

November 4, 2002

Via Hand Delivery

Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48909

**Re: In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.
Case No. U-12320**

Dear Ms. Wideman:

Please find enclosed for filing the original and 15 copies of *SBC Ameritech Michigan's Implementation Plan In Compliance With October 3, 2002 Opinion And Order and Proof of Service*.

If you should have any questions, please contact me. Thank you.

Very truly yours,



William J. Champion III

WJC/mds
Enclosures
cc: Parties of Record

C o u n s e l l o r s A t L a w

DETROIT BLOOMFIELD HILLS LANSING GRAND RAPIDS ANN ARBOR
WASHINGTON, D. C.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to consider Ameritech Michigan's compliance)
with the competitive checklist in Section 271 of) Case No. U-12320
the federal Telecommunications Act of 1996.)
_____)

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Alicia M. Ball, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on November 4, 2002 she served a copy of SBC Ameritech Michigan's Implementation Plan In Compliance With October 3, 2002 Opinion And Order upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.

Alicia M. Ball
Alicia M. Ball

Subscribed and sworn to before me,
a Notary Public in and for said County,
this 4th day of November, 2002.

Kristi A. Grieve

Kristi A. Grieve, Notary Public
Ingham County, Michigan
My Commission Expires: 11/12/04

SERVICE LIST – MPSC CASE NO. U-12320

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SBC AMERITECH MICHIGAN'S COMPLIANCE
PLAN AS REQUIRED BY OCTOBER 3, 2002 OPINION AND ORDER

On October 3, 2002, the Commission entered and Opinion and Order ("October 3 Order")
in which it modified SBC Ameritech Michigan's proposal concerning the migration of voice
services to a CLEC when a data provider is using the HFPL UNE.¹ Michigan Bell Telephone
Company, d/b/a SBC Ameritech Michigan ("SBC") submits herewith its compliance plan to
implement the October 3 Order.²

I. INTRODUCTION

In its October 3 Order, the Commission addressed four scenarios relating to line sharing
and line splitting. Specifically, the Commission determined that "a voice CLEC should be able
to obtain migration of voice service despite the presence of a data CLEC in a line-sharing
arrangement."³ The Commission required SBC to facilitate line-splitting between voice and data

¹ Id., at 25.

² While SBC is submitting a compliance plan to implement the October 3 Order, SBC
reserves its right to seek review of the order, particularly in the light of the FCC's
upcoming Triennial review and other pending matters.

³ Id., at 15. Line sharing occurs when SBC provides voice service to an end-user and a
data CLEC provides data service over the high frequency portion of the loop.

CLECs, but made clear that SBC is not required to "act as a mediator between CLECs."⁴ Instead, the "voice and data CLECs are required to coordinate their activities to minimize the probability that their common customer will experience a disruption in service."⁵

The Commission recognized that a data CLEC may not be required to continue providing data services over the HFPL in the event the voice service migrates to a voice CLEC.⁶ Accordingly, the Commission determined that "when a voice CLEC markets its service to a potential customer with DSL service already in place, it must inform the potential customer that the DSL service may be affected by a switch of voice service providers."⁷ Ultimately, "the end-user is responsible for managing its contractual relationship with the ISP" since neither the ILEC nor the voice CLEC "can be expected to enforce provisions of a contract to which it is not a party."⁸

II. SBC'S PROPOSED COMPLIANCE PLAN IS CONSISTENT WITH THE OCTOBER 3 ORDER AND PERMITS MIGRATION OF SERVICE TO A VOICE CLEC WITHOUT DISRUPTING AN END-USER'S VOICE SERVICE

SBC's compliance plan is set forth in detail on Exhibit A. Under SBC's proposed compliance plan, where an end-user obtains voice service from SBC, and data service from either an affiliated or unaffiliated provider over the HFPL of the loop used to provide voice service, the end user's voice service may be migrated to a voice CLEC without the permission of the data service provider. Under these circumstances, the data service provider utilizing its own

⁴ *Id.*, at 19.

⁵ *Id.*, at 23.

⁶ *Id.*, at 18.

⁷ *Id.*, at 19.

⁸ *Id.*, at 19

splitter may continue the provision of data service over the HFPL of the loop used to provide voice service in a line splitting arrangement with the voice CLEC if it chooses to do so.⁹ The procedures for accomplishing the conversion of line sharing to line splitting are currently documented in CLEC OnLine and were not required to be altered by the October 3 Order.¹⁰

To the extent a data CLEC does not choose to engage in line splitting with the voice CLEC, SBC will disconnect the HFPL used by the data CLEC.¹¹ If SBC were to fail to disconnect the HFPL under these circumstances, there is a strong likelihood that the end-user's voice service would be terminated when the data CLEC disconnects its splitter being involuntarily used by the voice CLEC.

A data CLEC that chooses not to line split is, of course, free to continue to provide data services over a stand-alone xDSL capable loop.¹² Where a voice CLEC wins the voice of a customer having DSL service on the HFPL, and does not have a line splitting arrangement with the data CLEC, the voice CLEC may submit a Local Service Request ("LSR") for a UNE-P on the loop. The data CLEC, which may have paid for conditioning the loop and will be responsible for disconnection charges, will not be required to submit an order to disconnect the HFPL.

⁹ Data CLECs are responsible for providing their own splitters for line splitting arrangements. Opinion and Order, Case No. U-12320 (December 20, 2001), at 7.

¹⁰ Similarly, if a data CLEC, whether affiliated with SBC or not, seeks to provide data service over the HFPL of a voice CLEC's loop at some later date pursuant to a line splitting arrangement, the process for accomplishing this is documented in CLEC OnLine.

¹¹ Under the October 3 Order, the data CLEC would be responsible for payment of applicable disconnection charges, and would absorb any charges it incurred for conditioning the loop.

¹² The data CLEC would be responsible for any new connection charges and charges for conditioning a new xDSL loop.

In disconnecting the HFPL, SBC will be acting at the behest of the voice CLEC as authorized by the October 3 Order. In doing so, SBC is justifiably relying upon the voice CLEC's compliance with the Commission's requirements that the voice CLEC advise its customer that disruption of data service may occur and that the voice CLEC coordinate its activities with the data CLEC to minimize disruption of service. Accordingly, it is reasonable under these circumstances for the voice CLEC to hold SBC harmless against any claims from either the end-user, the data CLEC, or some other third party arising out of disruption or disconnection of data service resulting from compliance with the Commission's Order.

In order to implement the Commission's October 3 Order as soon as reasonably possible while minimizing the risk of disrupting an end-user's voice or data service, SBC intends to implement the new processes required by order in two phases. In the first phase, SBC will accept manual LSRs for conversion of line sharing to UNE-P. Upon implementation, a voice CLEC will be able to submit a single LSR. SBC will internally coordinate the multiple orders required to accomplish the migration.¹³

As the Commission is aware, SBC's current mechanized processes causes orders for UNE-P on line shared loops to be rejected. Implementing the new manual process will require significant effort developing appropriate methods and procedures, tracking mechanisms, training of personnel and communication with affected CLECs, as more particularly set forth in Exhibit A.

