. Mr. Brackett is in daily contact with his members in New Hampshire.

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FP: Labor-47, continued

Both Mr. Erickson and Mr. Brackett stated that they could not recall any pension eligible worker they contacted who is not considering retirement if the transaction is approved - even pension eligible workers who would incur a penalty if they retired were considering retirement. Both gentlemen also stated that currently few qualified workers have bid on jobs in New Hampshire from other states outside of the three-state region even though qualified workers in other states would frequently compete for jobs in the three-state region in the past.

Mr. Erickson was told by business managers in Massachusetts that some people who had bid into the three-state region and were awarded jobs were allowed to renege on the bids following the announcement of the transaction. Verizon would be able to provide more specific data.

Response provided by: Kenneth Peres