

DRAFT

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Application by SBC Communications Inc.,)
Michigan Bell Telephone Company d/b/a)
Ameritech Michigan and Southwestern Bell) CC Docket No.
Communications Services, Inc. d/b/a Ameritech)
Long Distance for Provision of In-Region)
InterLATA Services in Michigan)

**AFFIDAVIT OF PATRICK L. FOSTER
ON BEHALF OF AMERITECH**

STATE OF ILLINOIS)
)
COUNTY OF COOK)

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NETWORK PROVISIONING OF SPECIAL SERVICES**

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I, Patrick L. Foster, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Patrick L. Foster. My business address is 2000 W. Ameritech Center Drive, Hoffman Estates, Illinois 60196. I am the Director of Operations Support for Special Services for Ameritech (“Ameritech”). I am responsible for monitoring the provisioning activities related to interconnection services for CLEC customers. These include the high capacity DS1 and DS3 circuits that link CLEC switches with Ameritech switches. I also lead the team of Network Project Managers who oversee the provisioning of large projects of high capacity services for Interexchange Carriers and major customers.
2. I graduated from Texas A&M University in 1990 with a Bachelor of Science degree in Industrial Engineering. I also have a Master of Science degree in Industrial Engineering from the University of Oklahoma, earned in 1997. I have 3.5 years experience in the telecommunications industry, all of it with SBC Communications. I have held several management positions in Southwestern Bell Telephone Company (“SWBT”) and Ameritech, including positions in central offices, account management, interconnection negotiations, and special services.

PURPOSE AND BACKGROUND

3. In the Ameritech region, CLECs place orders to obtain wholesale products and services using Local Service Requests (“LSRs”) or Access Service Requests (“ASRs”) they send to Ameritech’s Local Service Center (“LSC”). CLEC orders for Resale POTS (“plain old telephone service”) and UNE-P flow to the normal Ameritech POTS provisioning processes. CLEC orders for POTS unbundled loops, DSL, LNP, and ISDN BRI flow from the LSC to Ameritech’s Local Operations Center (“LOC”). As described in the Affidavit of Justin Brown (“the Brown affidavit”), the LSC/LOC maintains centralized supervision and

oversight of the provisioning process performed by the Ameritech Network Services Organization for these products and services.

4. CLECs also send orders to the LSC for designed telecommunications circuits, including for example, high capacity services (DS1 and above, also called high capacity or “hicap”). These orders for high capacity and other products then flow from the LSC to the Special Services group (rather than the LOC) in the Network Organization, which is responsible for provisioning these CLEC “hicap” orders.
5. The purpose of my affidavit is to describe how this Special Services group provisions, maintains, and repairs high capacity telecommunications services for CLECs across its five-state region, including for Michigan Bell Telephone Company d/b/a Ameritech Michigan or Ameritech (“Ameritech”)¹. Specifically, I briefly overview the central office, engineering and construction, and installation and repair functions in Ameritech Network Services. Then, I describe the Special Service group within Network Services, including the systems and processes it uses to provision and maintain high capacity services and products for CLECs in the five Ameritech states, including Michigan. As I demonstrate, Ameritech provides these products and services to its CLEC customers in a nondiscriminatory manner, using the same provisioning and maintenance functions that it provides to its own retail operations. The affidavits of Messrs. Alexander and Deere describe Ameritech’s legal obligations and the circumstances in which hicap services are to be provided. My affidavit addresses the procedures used to fulfill those obligations.

¹ Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications, Inc. Michigan Bell offers telecommunications services and operates under the names “Ameritech” and “Ameritech Michigan” pursuant to assumed name filings with the state of Michigan.

