

**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 Communications Services, Inc. d/b/a )  
Ameritech Long Distance for Provision of )  
In-Region InterLATA Services in Michigan )

CC Docket No. \_\_\_\_\_

**AFFIDAVIT OF ROBBEN KNIFFEN-RUSU  
ON BEHALF OF AMERITECH**

**STATE OF MICHIGAN )**

**COUNTY OF OAKLAND )**

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WHITE PAGES LISTINGS**

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I, Robben Kniffen-Rusu, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Robben Kniffen-Rusu. My business address is 100 East Big Beaver, Floor 13, Troy, Michigan 48083. I am Director - CLEC Strategy for Ameritech Advertising Services (“AAS” or “Publisher”). I am responsible for facilitating the relationship between CLECs and Ameritech Advertising Services, Michigan Bell Telephone Company’s d/b/a Ameritech Michigan or Ameritech (“Ameritech”)<sup>1</sup> Directory Publishing affiliate. I also assist Ameritech in meeting its legal and regulatory requirements relating to White Page directory operations.

**PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND**

2. I have a Bachelor of Business Administration in Management and a Master of Business Administration from Michigan State University in East Lansing, Michigan. While working for Ameritech I have attended a number of seminars and other training sponsored by Ameritech and other industry organizations on various management subjects. I began my career with Ameritech in 1990. I have held various positions in the information technology, legal, and marketing departments. Most relevant to this proceeding I have been involved in supporting CLEC activity for more than 4 years. These activities include negotiating listing and directory services agreements with CLECs on behalf of AAS and directing the implementation of processes to support the terms of these agreements. I began my current assignment as Director-CLEC Strategy for AAS in October 1999.

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<sup>1</sup> 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

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**PURPOSE OF AFFIDAVIT**

3. The purpose of my affidavit is to demonstrate that Ameritech satisfies § 271(c)(2)(B)(viii) of the Act, which requires that Ameritech provide “[w]hite pages directory listings for customers of the other carrier’s telephone exchange service.” Ameritech meets this requirement by ensuring that its directory publishing affiliate publishes and integrates the primary listings of a CLEC’s customers, who are located within the geographic scope of the White Page (“WP”) directories serving Ameritech’s customers, in the same manner (including size, font, and typeface) as the listings of Ameritech’s customers appearing in these WP directories.<sup>2</sup> CLEC, Ameritech and independent telephone company listings in the WP directories serving Ameritech’s customers all include the subscriber’s name, address and telephone number. CLECs may also request and negotiate arrangements for enhanced listings or services. In addition, as I describe below, Ameritech takes reasonable and appropriate steps to ensure that CLECs’ customers’ listings are maintained with the same accuracy and reliability as Ameritech’s customers’ listings.

**APPEARANCE AND INTEGRATION OF WHITE PAGES LISTINGS FOR CLECS’ END**

**USER CUSTOMERS**

4. A primary WP listing for each end user is furnished to a CLEC providing resale and UNE-P services in the same manner (including size, font, and typeface) as Ameritech provides the listing to its own retail customers. In addition, carriers who provide local exchange service through the

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Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" pursuant to assumed name filings with the state of Michigan.

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purchase of unbundled local switching, or some combination of unbundled network elements and their own facilities, or solely through their own facilities, can also include their customers' primary listings in the WP directory serving Ameritech's customers in the same manner as Ameritech provides the listing to its own retail customers. The CLEC customer listing information is fully integrated and included alphabetically with Ameritech end user listings<sup>3</sup>. As of May 2, 2001, directories serving Ameritech customers contained over 222,500 listings of CLEC end user customers.

5. CLECs may request Primary, Additional, and Foreign Listings under the terms and conditions contained in the CLECs' respective interconnection agreements<sup>4</sup>. A Primary Listing is the listing associated with the end user subscribing to the local telephone service. An Additional Listing is one that pertains to, or is associated with, the Primary Listing. A Foreign Listing is a listing for a telephone number of an end user who is not located within the local geographic scope of the WP directory. Each of these types of WP listings contain a name, address and telephone number. Primary Listings of CLECs' end user customers are fully integrated into Ameritech's WP directories and included at no charge. Additional and Foreign Listings are provided to CLECs for their end users at the same rate charged Ameritech's retail end user customers.
6. Ameritech determines whether a listing is a Primary or a Foreign Listing based on the geographic scope of the directory. Geographic scope is in turn based on the Ameritech serving exchanges that are selected for inclusion in that specific directory. As an example, the telephone number prefix of 224 (Detroit, Michigan) in the 313 area code is included in the Detroit WP directory. All published

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<sup>2</sup> See Interconnection Agreement under Sections 251 and 252 of the Act between Teligent, Inc. and Ameritech Michigan dated May 13 1998. Article XV1.1 & 1.2.

