

December 11, 2002

Via Hand Delivery

Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48909

**Re: 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**

Dear Ms. Wideman:

Please find enclosed for filing the original and 15 copies of *SBC Ameritech Michigan's Amended Compliance Plan As Required by October 3, 2002 Opinion Order and Proof of Service*.

If you should have any questions, please contact me. Thank you.

Very truly yours,



William J. Champion III

WJC/mds
Enclosures
cc: Parties of Record

C o u n s e l l o r s A t L a w

DETROIT BLOOMFIELD HILLS LANSING GRAND RAPIDS ANN ARBOR
WASHINGTON, D.C.

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) Case No. U-12320
the federal Telecommunications Act of 1996.)
_____)

**SBC AMERITECH MICHIGAN'S AMENDED COMPLIANCE PLAN
AS REQUIRED BY OCTOBER 3, 2002 OPINION AND ORDER**

On October 3, 2002, the Commission entered an Opinion and Order ("October 3 Order") in which it modified Michigan Bell Telephone Company's, d/b/a SBC Ameritech Michigan's ("SBC"), proposal concerning the migration of voice service to a CLEC when a data provider is using the High Frequency Portion of the Loop ("HFPL") UNE.¹ On November 4, 2002, SBC submitted its Compliance Plan to implement the October 3 Opinion and Order in this proceeding ("November 4 Compliance Plan").

Based on discussions with the Commission Staff, comments filed on November 15, 2002 by various competitive local exchange carriers ("CLECs") and concerns raised during the November 25, 2002 public hearing before the Commission in this proceeding, SBC submits herewith as Exhibit A its Amended Compliance Plan to implement the October 3 Order ("Amended Compliance Plan").

¹ October 3 Order, at 25.

I. INTRODUCTION

In its October 3 Order, the Commission addressed four scenarios relating to line sharing and line splitting:

- Scenarios #1 / #3: Line Sharing to Line Splitting²
- Scenario #2: Line Sharing to UNE-P
- Scenario #4: UNE-P to Line Splitting

The Commission found that the end user must have full choice of voice providers, regardless of the presence of data service on a line. Accordingly, the Order required that "...[SBC] must facilitate migration of voice to a CLEC, even if there is a data provider on the HFPL. Whether the work to disconnect the data provider is done before or after should be of no consequence to the voice service migration..."³ In its November 4 Compliance Plan, SBC described how its existing or revised procedures for line splitting complied with the Commission's requirements with respect to each of these four scenarios.

II. SBC'S AMENDED COMPLIANCE PLAN

Based upon feedback from discussions with Commission Staff, comments filed on November 15, 2002 by interested CLECs, and concerns raised during the November 25, 2002

² Under Scenario # 1, the data CLEC is affiliated with SBC. Under Scenario #3, the data CLEC is not affiliated with SBC. In both cases, the process for migration of line sharing to line splitting is identical and assumes the splitter is owned by the data CLEC.

³ *Id.*, at 21. In its November 4 Compliance Plan, SBC fully explained why it chose to disconnect the data *before* voice migration to avoid future service disruption and involuntary line splitting as required by the October 3 Order at pps. 17, 18, 23-24. The Amended Compliance Plan remains unchanged in this regard.

public hearing before the Commission in this proceeding, SBC has amended its compliance plan in three respects.

First, some concerns were raised that the November 4 Compliance Plan either required the end user to identify the incumbent data CLEC, required the voice CLEC to contact the incumbent data CLEC, or resulted in SBC itself deciding to disconnect the data service. The Amended Compliance Plan now further describes the information regarding the identity of the incumbent data CLEC available on the customer service record and the required notification the voice CLEC should provide to the end user regarding potential data service impacts. Consistent with the October 3 Order, the Amended Compliance Plan clarifies that the determination regarding whether data service is disconnected is one for the end user; it is not the decision of either the voice CLEC or SBC. These provisions apply equally to Scenarios #1, #2 and #3.

Second, there was a concern the changes required to meet the Commission's requirements regarding Scenario #2 (Line Sharing to UNE-P) were not currently in place. The Amended Compliance Plan describes a revised process for Scenario 2 that will be effective and available on December 16, 2002. SBC's existing ordering procedures for Scenarios #1, #3 and #4 meet the requirements of the Order.

Third, there was a concern that the pricing requirements of the Order were not clearly defined in SBC's filing. The Amended Plan now includes specific pricing application illustrations for each of the four scenarios.

A. Potential DSL Service Impacts

The Commission found that the end user must be informed of the impact of a decision to switch voice providers on its data services. The October 3 Order provides that:

[W]hen a voice CLEC markets its services to a potential customer with DSL service already in place, it must inform the potential customer that the DSL service may be affected by a switch of voice service providers. Customers should be encouraged to check with their DSL providers. This requirement applies equally to [Scenario #1], Scenario #2 and Scenario #3.⁴

The October 3 Order also concluded that:

[T]he end user must be responsible for managing its contractual relationship with the ISP. The end user may well have signed a contract, the terms of which may not be known to either the voice CLEC or the ILEC. Neither of those two entities can be expected to enforce the provisions of a contract to which is not a party.⁵

Therefore, a common and important attribute of the process needed to comply with the October 3 Order is an informed and orderly migration of an end-user's voice service under Scenarios #1 / #3 and #2 based upon the voice CLEC's communication with its prospective end-user customer, which accurately reflects the end user's decision regarding DSL service. The Amended Compliance Plan has been revised to more fully describe this important component of the migration process and to clarify for the voice CLEC how to determine whether its potential voice customer has line sharing already in place.

By accessing the CSR, the voice CLEC will be able to determine whether line sharing exists and, if so, the identity of the data CLEC utilizing the HFPL. The CLEC can then determine whether it has any line splitting arrangements with the current data CLEC.

If the voice CLEC has line-splitting arrangements with the current data CLEC, the ordering procedures for line sharing to line splitting (Scenarios #1/#3) documented in CLEC OnLine will be used to migrate the service. If the voice CLEC does not have any line splitting arrangements with the current data CLEC, it must inform the end user that its data service may be affected by a migration of voice service. Based on this information, the end user will

⁴ *Id.*, at 19.

⁵ *Id.*, at 19.

determine whether it would like to continue with its current data service or seek alternatives.⁶ If the end user does wish to continue with its current data service, it will coordinate with its data provider to determine the proper next step to execute its wishes for both voice and data services. If the end user does not wish to continue its data service, it will authorize the voice CLEC to disconnect its data service on its behalf.

B. Implementation of Scenario #2

Scenario #2 applies where the end user decides to migrate its voice service to a CLEC, and disconnect its DSL service. SBC has re-designed the process to make it more reliable and more streamlined, and to reduce the need for manual processing. Under the updated process for Scenario #2, the voice CLEC will fax a request to disconnect the HFPL UNE on behalf of the end user.⁷ This will help ensure an informed end user decision and avoid concerns raised by the unfounded claim that SBC itself was deciding to disconnect the data service. Upon receipt of the end user's authorization from the voice CLEC to disconnect the data, SBC will process that disconnect order. The voice CLEC will then submit its normal, electronic UNE-P migration order to migrate the voice service after receiving the firm order confirmation on the disconnect order.

⁶ As the Commission recognized, only the end-user is in a position to know what contractual relationship, if any, it has with its current ISP that may be impacted by a decision to discontinue its data service.

⁷ Based on this revision, since the voice CLEC will submit a disconnect order on behalf of its end user, the Amended Compliance Plan eliminated the provisions that previously related to indemnification for unauthorized disconnects.

C. Pricing for all Scenarios

SBC has added pricing illustrations for each of the scenarios that delineate the non-recurring and recurring charges that would apply for each ordering scenario. These update the pricing illustrations provided by SBC in its April 30, 2002 submissions to the collaborative on the four scenarios to reflect the requirements of the October 3 Order.

III. BENEFITS OF SBC'S AMENDED COMPLIANCE PLAN

SBC's Amended Compliance Plan has direct benefits. The plan properly recognizes the central role of the end user in making decisions about both voice and data services. The plan also provides for a shorter implementation interval and reduced manual processing, by eliminating the need for an interim manual ordering process for the UNE-P migration in Scenario #2.

The Amended Compliance Plan demonstrates how the voice CLEC can identify when line sharing is present, so that the next steps can be properly identified and executed – all reflecting the end user's wishes for both its voice and data services. It explains how the voice CLEC can determine whether it needs to inform the end user about data services implications to avoid unintended consequences. The Amended Compliance plan makes the end user central to the choices and timing of migration.

Because the changes to SBC's process will now be centered in the Local Service Center ("LSC"), the implementation time required will be reduced so that the process will be available on December 16, 2002. The new process will require development of procedures and service representative training for only one type of manual order (versus two under the November 4

Compliance Plan), and that will be for the most simple of the two orders involved – the disconnect of the HFPL UNE. Further, and more significantly, it will require little or no new training for other groups, including the Local Operations Center (“LOC”) and all downstream groups. The LOC procedures will be updated to handle any issues that arise during provisioning, but this will be much less complex than the provisioning of the two related manual orders contemplated under the November 4 Compliance Plan.

