

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

Proceedings had in the above-entitled
matter at the Michigan Public Service Commission, 6545
Mercantile Way, Lansing, Michigan.

SESSION OF WEDNESDAY, AUGUST 2, 2000

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- - -

BEFORE: JOHN KERN, Facilitator

PARTICIPANTS

MPSC

ANN SCHNEIDEWIND, MPSC Communications Staff

AMERITECH MICHIGAN

CRAIG ANDERSON, Legal
DONALD CALAMIA
CRAIG ANDERSON
SAL FIORETTI, Director, Performance Measures
DEMETRIOS G. METROPOULOS, Legal, via telephone
JEFF BARTON
RANDY HAPPEL
SUSAN FRENTZ

AT&T COMMUNICATIONS

BOB KLIPSTEIN, via telephone
KAREN MOORE, via telephone
DOUG TRABARIS, via telephone

CORECOMM

MARY CEGELSKI

WORLD.COM

JANEEN SANDERS
MARSHA EMCH, via telephone

NEXTLINK

CHRISTINE EMMEL, via telephone

Z-TEL

CLAUDIA EARLS, via telephone

RHYTHMS NETCONNECTIONS
CLEC ASSOCIATION OF MICHIGAN
McLEODUSA

ROD COX, via telephone
TODD McNALLY, via telephone

INDIANA COMMISSION

JOEL FISHKIN, via telephone

ATTORNEY GENERAL

ORJIAKOR ISIOGU, Assistant Attorney General

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Lansing, Michigan
Wednesday, August 2, 2000
10:15 A.M.

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(The proceedings were resumed pursuant to the adjournment.)

MR. KERN: O.K., are we ready to begin?

Welcome, everybody, to the tariff collaborative. We are reconvening -- performance standards. Tariffs are tomorrow. Sorry.

Today we're going to start Phase 2 of the performance measures effort. Specifically we're going to talk about some measures that have been agreed to in other states, we're going to talk about measures for advanced services, and we've had a request by WorldCom to talk about syncing up the measures with residential billing and service quality standards. So that's pretty much the agenda for today.

Late last night Sal Fioretti from Ameritech sent out a matrix -- actually it's a pretty good tool -- in an attempt to show what Michigan has already done, what's gone on in other states, and how it syncs up with Michigan. I'm assuming everybody got a copy of that e-mail. There's a few hard copies here in the room for those who don't have one.

1 But that's pretty much the agenda. We'll
2 go until, you know, mid-afternoon or however long we need
3 to complete the effort for today.

4 Anybody else have things they want to talk
5 about?

6 Why don't we go around the room and do a
7 quick round of introductions.

8 MS. SCHNEIDEWIND: Ann Schneidewind,
9 Commission staff.

10 MR. BARTON: Jeff Barton, Ameritech.

11 MR. ANDERSON: Craig Anderson, Ameritech.

12 MR. FIORETTI: Sal Fioretti, Ameritech.

13 MS. SANDERS: Janeen Sanders, WorldCom.

14 MS. CEGELSKI: Mary Cegelski, CoreComm.

15 MR. ISIOGU: Orji Isiogu, Michigan Attorney
16 General.

17 MR. CALAMIA: Don Calamia, Ameritech.

18 MR. HAPPEL: Randy Happel, Ameritech.

19 MS. FRENTZ: And Susan Frentz, Ameritech
20 Michigan regulatory.

21 MR. KERN: Thank you.

22 On the conference bridge, one at a time,
23 please.

24 MR. COX: Rod Cox, McLeodUSA.

25 MR. McNALLY: Todd McNally, McLeodUSA.

1 MS. EARLS: Claudia Earls, Z-Tel.

2 MR. KLIPSTEIN: Bob Klipstein, AT&T.

3 MS. MOORE: Karen Moore, AT&T.

4 MR. KERN: For those of you on the
5 conference bridge, this is being transcribed. So if you
6 are on the conference bridge and you have a statement to
7 make, please identify your name before you make your
8 statement so the reporters can make an accurate
9 representation of the session today.

10 With that I'll turn it over to Sal.

11 Sal, why don't you describe the matrix
12 that you put together and then start walking us through
13 it.

14 MR. FIORETTI: Let me ask first, is there
15 anyone on the call that does not have a copy? I
16 think everyone should have. It went out about 7:00
17 o'clock last night Chicago time.

18 What I have put together is a matrix that
19 is based on the joint matrix that we put together in
20 collaboratives in Ohio and Illinois predominantly. Some
21 of the data actually came from earlier collaboratives in
22 Indiana as well.

23 And what I did was, we have developed a
24 joint matrix where we have begun in Ohio at the very
25 beginning of the measurements, begun in Illinois at the

1 the very end of the performance measurements and we have
2 basically met in the middle and we're going to do
3 something like that kind of review in those states as
4 well.