AMERITECH NETWORK SERVICES-GENERAL OVERVIEW

6. Ameritech provides high capacity service to both retail and wholesale customers through the Network Services organization. This business unit is responsible for performing the actual provisioning, maintenance, and repair of high capacity customer services within the five Ameritech states. There is no difference in the manner in which Ameritech provides high capacity service to a CLEC customer as opposed to a retail customer or another wholesale customer.
7. The Ameritech Network Services business unit is a single team of employees that reports to one corporate officer, the President of Ameritech Network Services, who in turn reports to the President of Ameritech. Network employees are organized into common work functions under that officer. These work functions are independent of the type of customer – retail or wholesale. The main work functions are central office operations, engineering and construction, and installation and maintenance. Within these functions, employees specialize in particular sub-processes in order to provide the most effective use of Ameritech resources. There are groups that handle POTS services and other groups that handle Special Services offerings (services that require specific transmission parameters over and above those required for POTS). In a few instances, e.g., rural areas served by smaller work groups, there are teams that handle both POTS and Special Services.
8. **Network Operations** includes the central office portion of the installation, maintenance, and repair of Ameritech switching and transport facilities and networks, as well as installation, maintenance, and repair of customer services supported by switching and transport equipment and networks. There is a single five-state organization that is responsible for all

of these functions. Within this group, the functions are further divided into line operations functions and centralized control functions. The line operation functions include the technicians and managers that complete wiring connections and set options in the central offices required to provide customer services and maintain Ameritech's switching equipment. The centralized control functions include network monitoring and dispatching of trouble reports and work orders. To take advantage of expertise developed at the local working level while maintaining consistency throughout the five states, Director level managers meet regularly to discuss issues related to the central office organization and agree on common methods and procedures.

9. The responsibilities of the **Engineering and Construction** organization include monitoring, planning, designing, scheduling and construction of the Ameritech infrastructure and distribution network. It is a single five-state organization within the Network Services department, which is further divided into six geographic regions. The line functions include both the engineers and support personnel who monitor, plan and design the infrastructure and distribution network, along with the managers and technicians who schedule, construct, splice and turn-up the network.
10. **Installation and Repair (“I&R”)** includes the installation, repair, and maintenance of customer services related to POTS and Special Services (in particular, the “subrate” or less than DS1 services). I&R is divided into line functions and centralized control functions. The I&R line functions include the technicians and managers that directly install and maintain customer and company services. I&R line functions are organized geographically; I&R line operations employees work within a specific geographic area, like a portion of a city or county. I&R centralized control functions include workload monitoring, tracking of

customer trouble reports, and dispatching of trouble reports, covering a broader geographical area that incorporates multiple line organizations.

11. In addition to the Network groups described above, **SBC's Network Services** organization is responsible for developing the policies, methods, and procedures used by the Network units throughout SBC's thirteen states, including the five Ameritech states. Network Services plays a key role in ensuring that network processes and procedures are developed in accordance with all industry, regulatory, and contractual requirements, and are documented properly. Network Services also ensures that appropriate training is developed based on these standard methods and procedures and is delivered to the Network department in the same format and content across all five Ameritech states by the Ameritech training organization.

AMERITECH NETWORK SERVICES—SPECIAL SERVICES GROUP

12. **Special Services** is the organization within Network responsible for the installation, repair, and maintenance of all designed telecommunications circuits, including both low speed (less than DS1, also called "subrate") and high speed (DS1 and above). Prior to April 2001, these functions were organized into separate subrate and hicap departments. However, they are now part of the same organization, reporting to the same Vice-President of Special Services. Sub-departments within the Special Services organization that provision and maintain high capacity circuits include the Hicap Provisioning Center ("HPC"), the Digital Operations Group ("DOG"), and the Interexchange Control Center ("IECC").