The amended process avoids manual processing in the order generation and handling of the UNE-P migration. Rather, such migrations will be handled on a mechanized basis by SBC’s Operational Support Systems (“OSS”). The electronic processing of these UNE-P orders will lend to the accurate processing and provisioning of such migrations.

IV. CONCLUSION

SBC’s Amended Compliance Plan, is consistent with the requirements of the October 3 Order, consistent with SBC's obligations under Section 271, and addresses the concerns identified with the November 4 Compliance Plan.

Respectfully submitted,

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Dated: December 11, 2002

EXHIBIT A

**Michigan Public Service Commission
October 3, 2002 Opinion and Order in Case No. U-12320
Re: Line Sharing and Line Splitting**

SBC Ameritech Michigan Amended Compliance Plan

December 11, 2002

Table of Contents

I. Summary of Order.....	1
II. Scenarios Outlined in Order.....	2
III. SBC Ameritech Michigan Implementation of Compliance Plan.....	8

Michigan Public Service Commission
October 3, 2002 Opinion and Order in Case No. U-12320
Re: Line Sharing and Line Splitting
SBC Ameritech Michigan Amended Compliance Plan

I. Summary of Order

On October 3, 2002, the Michigan Public Service Commission (“Commission”) issued its Opinion and Order (“Order”) in Case No. U-12320, in which it addressed four (4) scenarios relating to line sharing and line splitting.¹ In its Order, the Commission found that “a voice CLEC should be able to obtain migration of voice service despite the presence of a data CLEC in a line-sharing arrangement.”² A data provider is not required to continue providing service upon migration of the voice service³. If the data CLEC chooses to cease providing service, or to provide service on a separate loop, it will be responsible to pay the costs associated with terminating its service and absorb any cost it incurred in conditioning the loop for DSL service.⁴

Where the voice CLEC and data CLEC choose to enter into a line splitting relationship, the Commission found that “either CLEC should be able to approach SBC Ameritech Michigan with a request for service, maintenance, or repair on the line, while giving notice to the other CLEC concerning its request.”⁵ SBC Ameritech Michigan is not, however, required to “act as a mediator between CLECs when permitting line splitting arrangements.”⁶ Instead, the Commission determined that “CLECs should be able to work out the details of their relationship among themselves.”⁷ The voice CLEC and data CLEC are “required to coordinate their activities to minimize the probability that their common customer will experience a disruption in service.”⁸

The Commission also determined that “when a voice CLEC markets its service to a potential customer with DSL service already in place, it must inform the potential customer that the DSL service may be affected by a switch of voice service providers. Customers should be encouraged to check with their DSL

¹ For purposes of its Order, the Commission defined “line sharing” as “when SBC Ameritech provides voice service over the low frequency portion of the loop (LFPL) and a data CLEC provides data service over the high frequency portion of the loop (HFPL).” The commission defined “line splitting” as “essentially the same as line sharing, but a voice CLEC provides the voice service over the LFPL, with a separate data CLEC providing services over the HFPL.” Order, at 2.

² Order, at 15.

³ Order, at 18.

⁴ Order, at 16.

⁵ Order, at 19.

⁶ Order, at 19.

⁷ Order, at 19.

⁸ Order, at 23.

providers.⁹ Finally, the Commission determined that "the end-user is responsible for managing its contractual relationship with the ISP," noting that the "end user may well have signed a contract, the terms of which may not be known to either the voice CLEC or the ILEC."¹⁰

Thus, upon migration of voice service from an existing line sharing arrangement, the data CLEC using the HFPL has the following options:

1. Discontinue providing data service (the existing loop in this option would be used solely by the voice CLEC following migration); or,
2. Provide data service over a new, separate, stand-alone xDSL-capable loop, as the existing loop in this option was taken by the voice CLEC. If loop conditioning is required to make the new loop suitable for the data CLEC's desired xDSL service, the data CLEC is responsible for ordering such loop conditioning and is also responsible for all charges associated therewith, even if the data CLEC had previously ordered and paid for conditioning on the existing loop which was taken by the voice provider; or,
3. The data CLEC, utilizing its own splitter, may continue providing data service via the existing migrated loop pursuant to a line splitting arrangement with the new voice CLEC.

In summary, under the Order, if a voice CLEC wins the voice service on a loop that is currently part of a line sharing arrangement, the data CLEC that is currently providing service does not have the option of retaining the existing loop for a stand-alone data service. The data CLEC may only use the existing loop if the data CLEC and the voice CLEC enter in to a line splitting arrangement.

II. Scenarios Outlined in Order

Based on the Order, and to avoid unnecessary service disruption, involuntary line splitting arrangements or unauthorized use of CLEC-owned facilities, SBC Ameritech Michigan has determined the following methods to employ for the scenarios and associated requirements addressed in the Order.

Scenarios #1, #2, #3: Events occurring before reaching any of these three scenarios.

Before a voice CLEC reaches any of the first three scenarios (#1/#3 – Line Sharing to Line Splitting or #2 – Line Sharing to UNE-P), it will undertake a conversation with the end user. The end user, based on the choices it makes for its voice and/or data services, will be the key component of determining which path is taken.

The voice CLEC views the end user's customer service record ("CSR") per the end user's permission, determining if there is the line sharing present. (See Attachment C for an example CSR;

⁹ Order, at 19.

¹⁰ Order, at 19.

confidential information has been redacted.) Pages 1 and 2 of the Attachment C show what additional information is contained on the CSR when line sharing is present. Further, on page 2 of the CSR, at the line labeled “/UNN1”, the OCN of the current data CLEC is displayed. Thus, the voice CLEC can determine from the CSR if it has line splitting arrangements with the current data CLEC. If it has line splitting arrangements with the data CLEC, the CLECs proceed to ordering scenarios #1 / #3 (Line Sharing to Line Splitting), which were determined to be the same.

If the voice CLEC does not have a line splitting arrangement with the data CLEC, then the voice CLEC must inform the end user of its choices with respect to its data service. The Commission found that the end-user, rather than the voice CLEC or SBC Ameritech Michigan, is responsible for managing his/her existing contractual relationships with his/her data provider. The end user will then decide the next steps and how to proceed.

If the end user wishes to continue its data service, the voice CLEC informs the end user that it should coordinate with its data provider. The end user, upon consultation with its data provider, will determine the path to follow: data CLEC establishes line splitting arrangements with the chosen voice CLEC; data CLEC establishes data service on a stand-alone loop¹¹ and voice CLEC will migrate to UNE-P; or end user will obtain data service from a different data provider.

If the end user decides that it no longer wants its current data service, it informs the voice CLEC to disconnect its data service on its behalf and the voice CLEC migrates the voice service to UNE-P, i.e., the voice CLEC follows Scenario #2.

Scenario 1: Line Sharing to Line Splitting (End user currently obtains both voice and data from the ILEC¹² and seeks to migrate voice service to a CLEC, while continuing the current data service).

If the voice CLEC and the data CLEC have agreed to engage in line splitting, and the data CLEC is currently providing, and will continue to provide, the splitter, then the existing ordering procedures to convert from line sharing to line splitting as documented on CLEC OnLine (<https://clec.sbc.com/clec/>) continue to apply without change; however rate application will be modified to comply with the Commission’s requirement that the voice CLEC not be assessed more than the applicable charge for a UNE-P migration.

¹¹ The data CLEC will be responsible for all disconnect and new connect related charges associated with the acquisition of a standalone xDSL capable loop, including any requested loop conditioning. Loop conditioning charges will apply if requested even if the data CLEC had already requested and paid for loop conditioning to access the HFPL of the loop that has been taken by the voice CLEC.

¹² SBC Ameritech Michigan does not provide DSL data services on either a retail or wholesale basis. Instead, DSL Internet access is provided to retail end users by Ameritech Interactive Media Services (“AIMS”), and DSL transport is provided by Ameritech Advanced Data Services (“AADS”) to ISPs and other CLECs on a wholesale basis. AIMS and AADS are affiliates of SBC Ameritech Michigan. SBC Ameritech Michigan understands this scenario to refer to situations where SBC Ameritech Michigan is engaged in line sharing with a data affiliate.

The following summarizes the rates that will be applied:¹³

Orders	Non-Recurring	Recurring
<p>1. Voice CLEC for UNE-P migration (loop and port) and DLEC for HFPL.</p> <ul style="list-style-type: none"> • Disconnect HFPL <ul style="list-style-type: none"> – Service Order – Disconnection • Order xDSL Capable Loop <ul style="list-style-type: none"> – Service Order – Connection – Cross Connect • Order ULS-ST Port <ul style="list-style-type: none"> – Service Order – Installation – Cross-Connect 	<p></p> <p style="text-align: right;">\$1.54</p> <p style="text-align: right;">N/A</p> <p style="text-align: right;">\$0.35</p> <p style="text-align: right;">N/A</p> <p style="text-align: right;">\$-.--</p> <p style="text-align: right;">N/A</p>	<p style="text-align: right;">N/A</p> <p style="text-align: right;">\$10.26</p> <p style="text-align: right;">\$0.13</p> <p style="text-align: right;">\$2.53</p> <p style="text-align: right;"><u>\$0.13</u></p> <p style="text-align: right;">\$13.05</p>
<p>Assumptions:</p> <ul style="list-style-type: none"> • DLEC provided splitter in line sharing arrangement and same splitter being used in line splitting arrangement, thus no physical work needs to be done to effectuate the change; however, order/billing work must be completed with order coordination to ensure no inadvertent disconnection. • Example uses Access Area A. 		