5 But the idea, as I understood it here,
6 was to do two things. No. 1, to sync up the Michigan
7 measures with other agreements that we have made elsewhere
8 and be able to identify what those other agreements are,
9 and to address whether or not or how we would sync those
10 up with agreements made elsewhere. And also to address
11 some of the advanced services issues.

12 On the advanced services side we have
13 collaboratives in other places where we have already
14 agreed to measures, essentially. Those are in this
15 matrix. So we can kind of cover those both at the same
16 time.

17 We also have some additional discussions
18 planned and some investigation in progress on other
19 advanced services measures and were looking to incorporate
20 those as we go along. And maybe at our next scheduled
21 collaborative we could sync up those additional
22 commitments that we make with these measurements. And
23 hopefully we would have a set in total that reflected
24 additional agreements that have been made elsewhere and
25 agreements on advanced services.

1 For those of you looking at this document
2 on a computer, obviously I have identified in red where --
3 I made comments in red. For those that are looking at it
4 here, you can actually see it on the printed copies. It's
5 a little bit lighter. So we'll be able to identify where
6 we have got changes pending.

7 The premise that we had coming into
8 Michigan was to sync up Michigan with the Texas baseline
9 that we had agreed to elsewhere already at that point. So
10 a lot of the changes that we have agreed to elsewhere we
11 have already incorporated into our Michigan document. It
12 just didn't seem to be the right thing to do to agree to
13 something that was a previous version of where we are.

14 So we'll see a lot in this third column
15 which is different from the Michigan position. We'll see
16 a lot of "no issues pending in Michigan" with a number
17 next to it. Or -- I don't know, I started this a couple
18 days ago -- "no modification necessary in Michigan." And
19 basically that means that what we have already got in our
20 performance measure for Michigan is the same as what we
21 have agreed to do in Ohio and/or Illinois at this point.
22 So there is no change necessary to bring it up to date
23 with those.

24 Some measurements we have no modification
25 in two out of three categories, and if we somehow missed

1 one when we talked about it here in Michigan we obviously
2 would be willing to incorporate that into Michigan, but
3 it's noted here in red where it's different.

4 I would suggest that there's a
5 possibility that I might have missed something. And so
6 we'll need to go through this again, you know, just to
7 make sure from those folks who have been involved in some
8 of the other collaboratives -- I would look at today as
9 basically a session where we walk through this document
10 and we talk about what the items in red are. And if
11 anybody thinks there is anything else just at first
12 glance -- I don't expect that you will -- but I look at
13 this as to be kind of a here's where I think we are out of
14 sync with those other states and what we would propose to
15 incorporate from those other states.

16 There are a couple of differences that
17 are pending. One is, I already talked about, is we still
18 have some discussions underway basically in Ohio on
19 advanced services. So we expect to have some additional
20 things that we will be agreeing to and incorporating in
21 this on another edition of this same document. So we
22 have that that we are in the midst of investigating and
23 we'll be bringing back to this document as well. We have
24 not reached agreement.

25 The second thing is in Illinois we have a

1 requirement to do parity versus benchmark, to do parity
2 for as many of the measures as possible, versus the
3 benchmarks that were stated in the original Texas order.
4 I believe there were 16 areas where we agreed to do parity
5 comparisons in Illinois.

6 We have yet to take those to any of the
7 other states. But one of my to-dos from the last Ohio
8 collaborative was to propose which, or it could be all of
9 them or 15 out of 16 or 14 out of 16, we would propose to
10 bring everywhere and have some discussion on that.

11 That will also be an area where we're
12 going to have to go, kind of re-sync this with Illinois
13 because there are things in Illinois that we initially
14 decided should be parity comparisons that we want to
15 change back to the benchmark.

16 So there's some additional work that has
17 to be done there across the board and I would look at
18 doing that work in the next session. I look at this
19 session as really to be laying out what are all the areas
20 that we think there are differences. And for the most
21 part, I mean, for anything that I prepared here that we
22 have agreed to do elsewhere, you know, we can argue about
23 it if you want, but Ameritech would agree to bring those
24 changes into Michigan.

25 So, you know, in the sense that this is a

1 collaborative, if you disagree, that you don't want those
2 changes which you've negotiated for elsewhere, bring that
3 up. But I'm assuming that if I've got them all, we're
4 going to just review them here today, and when I say
5 review them, review them at a relatively high level.
6 There might be some that we need to do some additional
7 investigation where the discussion hasn't really ended yet
8 on particular items, in which case I think we're going to
9 have to follow up and talk about the details also at our
10 next session.

11 So, you know, I look at today as being a
12 relatively easy session where we can basically establish
13 here's where we've agreed to do things in other states,
14 Ameritech would agree to bring them here, and, you know,
15 unless anyone has any major difficulty with them.

