

525 Junction Road, Ste. 6000  
Madison, WI 53717

July 18, 2002

Via Email  
Ms. Nancy B. Weber  
Illinois Commerce Commission

Dear Ms. Weber

At the Commission's open meeting on July 9, 2002, the CLECs were asked to provide information on any aspects of the Ameritech OSS that we could "live without" if those elements were not tested as part of the Master Test Plan (MTP). The indicated purpose was to see if there were changes that could be made to "move the test along". TDS Metrcom, Inc. appreciates the opportunity to be heard on this issue and provides the following response.

In responding to this request, TDS Metrocom feels it is important to recall the origin of the MTP. When the MTP was first being developed on a region wide basis for Ameritech, the starting point, at Ameritech's suggestion, was from plans that were originally created for BellSouth and Verizon. CLECs, Ameritech and staff of the various states spent hundreds, if not thousands, of hours to come up with the current MTP.. We can be certain that Ameritech pushed back on anything CLECs or Staff asked to put in the plan if Ameritech thought CLECs could "live without it". Thus, anything the CLECs clearly could live without was already excluded at the time the test plan was put together. It is not realistic to expect the CLECs to respond, to a general request for suggestions to "move the test along", without revisiting the entire process of putting the plan together in the first place, and such a process is not possible in so short a time.

Both KPMG and AT&T provided uncontroverted information at the recent open meeting that the tests conducted of systems for Verizon, Qwest and BellSouth were the same, if not more exacting, than those being performed in Illinois for Ameritech's systems. If Verizon, Qwest and BellSouth can pass the same type and level of test, we should not settle for less from Ameritech. The test will "move along" just as fast as Ameritech fixes its systems so that they pass. We feel is important to remember that the test is not an end in itself. It is a means to ensure a properly functioning, adequate OSS system, and to ensure that

supporting systems report data about the OSS system accurately. We are experiencing ongoing problems with Ameritech's OSS system in the real world. We certainly cannot think of anything that has happened since the time the MTP was agreed to that would cause us to abandon items included in the MTP. For example, attached is a spreadsheet detailing current problems TDS Metrocom is encountering with Ameritech's loop qualification processes for ordering DSL loops. As these examples show, Ameritech's systems cannot even report the customer address correctly. The information that is reported back by Ameritech varies widely based on the particular interfaced used. Further, when the facility is investigated in the field, it has been found to be different than reported by either interface. With this type of real world performance, we urge the Commission to be very careful with respect to any changes that might lower the bar on the current tests.

As CLECs we are less directly involved in the day to day mechanics of running the tests. From this purely practical view it is difficult for us to make suggested changes to the MTP that will "move the test along". Even if we were able to suggest areas where changes may not have critical negative impacts on our business and our interactions with Ameritech's OSS, it would be entirely a matter of chance if those were the same areas that would allow the test to "move along". Thus, while we are certainly not categorically opposed to changes to the MTP, provided such changes do not reduce the integrity of the test, we do not feel it is appropriate or especially productive to ask us to bid blindly to make changes to the current MTP.

While we appreciate the Commission's request to provide our input, under the current circumstances we think it is unfair to put the burden on the CLECs to come up with suggestions to "move the test along". Despite that, we do have one suggestion that does not require any changes to the testing scope or methodology. From a purely administrative view, the addition of a formal escalation and expedited dispute resolution policy might help issues get identified and resolved more quickly. As a starting point the Commission might consider a process similar to that used in the ROC test in the Qwest region.

We understand that Ameritech has made an informal proposal, and we will review that and respond. However, we think it is more appropriate that such requests follow the formal process contained in the MTP. If Ameritech, KPMG or Staff makes a proposal under that process, we certainly agree to respond in good faith and attempt to negotiate resolution of any changes the parties may request.

Very truly yours,

Peter R. Healy  
Manager CLEC External Relations  
TDS Metrocom, Inc.  
525 Junction Road, Suite 6000  
Madison, WI 53717  
Phone: 608-664-4117  
Fax: 608-663-3030  
[peter.healy@tdsmetro.com](mailto:peter.healy@tdsmetro.com)

## Attachment A

This attachment summarizes actual orders that have been qualified or placed using both the DTI and Verigate interfaces provided by Ameritech. All of the orders had at least address fields populated with some data using DTI. As is shown, some addresses did not appear in Verigate. In others the loop length was reported differently for Verigate and DTI, sometimes with a third different loop length determined by field testing.

## Verigate Discrepancies

07/18/2002

Address	PON	Status	Verigate		DTI	Notes
			Loop Stat	Eq. Loop Lgth		
10200 Innovation Drive, Wauwatosa, WI 53226		No data	No data	No data	<17,500 Eligible	Verigate is missing all loop information.
2122 Vilas Ave, Madison, WI 53711		No data	No data	No data	14.180 Eligible	Verigate is missing all loop information.
7040 Industrial Loop, Greendale, WI 53129		No data	No data	No data	18.0kft	Can't find address in Verigate.
835 W. Badger Road, Madison, WI 53713	490820	?? Keeps changing	Changes	14.985kft	18kft	Verigate Loop Status changed 3 times in one week. TDS has DSL in building next door.
285 Forest Grove Drive, Suite 207 Pewaukee, WI 53072	510799	Rejected FTTC	L (yes)	7.981kft	13.800kft Eligible	Existing TDS DSL customer in the building (PON 465945). Loop tested good @ 8.56 kft. Loop was completed on 5/28/2002 - before Verigate and YZP process .
1442 North Farwell, Milwaukee, WI 53202	499003	Rejected FTTC	L (yes)	8.376kft	9.2kft Eligible	Existing TDS DSL customer in the building. Loop tested good @ 9.37 kft. Loop was completed on 5/29/2002 - before Verigate and YZP process.

655 Rockland Road, Lake Bluff, IL 60044		Never placed order	L (yes)	11.529kft	22.66kft Not eligible	Discrepancy between Verigate & DTI. Did not place order as DTI was the pre-qual tool we were using at that time and it indicated DSL was not available.
28835 North Herky Drive, Lake Bluff, IL 60044	183893	Operational	M (maybe)	12.964kft	17.530kft	Discrepancy between Verigate, DTI & our own testing. TDS tested @ 18.71kft.
619 W. Mifflin St., Madison, WI 53703	502388-5	Rejected FTTC	L (yes)	3.545	4.02	TDS already has 45 DSL loops in this building which all tested out between 4-5kft.

**KEY**

**PON:** Ameritech Purchase Order Number

**Status:** Status of DSL order. FTTC is Fiber to the Curb

**Loop Stat:** Verigate qualifiers. L = Will qualify; M = Might qualify; N = Won't qualify

**Eq. Loop Length:** DSL line loop length

**DTI:** DSL loop qualification tool TDS has used for 2 years.