In the second phase, SBC will work cooperatively with CLECs through the Change Management Forum to mechanize the process for processing line-sharing to UNE-P orders. In this way, the CLECs will have input into the prioritization and the parties will be able to

appropriately balance the costs and benefits of mechanization given the limited resources of both SBC and the CLECs.

Respectfully submitted,

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November 4, 2002

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Footnote continued from previous page ...

13 SBC will issue an order to disconnect the HFPL, an order to disconnect the retail POTS line, and an order to convert the existing loop to UNE P.

A

**Michigan Public Service Commission
October 3, 2002 Opinion and Order in Case No. U-12320
Re: Line Sharing and Line Splitting**

SBC Ameritech Michigan Compliance Plan

November 4, 2002

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Michigan Public Service Commission
October 3, 2002 Opinion and Order in Case No. U-12320
Re: Line Sharing and Line Splitting
SBC Ameritech Michigan Compliance Plan

I. Summary of Order

On October 3, 2002, the Michigan Public Service Commission (“Commission”) issued its Opinion and Order (“Order”) in Case No. U-12320, in which it addressed four (4) scenarios relating to line sharing and line splitting.¹ In its Order, the Commission found that “a voice CLEC should be able to obtain migration of voice service despite the presence of a data CLEC in a line-sharing arrangement.”² A data provider is not required to continue providing service upon migration of the voice service³. If the data CLEC chooses to cease providing service, or to provide service on a separate loop, it will be responsible to pay the costs associated with terminating its service and absorb any cost it incurred in conditioning the loop for DSL service.⁴

Where the voice CLEC and data CLEC choose to enter into a line splitting relationship, the Commission found that “either CLEC should be able to approach SBC Ameritech Michigan with a request for service, maintenance, or repair on the line, while giving notice to the other CLEC concerning its request.”⁵ SBC Ameritech Michigan is not, however, required to “act as a mediator between CLECs when permitting line splitting arrangements.”⁶ Instead, the Commission determined that “CLECs should be able to work out the details of their relationship among themselves.”⁷ The voice CLEC and data CLEC are “required to coordinate their activities to minimize the probability that their common customer will experience a disruption in service.”⁸

The Commission also determined that “when a voice CLEC markets its service to a potential customer with DSL service already in place, it must inform the potential customer that the DSL service may be affected by a switch of voice service providers. Customers should be encouraged to check with their DSL providers.”⁹ Finally, the Commission determined that “the end-user is responsible for managing its contractual

¹For purposes of its Order, the Commission defined “line sharing” as “when SBC Ameritech provides voice service over the low frequency portion of the loop (LFPL) and a data CLEC provides data service over the high frequency portion of the loop (HFPL).” The commission defined “line splitting” as “essentially the same as line sharing, but a voice CLEC provides the voice service over the LFPL, with a separate data CLEC providing services over the HFPL.” Order, at 2.

² Order, at 15.

³ Order, at 18.

⁴ Order, at 16.

⁵ Order, at 19.

⁶ Order, at 19.

⁷ Order, at 19.

⁸ Order, at 23.

⁹ Order, at 19.

relationship with the ISP," noting that the "end user may well have signed a contract, their terms of which may not be known to either the voice CLEC or the ILEC." ¹⁰

Thus, upon migration of voice service from an existing line sharing arrangement, the data CLEC using the HFPL has the following options:

1. Discontinue providing data service (the existing loop in this option would be used solely by the voice CLEC following migration); or,
2. Provide data service over a new, separate, stand-alone xDSL-capable loop, as the existing loop in this option was taken by the voice CLEC. If loop conditioning is required to make the new loop suitable for the data CLEC's desired xDSL service, the data CLEC is responsible for ordering such loop conditioning and is also responsible for all charges associated therewith, even if the data CLEC had previously ordered and paid for conditioning on the existing loop which was taken by the voice provider; or,
3. The data CLEC, utilizing its own splitter, may continue providing data service via the existing migrated loop pursuant to a line splitting arrangement with the new voice CLEC.

In summary, under the Order, if a voice CLEC wins the voice service on a loop that is currently part of a line sharing arrangement, the data CLEC that is currently providing service does not have the option of retaining the existing loop for a stand-alone data service. The data CLEC may only use the existing loop if the data CLEC and the voice CLEC enter in to a line splitting arrangement.

II. Scenarios Outlined in Order

Based on the Order, and to avoid unnecessary service disruption, involuntary line splitting arrangements or unauthorized use of CLEC-owned facilities, SBC Ameritech Michigan has determined the following methods to employ for the scenarios and associated requirements addressed in the Order.

Scenario 1: Line Sharing to Line Splitting (End user currently obtains both voice and data from the ILEC¹¹ and seeks to migrate voice service to a CLEC, while continuing the current data service).

If the voice CLEC and the data CLEC have agreed to engage in line splitting, and the data CLEC is currently providing, and will continue to provide, the splitter, then the existing ordering procedures to convert from line sharing to line splitting as documented on CLEC OnLine (<https://clec.sbc.com/clec/>) continue to

¹⁰ Order, at 19.

¹¹ SBC Ameritech Michigan does not provide DSL data services on either a retail or wholesale basis. Instead, DSL Internet access is provided to retail end users by Ameritech Interactive Media Services ("AIMS"), and DSL transport is provided by Ameritech Advanced Data Services ("AADS") to ISPs and other CLECs on a wholesale basis. AIMS and AADS are affiliates of SBC Ameritech Michigan. SBC Ameritech Michigan understands this scenario to refer to situations where SBC Ameritech Michigan is engaged in line sharing with a data affiliate.

apply without change; however rate application will be modified to comply with the Commission's requirement that the voice CLEC not be assessed more than the applicable charge for a UNE-P migration. CLECs that share a loop to simultaneously deliver voice and data service must coordinate their respective activities with each other to minimize the probability of disruption to their common end user customer. SBC Ameritech Michigan will provide CLECs the necessary unbundled network elements and maintain those elements as needed.

If the voice CLEC and the data CLEC have not agreed to engage in line splitting, then each will execute the appropriate orders to migrate the voice service to the voice CLEC and to establish the data service on a new, stand-alone xDSL-capable loop.

The voice CLEC will follow the process described in Scenario #2, below; that is, to convert the existing Line Sharing arrangement to UNE-P.

The data CLEC must submit an order for a new, standalone xDSL-capable loop to replace the HFPL (original line shared loop) that has been disconnected via the voice CLECs order to migrate the voice service. The data CLEC will be responsible for all disconnect and new connect related charges associated with the acquisition of a standalone xDSL capable loop, including any requested loop conditioning. Loop conditioning charges will apply if requested even if the data CLEC had already requested and paid for loop conditioning to access the HFPL of the loop that has been taken by the voice CLEC.

Scenario 2: Line Sharing to UNE-P: The end user currently obtains both voice and data from the ILEC and seeks to migrate the voice service to a CLEC and disconnect the data service from the ILEC.