16 Now, what we would expect to do then is to
17 prepare, based on this document, a redline version of the
18 Michigan Business Rules that have these changes identified
19 in them and we would send that out in e-mail.

20 So, you know, again I don't see this as
21 being a very complex discussion this morning. It's really
22 a review of what we did in other states that isn't
23 incorporated here, and I think for the most part the only
24 reason that we haven't incorporated anything in Michigan
25 that we've incorporated elsewhere is it's either been a

1 timing thing that we just, you know, are just agreeing to
2 it elsewhere since we had our last Michigan session, or
3 that we just plumb missed it and then incorporated it.
4 And so that's why I said Ameritech is willing to bring all
5 those over, and unless you want to debate it ...

6 MS. SCHNEIDEWIND: But Sal, clarify for me
7 if you would, please, the baseline measures which our
8 Commission just adopted based on the proposals of this
9 collaborative is what is being incorporated in our KPMG
10 contract as the beginning measures that they will test.

11 MR. FIORETTI: Right.

12 MS. SCHNEIDEWIND: And so at this point to
13 what degree are we proposing to change those, or are they
14 mostly additional measures that you're talking about?

15 MR. FIORETTI: Well, what we've agreed to
16 do in the KPMG test in Michigan, I think even stated in
17 the motion, was we expect to implement those by September
18 1st date of reporting. So that would actually be reported
19 October 20th. But we would begin collecting the data for
20 all of those.

21 We're already collecting the data for, I'm
22 going to tell you, 85 to 90 percent of those. And so
23 basically what that was, was all of the things that we
24 already had talked about in the other states up to a
25 particular point in time that we felt we could implement

1 by September 1st, O.K.? These additional measures, we
2 will also have to go back and establish a schedule for
3 when can we actually implement these, but I believe the
4 first step that we want to take here is let's agree on
5 what they are, let's get all that down, and let's give
6 some -- I know we've got a date when we need to file with
7 the Michigan commission for the Phase 2 measures, what
8 will be included in them.

9 So again we have a kind of a timing issue
10 in terms of what we can expect to do in that time, but I
11 think we've basically outlined, between the measures we've
12 outlined here today in this document and those that we'll
13 be agreeing to in the very near future -- and most of
14 those are advanced services-type things, and there might
15 be a few differences in what I'll call the resale I&M-type
16 measurements, which we really haven't gone through in
17 great detail elsewhere at this point, but we've started
18 those conversations and there's been planning calls on the
19 CLEC side and an initial discussion with Ameritech. So
20 there's no reason to start those discussions over again
21 here necessarily.

22 What I did was take some of the questions
23 and issues that were involved in those and put them on
24 this two. What I expect that we will end up here is
25 basically the baseline set of measures that will be very

1 specific to Michigan, which might be a little bit
2 different than those in the other five states that we end
3 up with. And when I say baseline, I mean second phase
4 baseline, and I look at the second phase baseline as kind
5 of the line that we'll draw that says O.K., from here on
6 we should go to periodic reviews, and Mary and I were
7 talking about this a little bit earlier.

8 We're almost on the same schedule in the
9 other states, by virtue of the merger requirements we have
10 to meet in the other states, at least until October 8th or
11 4th or whatever, the one year, in the collaboratives, and
12 then I'm going as necessary. I believe it's our
13 expectation that we will take and really identify the
14 issues that need to be resolved up until that October 8th
15 timeline, but maybe from there kind of begin our timeline
16 for our periodic reviews, and hopefully we can do those in
17 a more regional kind of offering so that we can bring
18 together and have the discussions of all of the different
19 changes that we want to do with some history behind them
20 and give us some time to implement them so we do have some
21 history on all of them by the time we do a six-month or
22 periodic-type review.

23 MR. KERN: Now, Sal, you mentioned we have
24 to make a filing by September 15th of the UNE remand and
25 line-sharing measures.

1 MR. FIORETTI: Is it September 15th?

2 MR. KERN: Hang on. The joint motion
3 states that the collaborative is expected to reach -- I'm
4 sorry -- reach resolution on those issues by September
5 15th. So I'm sorry, I misunderstood. There's no need for
6 a filing.

7 But at some point we need to include those
8 measures into the test plan, and I guess my question to
9 you is, what's your time frame do you think certain Phase
10 2 issues get included in the test and what's that cutoff
11 point?

12 MS. SCHNEIDEWIND: And excuse me just a
13 minute, but there is a need to have the Commission adopt
14 any modifications to what they've already adopted or any
15 additions to.

16 MR. FIORETTI: Right. I would expect that
17 following -- not following, but September 15th we would
18 file another set of business rules and another matrix that
19 described what the changes are that we were adopting, and
20 that will be basically -- in my mind that will be what we
21 would begin as a starting point for the periodic reviews.
22 O.K.