<sup>3</sup> Id Article XV1.2

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end user listings with the 224 prefix (i.e., 224-XXXX) will appear in the Detroit WP directory, along with listings for other serving Ameritech exchanges which are included in the Detroit WP directory. Primary listings of CLEC subscribers that are located within the geographic area of the Ameritech serving exchanges will also be included in the Detroit WP directory. When a CLEC's service area differs from the geographic scope for a particular Ameritech WP directory, and the CLEC wants to include listings that are outside the scope of the local directory, the CLEC may list such end user listing information in the WP directory serving Ameritech's customers on a Foreign Listing basis.

7. Each subscriber of CLEC resale and UNE-P services will receive delivery of the white pages directory serving Ameritech's customers in the same manner and at the same time that the directory is delivered to Ameritech's retail subscribers during the annual delivery ("Initial Delivery") of newly published directories. In addition, Ameritech has agreed to provide delivery of white pages directories to customers of CLEC resale and UNE-P providers who have changed addresses or established local service for the first time after the Initial Delivery of the directory (referred to as "Secondary Delivery") on the same basis as its own retail customers. CLECs may request and negotiate arrangements with Ameritech's directory publishing affiliate to provide for the Initial and Secondary Delivery of white pages directories to their switched-based customers in the same manner and at the same time that the directory is delivered to Ameritech's retail subscribers.<sup>5</sup>
8. Ameritech has arranged with its directory publishing affiliate for the opportunity, at a CLEC's request, to include CLEC-specific customer-contact information (i.e., CLEC logo, business office, residence office, repair bureau telephone numbers, etc.) in Ameritech's WP directory on an "index-

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<sup>4</sup> Id Article XV 2.1 – 2.3

<sup>5</sup> Id Article XV 2.5

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type” informational page in the same form and format as other carriers, including Ameritech, listed on the page. The charge, if any, for the listing of such information will be calculated on the same basis as the charges, if any, paid by Ameritech for similar listings.<sup>6</sup>

### **PROCESS FOR REQUESTING CLEC WHITE PAGE LISTINGS**

9. Ameritech provides support and training for all CLECs who decide to have their customers’ listings placed in Ameritech white pages directories. Ameritech instructs resale and UNE-P CLECs on the proper formatting of WP listings by offering instructions on its CLEC Handbook website <<https://clec.sbc.com>> and by offering workshops on how to complete the industry-standard Local Service Request (“LSR”) form in a two-day class on how to properly format directory listings. Ameritech also supports switched-based CLECs’ capability to order WP listings for their customers, by providing instructions for the proper ordering and formatting of WP listings on its CLEC Handbook website <<https://clec.sbc.com>>. As explained further in the affidavit of Mr. Mark Cottrell, (“Cottrell Affidavit”) as of June 2001, switched-based CLECs will have the option of requesting a LSR and a Directory Service Request (“DSR”) using Ameritech’s Electronic Data Interchange (“EDI”) interface. At that time, Ameritech will offer switched-based CLECs two-day workshops on how to complete the LSR and DSR forms and properly format directory listings. In the meantime, a listing workshop is available to all switched-based CLECs through the Publisher.
10. Resale or UNE-P based CLECs can submit their end user listing information via Ameritech’s local service center or via the electronic operations support systems: LSR Exchange (“LEX”) or EDI. Starting in June 2001, switched-based CLECs will also have the option of submitting their listing

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<sup>6</sup> Id Article XV.1.7

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orders (as a standalone DSR or as a component of an LSR) via Ameritech's electronic operations support systems, LEX or EDI, for downstream processing by the Publisher. Additionally, if the CLEC is migrating a complete account under Local Number Portability ("LNP") and wishes the existing end user listing(s) and directory delivery information to remain the same as they currently appear, the CLEC may request Ameritech to retain this information "as is" in its directory affiliate's database by selecting the End User Retain Listing ("ERL") field on the End User Form. This ERL field is available both in a paper and electronic formats of the End User Form as part of Ameritech's standard CLEC ordering interfaces. The details of these operating support systems are further discussed in the Cottrell affidavit. Regardless, switched-based CLECs can submit their end user listing information directly to the Publisher via the Publisher's EDI interface, using the DSR format based on OBF industry standards, or via fax by submitting the Manual Listing Input Form to the Publisher's Listing Services centers.

11. As part of the listing ordering process, CLECs receive a daily confirmation for each order processed that day. Resale or UNE-P based CLECs submitting their end user listing information via Ameritech's LEX or EDI systems receive a Firm Order Confirmation ("FOC"), followed by a Service Order Completion ("SOC") to confirm their listings were processed and forwarded to the publishing affiliate. Switched-based CLECs who order their end user listings directly from Ameritech's directory publishing affiliate via the Publisher's EDI interface receive a reject or a FOC. This FOC is a confirmation transaction, which indicates that the order received has passed a series of edit checks and a service order can successfully be created for processing into the WP listing database. Switched-based CLECs who order their end user listings directly from

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Ameritech's directory publishing affiliate via fax by submitting the Manual Listing Input Form, receive a daily order confirmation report electronically via email.