CLECs that share a loop to simultaneously deliver voice and data service must coordinate their respective activities with each other to minimize the probability of disruption to their common end user customer. SBC Ameritech Michigan will provide CLECs the necessary unbundled network elements and maintain those elements as needed.

¹³ Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement would control.

Scenario 2 Line Sharing to UNE-P: The end user currently obtains both voice and data from the ILEC and seeks to migrate the voice service to a CLEC and disconnect the data service from the ILEC.

A voice CLEC may migrate a line sharing customer's voice service without the data CLEC's permission. The Commission further held that when a voice CLEC markets its services to a potential customer with DSL service in place, the voice CLEC must inform the potential customer that the DSL service may be affected by a switch in voice providers. The Commission found that the end-user, rather than the voice CLEC or SBC Ameritech Michigan, is responsible for managing his/her existing contractual relationships with his/her data provider.

The following apply whether the line sharing arrangement used by the data CLEC's splitter or a splitter "port" from an SBC Ameritech Michigan-owned splitter.

The end user has affirmed to the voice CLEC to disconnect its data service; the voice CLEC will have permission from the end user. The voice CLEC will submit, via fax, the request to disconnect the HFPL on behalf of the end user. SBC Ameritech Michigan will process that disconnect and provide a firm order confirmation ("FOC") within 24 hours as required by approved performance measures. SBC Ameritech Michigan notifies the data CLEC of the disconnect.

After receiving the FOC from the disconnect, the voice CLEC then submits, and SBC processes, a normal, electronic UNE-P migration local service request ("LSR"). The UNE-P will be provisioned over the same loop that was previously used for line sharing. In the event that the LSR does not properly process, a phone number will be set up in the SBC's Local Service Center ("LSC") to expeditiously handle the order.

The following summarizes the rates that will be applied:¹⁴

<u>Orders</u>	Non-Recurring	Recurring
1. DLEC <ul style="list-style-type: none"> • Disconnect HFPL <ul style="list-style-type: none"> – Service Order – Disconnection 	\$1.54 <u>\$10.00</u> \$11.54	N/A
2. Voice CLEC <ul style="list-style-type: none"> • Migrate Voice to UNE-P <ul style="list-style-type: none"> – Service Order – Loop – Port – Cross Connect 	\$0.35	\$8.47 \$2.53 <u>\$0.13</u> \$11.13
Assumptions: <ul style="list-style-type: none"> • Disconnect of HFPL completed prior to migration order being submitted. • Under Phase I, SBC submits both orders to accomplish based on single LSR submitted by Voice CLEC. • Example uses Access Area A. 		

Scenario 3: Line Sharing to Line Splitting: The end user currently obtains voice service from the ILEC and data services from a data CLEC that is not affiliated with the ILEC, and seeks to migrate the voice service alone to a CLEC.

The Commission found that the only difference between scenarios 1 and 3 is whether the data CLEC is affiliated with the ILEC. Accordingly, the description of the process for Scenario 1 applies here.

Scenario 4: UNE-P to Line Splitting: The end user currently obtains voice service from a voice CLEC and seeks to add data services from a data CLEC that may or may not be affiliated with the ILEC:

The existing ordering procedures and charges to convert from UNE-P to line splitting as documented on CLEC OnLine (<https://clec.sbc.com/clec>) continue to apply without change. The documented process reflects the single LSR process requested by CLECs that was implemented in the August 2002 release. The Commission held that SBC Ameritech Michigan need not take on the role of mediator between two line

¹⁴ Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement would control.

splitting CLECs. CLECs that share a loop to simultaneously deliver voice and data service must coordinate their respective activities with each other to minimize the probability of disruption to their common customer.

SBC Ameritech Michigan will provide CLECs the necessary unbundled network elements and maintain those elements as needed. In processing this type of LSR, installation of the xDSL capable loop includes all work associated with determining if the existing loop is xDSL-capable or if a new loop is required to be selected. SBC Ameritech Michigan also reuses the ULS-ST port. These are the same steps undertaken when SBC Ameritech Michigan installs the HFPL UNE for a data CLEC in a line sharing arrangement. The required physical change in the facilities serving the end user is made so as to minimally disrupt the end user's service.

The following summarizes the rates that will be applied:¹⁵

<u>Orders</u>	Non-Recurring	Recurring
1. Voice CLEC or DLEC depending on Partnering Agreement.		
<ul style="list-style-type: none"> • Disconnect UNE-P <ul style="list-style-type: none"> – Service Order – Disconnection 	 N/A N/A	 N/A
<ul style="list-style-type: none"> • Order xDSL Capable Loop <ul style="list-style-type: none"> – Service Order – Loop Qualification – Connection – Cross Connect 	 \$3.16 \$0.10 \$17.82	 \$10.26 \$0.13
<ul style="list-style-type: none"> • Order ULS-ST Port <ul style="list-style-type: none"> – Service Order – Installation – Cross-Connect 	 \$3.02 N/A	 \$2.53
	<hr/> \$24.10	<hr/> \$0.13 \$13.05

¹⁵

Tariffed rates are provided for illustrative purposes; rates in a CLEC's interconnection agreement would control.

Assumptions:

- A mechanized loop qualification will be completed to determine if the existing loop may be used to provide xDSL services, indicating if any loop conditioning may be appropriate.
- The DLEC/voice CLEC makes the determination of whether to have any loop conditioning performed. Any loop conditioning would result in additional NRCs as approved by the Commission in U-12540.
- If the existing loop is not able to support xDSL services, then a new loop will be provisioned.
- Assumes DLEC's collocation is used. If not, then additional charges would apply to connect the collocations of the DLEC and voice CLEC.
- Example uses Access Area A.

III. SBC Ameritech Michigan Implementation of Compliance Plan

A. Background, Philosophy, and Timing

As noted, SBC Ameritech Michigan currently has methods and procedures in place to facilitate Scenarios 1/3 and 4. These existing processes are currently available to CLECs and documented in the CLEC Handbook on CLEC OnLine. For Scenario 2 (Line sharing to UNE-P), SBC Ameritech Michigan is required to develop new methods and procedures to facilitate this order processing in the manner in which it has been ordered by the Commission. These Commission mandates require a significant change to how SBC Ameritech Michigan currently processes and provisions orders that affect existing line sharing arrangements. Thus, SBC Ameritech Michigan looked to ensure that the change to its processes would continue to support accurate and timely processing of CLEC orders. SBC Ameritech Michigan also looked to the Commission's mandate that the end user be given full choice in its voice provider, and be fully informed when making that choice.

To efficiently manage these migration requests, SBC Ameritech Michigan will implement these new processes in a two-phase approach. First SBC Ameritech Michigan will implement manual ordering method for one aspect of the scenario using the current capabilities of SBC Ameritech Michigan's regional Operations Support Systems ("OSS"). In the second phase, SBC Ameritech Michigan will mechanize this Michigan-specific ordering requirement pursuant to the terms of the FCC mandated Change Management Forum.¹⁶

Based on the effort required and the designed process change, SBC Ameritech Michigan anticipates being able to fully implement Phase I by December 16, 2002, with notification to CLECs via accessible letter following with the filing of this amended compliance plan. Implementation of Phase II will be determined in collaboration with CLECs as required by the FCC mandated Change Management Process. SBC Ameritech

¹⁶ The change management process is a resolved OSS issue, as set forth in the *Joint Report of the Participants Regarding Resolved OSS Enhancements and Process Improvements*, filed December 27, 2000, with the Commission ordered voting quorum for this Michigan-specific change.

Michigan began discussions with CLECs regarding this required process change via the Ameritech Regional CLEC User Forum (“CUF”) at its November 13, 2002 session and the follow-up call held for this topic on November 18, 2002.

Currently, when a voice CLEC submits a UNE-P migration order on a loop on which the HFPL UNE is present, SBC Ameritech Michigan’s regional OSS automatically rejects this type of order; and the edit cannot be modified in the near term for Michigan only.¹⁷ The Commission found that a voice CLEC can migrate the end-user’s voice service despite the presence of a data CLEC using the HFPL to provide data service to the same end-user. That is, SBC Ameritech Michigan cannot reject a UNE-P migration order when the use of the HFPL UNE is present on the loop serving the end user. This is a significant change, and thus, until a mechanized update can be made, SBC Ameritech Michigan is implementing a manual procedure to accomplish this requirement by using the current OSS capabilities. Based on the end user’s direction, the voice CLEC will manually submit the disconnect of the HFPL, and then, upon receiving the firm order confirmation (“FOC”), will submit its normal electronic UNE-P migration order.