23 That will then also have to go into the
24 test plan. We will have to identify an implementation
25 schedule for each of those, and we've already started an

1 implementation schedule for some of those that we've
2 already identified here in other states. But we will have
3 to then circle back and say O.K., here's our time frame
4 for implementing them, and we can put them in the test
5 plan and maybe we can establish then when we begin testing
6 based on the implementation schedule, which will certainly
7 be within the time frame of the test, based on what I know
8 about the time frame line of the test, but it will
9 probably stretch out between 30 and 60 days from the time
10 we file. Possibly there might be some of the more
11 difficult ones that might go 90 days, but we will
12 certainly have, within the time frame of the test, have
13 implemented them, and then after implementing them have
14 the opportunity to test them and do that work.

15 MR. KERN: So basically everything that
16 would be in that September 15th -- the upcoming September
17 15th filing as well as the previous filing, that would be
18 the sum total of the performance measures that goes into
19 the test?

20 MR. FIORETTI: Well, I think what would go
21 into the test initially would be what we've already agreed
22 on.

23 MR. KERN: I understand that.

24 MR. FIORETTI: And then there would be the
25 expectation of this implementation schedule and additional

1 measures that had to be involved in the test based on when
2 they came into play.

3 So I would agree that we would, while we
4 were doing the test, test these measures and then, you
5 know, wrap up things from a testing perspective.
6 Hopefully, then, we'll be done with the test before we get
7 to our six-month review. Otherwise we may have to go
8 through, you know --

9 MR. KERN: Well, I guess that's my point.
10 That's what I want parties to be thinking about, because
11 my understanding is these performance measures are going
12 to be a continuing, ongoing effort and you're going to be
13 reviewing them every six months.

14 MR. FIORETTI: Right.

15 MR. KERN: And at some point, you know, the
16 testing process and the performance measures process has
17 to be synced up so that you have a pretty firm set of
18 measures that will be tested --

19 MR. FIORETTI: Right.

20 MR. KERN: -- and then not revisited for
21 testing purposes. And I guess I want parties to be
22 thinking about what's that time frame by which we would
23 stop, you know, playing around with performance measures
24 that would be part of testing and then maybe go into your
25 six-month review that you just alluded to a little bit

1 earlier that would be outside the scope of testing.

2 I don't know if I have the answer. I'm not
3 sure people have thought about that.

4 MR. FIORETTI: I think it's a matter of
5 timing, too. It depends on where things fall.

6 MR. KERN: And I'm not suggesting we need
7 to have that answer now, but I think that's something
8 people need to be thinking about, because we're going to
9 be finalizing the test plan hopefully next week, right?

10 MS. SCHNEIDEWIND: Right.

11 MR. KERN: And, you know, I've always
12 assumed that the September 15th, the new measures would be
13 factored into the master test plan.

14 MR. FIORETTI: At some point.

15 MR. KERN: I figured that was pretty
16 obvious.

17 MR. ANDERSON: But, John, those would be
18 factored in down the road, not in the initial test plan.

19 MR. FIORETTI: Right.

20 MR. ANDERSON: The initial test plan is
21 going to have the measures that have now been approved by
22 the Commission.

23 MR. KERN: Yes. But the September 15th
24 would be included into the testing process sometime down
25 the road.

1 MR. FIORETTI: Right.

2 MR. ANDERSON: Right.

3 MR. KERN: But as Sal mentioned, there's
4 going to be these periodic reviews, you know, either six-
5 month cycles or maybe outside of the six-month cycle until
6 everything is synced up. You know, at what point do you
7 stop feeding these modifications into the testing process,
8 or else I could see a cycle just going on and on and on
9 forever.

10 MR. FIORETTI: Well, I think that's what we
11 have to avoid. Unlike the other collaboratives, we have
12 an established process -- it's not established yet but
13 we'd like it to be -- whereby we do six-month reviews of
14 these measurements. So we don't expect that the
15 measurements forever will stay static once we agree to
16 them, and we'll get rid of measures and we'll add measures
17 based on products and services and so forth.

18 So we've got to get to that, and at the
19 same time, you know, in that span of time be doing the
20 testing, and then it would be my expectation that going
21 into the six-month review we'll be done with testing,
22 hopefully, or, you know -- it wouldn't be my expectation
23 that output of the next six-month review would go back
24 into KPMG's test. It would be subject to an audit later
25 on, you know, in terms of did we do them right and all

1 those things that would be part of the audits, but it
2 wouldn't be my expectation.

3 Now, if timing turns out to be much, much
4 different, maybe we have to revisit that. But just at
5 this point in time, looking toward the future, I wouldn't
6 expect that.

7 MR. ISIUGU: So for purposes of the Phase 2
8 measures, are those geared to change what has already been
9 approved by the Commission or does it use additional
10 measures and new measures?