13. There are ten centers that design and maintain records of facilities used for Special Services in Ameritech. The functions of these centers are divided into low speed (less than DS1) and high capacity (DS1 and greater). The low speed function is served by the Circuit Provisioning Centers (“CPC”), of which there are four locations in the Ameritech region. The high-speed function is served by the Hicap Provisioning Centers (“HPC”), of which there are six locations that serve the Ameritech region. These HPCs are located in Chicago, IL, Springfield, IL, Waukesha, WI, Indianapolis, IN, Cleveland, OH, and Southfield, MI.
14. The **Digital Operations Group** (“DOG”) includes the managers and technicians that perform the field and customer premise work for the installation, repair, and maintenance of hicap services. (As mentioned above, there are certain workgroups that handle both POTS and Special Services. These workgroups report to Ameritech’s I&R organization, the department responsible for POTS customers.)
15. There are two Interexchange Control Centers (“IECC”), one located in Detroit, Michigan, and the other in Chicago, Illinois, that track and dispatch all CLEC Special Service orders and Special Service trouble tickets for all five Ameritech states. Before April 2001, there were two separate centers (called Hicap Control Centers or “HCC”) that performed these functions. HCC-East, located in Detroit, handled Michigan, Wisconsin, and Ohio, while HCC-West, in Chicago, handled Illinois and Indiana. Under the new structure, the Chicago IECC handles Special Services orders and trouble tickets for a particular carrier with a high volume of hicap services. The IECC in Detroit handles the Special Services activity for all other CLECs. Within Special Services, there is a five-state group known as the Special Service Advisory Board (“SSAB”) that includes all Special Services Director level managers that meet regularly to agree on common methods and procedures related to Special Services.

OPERATIONAL SUPPORT SYSTEMS

16. Ameritech uses the same operational support systems (“OSS”) throughout its five-state territory. The network organization uses a suite of systems including the following:

- **SOAC** (Service Order Analysis & Control): Parses service orders into assignment requests which for high capacity services it sends to TIRKS for design in the HPC.
- The **TIRKSÒ** System: A number of mechanized conversion, interim, and ongoing inventory and assignment systems for facility equipment and circuit information used in trunks and Special Services operations.
- **WFA/C** (Work and Force Administration / Control): Directs and tracks the flow of work items to WFA/DI and WFA/DO. WFA/C facilitates communication between the WFA systems and external systems.
- **WFA/DO** (Work and Force Administration / Dispatch Out): Loads, prioritizes, and schedules work assignments of outside POTS and Special Services installation and maintenance technicians, and provides on-line tracking and status of work requests and technicians.
- **WFA/DI** (Work and Force Administration / Dispatch In): Loads, prioritizes, and schedules work assignments of central office technicians, and provides on-line tracking and status of work requests and technicians.
- **NSDB** (Network Services Database): Stores data received from the TIRKS system and SOAC system, distributes data to operations systems such as WFA/C, and receives completions and updates from WFA/C.

17. Ameritech does not own these systems, but instead leases them from outside vendors.

Because the Ameritech five-state region represents the “old” Michigan, Illinois, Ohio, Wisconsin, and Indiana Bell Telephone Companies prior to divestiture, many of these systems have been in use on a five-state region basis for over 20 years. Although many upgrades have been implemented during that time, these systems have matured with the business and have served as the foundation for a uniform and systematic method of doing business. As new services have developed, such as those provided to CLECs, these systems continue to serve their intended purpose of providing a uniform and systematic method of provisioning those services. Any changes to the underlying program code on these systems must be negotiated with the vendors. This negotiation is the responsibility of the centralized SBC Network Services Staff. Ameritech uses a single version of each application, which handles CLEC and Ameritech service orders on a nondiscriminatory basis throughout the five states. The managers and technicians in the Network department also use the systems in the same manner, as defined in the training and methods and procedures produced by the centralized Network Services Staff.

AMERITECH PROVISIONING FLOW FOR SPECIAL SERVICES

18. Ameritech uses a common provisioning flow for each product across its five-state territory.

This section addresses only the portion of the hicap provisioning flow beginning with issuance of an order by the LSC and ending when the provisioning and/or maintenance and repair work for hicap services is completed. Information on OSS interfaces used and the LSC processes that take place before and after provisioning these hicap services and products is provided in the Cottrell and Brown affidavits.