The Commission stated that if the data CLEC does not wish to partner with the voice CLEC to line split, the voice service should be migrated and the HFPL could be disconnected before or after the conversion. SBC Ameritech Michigan has determined that it would likely not be able to process a disconnection order after the conversion, nor would it be prudent to do so, as it is likely that the end-user's voice service would be interrupted, perhaps significantly. As shown in Attachment A, if the HFPL disconnection is not processed before the migration occurs, there is a likelihood that the voice service will be subsequently disrupted when the data CLEC removes its splitter between the loop and switch port, thus disconnecting the UNE-P. Further, SBC Ameritech Michigan does not believe that the data CLEC would be able to submit an order disconnecting the HFPL after the migration, as the loop would now be assigned to the voice CLEC. Finally, allowing the UNE-P to be connected through the data CLEC’s splitter without the data CLEC’s permission would constitute involuntary line splitting, unauthorized use of the data CLEC-owned equipment, or both, in direct violation of the Commission’s findings. Thus, to avoid these unnecessary complications, SBC Ameritech Michigan is developing new methods and procedures under which the voice CLEC will submit a disconnect for the HFPL on behalf of the end user. Because this order will be initiated by the new voice CLEC, SBC Ameritech Michigan is relying on the representation of the voice CLEC that it has authorization to do so from the end user. Attachment B includes diagrams showing the proper steps to migrate to the UNE-P; that is, to remove the jumpers connecting the loop and switch port to the data CLEC’s collocated splitter.

B. PHASE I Manual Process to Convert Line Sharing to UNE-P per the Commission’s Requirements

The following summarize the process changes and necessary steps required to implement the Commission's Order.

¹⁷ This edit was implemented to facilitate compliance with the FCC’s requirements for the loss of ILEC voice service in line sharing arrangements, referencing FCC 99-355, ¶72.

The following steps will be necessary to convert from Line Sharing to UNE-P:

- Voice CLEC informs end user desiring to change voice providers, that their DSL service will be impacted.
- End user affirms to Voice CLEC that it wishes to have its data service disconnected.
- Voice CLEC issues manual LSR via fax to disconnect the HFPL present on the end user's line.
 - SBC Ameritech Michigan issues service order to disconnect the HFPL and FOC within 24 hours per approved performance measure benchmarks..
- SBC Ameritech Michigan issues a Line Loss Notification to data CLEC, as the data CLEC will not be anticipating the service order completion of the disconnect order since it did not submit one.
- After receiving the FOC for the disconnect, Voice CLEC submits normal electronic UNE-P Migration Order.
 - SBC Ameritech Michigan will establish a phone number in the LSC in the event the UNE-P migration order does not process as expected so that the order may be expeditiously corrected and processed.

The following work activities must be completed prior to implementation of Phase I:

- Develop manual disconnect LSR for CLECs to complete and method of delivery to SBC Ameritech Michigan.
- Develop CLEC OnLine documentation for CLECs on this ordering scenario, including requirements on how to complete new LSR.
- Select and assign the group of service representatives that will exclusively handle this type of LSR, as well as any fall-out issues that may occur with the subsequent submission and processing of the UNE-P migration order.
- Develop internal methods and procedures for LSC to follow in accepting, processing, and provisioning this manual LSR.
 - Train service representatives on how to issue the disconnect of the HFPL. Service representative will access the Customer Service Record (CSR) to obtain information required to issue the disconnect service order. From the CSR, service representative obtains the name of the data provider and the circuit id.
 - Train service representatives on how to correct and then process a UNE-P migration order that may not flow as expected.

- Develop and provide training for LOC personnel on handling various trouble ticket scenarios that may arise related to provisioning, as well as trouble tickets received from the data CLEC after HFPL has been disconnected.
- Determine impact on Line Loss Notification.
 - Based on anticipated input from data CLECs, possibly establish new code for “Disconnect Reason Code” that will advise data provider that the HFPL has been disconnected due to voice CLEC taking the loop.
 - Educate data CLECs on the fact that they no longer have the 3 days to respond to a line loss notification. Data CLECs will need to modify their procedures to immediately stop billing end user for DSL service.
- Determine, develop and implement any necessary tracking mechanisms for this type of LSR.
- Implement fax number to receive this type of disconnect; this ensures these LSRs are worked by the service representatives trained to do so.
- Implement phone number to receive escalations related to the processing of UNE-P migration orders (in connection with this plan).

C. PHASE II Mechanized Line sharing to UNE-P

The final stage will be a mechanized process for conversions from Line sharing to UNE-P. This issue will be submitted to the Change Management Forum in accordance with the FCC mandate. The Change Management Forum provides for direct CLEC input on prioritization of projects to be implemented, as there are limited resources available with each release; that is, CLECs provide input on which OSS changes are most important to the CLECs’ ability to do business. This forum provides for the balancing of the benefits of mechanization with the costs of mechanization and the limited resources available to effectuate the mechanization changes.

Diagram:
Line Sharing Arrangement to CLEC Voice
Data CLEC discontinues data service after
Voice CLEC's assumption of the voice service

The following diagrams illustrate the steps that would occur if SBC Ameritech Michigan handled a CLEC request to win an end user's voice that is currently part of a line sharing arrangement in the following manner:

1. SBC Ameritech Michigan transfers the voice to the requesting CLEC.
2. Data CLEC chooses to discontinue the data service **after** the voice service has transferred.

SBC Ameritech Michigan is not planning to implement this process due to the high probability of prolonged loss of dial tone (voice service) for the end user.

The following provides a high level description of each slide. The slides collectively demonstrate the risk of dial tone loss to the end user, as well as how the data CLEC is being forced to allow the voice CLEC to utilize its equipment and to, potentially, be involved in involuntary line splitting.

Slide 1:

This diagram illustrates a working line sharing arrangement between SBC Ameritech Michigan and a data CLEC. The data CLEC is providing the splitter.

The loop that carries the end user's voice and data traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connects 1 and 2 that allow the voice and data traffic to be carried to the data CLEC's cabling (labeled "B" on the diagram) are depicted by a purple/pink dotted line.

The voice and data traffic is then carried over the data CLEC's cabling (again, labeled as "B" on the diagram) to the data CLEC's collocation arrangement.

Once the voice and data traffic reaches the data CLEC's collocation arrangement, it is routed through the data CLEC's splitter. The splitter separates the voice traffic from the data traffic.

The data traffic is sent on to the data CLEC's DSLAM where it remains separate from the voice traffic.

The voice traffic is carried back towards SBC Ameritech Michigan's IDF on another CLEC cable (shown as "A" on the diagram).

The cross connects “3” and “4” that allow the voice traffic to be carried to SBC Ameritech Michigan’s switch (“OE”) are depicted by a blue dotted line.

Slide 2:

This diagram illustrates the physical arrangement that would occur after the voice has been assumed by a voice CLEC, but before the data CLEC had discontinued its service.

No physical changes have occurred at this stage in the process. The voice and data services still follow the same path as on slide 1.

It should be noted that at this point, the voice CLEC’s voice service is now traveling over the data CLEC’s cabling (labeled as “A” and “B”) and through the data CLEC’s splitter equipment. The unbundled elements that the voice CLEC has purchased are actually connected within the data CLEC’s network.

Slide 3:

This diagram illustrates the physical arrangement that would occur after the voice has been assumed by a voice CLEC, but after the data CLEC had discontinued its service.

The only physical change that occurs in this slide is that the data CLEC has disconnected its splitter in order to recover the splitter port upon the discontinuation of data service. The splitter equipment is in the control of the data CLEC. The data CLEC would not submit an LSR to request the disconnection as this is work performed by the data CLEC and not by SBC Ameritech Michigan.