11 MR. FIORETTI: Some of them are
12 modifications to what the Commission has already approved.
13 And the reason that they're modifications is because
14 basically we started with adopting the Texas plan in the
15 other states, and we've been moving through the
16 measurements and reviewing them one by one to understand
17 modifications that might need to be made here. Some of
18 them or most of them we already had visited and reviewed
19 prior to filing the joint motion in Michigan. Those that
20 we hadn't, we provided the input based on what we had
21 reviewed.

22 We have additional modifications
23 potentially on some of them. When I say modifications,
24 we're not meaning in most cases major modifications to the
25 measurement. Mostly what we mean are new disaggregations,

1 a new product or a new service or a little bit of change
2 in the business rule in how it's written or clarification.
3 But for the most part we've already got most of that in
4 our baseline. That's why we tried to get as much of that
5 in our baseline. We didn't want to look like we were just
6 changing something --

7 MR. ISIOGU: So we won't reinvent the wheel
8 and start from scratch, is my concern.

9 MR. FIORETTI: Right. We are starting
10 from a point where we already have incorporated most of
11 the changes. And that's why you'll see in a lot of cases
12 there are no differences in what we had agreed to do in
13 Michigan to what we had agreed to do elsewhere. And where
14 there are, it might have been timing differences or purely
15 oversight. You know, we just missed it.

16 MS. SCHNEIDEWIND: So to the extent that,
17 for example, our baseline measures incorporate some that
18 were originally adopted here in Michigan but not in Texas,
19 the other states, Ohio and Illinois, have incorporated
20 those? Or we are still going to end up with different
21 measures?

22 MR. FIORETTI: Than who?

23 MS. SCHNEIDEWIND: Than the other
24 Ameritech states.

25 MR. FIORETTI: I would expect -- there's

1 two things that, when you say that, jump out to me,
2 there's two items. One are the 911 measures. And we
3 opted for the Michigan measures here. So those are going
4 to be different unless we can agree in the Illinois and
5 Ohio collaboratives to go to the Michigan measures.

6 I think, you know, basically the
7 Michigan, the 911 measures, the FCC and the NPRM proposed
8 two methods to do it, O.K.? Michigan selected one and
9 Texas selected the other and both are reasonable ways to
10 go about it. Although if you ask me which ones were
11 better reflective, I think the Michigan ones are.

12 So in my mind that might be something the
13 CLECs would want to consider, moving away from the Texas
14 plan and moving to the Michigan. But we haven't made that
15 move. So that would be one difference, at least
16 initially. And there's three measures. So it's not a
17 huge difference.

18 The other is something that we'll talk
19 about today and this is -- I'll say this is kind of
20 silly -- but this was a case of timing. In Michigan we
21 included all the baseline Texas measures. CLECs
22 recommended in I think it was Ohio or Illinois,
23 subsequent to when we finished our work, that we remove a
24 couple measures because they were not reasonable.

25 So now I don't know if we really want to

1 incorporate that change or not in Michigan, just from the
2 practical perspective of here we just had the Commission
3 adopt these. Do we want to remove them? I just don't
4 know that we want to do that. Whether they mean anything
5 or not or they are useful or not, maybe we want to hold
6 those for the six-month review in Michigan.

7 So those are the only two areas that jump
8 out at me where there would be any potential differences
9 really, in addition to the fact that we have some
10 measures from Michigan that we took and incorporated into
11 the Texas plan that the other states don't have yet. I
12 would also expect to do this kind of exercise with them to
13 say do you want to do this. And maybe there will be
14 some -- maybe there will also be some horse trading going
15 on at that point to say we do this, but we don't do this,
16 or whatever.

17 And I'm hoping that we can get that all
18 done before the September 15th date. But likely it might
19 go just beyond there. So there might be some minor
20 differences in the five states. And that's what makes me
21 think that the review that we can plan can be very much
22 regional and we can take advantage of all the input and do
23 it one time and sync them up and do the right thing. At
24 that point we'll be so very close so that it won't be
25 difficult to do.

1 MR. COX: Sal, this is Rod Cox from
2 McLeodUSA.

3 It might be a good time to mention the
4 fact that we had Centrex resale measures that we're
5 negotiating right now, that those will be added as we
6 complete that.

7 MR. FIORETTI: Rod, I'm glad you
8 mentioned that because that will be one that I have to
9 add -- well, it's not on this matrix. And it's only not
10 on it because we have not completed that discussion. And
11 really, it's something that we have been working --
12 Ameritech has been working with McLeod off line because
13 they are really the only ones that have made that service
14 an effective service and want to add some measurements
15 specifically for that. And we're agreeable to do that.
16 We'll just incorporate them into the measurements. I
17 fully expect that will be done before September 15th and
18 that will be incorporated into these measures as well in
19 Michigan.