A voice CLEC may migrate a line sharing customer's voice service without the data CLEC's permission. The Commission further held that when a voice CLEC markets its services to a potential customer with DSL service in place, the voice CLEC must inform the potential customer that the DSL service may be affected by a switch in voice providers. Finally, the Commission found that the end-user, rather than the voice CLEC or SBC Ameritech Michigan, is responsible for managing his/her existing contractual relationships with his/her data provider.

The following apply whether the line sharing arrangement used by the data CLEC's splitter or a splitter "port" from an SBC Ameritech Michigan-owned splitter.

The voice CLEC submits a Local Service Request ("LSR") for a UNE-P on a loop that is currently part of a line sharing arrangement. Upon receipt of that LSR, SBC Ameritech Michigan will disconnect the HFPL and process the UNE-P migration order. The UNE-P will be provisioned over the same loop that was previously used for line sharing. Applicable disconnection charges for the HFPL will be billed to the data CLEC. By submitting the LSR, the voice CLEC affirms to SBC Ameritech Michigan the following:

- The voice CLEC has informed the end user that its data service will be disrupted, and possibly disconnected in full, and has received permission from the end user to process the orders to

change the end user's voice service. The voice CLEC should encourage the end user to fully coordinate with his/her data provider.

- The voice CLEC agrees to indemnify and hold SBC Ameritech Michigan harmless as to any third party claims or any other potential liability as to any disruption or disconnection of the data service that had been provided using the HFPL UNE.

Scenario 3: Line Sharing to Line Splitting: The end user currently obtains voice service from the ILEC and data services from a data CLEC that is not affiliated with the ILEC, and seeks to migrate the voice service alone to a CLEC.

The Commission found that the only difference between scenarios 1 and 3 is whether the data CLEC is affiliated with the ILEC. Accordingly, the description of the process for Scenario 1 applies here.

Scenario 4: UNE-P to Line Splitting: The end user currently obtains voice service from a voice CLEC and seeks to add data services from a data CLEC that may or may not be affiliated with the ILEC:

The existing ordering procedures and charges to convert from UNE-P to line splitting as documented on CLEC OnLine (<https://clec.sbc.com/clec>) continue to apply without change. The Commission held that SBC Ameritech Michigan need not take on the role of mediator between two line splitting CLECs. CLECs that share a loop to simultaneously deliver voice and data service must coordinate their respective activities with each other to minimize the probability of disruption to their common customer. SBC Ameritech Michigan will provide CLECs the necessary unbundled network elements and maintain those elements as needed.

III. SBC Ameritech Michigan Implementation of Compliance Plan

A. Background, Philosophy, and Timing

As noted, SBC Ameritech Michigan currently has methods and procedures in place to facilitate Scenarios 1, 3 and 4. These existing processes are currently available to CLECs and documented in the CLEC Handbook on CLEC OnLine. For Scenario 2 (Line sharing to UNE-P), SBC Ameritech Michigan is required to develop new methods and procedures to facilitate this order processing in the manner in which it has been ordered by the Commission. These Commission mandates require a significant change to how SBC Ameritech Michigan currently processes and provisions orders that affect existing line sharing arrangements. To efficiently manage these migration requests, SBC Ameritech Michigan will implement these new processes in a two-phase approach. First SBC Ameritech Michigan will implement manual ordering methods using the current capabilities of SBC Ameritech Michigan's regional Operations Support Systems ("OSS"). In the

second phase, SBC Ameritech Michigan will mechanize this Michigan-specific ordering requirement pursuant to the terms of the FCC mandated Change Management Forum.¹²

Based on the significant effort required, SBC Ameritech Michigan anticipates being able to fully implement Phase I by January 31, 2003, with notification to CLECs via accessible letter in the appropriate timeframe. This date reflects the great deal of work needed to develop and fully test the new processes and procedures; as well as to fully train all impacted union personnel. Implementation of Phase II will be determined in collaboration with CLECs as required by the FCC mandated Change Management Process. SBC Ameritech Michigan will begin discussions with CLECs regarding this required process change via the Ameritech Regional CLEC User Forum (“CUF”) at its next session scheduled for November 13, 2002.

Currently, when a voice CLEC submits a UNE-P migration order on a loop on which the HFPL UNE is present, SBC Ameritech Michigan’s regional OSS automatically rejects this type of order; and the edit cannot be modified in the near term for Michigan only.¹³ The Commission found that a voice CLEC can migrate the end-user’s voice service despite the presence of a data CLEC using the HFPL to provide data service to the same end-user. That is, SBC Ameritech Michigan cannot reject a UNE-P migration order when the use of the HFPL UNE is present on the loop serving the end user. This is a significant change, and thus, until a mechanized update can be made, SBC Ameritech Michigan is implementing manual procedures to accomplish this requirement by using the current OSS capabilities. From the manual LSR submitted, SBC Ameritech Michigan will generate three related orders so that the HFPL UNE is disconnected and the UNE-P migration order can then be processed and not be rejected.

The Commission stated that if the data CLEC does not wish to partner with the voice CLEC to line split, the voice service should be migrated and the HFPL could be disconnected before or after the conversion. SBC Ameritech Michigan has determined that it would likely not be able to process a disconnection order after the conversion, nor would it be prudent to do so, as it is likely that the end-user’s voice service would be interrupted, perhaps significantly. As shown in Attachment A, if the HFPL disconnection is not processed before the migration occurs, there is a likelihood that the voice service will be subsequently disrupted when the data CLEC removes its splitter between the loop and switch port, thus disconnecting the UNE-P. Further, SBC Ameritech Michigan does not believe that the data CLEC would be able to submit an order disconnecting the HFPL after the migration, as the loop would now be assigned to the voice CLEC. Finally, allowing the UNE-P to be connected through the data CLEC’s splitter without the data CLEC’s permission would constitute involuntary line splitting, unauthorized use of the data CLEC-owned equipment, or both. Thus, to avoid these unnecessary complications, SBC Ameritech Michigan is developing new methods and procedures under which SBC Ameritech Michigan will issue a disconnect order on behalf of the voice CLEC to disconnect the HFPL for the data CLEC. Because this order will be initiated on behalf of the new voice CLEC, SBC Ameritech Michigan is relying on the representation of the voice CLEC that it has advised its end user of the consequences of the migration. Attachment B includes diagrams showing the proper steps to migrate to the UNE-P; that is, to remove the jumpers connecting the loop and switch port to the data CLEC’s collocated splitter.

¹² The change management process is a resolved OSS issue, as set forth in the *Joint Report of the Participants Regarding Resolved OSS Enhancements and Process Improvements*, filed December 27, 2000, with the Commission Ordered voting quorum for this Michigan-specific change.

¹³ This edit was implemented to facilitate compliance with the FCC’s requirements for the loss of ILEC voice service in line sharing arrangements, referencing FCC 99-355, ¶72.