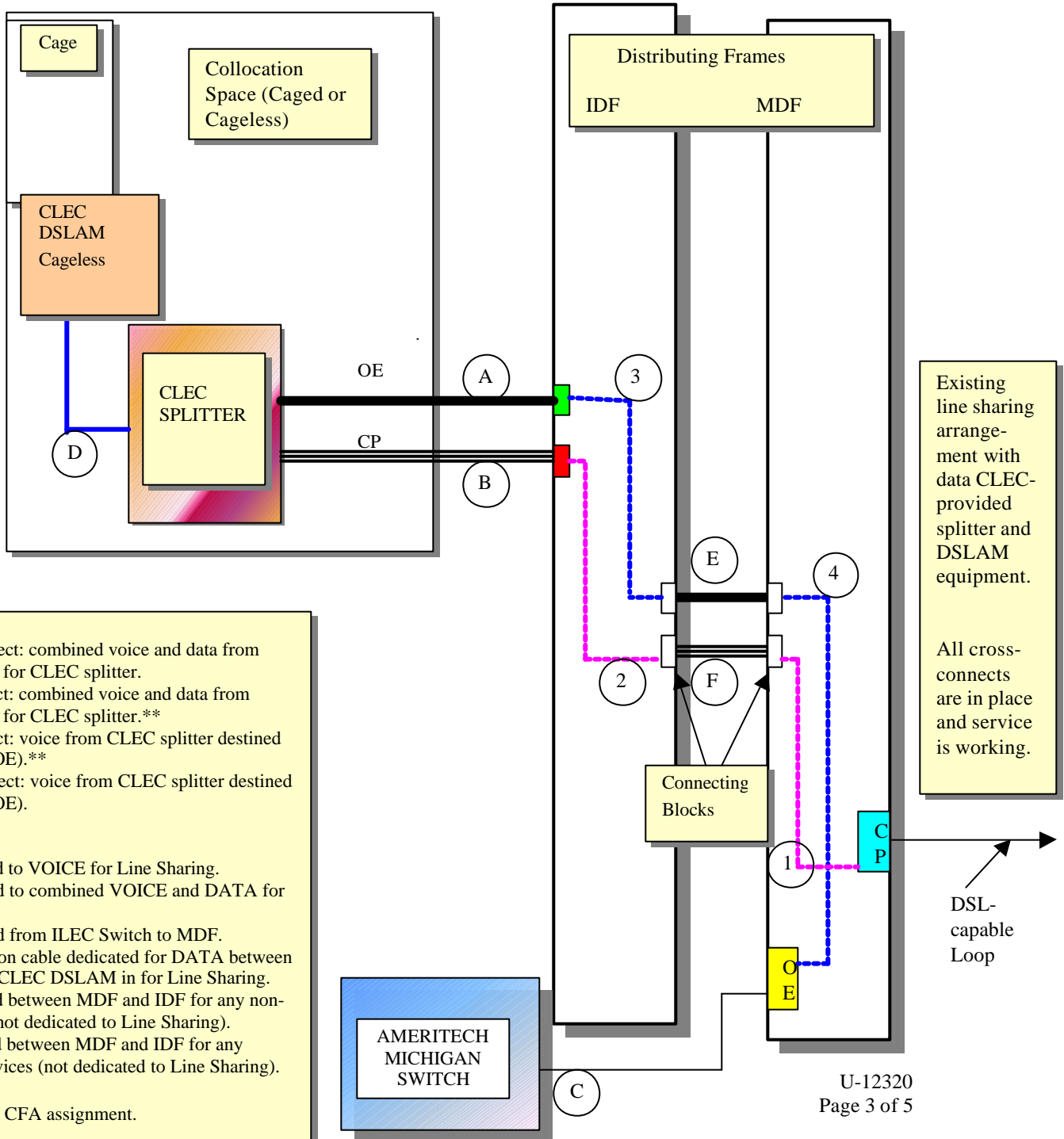
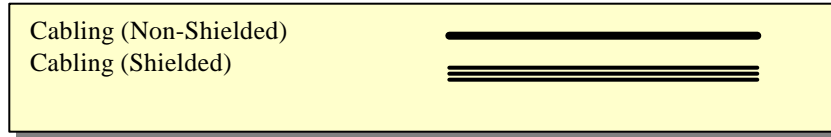
Once the data CLEC has disconnected its splitter, the end user will lose voice service as there is no longer continuity between the loop and the switch. There is no longer a connection between the data CLEC’s “A” cabling and the data CLEC’s “B” cabling.

It should also be noted that although the data CLEC has disconnected its splitter, the voice CLEC is still tying up the data CLEC’s cabling (shown as “A” and “B”). Since the data CLEC is no longer leasing an HFPL from SBC Ameritech Michigan in this situation, the data CLEC cannot submit an HFPL disconnect request to SBC Ameritech Michigan to free up this cabling.

**LINE SHARING TO CLEC VOICE -
DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE**

SLIDE 1 OF 3 Depicting Existing Line Sharing Arrangement

DLEC/CLEC Owned Splitter



Cross-connects:
 1 MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
 2 IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
 3 IDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).**
 4 MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

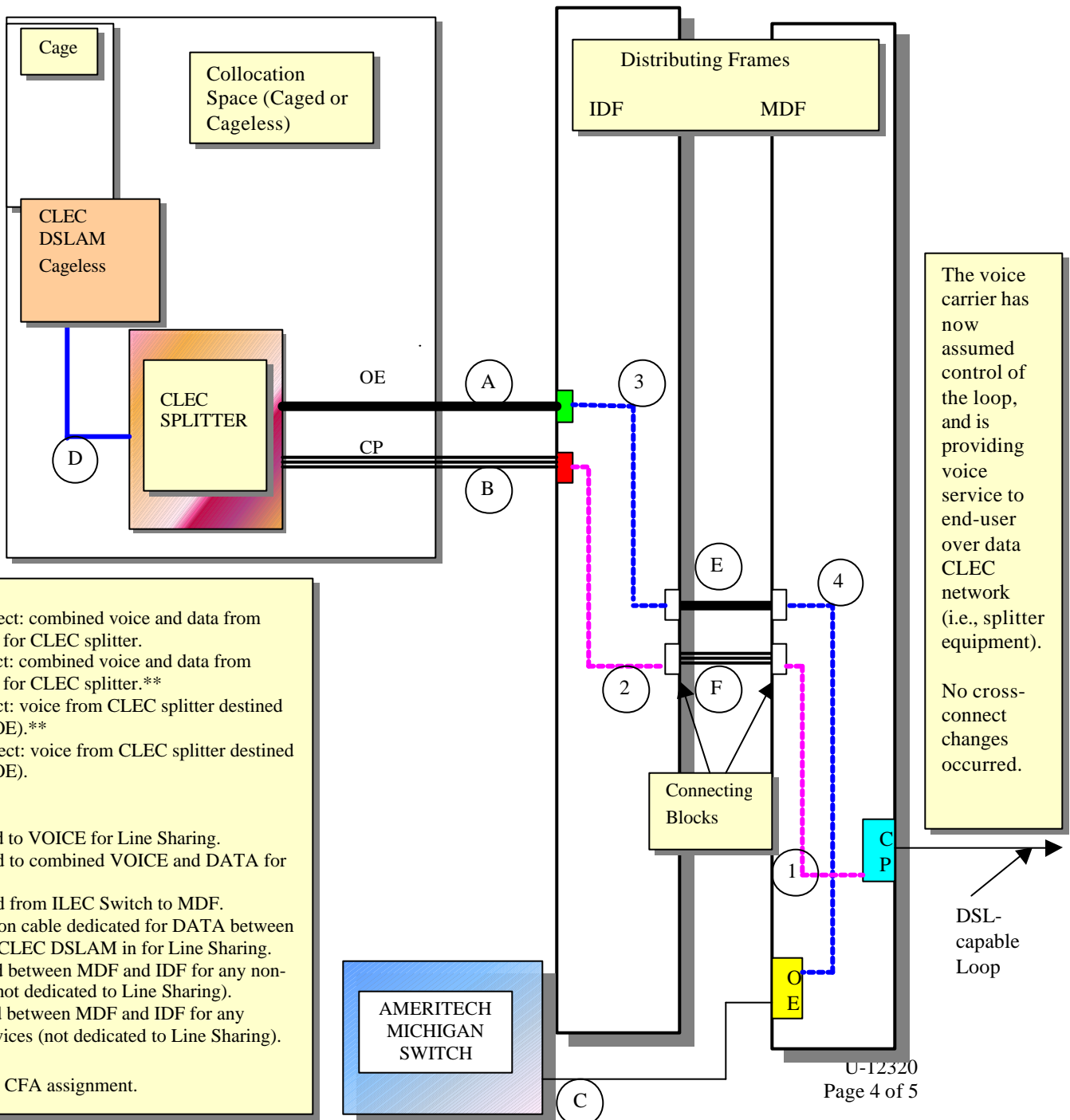
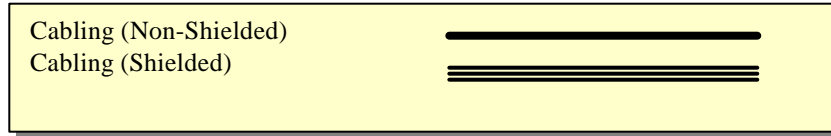
Tie Cables:
 A. Cable dedicated to VOICE for Line Sharing.
 B. Cable dedicated to combined VOICE and DATA for Line Sharing.
 C. Cable dedicated from ILEC Switch to MDF.
 D. CLEC collocation cable dedicated for DATA between CLEC splitter and CLEC DSLAM in for Line Sharing.
 E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
 F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

** Requires CLEC CFA assignment.

**LINE SHARING TO CLEC VOICE -
DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE**

**SLIDE 2 OF 3 Depicting Line Splitting Arrangement
(Post Migration of Voice Service to Voice CLEC – Data CLEC Providing Data)**

DLEC/CLEC Owned Splitter



Cross-connects:

- 1 MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
- 2 IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
- 3 IDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).**
- 4 MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

Tie Cables:

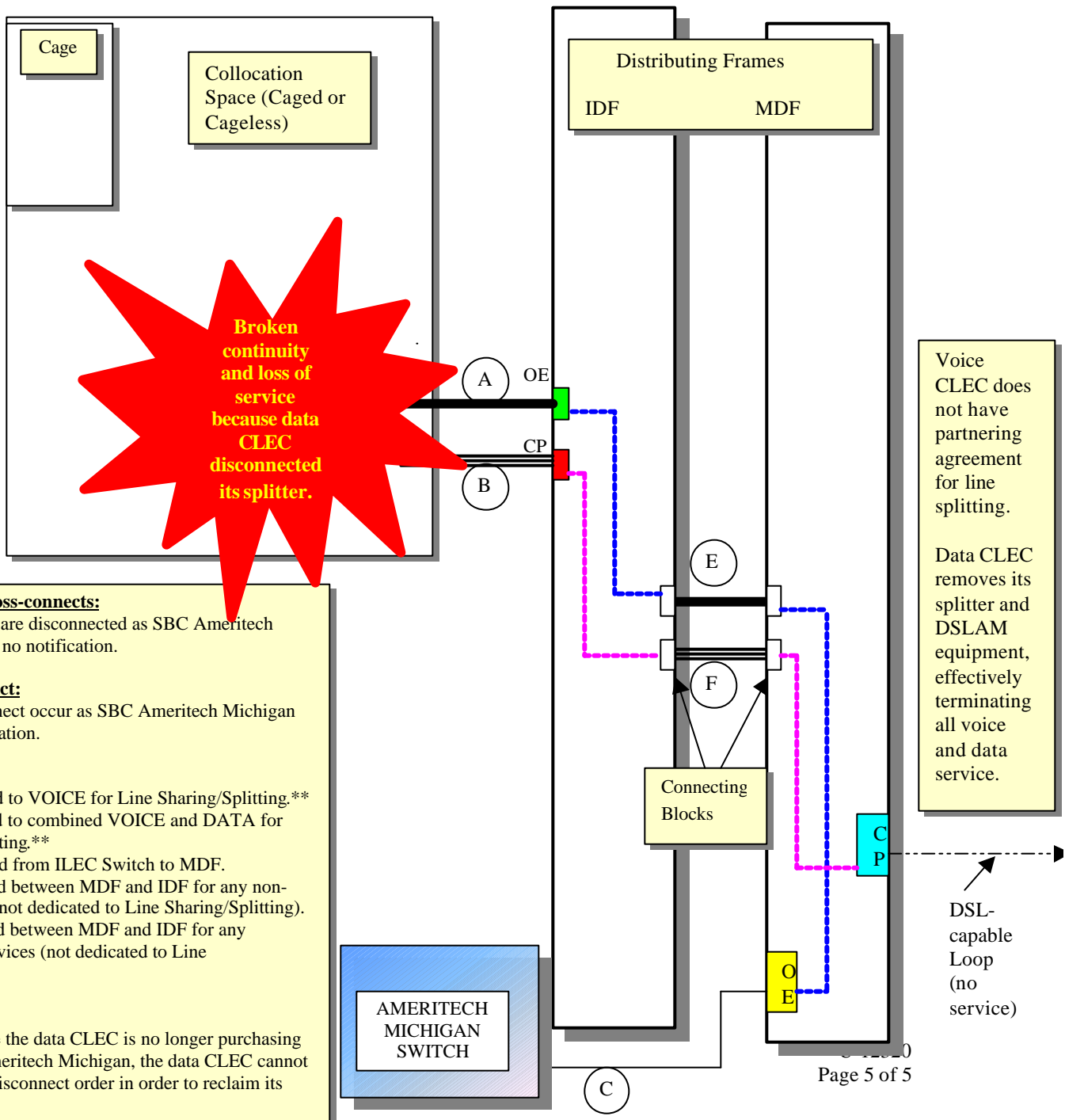
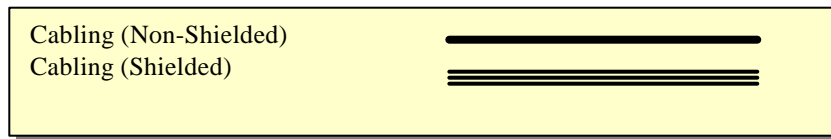
- A. Cable dedicated to VOICE for Line Sharing.
- B. Cable dedicated to combined VOICE and DATA for Line Sharing.
- C. Cable dedicated from ILEC Switch to MDF.
- D. CLEC collocation cable dedicated for DATA between CLEC splitter and CLEC DSLAM in for Line Sharing.
- E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
- F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

** Requires CLEC CFA assignment.

**LINE SHARING TO CLEC VOICE -
DATA CLEC DISCONTINUES SERVICE AFTER CLEC ASSUMPTION OF VOICE**

(SLIDE 3 OF 3 Depicting Data CLEC Disconnecting Its Equipment)

DLEC/CLEC Owned Splitter



Disconnected Cross-connects:
No cross connects are disconnected as SBC Ameritech Michigan receives no notification.

New Cross-connect:
No new cross connect occur as SBC Ameritech Michigan receives no notification.

Tie Cables:
A. Cable dedicated to VOICE for Line Sharing/Splitting.**
B. Cable dedicated to combined VOICE and DATA for Line Sharing/Splitting.**
C. Cable dedicated from ILEC Switch to MDF.
E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing/Splitting).
F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing/Splitting).

**** Note:** Because the data CLEC is no longer purchasing an HFPL from Ameritech Michigan, the data CLEC cannot submit an HFPL disconnect order in order to reclaim its own CFA.

**Diagram:
Line Sharing Arrangement to UNE-P**

**HFPL Disconnected as Part of the Migration
Process of the Voice to the Voice CLEC**

The following diagrams illustrate the steps that would occur if SBC Ameritech Michigan handled a CLEC request to win an end user's voice that is currently part of a line sharing arrangement in the following manner:

1. SBC Ameritech Michigan disconnects the HFPL (per voice CLEC's request).
2. SBC Ameritech Michigan re-establishes the voice service.
3. SBC migrates the voice to UNE-P.

SBC Ameritech Michigan is planning to implement this process as it will prevent the extended loss of end user's dial tone. In addition, this process returns the data CLEC's CFA to the data CLEC and does not force the data CLEC to line split.

The following provides a high level description of each slide.

Slide 1:

This diagram illustrates a working line sharing arrangement between SBC Ameritech Michigan and a data CLEC. The data CLEC is providing the splitter.

The loop that carries the end user's voice and data traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connects 1 and 2 that allow the voice and data traffic to be carried to the data CLEC's cabling (labeled "B" on the diagram) are depicted by a purple/pink dotted line.

The voice and data traffic is then carried over the data CLEC's cabling (again, labeled as "B" on the diagram) to the data CLEC's collocation arrangement.

Once the voice and data traffic reaches the data CLEC's collocation arrangement, it is routed through the data CLEC's splitter. The splitter separates the voice traffic from the data traffic.

The data traffic is sent on to the data CLEC's DSLAM where it remains separate from the voice traffic.

The voice traffic is carried back towards SBC Ameritech Michigan's IDF on another CLEC cable (shown as "A" on the diagram).

The cross connects "3" and "4" that allow the voice traffic to be carried to SBC Ameritech Michigan's switch ("OE") are depicted by a blue dotted line.

Slide 2:

This diagram illustrates the physical activity that would occur when SBC Ameritech Michigan processes the disconnect of the HFPL and re-establishes the voice service.

SBC Ameritech Michigan removes cross connects 1 and 2 that connect the loop to the data CLEC's collocation arrangement (depicted as a purple/pink dotted line) and cross connects 3 and 4 that connect the switch to the data CLEC's collocation arrangement (depicted as a blue dotted line). This activity disconnects the HFPL and frees up the data CLEC's CFA and splitter port, so the data CLEC can utilize its network for future line sharing or line splitting arrangements.

SBC Ameritech Michigan then re-establishes the voice service by placing new cross-connect 5 (depicted as a red dotted line) between the switch (shown as "OE") and the loop ("CP").

It should be noted that at this point, the voice service is no longer traveling over the data CLEC's cabling (labeled as "A" and "B") or through the data CLEC's splitter equipment. The unbundled elements that the voice CLEC has purchased are connected within SBC Ameritech Michigan's network.

The end user down-time associated with this process is very brief, and managed by SBC Ameritech Michigan as it is when SBC Ameritech Michigan converts retail voice to a line sharing arrangement.

Slide 3:

This diagram illustrates the physical arrangement that would occur as an end result after all of the work on Slide 2 has been completed.