20 So again, those are kind of the
21 highlights. I don't see -- does anybody, Rod or Bob or
22 Karen, Janeen -- you are here -- anybody disagree with
23 kind of the thought process that I went through? This
24 doesn't seem to be a real difficult process to do. We
25 just have to make sure we sync everything up and I think

1 we can do that.

2 MR. COX: This is Rod. I think you
3 stated it pretty well, Sal.

4 MR. ANDERSON: Ann -- this is Craig
5 Anderson with Ameritech. In terms of process, I think
6 based on what we're hearing and what I would anticipate as
7 following the September 15th resolution hopefully of this,
8 that we would do a subsequent joint motion to the
9 Commission asking them to adopt the changes that have been
10 agreed to and then down the road following the periodic
11 reviews, each of those, the six-month reviews, then we
12 would have to go back to the Commission and ask them to
13 approve the changes that came out of that.

14 So I guess in terms of procedure, how it
15 gets to the Commission, that there would be one more
16 filing asking for approval of this next batch of changes
17 coming out of September 15th. And then from there on,
18 changes get approved following, hopefully in joint motion
19 or other form we can get it up to the Commission.

20 MR. SCHNEIDEWIND: I agree. In fact, I
21 think the Commission adopted the proposal that the group
22 had made earlier that there's actually two more interim
23 steps, the assurance plan --

24 MR. ANDERSON: The remedy section.

25 MS. SCHNEIDEWIND: Right, the remedy

1 section. We'll have to again go forward with that to
2 them.

3 And I guess I understand that we're going
4 to start with the measures the Commission approved in July
5 to incorporate those in the KPMG master test plan that
6 hopefully will finalize next week.

7 Then you're saying the September measures
8 would be modifications to their testing plan, depending on
9 when those services are rolled out or when the standards
10 can be implemented.

11 MR. FIORETTI: Right.

12 MS. SCHNEIDEWIND: And then, Craig, as
13 you suggested, a six-month review, we'll keep doing that
14 but it may fall out of the master test plan types of
15 activities.

16 I think it will become more clear to me
17 when we go through and look at these. I'm just concerned
18 that we just went to the Commission last week saying, "Hi,
19 adopt these." And then next week we're going and saying,
20 "Well, we didn't really mean that. We want you to modify
21 that."

22 And I think what you are talking about
23 for the most part are additional disaggregations and
24 things like that.

25 MR. FIORETTI: And things that maybe we

1 haven't talked specifically about -- benchmarks, you know,
2 then we have adopted the benchmarks that were there.
3 We're talking about changing the benchmarks or changing it
4 from a parity measure to a standard or vice versa.

5 MS. SCHNEIDEWIND: And I think that kind
6 of change doesn't concern me as much because KPMG is going
7 to go ahead and do their testing regardless of the
8 benchmark. And I think they made clear to us that they
9 can more readily go about testing and then modify or
10 report results differently based on the benchmark. But
11 they are actually going to be measuring the same thing.

12 MR. FIORETTI: Right.

13 MS. SCHNEIDEWIND: So I'm more concerned
14 about if we're telling them "Oh, no, you're not going to
15 be measuring the same thing." Additional things I'm not
16 concerned about.

17 MR. FIORETTI: And believe me, and I
18 think Rod and Karen and Bob and Janeen and Mary would
19 agree, that we're talking about the same set of
20 measurements with some additions, with some minor tweaks,
21 with some additional discussions that we have to have.

22 And really, we have got it -- we have
23 already incorporated most of the things that are here.
24 And that's why I basically went through each one of the --
25 what I did was again started with the matrix we have

1 developed for these other states and I went through them
2 to see if we have accommodated them already in our
3 Michigan document. If we have, I just noted it in black
4 and it says no issues pending, or we already did this, or
5 here's the measurement. No. It maps to the Michigan.

6 For example, the first one. There was a
7 change that we made to the business rule where we wanted
8 to put some additional language in. And we already
9 included that in our Michigan filing so there is no issue
10 pending in Michigan.

11 There was some additional interfaces that
12 we want to look at, average response time on that we were
13 introducing in NCI codes, CFA assignments, facilities
14 modifications and loop makeup, DSL loop makeup. We
15 already incorporated that in Michigan, so there is no
16 issue pending there.

17 We wanted to include time-out messages
18 and air messages. We have incorporated those in Michigan
19 measures 10 and 16. So there's no issue to address there.

20 No. 3 was when we're going to introduce --
21 when we introduce new interfaces, how quickly are we going
22 to try to get changes in them. Well, we already discussed
23 them in Michigan, so there is no issue there.

24 The fourth one was we were going to
25 propose some new benchmarks based on an internal study and

1 potentially on input from KPMG as they go through the
2 third-party test while the internal study is in progress.
3 And KPMG hasn't started the test. So yeah, we might
4 expect a change from that. But more than likely that's
5 going to go into the six-month review or into the changes
6 we would expect.