12. Other information regarding Ameritech's WP listings and WP directories, including directory close dates, is available to CLECs in the Forms & Exhibits and User Guide & Tech Pubs portions of the CLEC Handbook.
13. By September 2001, Ameritech will provide, through its publishing affiliate, the capability for CLECs to perform pre-order inquiries on listings of other carriers via a graphical user interface ("GUP") listing inquiry tool provided by AAS. CLEC's ability to perform pre-order inquiries on the end user listings of other carriers may be subject to AAS' legal restrictions or contractual obligations with other CLECs. The terms and conditions under which Ameritech will provide this pre-ordering inquiry function were subject to considerable time and effort as part of the CLEC collaboratives conducted in the state of Wisconsin and resulted in an Interlocutory Order, filed before the Public Service Commission of Wisconsin on December 15, 2000<sup>7</sup>. In order to ensure equal treatment, this process will be implemented in all Ameritech states.

## **NONDISCRIMINATORY TREATMENT OF CLEC WHITE PAGE LISTINGS**

14. Ameritech treats all CLECs' end user WP listings contained in Ameritech's WP databases in the same manner it treats WP listings of its own retail end user customers. Ameritech's WP database contains names, addresses, telephone numbers, directory listing format, and directory delivery information for Ameritech and CLEC end users alike.

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<sup>7</sup> 6720-TI-160 - Interlocutory Order, filed before the Public Service Commission of Wisconsin on December 15, 2000. ("Interlocutory Order"). Also see the Joint Progress Report filed with the MPSC on December 27, 2000.

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15. Ameritech's WP database updates Ameritech's Directory Assistance ("DA") database each night and treats all listings in the same manner, regardless of the underlying local exchange carrier. White Page directory listings for CLEC end users served via resale or UNE-P CLECs reach Ameritech's WP database in the same manner and within the same time frame as White Page directory listings for Ameritech's retail end users. Like retail, resale and UNE-P WP listings, the listings orders of switched-based CLECs, regardless of the ordering method utilized by the CLEC, are updated into Ameritech's WP database each night and the WP database subsequently updates the DA database.

### **WHITE PAGE LISTING VERIFICATION AND CORRECTION PROCESS**

16. Prior to the publication of a directory, Ameritech offers CLECs the option of receiving two pre-Business Office Close (pre-BOC) white page verification review reports. Upon request from the CLEC, no later than 60 days prior to the directory close date (the last date service orders can be submitted to assure modification of listings for the directory publication), Ameritech will provide the first pre-BOC report 45 calendar days in advance of the directory close date. The second pre-BOC report, if requested, will be provided 15 calendar days in advance of directory close. CLECs are required to request the second pre-BOC report 45 to 30 calendar days before the directory close date. The charge for the second pre-BOC report is \$200. CLECs must provide changes to first pre-BOC report at least 4 business days before the delivery of the second pre-BOC report in order for changes to be reflected on the second pre-BOC report. As with the pre-order functionality described in paragraph 11, the terms and conditions under which Ameritech provides these reports were subject to considerable time and effort as part of the CLEC collaboratives conducted in the state of Wisconsin and resulted in the Interlocutory Order. In order to ensure

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equal treatment, this process was implemented in all Ameritech states. On December 27, 2000, these identical provisions were committed to in Michigan via a Joint Progress Report filed with the MPSC.

17. For corrections submitted by the CLEC to the Publisher following review of the first pre-BOC report, 95% must be corrected in the second pre-BOC report or the \$200 charge for the second pre-BOC report will be waived. For corrections noted in the review of the second pre-BOC report, 99% of those corrections requested initially must be corrected in the final published directory or Tier 1 remedies will apply. This measurement is CLEC-W4<sup>7</sup> and is discussed in more detail in Mr. Salvatore Fioretti's affidavit.
18. In addition to the pre-order inquiry capability described in paragraph 11, by September 2001, Ameritech will provide, through its publishing affiliate, the capability for CLECs to perform post-order listing verification of their end user's listings via a GUI listing inquiry interface provided by the publisher.
19. A CLEC can correct any error in an end user's listings by submitting an order through the normal service order process. Utilizing the service order process for modifications to listings updates all of Ameritech's downstream databases with the corrected listing information and allows accurate CLEC customer records to be maintained within the system. CLECs should submit any necessary correcting additions, deletions, or modifications to CLEC listings as soon as they are identified by the CLEC. The CLEC must submit any modifications intended for CLEC listings before the directory close date for the directory in which the end user listing will appear in order for the modifications to be included in the directory<sup>8</sup>.

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**CONCLUSION**

20. As shown above, Ameritech Michigan satisfies the requirements of checklist item 8 because it: (1) provides nondiscriminatory appearance and integration of white page directory listings to competitive LEC's customers; and (2) provides white page listings for competitors' customers with the same accuracy and reliability that it provides its own customers.

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.

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Robben Kniffen-Rusu  
Director – CLEC Strategy

STATE OF MICHIGAN  
COUNTY OF OAKLAND

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2001.

\_\_\_\_\_  
Notary Public

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<sup>8</sup> Id Article XV1.4.