

11-07-00 Michigan

Final Issues List 10/13/00

~~BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN~~

~~Investigation Into Ameritech Wisconsin~~

~~Operational Support Systems~~ \_\_\_\_\_ ~~6720 TI 160~~

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, \_\_\_\_\_)

11-07-00 Michigan

Final Issues List 10/13/00

to consider Ameritech Michigan's compliance )  
with the competitive checklist in Section 271 of ) Case No. U-12320  
the Federal Telecommunications Act of 1996. )  
ederal Telecommunications Act of 1996. )  
\_\_\_\_\_ )

**FINAL ISSUES LIST**

(11/7/00 Discussion Draft)

**I. Facilities Modification Process: Issue A/F**

Final Issues List 10/13/00

1. Does the most recent version of Ameritech's facilities modification policy, as documented in Accessible Letter CLEC AM-00-153, dated October 27, 2000, ~~and anticipated modifications to the policy language and notifications~~ solve the problems identified by CLECs in this proceeding?
2. Should the facilities modification policy require a delay notice within 24 hours rather than 48 hours of receiving the original firm order confirmation (FOC)?
3. Should Ameritech be able to impose charges as proposed under the facilities modification policy?
  - (a) Can charges be properly imposed for complex modifications? If so, for what complex modifications are charges appropriate?

- (b) On what basis may charges be imposed and what charges are reasonable?
- 4. Should Ameritech be required to respond with a price quote for provisioning a UNE loop where an IDLC circumstance is presented in less than a 30-day period?
- ~~5. What performance measures are required for the facilities modification process?~~

~~**II. UNE-P and EELs: Issues B and E**~~

- ~~1. Do the terms and conditions of the proposed amendment meet the requirements for providing combinations of network elements assuming satisfactory OSS test and performance measurement results?~~

- ~~(a) In light of the July 18, 2000, 8<sup>th</sup> Circuit Court decision, is Ameritech obligated to provide new combinations?~~
- ~~(b) Can new combinations be obligated under state statutes? Should these amendments be tariffed? How should the tariff read?~~
- ~~(c) If Ameritech is not required to provide new combinations, are the market prices proposed by Ameritech in compliance with state and federal requirements?~~
- ~~2. Is the distinction between new and existing UNE-Ps and EELs appropriate as designated in the proposed amendment?~~
- ~~3. Can operator service (OS) and directory assistance (DA) be priced at market rates? What terms and conditions are appropriate for this offering? Should Ameritech be required to detail its voice mail and OS/DA~~

~~offerings prior to requiring signing of the agreement? If so, what should be included in these offerings?~~

- ~~4. To what extent must combinations offered under the terms of the proposed amendment (including both existing and new) and OS/DA offerings also be tariffed? Even where the rates of an offering may not be regulated, is a tariff required under state law?~~
- ~~5. Does the non-collocation alternative proposed by Ameritech for CLEC combination of network elements satisfy the federal requirements? Is a dedicated area rather than a secure frame room the preferred requirement? Must the proposed secured frame room alternative be available pursuant to tariff?~~
- ~~6. May Ameritech condition the availability of these offerings on agreement by the CLECs that they not purchase the same services under available~~

~~tariffs? May Ameritech limit a signing CLEC from picking and choosing parts of other interconnection agreements for the CLEC's use?~~

- ~~7. May Ameritech limit the portability of this amendment to other states?~~
- ~~8. Should the conversion of special access circuits to EELs be tariffed and if so under what conditions should this be offered?~~
- ~~9. Is the length of the term of the proposed amendment acceptable? Is it appropriate to link availability of an amendment to agreement that it meets the requirements of Section 271?~~
- ~~10. Should Ameritech have the option to withdraw its UNE-P offering for business customers when 4 or more collocators are present in a particular office?~~
- ~~11. Should the CLEC waiver language be modified? Is the limitation on a signing CLEC's ability to bring UNE issues and complaints concerning~~

Final Issues List 10/13/00

~~this amendment to the Commission or the FCC for resolution, if any, appropriate?~~

- ~~12. Should Ameritech be required to offer resale at a price no higher than the lower of the current resale price or the prices offered for UNE-P until Ameritech tariffs and offers an unrestricted UNE-P? Should damage issues or collateral complaints for damages be permitted?~~
- ~~13. Should Ameritech be required to issue all telco bills for UNE-P in the CABS BOS format?~~
- ~~14. Should Ameritech install UNE-P at a level of parity with their retail operations, but at a minimum service level adhering to Commission regulation standards?~~
- ~~15. Should CLECs be required to complete a Bona Fide Request to request additional capacity to meet their network needs?~~

- ~~16. May the Commission determine Ameritech obligations as to offerings and pricing outside a specific arbitration under section 252 of the Telecommunications Act based on authority in state or federal law?~~
- ~~17. For UNE-P, EELS, and the following additional products, long term shared transport, sub-loop unbundling and dark fiber:~~
- ~~(a) What is Ameritech required to offer under the Act?~~
  - ~~(b) What is Ameritech required to offer under state law?~~
  - ~~(c) What should the Commission in its discretion direct Ameritech to offer?~~
  - ~~(d) Should the product be tariffed?~~
  - ~~(e) Should the product be offered at TELRIC-based prices?~~
  - ~~(f) When should the product be made available?~~

**III.II. Deferral of Implementation Dates: Issues F(2), and H, ~~and D~~**

1. Should Ameritech be required to deploy the following OSS enhancements on the dates identified in the [Public Service Commission of Wisconsin's](#) July 19, 2000, Order, [as subsequently amended by and committed to by Ameritech](#)? [How should these functions be deployed?](#)
  - (a) Issue F(2): "865" Versioning (~~September 27, 2000~~[December 2, 2000](#))
  - ~~(b) Issue D: Sub-Loop Ordering (September 27, 2000)~~
  - (e) Issues H: Abbreviated address validation (~~September 1, 2000~~[March 2001 Release](#))

- (i) Should Ameritech be required to synchronize its Street Address Guide ("SAG") with its Customer Service Record ("CSR")?
- (ii) Should Ameritech be required to perform a one-time scrub of its SAG and CSR database to eliminate existing problems?