7 But we do probably expect that there will
8 be some recommendations coming out of the test. That's
9 something we haven't talked about. But those will be
10 incorporated as they need to be.

11 Basically for the first measure, measure
12 No. 1, that's the story. We already have got everything
13 else in Michigan.

14 MR. KERN: And this might be a good time
15 to start going through the matrix. In fact, I do have a
16 question on your first one, though. On No. 2 you say a
17 target date for data capture of May 1st. Are you
18 capturing the data?

19 MR. FIORETTI: We're already measuring
20 that.

21 MR. KERN: O.K.

22 MR. FIORETTI: And it's already in the
23 Michigan measures. And all I did was -- it was not
24 reflective of time. I tried not to change anything.

25 Basically, for those of you who follow

1 along

2 at home that have done this in other states -- and Janeen
3 here and Mary here -- the Michigan, the joint matrix that
4 we have done before had four columns, five columns
5 counting the measure number, the measure name. Then it
6 was the CLEC proposal in the third column. And it was
7 what are the things Ameritech would agree to in the fourth
8 column and in the fifth column would be open issues.

9 I really, for the most part, either left
10 the fifth column the same as it was or clarified some
11 things based on Michigan.

12 I took out the CLEC proposal column only
13 because it didn't fit -- it made it too small to read --
14 and tried to make sure that the Ameritech agreed column
15 was detailed enough so that we can understand what we
16 agreed to do. And so really that represents today the
17 agreed-to-in-other-states column.

18 And I put in what is now the fourth
19 column which is kind of my assessment of did we already
20 incorporate the changes or do we have some additional work
21 to do.

22 So that's how the matrix was built. So
23 based on the way, as I understood the premise of this
24 meeting was, review of measures agreed to in other states,
25 that column, that Ameritech-agreed-to column is really the

1 agreed-to in other states already.

2 Now, again, we may have some additions to
3 that yet after this meeting. But hopefully before we do
4 our joint motion and before September 15th we will have
5 closed up all of those. I'm hoping we have closed up all
6 of them. If there are some stragglers, there might be
7 some minor differences and we'll have to address how we
8 want to go about those.

9 But I would hope that we could also close
10 up in other states, since we are nearing our one year from
11 the merger, to the extent that let's get on with the
12 six-month periodic reviews.

13 And so October 8th and September 15th are
14 not that far away that we're going to have major changes
15 in those couple of weeks; that we're going to be pretty
16 much in sync by that point with what's going to be going
17 on in the other states is not only my hope but my
18 expectation. And I think that the CLEC representatives
19 would agree.

20 So we talked about No. 1. Does anybody
21 have any questions on No. 1? That's average response time
22 for interface, preorder interfaces. O.K.

23 No. 2 is just a take-off on that percent
24 responses received within so many seconds. It's the same
25 measure but putting a standard of X seconds on it. And

1 again, the only issue that's pending is the development of
2 additional benchmarks. And I have got a note for myself
3 in there about the study that we have done or started to
4 do with respect to benchmarks for these preorder
5 interfaces to make sure we get to those. But also to look
6 at what comes out of KPMG, not other differences on No. 2.

7 Performance Measure 3, that was
8 technically infeasible. We agreed on that. Technically
9 infeasible in the other states. And so we don't have
10 anything to do on No. 3 either.

11 No. 4 is OSS interface availability.
12 There was a discussion in Michigan -- I'm sorry, in
13 Ohio -- where we wanted to further disaggregate the
14 interfaces by servers. We are still working some of those
15 issues as to which, what the breakout is on this. We will
16 close hopefully on that before the 15th, but there is
17 still some development work in progress with respect to
18 how we would report and what we think we would report.
19 But we have already made some changes to the way we would
20 report some of those and those are already included in
21 Michigan's performance measures. But we still have some
22 work to do on item No. 2 in Michigan that we'll close up
23 before the 15th.

24 Questions on No. 4?

25 No. 5 is percent firm order confirmation

1 within X. Michigan has already identified -- we have
2 already identified for Michigan all of the things that we
3 included elsewhere except I found something that we
4 have that we seem to have overlooked in our other matrix
5 in terms of our change management. I don't remember doing
6 this, but it seems like we agreed to diagnostic measures
7 for unsolicited 865 responses. And that's not included in
8 Michigan. We're going to have to develop that for all the
9 other states too, because we have overlooked it and our
10 conversations are ongoing. So we haven't included that
11 elsewhere as well.

12 So I found something that we might want
13 to talk about again in another state and/or in Michigan,
14 but that's outstanding.

15 We also have a specific disaggregation
16 for DSL loops that we have not yet closed on the
17 benchmarks for. I believe we were waiting for some of the
18 discussion to happen in Texas.