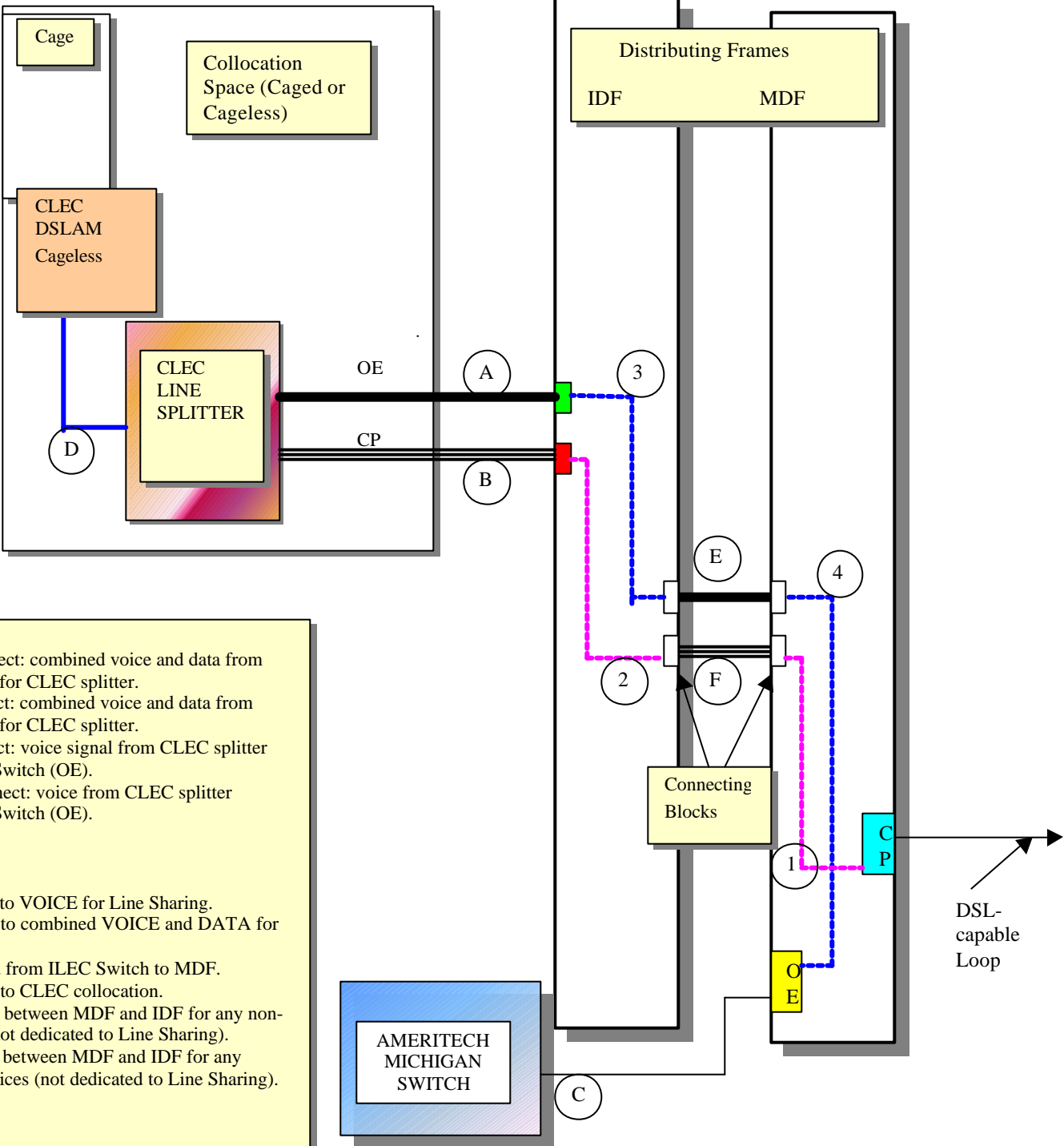
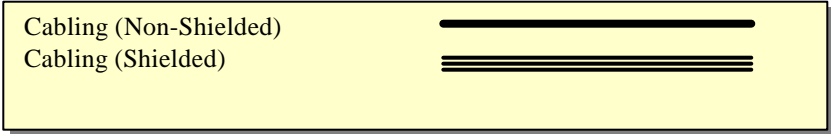
The loop that carries the end user's voice traffic terminates on the MDF in the SBC Ameritech central office. This is depicted at the box labeled "CP" (cable pair) at the lower right-hand corner of the diagram.

The cross connect 1 (depicted as a red dotted line) allows the voice traffic to be carried to the SBC Ameritech Michigan switch (labeled "OE" on the diagram).

LINE SHARING TO UNE-P

SLIDE 1 OF 3 Depicting Existing Line Sharing Arrangement

DLEC/CLEC Owned Splitter



Cross-connects:

- 1. MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
- 2. IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
- 3. IDF cross-connect: voice signal from CLEC splitter destined for ILEC Switch (OE).
- 4. MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

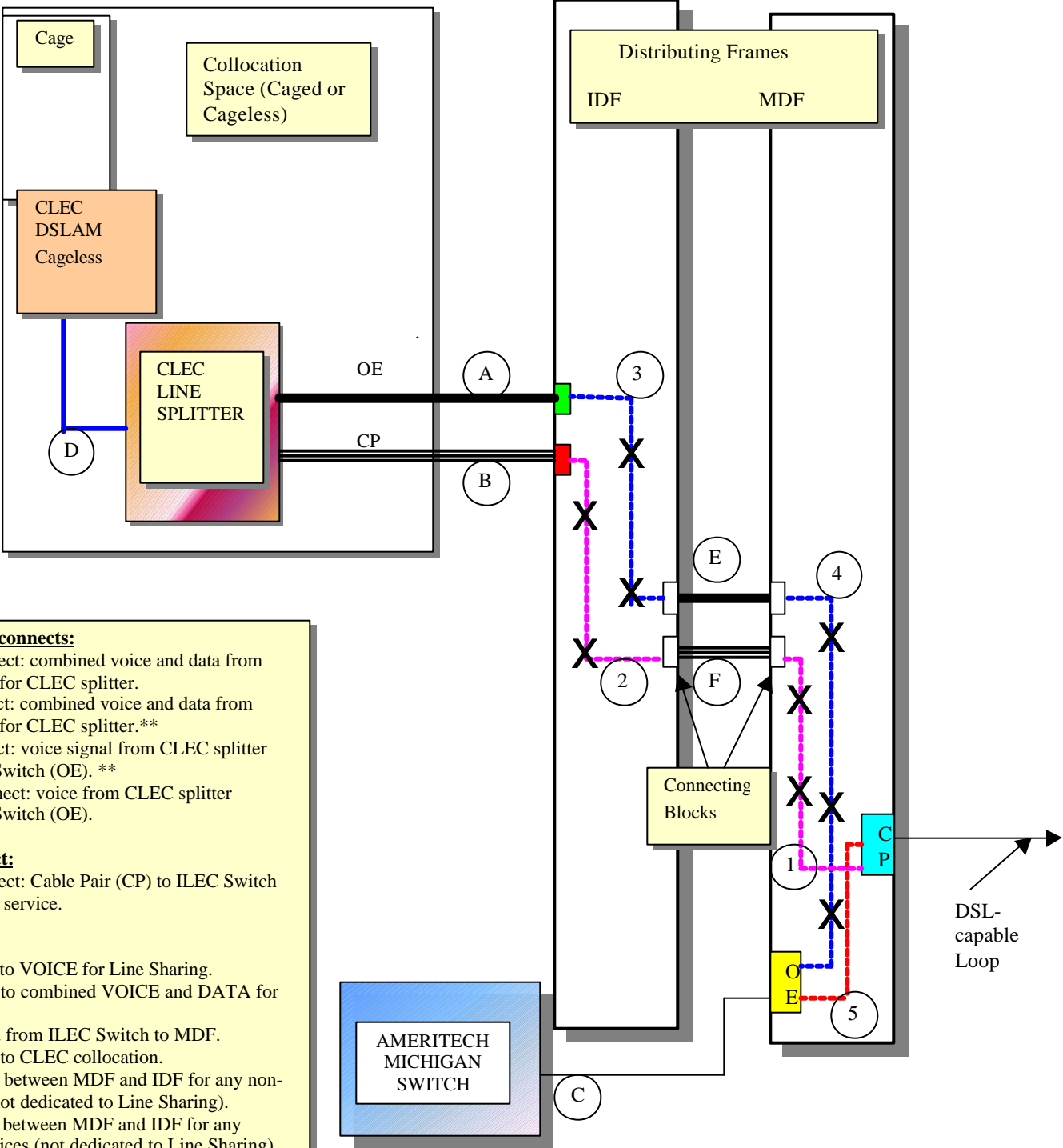
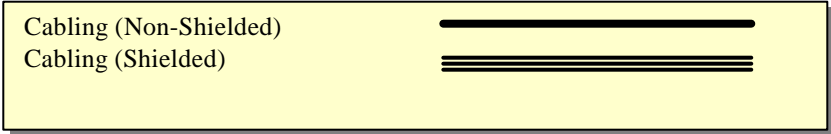
Tie Cables:

- A. Cable dedicated to VOICE for Line Sharing.
- B. Cable dedicated to combined VOICE and DATA for Line Sharing.
- C. Cable dedicated from ILEC Switch to MDF.
- D. Cable dedicated to CLEC collocation.
- E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
- F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

LINE SHARING TO UNE-P

SLIDE 2 OF 3 Depicting Work Associated with Disconnecting HFPL and Establishing UNE-P

DLEC/CLEC Owned Splitter



Disconnect Cross-connects:

1. MDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.
2. IDF cross-connect: combined voice and data from cable pair destined for CLEC splitter.**
3. IDF cross-connect: voice signal from CLEC splitter destined for ILEC Switch (OE). **
4. MDF cross-connect: voice from CLEC splitter destined for ILEC Switch (OE).