**~~IV. Parity with a Floor~~**

- ~~1. Should the Temporary ALJ Proposed Order dated September 25, 2000, concerning parity with a floor be adopted by the Commission?~~
- ~~2. What benchmarks should the Commission adopt for service quality to define adequate performance so that CLECs have a reasonable opportunity to provide adequate retail service to their own customers?~~

**V.III. Change Management Process**

1. Should the Commission adopt as the permanent ~~Wisconsin~~Michigan change management process the SBC 13-state plan, including the modified voting process allowing for a majority vote by the OIS participants?

**VI.IV. Hot Cuts: Issue G**

1. In what time frame before cutover should dial tone/ANI testing be performed?
  - (a) Should testing be accomplished on Due Date-2, Due Date-1, 30 minutes on cutover date or 1 hour on cutover date?

2. Should Ameritech be required to provide a status update every 1 hour on trouble report orders?
3. Should Ameritech be able to charge CLECs for dial tone/ANI testing? If so, on what basis and in what amount should a charge be imposed?
4. Should Ameritech be required to provide an additional indicator on the return transaction identifying that a change to the originally requested time has been made?

**VII.V. Network Interface Devices: Issue O**

1. Should Ameritech be required to implement its promised revised policy concerning moving internal NIDS?

- (a) Should Ameritech's revised policy include recalling technicians to any premises at no charge to the CLEC to move the NID outside?

**VIII.VI. Flow Through: Issue S**

1. Should Ameritech be required to improve its flow through capabilities for CLEC orders, including for any type of unbundled element orders such as loop and number portability orders?
2. If Ameritech should be required to improve its flow through capabilities, in what manner and over what time should Ameritech be required to improve its flow through capabilities?

**VII.IX. Directory Listing and Ordering: Issue L**

1. Should Ameritech be required to incorporate the functionalities of its OSS interface and Ameritech advertising services interface so that CLECs can use a single interface for service orders and directory listing orders?
2. By what date should Ameritech be required to implement a single interface?
3. Should Ameritech be required to develop a work around solution for CLECs regarding the single interface for the period prior to the implementation of the permanent single interface? If so, what work-around solution should be employed and when should it be employed?
4. Should the single interface be required for both ordering and preordering?

~~5. What performance measures should be developed concerning directory listings?~~

6.5. Has Ameritech complied with its policy providing a review of listings on a timely basis, including providing a second proof of listing on a timely basis?

~~X. Line Splitting/Line Sharing~~

~~1. Should Ameritech be required to provide line splitters?~~

~~XI. VI Dark Fiber~~

~~1. Should Ameritech's dark fiber tariff be modified to delete the term and condition permitting Ameritech to unilaterally terminate the provision of dark~~

fiber to a CLEC on 12 months notice revoke a CLEC's access to dark fiber as set forth in P.S.C. of W. Tariff 20, Part 19, Section 18(1)(B)(4)?

**XII.VIII. Master Test Plan**

1. Should the Master Test Plan require Ameritech to perform some sort of volume test for manual items, such as loop ordering and provisioning, through, for example, a work force review or force and load analysis, that would identify work force additions necessary to accomplish manual ordering and provisioning requirements at certain increased future order ~~levels~~levels?

**XIII. Remedy Plan**

- ~~1. What remedy plan should be adopted by the Commission to ensure Ameritech's compliance with performance measures?~~

Final Issues List 10/13/00

~~2. Payment recipients~~

~~3. Payment amounts~~

~~4. Application of statistical measurements for parity and benchmark tests~~

~~XIV. Performance Measures~~

~~1. What performance measures should be adopted by the Commission?~~

~~2. Should the CLECs' proposed performance measure CLEC-W1 regarding average delay in original FOC due dates due to delay notices be adopted?~~

~~3. Should the CLECs' proposed measurement CLEC-W2 concerning the accuracy of facilities modifications classifications be adopted?~~

~~4. Should the CLECs' proposed performance measure CLEC-W3 concerning timeliness of submission of directories for review be adopted?~~

Final Issues List 10/13/00

- ~~5. Should the CLECs' proposed performance measure CLEC-W4 concerning the accuracy of processing CLEC corrections based on review of directory information be adopted?~~
- ~~6. Should the CLECs' proposed performance measure CLEC-W5 concerning the percentage of NIDs not moved after technician visit be adopted?~~
- ~~7. Should performance measures 79 and 81 be disaggregated for CLEC branded and Ameritech branded service?~~
- ~~8. What is the appropriate interval for installation to be included in performance measure 55.2?~~
- ~~9. Should performance measure 58 be disaggregated for fieldwork and no fieldwork orders?~~
- ~~10. Should the exiting performance measure be implemented pending resolution of negotiations between the parties to revise performance measure 70?~~

11-07-00 Michigan

Final Issues List 10/13/00

- ~~11. Should performance measures 1.2 and 124 from the Texas performance measures be adopted in Wisconsin?~~
- ~~12. Should performance measures MI 1 through MI 14 and WI 1 through WI 9 be disaggregated for DSL as provided in Texas performance measures 5.1, 58, 107 and 108?~~