Until Phase I is fully implemented, a voice CLEC may convert from line sharing to UNE-P by directing its prospective end-user to notify their data provider of their intention to switch voice providers and desire to disconnect their DSL service. The data CLEC will then issue a LSR to disconnect the HFPL. Following issuance of the disconnect order for the HFPL by the data CLEC, the winning voice CLEC will issue an LSR to migrate the remaining retail local exchange service to UNE-P. The voice CLEC will be able to ascertain when to submit the LSR by monitoring the end user's records and noting when the HFPL UNE no longer appears on the loop.

B. PHASE I Manual Process to Convert Line Sharing to UNE-P per the Commission's Requirements

The following summarize the significant process changes and necessary steps required to implement the Commission's Order.

The following steps will be necessary to convert from Line Sharing to UNE-P:

- Voice CLEC informs end user desiring to change voice providers, that their DSL service will be impacted.
- Voice CLEC issues manual LSR via fax for conversion from Line sharing to UNE-P.

Three service orders are issued by SBC Ameritech Michigan. The service orders are related and coordinated internally to minimize disruption of voice service.

- SBC Ameritech Michigan issues service order on behalf of the data CLEC to disconnect the HFPL; and
- SBC Ameritech Michigan issues service order to disconnect retail POTS; and
- SBC Ameritech Michigan issues service order for conversion of existing loop to UNE-P.
- SBC Ameritech Michigan issues a Line Loss Notification to data CLEC, as the data CLEC will not be anticipating the service order completion of the disconnect order since it did not submit one.

The following work activities must be completed prior to implementation of Phase I:

- Develop manual LSR for CLECs to complete and method of delivery to SBC Ameritech Michigan.
- Develop CLEC OnLine documentation for CLECs on this ordering scenario, including requirements on how to complete new LSR.
- Select and assign the group of service representatives that will exclusively handle this type of LSR.

- Develop internal methods and procedures for LSC and all downstream personnel to follow in accepting, processing, and provisioning this manual LSR.¹⁴
 - Train service reps on how to issue the required related orders, including the disconnect of the HFPL on behalf of a data CLEC. Service representative will access the Customer Service Record (CSR) to obtain information required to issue the disconnect service order. From the CSR, service representative obtains the name of the data provider and the circuit id.
 - All service orders will need to be related and coordinated to minimize disruption of service to end user.
 - Train all downstream personnel on the processing and provisioning requirements related to these related orders that are required to be highly coordinated, including Local Operations Center (“LOC”) personnel, to minimize disruption of service to the end user.
- Develop and provide training for LOC personnel and all involved technicians and downstream personnel on handling various trouble ticket scenarios received related to the provisioning of the LSR, as well as trouble tickets received from the data CLEC after HFPL has been disconnected.
- Determine impact on Line Loss Notification.
 - Based on anticipated input from data CLECs, possibly establish new code for “Disconnect Reason Code” which will advise data provider that the HFPL has been disconnected due to voice CLEC taking the loop.
 - Educate data CLECs on the fact that they no longer have the 3 days to respond to a line loss notification. Data CLECs will need to modify their procedures to immediately stop billing end user for DSL service.
- Determine, develop and implement any necessary tracking mechanisms for this type of LSR.
- Implement dedicated fax number to receive this type of LSR; this ensures these LSRs are worked by the service representatives trained to do so.

¹⁴ It will be a significant effort to ensure training of all potential downstream personnel. While the group of service representatives in the LSC may be limited, personnel assigned to the downstream processes, including the LOC, loop assignment, translation, central office, etc., will not be so limited, particularly those assigned geographically.

C. PHASE II Mechanized Line sharing to UNE-P

The final stage will be a mechanized process for conversions from Line sharing to UNE-P. This issue will be submitted to the Change Management Forum in accordance with the FCC mandate. The Change Management Forum provides for direct CLEC input on prioritization of projects to be implemented, as there are limited resources available with each release; that is, CLECs provide input on which OSS changes are most important to the CLECs' ability to do business. This forum provides for the balancing of the benefits of mechanization with the costs of mechanization and the limited resources available to effectuate the mechanization changes.

A

Diagram:
Line Sharing Arrangement to CLEC Voice
Data CLEC discontinues data service after
Voice CLEC's assumption of the voice service

The following diagrams illustrate the steps that would occur if SBC Ameritech Michigan handled a CLEC request to win an end user's voice that is currently part of a line sharing arrangement in the following manner:

1. SBC Ameritech Michigan transfers the voice to the requesting CLEC.
2. Data CLEC chooses to discontinue the data service **after** the voice service has transferred.

SBC Ameritech Michigan is not planning to implement this process due to the high probability of prolonged loss of dial tone (voice service) for the end user.

The following provides a high level description of each slide. The slides collectively demonstrate the risk of dial tone loss to the end user, as well as how the data CLEC is being forced to allow the voice CLEC to utilize its equipment and to, potentially, be involved in involuntary line splitting.

Slide 1:

This diagram illustrates a working line sharing arrangement between SBC Ameritech Michigan and a data CLEC. The data CLEC is providing the splitter.

The loop that carries the end user's voice and data traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connects 1 and 2 that allow the voice and data traffic to be carried to the data CLEC's cabling (labeled "B" on the diagram) are depicted by a purple/pink dotted line.

The voice and data traffic is then carried over the data CLEC's cabling (again, labeled as "B" on the diagram) to the data CLEC's collocation arrangement.

Once the voice and data traffic reaches the data CLEC's collocation arrangement, it is routed through the data CLEC's splitter. The splitter separates the voice traffic from the data traffic.

The data traffic is sent on to the data CLEC's DSLAM where it remains separate from the voice traffic.

The voice traffic is carried back towards SBC Ameritech Michigan's IDF on another CLEC cable (shown as "A" on the diagram).

The cross connects “3” and “4” that allow the voice traffic to be carried to SBC Ameritech Michigan’s switch (“OE”) are depicted by a blue dotted line.

Slide 2:

This diagram illustrates the physical arrangement that would occur after the voice has been assumed by a voice CLEC, but before the data CLEC had discontinued its service.

No physical changes have occurred at this stage in the process. The voice and data services still follow the same path as on slide 1.

It should be noted that at this point, the voice CLEC’s voice service is now traveling over the data CLEC’s cabling (labeled as “A” and “B”) and through the data CLEC’s splitter equipment. The unbundled elements that the voice CLEC has purchased are actually connected within the data CLEC’s network.

Slide 3:

This diagram illustrates the physical arrangement that would occur after the voice has been assumed by a voice CLEC, but after the data CLEC had discontinued its service.

The only physical change that occurs in this slide is that the data CLEC has disconnected its splitter in order to recover the splitter port upon the discontinuation of data service. The splitter equipment is in the control of the data CLEC. The data CLEC would not submit an LSR to request the disconnection as this is work performed by the data CLEC and not by SBC Ameritech Michigan.