New Cross-connect:

5. MDF cross-connect: Cable Pair (CP) to ILEC Switch (OE) for voice only service.

Tie Cables:

- A. Cable dedicated to VOICE for Line Sharing.
- B. Cable dedicated to combined VOICE and DATA for Line Sharing.
- C. Cable dedicated from ILEC Switch to MDF.
- D. Cable dedicated to CLEC collocation.
- E. Cable dedicated between MDF and IDF for any non-shielded services (not dedicated to Line Sharing).
- F. Cable dedicated between MDF and IDF for any shielded (data) services (not dedicated to Line Sharing).

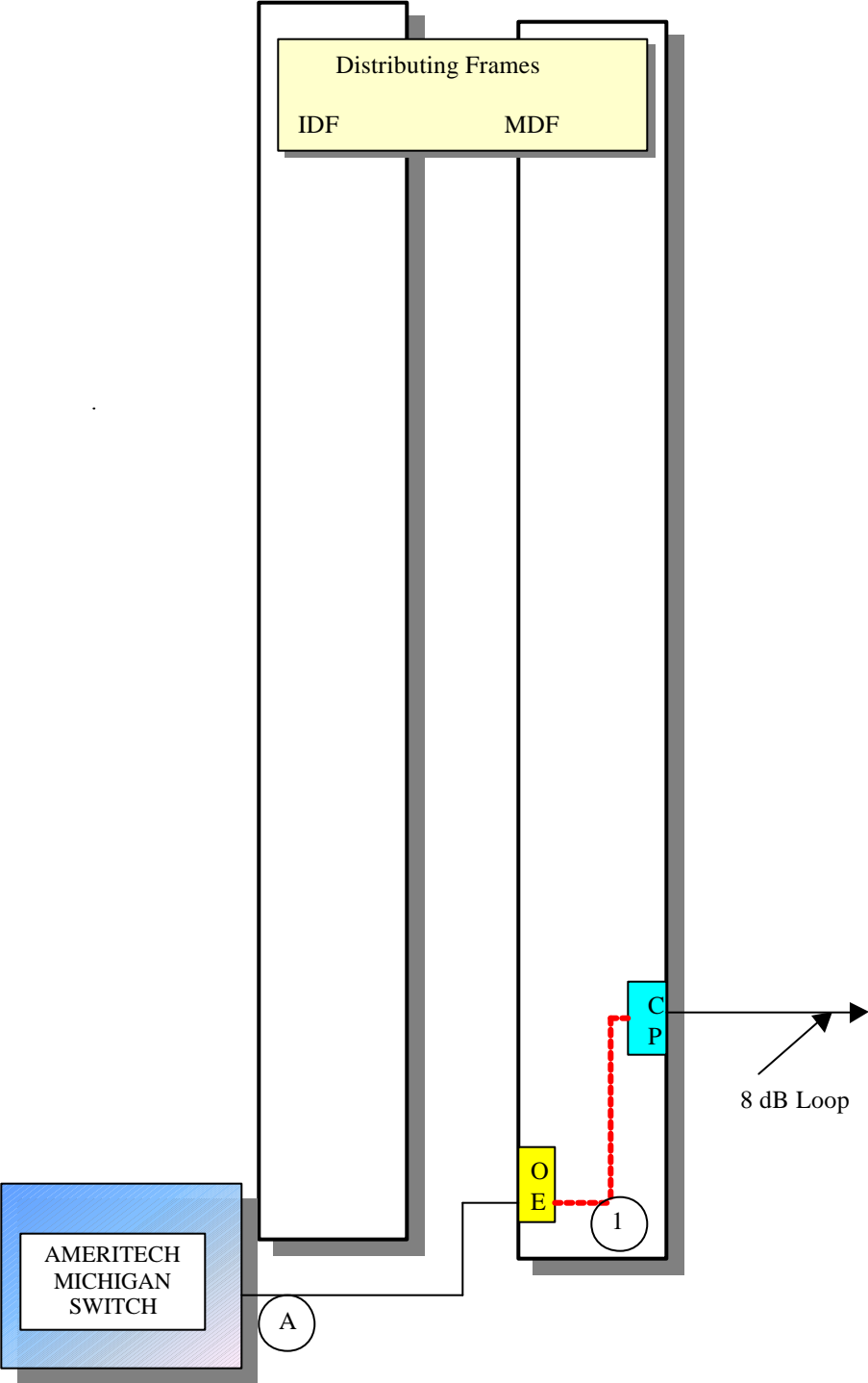
** Requires CLEC CFA assignment.

LINE SHARING TO UNE-P

SLIDE 3 OF 3 Depicting End Result - UNE-P

Cross-connect:
1. MDF cross-connect: Cable Pair (CP) to ILEC Switch (OE) for voice only service.

Tie Cables:
A. Cable dedicated from ILEC Switch to MDF.





CSI and Listings Report

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Account Section

General Account Information:

Account Telephone Number (ATN): 248-
Customer Code (CUSCODE): 340
RSCP Indicator (RSCPInd): N
Class of Service (CS): MWH
End-User Name (NAME):
Type of Service (TOS): 2---

Account Service Address Information:

Service Address Number (SANO):
Service Address Street Name (SASN):
City (CITY):
Zip Code (ZIP):

FEATURE INFORMATION SECTION

Feature	Feature Detail	Feature Description
TN 2484436912340		Telephone Number
CUST_CD 340		Description is not available
CLSV MWH		Description is not available
EXCH SFLD		Description is not available
NOCN 9300		Description is not available
DZIP 48076		Description is not available
BN1 LINDA DE DOLPH		Description is not available
BA1 18833 SUNNYBROOK		Description is not available
PO LATHRUP VLG MI 48076		Description is not available
TAR NONE		Description is not available
/LN DE*DOLPH, L S		Description is not available
/LA 18833 SUNNYBROOK, LATHRUP VIL		Description is not available

Service and Equipment Section

Service Information:

Working Telephone Number (WTN): 248-
Exchange Company Circuit Id (ECCKT): .UAFU.248.
End-User's Name (NAME):
IntraLATA Pre-Subscription Indicator Code (LPIC): 9100
InterLATA Pre-Subscription Indicator Code (PIC): 0288



←
ECCKT shows presence of HFPL

Service Address Information:

Service Address Number (SANO):
Service Address Street Name (SASN):
City (CITY):
Zip Code (ZIP):

FEATURE INFORMATION SECTION

Feature	Feature Detail	Feature Description
MWH	/PIC ATX	Call Plan 400
	/PICX 0288	Carrier
	/PCA 80, 10-25-88	Carrier Identifier
	/ZPIC A13	Carrier Arrangement
	/LPIC 9100	Predesignated Intralata (ACNA)
	/LPCA SQ, 05-12-99	Predesignated Intralata Carr
	/CLT .UAFU.248.4	Intralata Carrier Arrangement
	/ME MEOE MEOE.IR00H10.001.08-036;MECP MECP.IR00H10.001.08-036;SPLT SPLT.IR00H10.001.08-036	Circuit ID Spec Serv -TN Form
	/UNN1 OCN	Miscellaneous Equipment
	/UNE1 .UAFU.922192..MB	Unbundled Network Cust Name
	/RA 313 OCN /CUS 000	Unbundled Network Elem Clr ID
	/SSP	Related Account
ESM		Special Service Protection
ESX		Call Forwarding
WHO		Call Waiting
NSD		Ameritech Privacy Manager
NWT		Caller Identification
ESC		Caller ID With Call Waiting
PGOEE		Three Way Calling
PGOEN		SBC Employee Discount Program
PGOEO		SBC Employee Discount Program
TTR		SBC Employee Discount Program
FYW		Touch-Tone Service
BSXUP		Abbreviated Toll Free Service
UXWAC		Unrestricted Calling Card
UXTAC		Oakland County Surcharge
9PZLX		9-1-1 Emergency System
9LP		Federal Universal Service Fee
9LM		State Access Charge
	/RTE 000	Federal Access Charge
NSR		Rate
		Number Portability Surcharge

Shows presence of HFPL →

N8D

Calling Name
Display

Listing Section

Listing Information:

Listed Name First Name (LNFN): ██████
Listed Name Last Name (LNLN): ██████████
Listing Name Placement (LNPL): L
Listing Type (LTY): 1
Record Type (RTY): LML

Caption Information:

Listed Address Information:

Listed Address Number (LANO): ██████
Listed Address Street Name (LASN): ██████████
Listed Address Locality (LALOC): ██████████

TXNUM:km242660906671k

D/T Sent:200212060431PM

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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) Case No. U-12320
the federal Telecommunications Act of 1996.)
_____)

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on December 11, 2002 she served a copy of SBC Ameritech Michigan's Amended Compliance Plan As Required by October 3, 2002 Opinion Order upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.

Mindy D. Smith
Mindy D. Smith

Subscribed and sworn to before me,
a Notary Public in and for said County,
this 11th day of December, 2002.

Kristi A. Grieve

Kristi A. Grieve, Notary Public
Ingham County, Michigan
My Commission Expires: 11/12/04

SERVICE LIST – MPSC CASE NO. U-12320

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