

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

AFFIDAVIT OF ROD COX

Rod Cox, being first duly sworn on oath, deposes and states as follows:

1. My name is Rod Cox. I am Manager of Carrier Relations for TDS Metrocom, LLC ("TDS Metrocom"). My business address is 525 Junction Road, Suite 6000, Madison, Wisconsin 53717.

2. The loop qualification information provided by SBC/Ameritech often is inaccurate. During the summer of 2002, in response to a request from the Illinois Commerce Commission, TDS Metrocom provided nine examples of discrepancies between the data reported by the DTI prequalification tool, and the Verigate tool, most of which also showed a third, different data point when the loops were tested in the field. A copy of the documents provided to the ICC is attached. In order to try to determine how widespread this problem was, TDS Metrocom tracked a sample of 125 DSL orders. The results showed that in 36 cases, the data reported by the DTI and Verigate systems was sufficiently different so as to call into question the integrity of the underlying data. A spreadsheet summarizing the orders is attached.

3. In a more recent example, the loop qualification in Verigate showed the loop length to be less than 6kft, the order was FOC'd by SBC/Ameritech, however when the technician in the field went to complete the order, the actual loop length was found to be

23kft. Needless to say, it was left to TDS Metrocom to explain to our customer why they would not be able to receive their DSL service that, according to SBC/Ameritech's records, was available.

4. The empirical data noted above highlights the grave concern TDS Metrocom feels over Exceptions 19 and 20 as noted by KPMG nearly a year ago. KPMG has noted that the data collection and retention procedures employed by SBC for reporting and calculating performance measures are not reliable. This unequivocally substantiated by the fact that, while TDS Metrocom was experiencing a 28.8 percent rate of errors in the loop make up information as reported by the two prequalification tools, SBC was reporting that the loop make up information provided to TDS Metrocom was "100% accurate". (See results for PM 1.2 posted by SBC on the CLEC Online website for May, June, and July of 2002. Copy attached.)

5. While the examples set forth in this affidavit are from other Ameritech states, they are relevant because Ameritech uses the same OSS systems in each state in the Ameritech region. Thus, If Ameritech is unable to accurately measure its data in Wisconsin the same systems will not provide accurate measurements in Michigan.

Further affiant sayeth not.

ROD COX

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

NOTARY PUBLIC