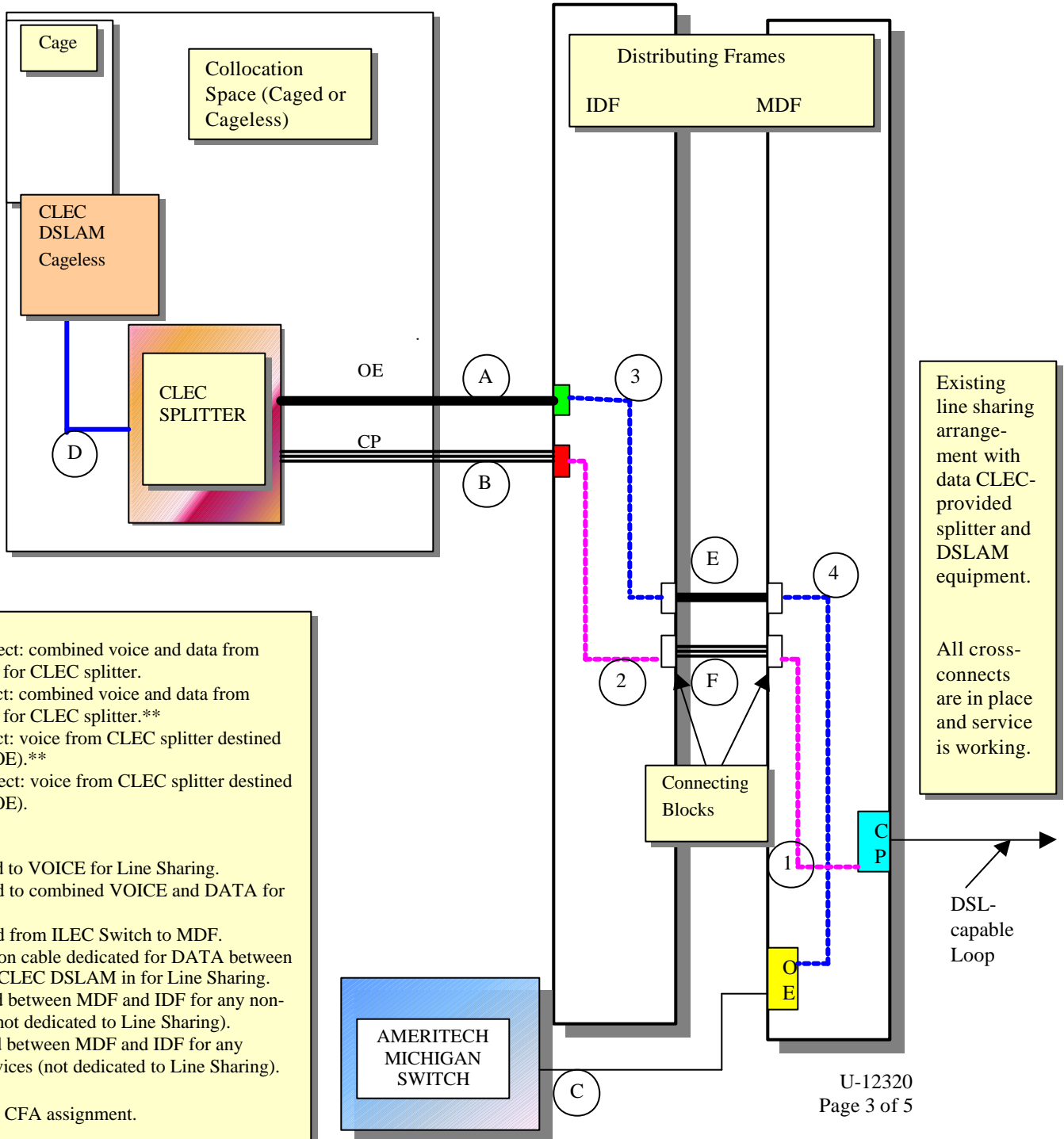
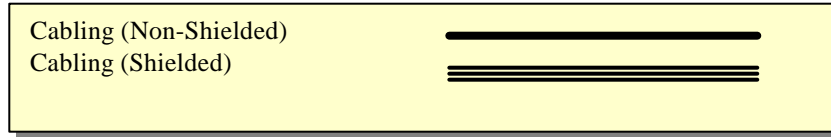
Once the data CLEC has disconnected its splitter, the end user will lose voice service as there is no longer continuity between the loop and the switch. There is no longer a connection between the data CLEC’s “A” cabling and the data CLEC’s “B” cabling.

It should also be noted that although the data CLEC has disconnected its splitter, the voice CLEC is still tying up the data CLEC’s cabling (shown as “A” and “B”). Since the data CLEC is no longer leasing an HFPL from SBC Ameritech Michigan in this situation, the data CLEC cannot submit an HFPL disconnect request to SBC Ameritech Michigan to free up this cabling.

**LINE SHARING TO CLEC VOICE -
DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE**

SLIDE 1 OF 3 Depicting Existing Line Sharing Arrangement

DLEC/CLEC Owned Splitter



Cross-connects:
 1 MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
 2 IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
 3 IDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).**
 4 MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

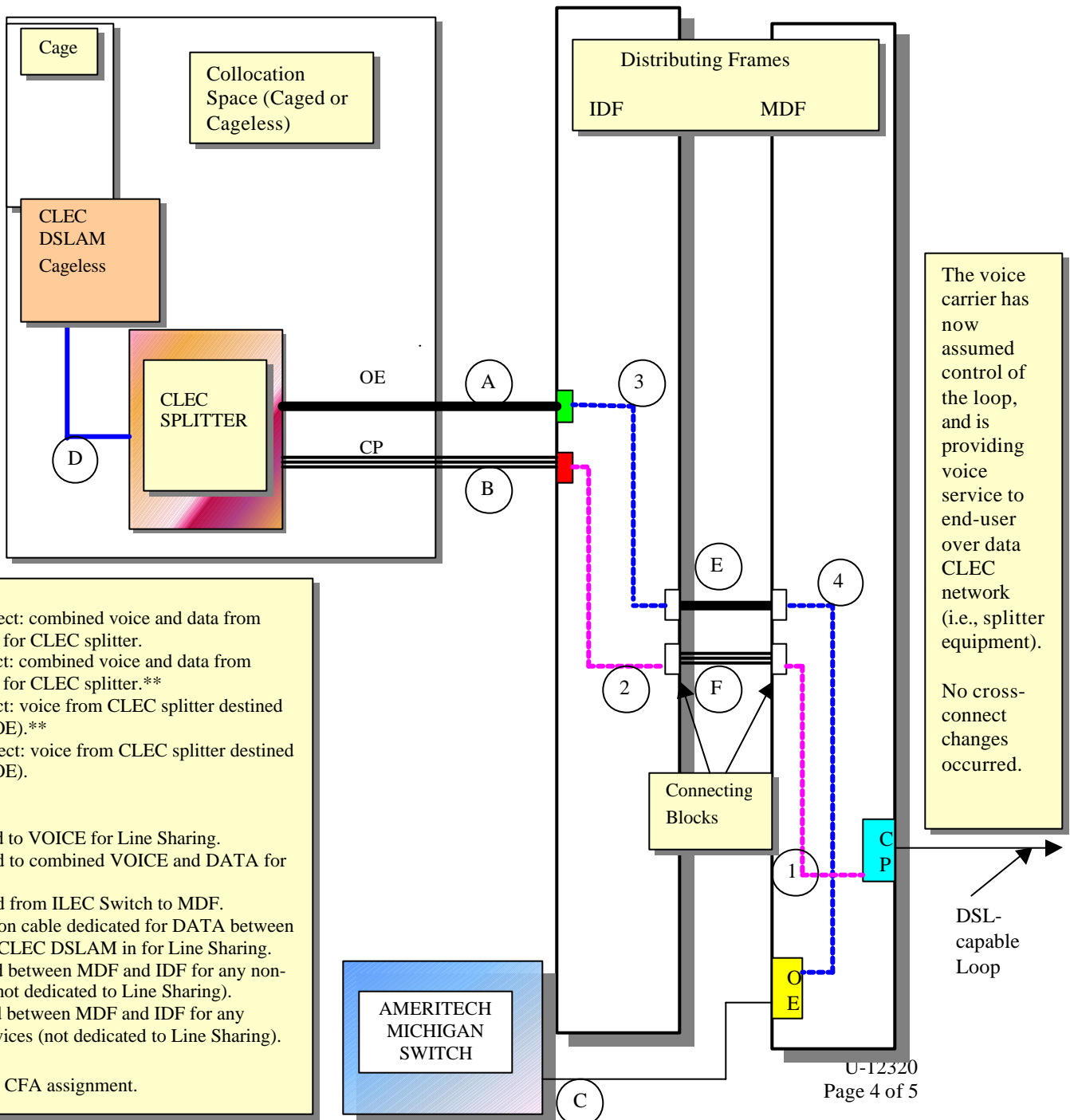
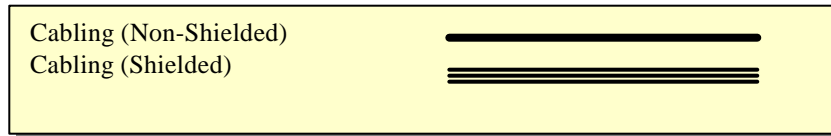
Tie Cables:
 A. Cable dedicated to VOICE for Line Sharing.
 B. Cable dedicated to combined VOICE and DATA for Line Sharing.
 C. Cable dedicated from ILEC Switch to MDF.
 D. CLEC collocation cable dedicated for DATA between CLEC splitter and CLEC DSLAM in for Line Sharing.
 E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
 F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