19. The Special Services provisioning process begins when the Hicap Provisioning Center (“HPC”) receives a customer order in the TIRKS system from the Local Service Center (“LSC”) via the SOAC system. The HPC first performs a facility check in the TIRKS system to determine if there are sufficient copper and/or fiber facilities to provision the requested circuit. If such facilities are not found to be available in the TIRKS system’s inventory, then the order is passed to an Outside Plant Engineer (“OSPE”) in Construction and Engineering to determine if other facilities are in place that could serve the order. If facilities still cannot be found, then the OSPE will return the order to the LSC and have them contact the customer. Then, depending on the type of modifications required, the customer then must decide whether to cancel the order or to authorize Ameritech to perform construction of the needed facilities, for which they will be charged as appropriate. Once facilities are either built or found available in inventory, then the HPC will design the service. The procedures for facility modification have been the subject of extensive discussion with CLECs, and the agreed procedures are described further in the affidavit of William Deere.

20. The HPC uses the TIRKS system to design facilities for Special Services orders. This design is then passed to the WFA system, which creates the appropriate work steps for the Network Operations forces, Digital Operations Group (“DOG”), and the Interexchange Control Center (“IECC”) to perform the actual provisioning. The Network Operations forces use the work document from WFA and the methods and procedures developed by the centralized staff to install the service in the Central Office. These functions include wiring the circuit, setting options in equipment, and testing the service. The WFA/DI system is used to track the progress of orders throughout the Central Office provisioning process. The DOG forces also

use the work document from WFA and the methods and procedures developed by the centralized staff to install the service in the field and at the customer premise. These functions also include wiring the circuit, setting options in equipment, and testing the service. The WFA/DO system is used to track the progress of orders throughout the DOG provisioning process. Work steps are also created in WFA/C for the IECC (the center ultimately responsible for the provisioning of the order) to monitor and track the completion of the order.

21. Upon completion of the work step(s) by the Network Operations and DOG forces, WFA/DI and WFA/DO send a completion transaction to WFA/C. The IECC then works with the CLEC to test the circuit, confirm the CLEC's acceptance of the service, and close out the order. Once closed, the order is posted to the various systems to complete the process.
22. The provisioning process described above is the same regardless of the type of customer – wholesale (including CLEC or access) or retail.

AMERITECH MAINTENANCE FLOW

23. Ameritech uses a common maintenance flow for each product across its five-state territory. The UNE and Special services maintenance process begins when the customer contacts Ameritech via telephone or uses electronic bonding to initiate a trouble report. A trouble ticket is created in WFA/C and flows to the IECC for handling. The IECC is the organization ultimately responsible for the testing, analysis, dispatch, and resolution of the trouble report.
24. From the IECC, the trouble ticket flows to the local serving office in the Network Operations organization for testing and isolation of the trouble. The WFA/DI system is used to track the trouble ticket while in the Central Office. If the trouble can be isolated and repaired in the

Central Office, then Network Operations does so and closes the ticket. In other situations, testing indicates that the trouble is in the field, and so Network Operations refers the ticket to the DOG team for investigation. The WFA/DO system is used to track the trouble ticket while it is being handled by DOG. (In some regions, as mentioned previously, Ameritech's I&R organization will be the field group that is dispatched for the trouble report.)

25. In some cases of trouble, cable repair will be needed to close a ticket in the field. In those cases, the DOG team will refer to the ticket to the I&R organization to perform that work.

26. The Network Services, DOG, and I&R forces use training and established methods and procedures to investigate the trouble condition, isolate, and correct the problem. The WFA/DI and WFA/DO systems are used to dispatch and track the trouble report throughout the life of the report. Once the problem is resolved, the trouble report is closed in WFA/DI or WFA/DO and passed to WFA/C. The IECC monitors the status of the trouble report through WFA/C and notifies the customer when the trouble is resolved.

CONCLUSION

27. Ameritech uses the same methods, procedures, systems, and process flows across all five Ameritech states. These same processes, systems, and methods are used in all lines of business – retail and wholesale.

28. This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on _____, 2001.

Patrick L. Foster
Director of Operations Support for Special Services

STATE OF ILLINOIS
COUNTY OF COOK

Subscribed and sworn to before me
this ___ day of _____, 2001.

Notary Public

My commission expires: