

OSS Problems Faced By Business UNE-P CLECs with Ameritech Michigan

Why It Is Premature to Grant "271" Approval
To Ameritech, For Long Distance Entry

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Overall Comments

- Some of the following issues fall within the scope of KPMG 3rd Party OSS Test; some do not.
- But all of these issues should be important to the Michigan Public Service Commission:
 - Does the evidence show Ameritech is applying necessary attention to CLEC OSS problems, as required by law?

Business CLEEC Carriers

- LDMMI provides both residential and business Ameritech UNE-P services.
- Ameritech OSS problems on residential UNE-P are significant.
- But Ameritech OSS problems on business UNE-P services are dramatically more serious and prevalent.

Business CLECs, (cont.)

- Business services are much more complex than residence.
- There are many more variations of business services.
- There are huge problems involving PBX, Centrex, ISDN-PRI, hunting, and DSL.
- We first reported many of these problems to Ameritech a year ago, but they still have not been fixed by Ameritech.

Business CLECs, (cont.)

- An analysis system that looked at “percentage of Ameritech CLEC orders with errors” would significantly understate the real problem.
- As many as 90% of the orders in Ameritech region are Residence orders, whereas half, or more than half, of the local phone lines in the Ameritech region are Business lines. Evaluations of OSS performance should look at the number of lines installed without problems, not the number of orders.
- LDMI is one of the few CLECs who have concentrated heavily on providing UNE-P to business customers, and have extensive business UNE-P experience.

Trouble Tickets Issued to

Ameritech on OSS Problems

- LDMI has encountered thousands of “Invalid Rejects” on UNE-P orders, in a problem going back more than a year, where Ameritech is unable to explain the reason for the Invalid Reject, or what should be done to avoid it in the future.
- LDMI issues trouble tickets to Ameritech, to insure these unexplainable Rejects are being investigated.
- But no one at Ameritech is tracking these trouble tickets, to insure they are being resolved.
- Some of those recent tickets are now more than three weeks old. When we check on them, the response is, “trouble ticket not worked”.

Errors on Post-Migration CSRs

- LDMI has experienced well over 2,000 instances where, post the migration of a customer from Ameritech retail to LDMI UNE-P, the Ameritech post-completion CSR is incorrect.
- LDMI first reported the problem 1 year ago.
- There has been no Ameritech progress on problem – why?
- These errors result in erroneous billing, mis-identification of the carrier, and subsequent customer-out-of service conditions.

Ameritech Takes DSL Out of Service

- Where an Ameritech retail customer has a DSL line (from an Ameritech affiliate) associated with their local service, and migrates local lines to LDMI UNE-P, Ameritech consistently disconnects the DSL during the conversion process. Problem began a year ago.
- In late June, MPSC ordered Ameritech to cease disconnecting DSL lines during this process. But the disconnects continue. (Our Ameritech team says no one told them about the MPSC order.)
- The problem continues unabated. On every single order LDMI has placed in last several months involving an Ameritech-affiliate DSL line, the DSL line has been taken out of service by Ameritech during the conversion.
- Customers are irate – they blame LDMI, when the DSL interruption is Ameritech's fault.

Pre-Conversion CSR Errors

- LDMI has encountered many hundreds of instances where the pre-conversion CSR (Ameritech's CSR that existed, before LDMI attempts to migrate the user to UNE-P) contains serious errors.
- When LDMI attempts to do an "assume as-is" on such a customer, the order is rejected for reasons that are unclear. Example of a cause: one of the phone lines listed on the CSR no longer belongs to that customer – line was reassigned to another customer, and the Ameritech CSR is wrong.
- In recent examples, LDMI has been trying to assume some customers for over two months, without success, due to pre-conversion Ameritech CSR errors.
- Ameritech acknowledged to LDMI it is a huge problem, but says it would be too expensive for Ameritech to fix.

Problems on PBX Orders

- A recent arbitrary Ameritech “Method & Procedure” says CLECs must issue two orders to migrate a PBX customer to UNE-P: one for the PBX lines, and one for the IMB business lines. And the two orders must be related together.
- Under UNE-P, the customer must now have two BTNs, whereas under Ameritech retail service, they only had one.
- Under this policy, LDMMI has had repeated instances where the customer was taken out of service, or otherwise disadvantaged, by Ameritech’s failure to relate the two orders together.

Inability to Relate Orders Together

- Often regarding orders for business customers, there is a need to relate two or more orders together, to insure they are completed on same date.
- Under Issue 7, this was done with the “secondary class of service” field. But in L SOG4, that field was eliminated by Ameritech!
- LDMI has discussed this problem extensively with Ameritech, without success.
- Result has been numerous customer out-of-service problems, and other difficulties.
- Ameritech’s CLEC competitors suffer this problem, but Ameritech itself does not.

Ameritech Downsizing of CLEC-Interface Personnel

- On August 20, the Ameritech Customer Care supervisor who services LDMI indicated their staff had just been significantly downsized.
- The level of services provided to LDMI by this center was being reduced, it was revealed. How other issues formerly handled by this office would now be dealt with, was not clear.

ISDN PRI

- In recent months, LDMI has been processing orders for UNE-P-based ISDN PRI service from Ameritech.
- To date, no such ISDN PRI order for an LDMI customer has ever been completed correctly or on time by Ameritech.
- Is there KPMG testing of ISDN PRI performance measures? What about by Ernst & Young?
- ISDN PRI is now a major method by which many businesses receive their local dial tone and data services. ISDN PRI order processing performance must be evaluated, if true "271" readiness is to be determined.

Directory Listing Problems

- During last 4 months, LDAMI has experienced over 100 problems involving adds, moves and changes in directory listings on accounts converted to Ameritech UNE-P service.
- As LDAMI makes changes, they come back as Invalid Rejects. Discussions with Ameritech on problem have not been fruitful.
- Serious customer listing problems in telephone directories have been the result.
- The volume of these problems escalated dramatically after LDAMI converted from Issue 7 to L SOG4. LDAMI believes Ameritech has a problem in L SOG4 it has not resolved.

Problems With Non-Native Numbers

- When LDMI attempts to migrate over to UNE-P an order involving both native and non-native numbers, the “hunting” by Ameritech of the non-native numbers stops working.
- Similarly, where the customer has Ameritech voice mail, the voice mail system suddenly is unavailable from the non-native numbers.
- Discussions of these problems with Ameritech, over many months now, have gone nowhere.

Erroneous Trouble Clearance Times

- When an LDMI UNE-P customer encounters a trouble, LDMI may need to open a trouble ticket with Ameritech.
- In many instances, Ameritech will close out such tickets as “no trouble found” or some other incorrect answer. LDMI then has to open a second trouble ticket with Ameritech on the same problem. And sometimes a third, or fourth...
- Premature closings of trouble tickets allows Ameritech to claim average trouble clearance times that are significantly shorter than the true figures.
- Every week, LDMI issues a report to Ameritech, showing the number of instances of multiple trouble tickets on the same customer problem.
- This issue has been outstanding for over a year, with no action or resolution by Ameritech.

Ameritech Billing Error on UNE-P

- In a letter to LDMI dated August 16, Ameritech said it had discovered it had a major reciprocal compensation billing error on UNE-P in Michigan, that apparently extends back at least a year. The letter was sent regular mail.
- On August 20, the Ameritech account team met with LDMI. LDMI said another CLEC had mentioned a major Ameritech billing problem on UNE-P had been discovered. Ameritech told LDMI they knew nothing about it.
- One August 21, the Ameritech letter finally arrived at LDMI. (With a problem this serious, we would have expected a phone call or an e-mail, not snail mail.)
- On August 22, KPMG said they had not been made aware of the problem by Ameritech.
- Ameritech's lack of a sense of urgency in this matter once again indicates Ameritech is not treating CLECs fairly or equitably, as required by law.

Chronic Delayed UNE-P Billing

- For well over a year now, LDMI and other CLECs have experienced a problem with Ameritech UNE-P, where a completion notice is issued by Ameritech following the migration to UNE-P, but it turns out that Ameritech has not yet migrated the billing for the customer.
- In some instances, the delay of start of UNE-P billing for LDMI customers has been as great as 8 months (KPMG on Aug. 22 said they themselves have observed delays as long as 6 months).
- The result: Ameritech continues to bill the customer for local calls, etc., long after the customer has been supposedly migrated to LDMI.
- Customers believe LDMI lacks billing credibility and reliability: “I never had this problem when I was with Ameritech”.
- Problem has gone on for over a year: Ameritech hasn’t fixed it, and can’t say when or if it will be fixed. Do they care?

Concluding Comments

- A few years ago, Ameritech IIS President Neil Cox told LDMI that it would be over his dead body that UNE-P would ever be implemented by Ameritech.
- Over the past year, Ameritech has treated UNE-P with “benign neglect” – or worse.
- Ameritech is, of course, now ruled by SBC.
- In July, SBC Chairman Ed Whitacre -- in a speech to ALTS -- said UNE-P was “economically irrational”, “not healthy”, and, (according to Phone+ magazine), one of SBC’s “common enemies”. That same month, Whitacre told SBC stockholders that UNE-P “is nuts”.
- A 271 should not be granted until Ameritech has demonstrated a sincere commitment to working with UNE-P, solving UNE-P problems, and dealing fairly with competitors who utilize UNE-P.

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)
the Federal Telecommunications Act of 1996.)
_____)

Case No. U-12320

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS:
COUNTY OF INGHAM)

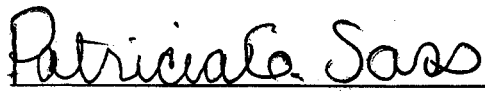
Patricia A. Tooker, being duly sworn, deposes and says that she is an employee of Clark Hill P.L.C., and that on November 15, 2002, a copy of the LDMI Telecommunications, Inc.'s Comments Regarding BearingPoint's Final Report and Ameritech Michigan's Compliance Proposal was served upon:

See attached service list

Except as otherwise noted on the attached list, service was accomplished via e-mail and by depositing same in a regular mail depository, enclosed in envelopes bearing postage fully prepaid and addressed properly and via electronic mail.


Patricia A. Tooker

Subscribed and sworn to before me
this 15th day of November, 2002.


Patricia G. Sass, Notary Public
Ingham County, Michigan
My Commission Expires: September 8, 2006

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CASE NO. U-12320**

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CASE NO. U-12320**

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