** Requires CLEC CFA assignment.

**LINE SHARING TO CLEC VOICE -
DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE**

**SLIDE 2 OF 3 Depicting Line Splitting Arrangement
(Post Migration of Voice Service to Voice CLEC – Data CLEC Providing Data)**

DLEC/CLEC Owned Splitter



Cross-connects:
 1 MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
 2 IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
 3 IDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).**
 4 MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

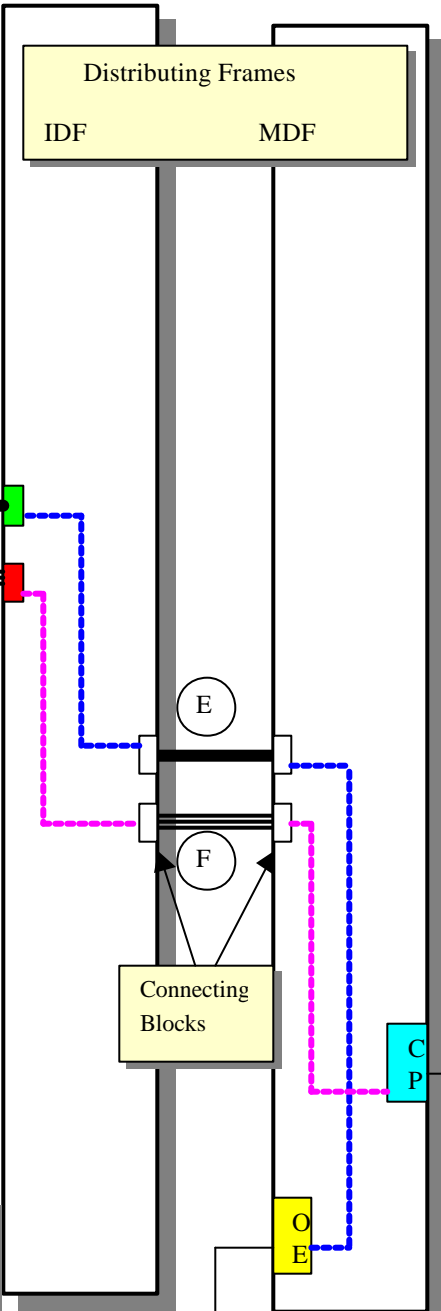
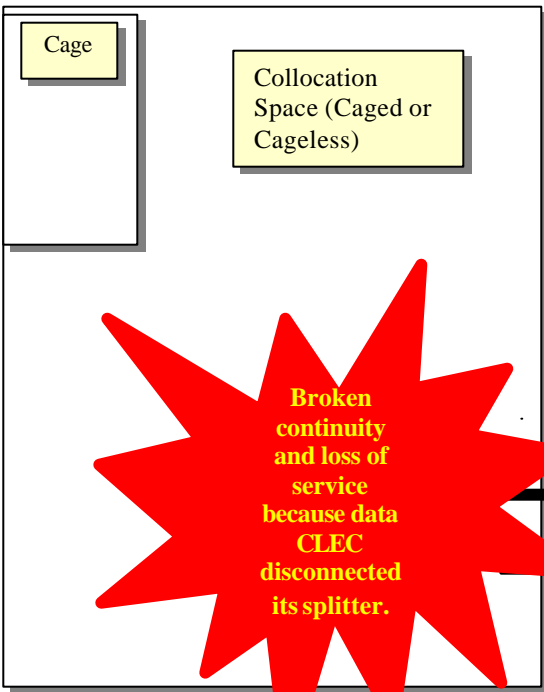
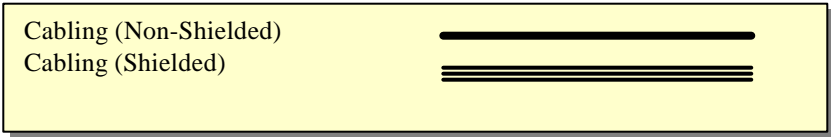
Tie Cables:
 A. Cable dedicated to VOICE for Line Sharing.
 B. Cable dedicated to combined VOICE and DATA for Line Sharing.
 C. Cable dedicated from ILEC Switch to MDF.
 D. CLEC collocation cable dedicated for DATA between CLEC splitter and CLEC DSLAM in for Line Sharing.
 E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
 F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

** Requires CLEC CFA assignment.

LINE SHARING TO CLEC VOICE - DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE

(SLIDE 3 OF 3 Depicting Data CLEC Disconnecting Its Equipment)

DLEC/CLEC Owned Splitter



Voice CLEC does not have partnering agreement for line splitting. Data CLEC removes its splitter and DSLAM equipment, effectively terminating all voice and data service.

Disconnected Cross-connects:
No cross connects are disconnected as SBC Ameritech Michigan receives no notification.
New Cross-connect:
No new cross connect occur as SBC Ameritech Michigan receives no notification.
Tie Cables:
A. Cable dedicated to VOICE for Line Sharing/Splitting.**
B. Cable dedicated to combined VOICE and DATA for Line Sharing/Splitting.**
C. Cable dedicated from ILEC Switch to MDF.
E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing/Splitting).
F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing/Splitting).
**** Note:** Because the data CLEC is no longer purchasing an HFPL from Ameritech Michigan, the data CLEC cannot submit an HFPL disconnect order in order to reclaim its own CFA.

B

Diagram:
Line Sharing Arrangement to UNE-P

**HFPL Disconnected as Part of the Migration
Process of the Voice to the Voice CLEC**

The following diagrams illustrate the steps that would occur if SBC Ameritech Michigan handled a CLEC request to win an end user's voice that is currently part of a line sharing arrangement in the following manner:

1. SBC Ameritech Michigan disconnects the HFPL (per voice CLEC's request).
2. SBC Ameritech Michigan re-establishes the voice service.
3. SBC migrates the voice to UNE-P.

SBC Ameritech Michigan is planning to implement this process as it will prevent the extended loss of end user's dial tone. In addition, this process returns the data CLEC's CFA to the data CLEC and does not force the data CLEC to line split.

The following provides a high level description of each slide.

Slide 1:

This diagram illustrates a working line sharing arrangement between SBC Ameritech Michigan and a data CLEC. The data CLEC is providing the splitter.

The loop that carries the end user's voice and data traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connects 1 and 2 that allow the voice and data traffic to be carried to the data CLEC's cabling (labeled "B" on the diagram) are depicted by a purple/pink dotted line.

The voice and data traffic is then carried over the data CLEC's cabling (again, labeled as "B" on the diagram) to the data CLEC's collocation arrangement.

Once the voice and data traffic reaches the data CLEC's collocation arrangement, it is routed through the data CLEC's splitter. The splitter separates the voice traffic from the data traffic.

The data traffic is sent on to the data CLEC's DSLAM where it remains separate from the voice traffic.

The voice traffic is carried back towards SBC Ameritech Michigan's IDF on another CLEC cable (shown as "A" on the diagram).

The cross connects "3" and "4" that allow the voice traffic to be carried to SBC Ameritech Michigan's switch ("OE") are depicted by a blue dotted line.

Slide 2:

This diagram illustrates the physical activity that would occur when SBC Ameritech Michigan processes the disconnect of the HFPL and re-establishes the voice service.

SBC Ameritech Michigan removes cross connects 1 and 2 that connect the loop to the data CLEC's collocation arrangement (depicted as a purple/pink dotted line) and cross connects 3 and 4 that connect the switch to the data CLEC's collocation arrangement (depicted as a blue dotted line). This activity disconnects the HFPL and frees up the data CLEC's CFA and splitter port, so the data CLEC can utilize its network for future line sharing or line splitting arrangements.

SBC Ameritech Michigan then re-establishes the voice service by placing new cross-connect 5 (depicted as a red dotted line) between the switch (shown as "OE") and the loop ("CP").

It should be noted that at this point, the voice service is no longer traveling over the data CLEC's cabling (labeled as "A" and "B") or through the data CLEC's splitter equipment. The unbundled elements that the voice CLEC has purchased are connected within SBC Ameritech Michigan's network.

The end user down-time associated with this process is very brief, and managed by SBC Ameritech Michigan as it is when SBC Ameritech Michigan converts retail voice to a line sharing arrangement.

Slide 3:

This diagram illustrates the physical arrangement that would occur as an end result after all of the work on Slide 2 has been completed.

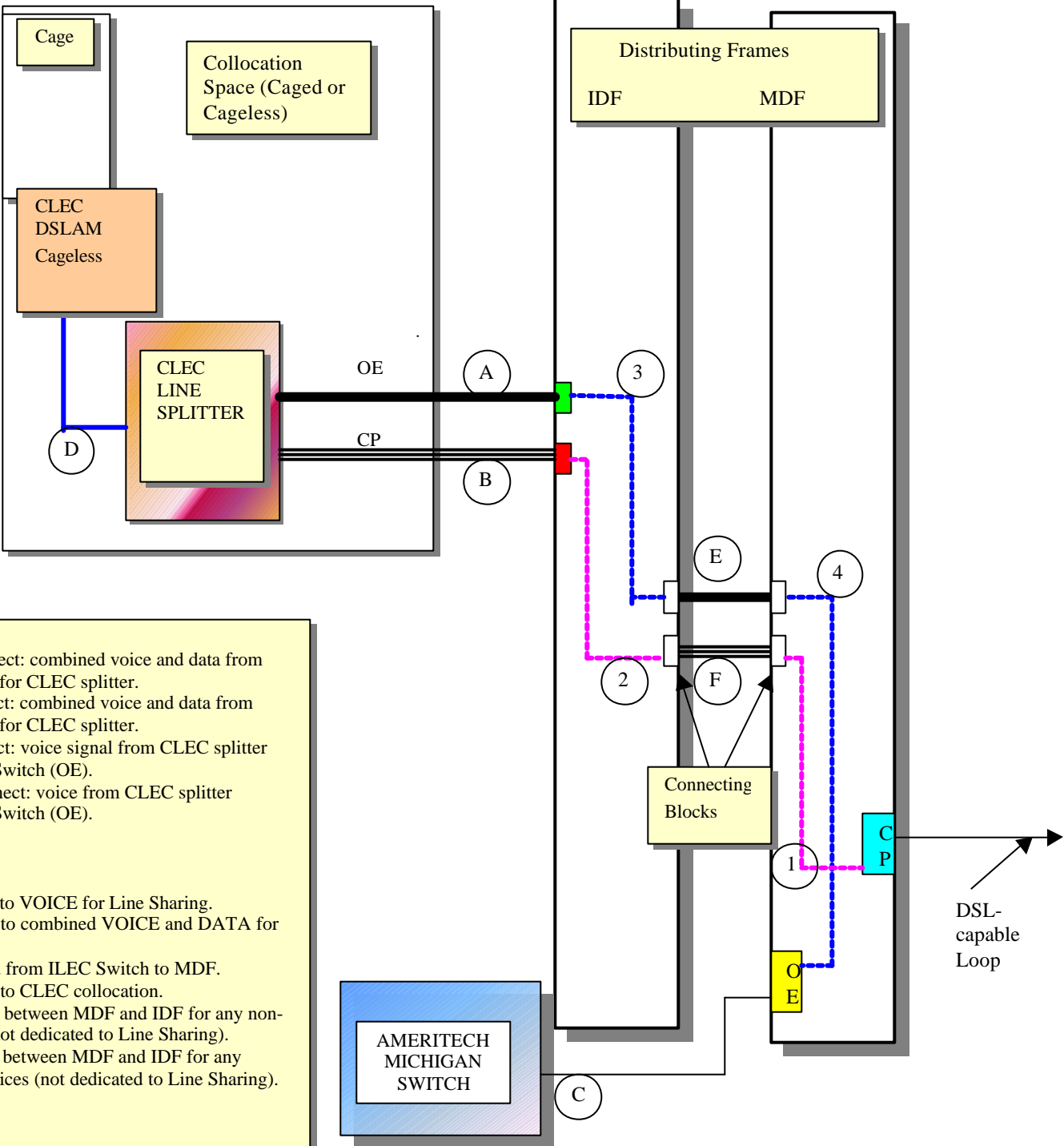
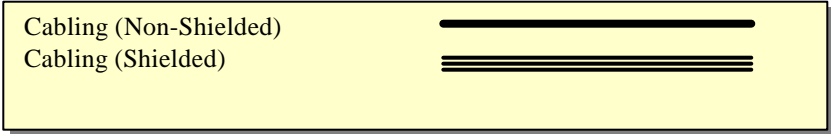
The loop that carries the end user's voice traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connect 1 (depicted as a red dotted line) allows the voice traffic to be carried to the SBC Ameritech Michigan switch (labeled "OE" on the diagram).

LINE SHARING TO UNE-P

SLIDE 1 OF 3 Depicting Existing Line Sharing Arrangement

DLEC/CLEC Owned Splitter



Cross-connects:

- 1. MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
- 2. IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
- 3. IDF cross-connect: voice signal from CLEC splitter destined for ILEC Switch (OE).
- 4. MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

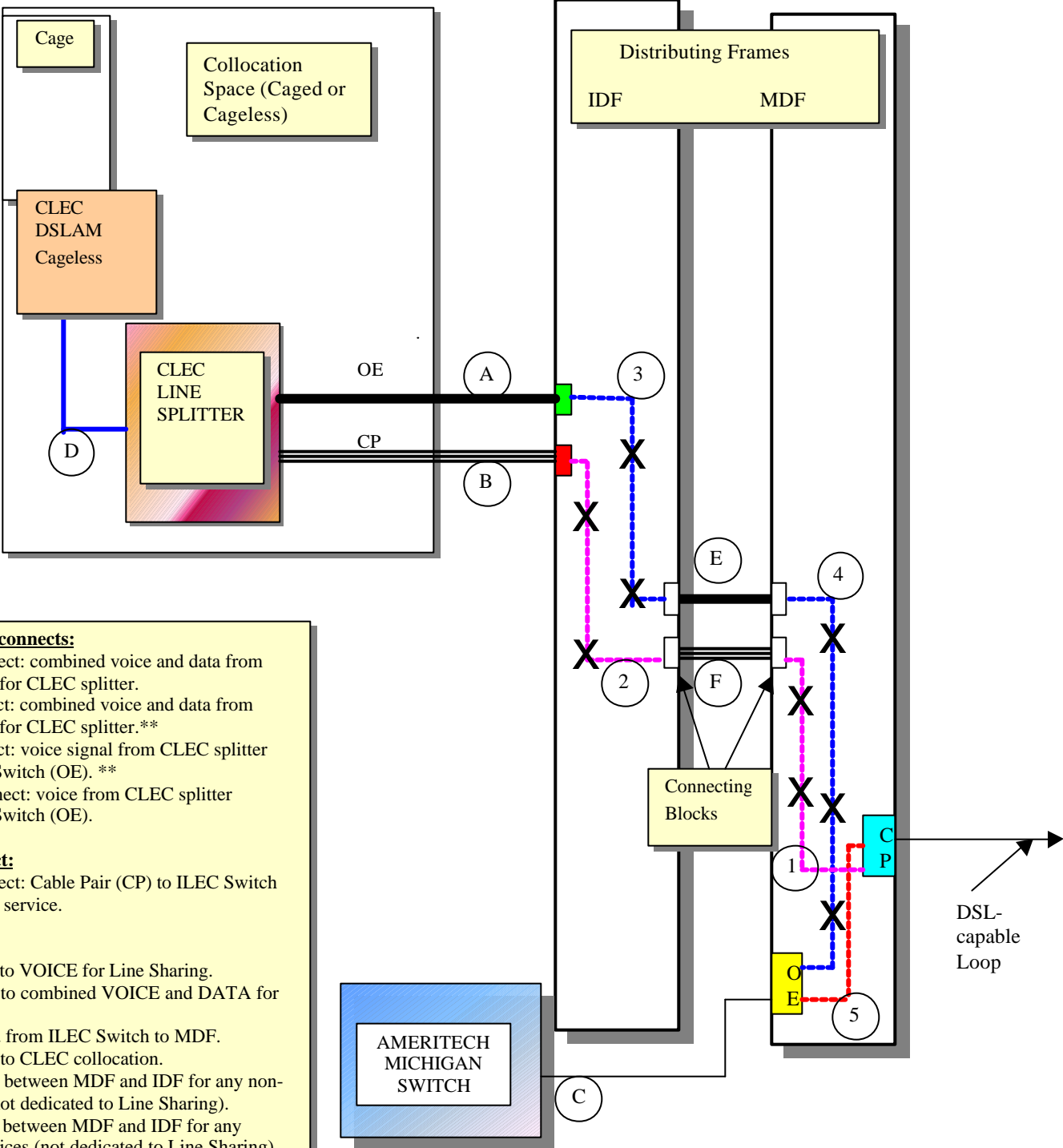
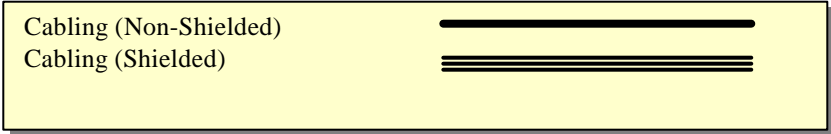
Tie Cables:

- A. Cable dedicated to VOICE for Line Sharing.
- B. Cable dedicated to combined VOICE and DATA for Line Sharing.
- C. Cable dedicated from ILEC Switch to MDF.
- D. Cable dedicated to CLEC collocation.
- E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
- F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

LINE SHARING TO UNE-P

SLIDE 2 OF 3 Depicting Work Associated with Disconnecting HFPL and Establishing UNE-P

DLEC/CLEC Owned Splitter



Disconnect Cross-connects:

1. MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
2. IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
3. IDF cross-connect: voice signal from CLEC splitter destined for ILEC Switch (OE). **
4. MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

New Cross-connect:

5. MDF cross-connect: Cable Pair (CP) to ILEC Switch (OE) for voice only service.

Tie Cables:

- A. Cable dedicated to VOICE for Line Sharing.
- B. Cable dedicated to combined VOICE and DATA for Line Sharing.
- C. Cable dedicated from ILEC Switch to MDF.
- D. Cable dedicated to CLEC collocation.
- E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
- F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

** Requires CLEC CFA assignment.

LINE SHARING TO UNE-P

SLIDE 3 OF 3 Depicting End Result - UNE-P

Cross-connect:
1. MDF cross-connect: Cable Pair (CP) to ILEC Switch (OE) for voice only service.

Tie Cables:
A. Cable dedicated from ILEC Switch to MDF.