19 A lot of discussion on the advanced
20 services happen in Texas, kind of in coordination with
21 some of the DSL discussions that were conducted there
22 anyway. And so we are looking to try to stay in sync with
23 a lot of things that they agreed to do in Texas.

24 And so at the time that we discussed DSL
25 disaggregations we hadn't closed that. We have got some

1 time in Ohio that we're going to review all of the DSL
2 measures again. The next Ohio meeting is toward the end
3 of the month, I believe, and we're going to close on the
4 DSL stuff there.

5 So we'll close on that benchmark either
6 there or here, I would suggest. But my bet is we have
7 already planned to which the DSL folks involved in the
8 discussion. So we'll add this to the list of things we'll
9 talk about there and incorporate it in as changes in other
10 states here.

11 But that is actually an advanced service,
12 a DSL line-sharing change that would be incorporated here.
13 But again, the reason that I have not made those
14 distinctly different in this matrix is much of the
15 discussion has already started elsewhere. So it also
16 avails itself as a change made in other states.

17 MR. KERN: Sal, are you using DSL and
18 line sharing interchangeably?

19 MR. FIORETTI: Yes, I'm sorry about that.
20 I do. Almost all of the -- in fact, all of the
21 measurements that we have talked about, when I say DSL, if
22 I don't say DSL and line sharing, I'm meaning both.

23 MR. KERN: And that has been agreed to in
24 other states that the two should be treated --

25 MR. FIORETTI: I don't know that I have

1 actually said that. But almost all of the measurements,
2 when we talk about one, we talk about both.

3 MS. CEGELSKI: We might ask for
4 disaggregation from a line share from the regular DSL
5 services. But those are discussions that we are still
6 having. Just so that they are covered.

7 MR. KERN: I just didn't see any
8 distinction in the matrix of DSL loops versus line-sharing
9 loops.

10 MR. FIORETTI: You know what, and I'll be
11 happy just for clarification purposes to add that.

12 MR. KERN: I'm sorry. I didn't mean
13 to -- if it's appropriate to separately identify them,
14 then do so. If it's not, you can keep them together too.
15 That's fine. I just needed to understand in my own mind.

16 MS. SCHNEIDEWIND: In other words, to the
17 extent that you're doing measurements on DSL loops that
18 are not line shared, obviously we want that separately
19 identified from measurements that would be applicable to
20 only a line where sharing is occurring.

21 MR. FIORETTI: And what we'll have in
22 most cases is DSL -- in most cases, for example, in the
23 I&M type measurements we'll have four disaggregations. Or
24 actually, we'll have DSL with line sharing and DSL with no
25 line sharing.

1 On some measurements we'll have DSL with
2 line sharing, DSL with no line sharing, and they will be
3 with no conditioning and there might be some breakout with
4 conditioning for both of those.

5 So again, I'll call them advanced
6 services or DSL, but we are addressing them -- I'll say we
7 are addressing them in the same breath. They don't always
8 avail themselves in ways that you'll pick them out. But
9 almost always there is with line sharing and without line
10 sharing.

11 The other point -- so that the only other
12 thing that I think I included in that measure was the
13 benchmark. We established a 95-percent measurement, I
14 think, in Michigan on interconnection trunks. I believe
15 that we agreed to 90 percent elsewhere. I believe that we
16 agreed on a 95-percent benchmark for FOC on
17 interconnection trunks here. It was 90 percent elsewhere.
18 I think we just have to sync that up.

19 But I noted it. That's why it's noted
20 here. We already got the trunk measures, the
21 interconnection trunk measures, for FOC. But we somehow
22 messed up the benchmark between what we had previously
23 agreed to end here. So we'll have to reconcile that.

24 And the obvious bit of reconciliation is
25 from 90 percent to 95 percent, so my sense is that we're

1 not in disagreement there.

2 Do we have extra people that have joined
3 the call that we haven't identified yet?

4 MR. METROPOULOS: I just joined. Jim
5 Metropoulos from Ameritech.

6 MS. KINARD: Sal, this is Karen Kinard
7 from WorldCom. I just joined.

8 MR. FIORETTI: Thank you.

9 MR. FISHKIN: This is Joel Fishkin from
10 the Commission staff, Indiana.

11 MR. FIORETTI: So to bring you all up to
12 speed, we are on Performance Measure 5.

13 MS. SCHNEIDEWIND: And was Chris Emmel
14 there too?

15 MS. EMMEL: Yes.

16 MR. FIORETTI: Did anyone that just
17 joined the call not get the document that I sent out last
18 night?

19 MS. EMMEL: I didn't.

20 MR. FIORETTI: Can one of your other
21 folks on the call send that to Chris?

22 MR. METROPOULOS: What's your e-mail
23 address?

24 MS. EMMEL: It's c-e-m-m-e-l.Nextlink.
25 com.

1 MR. METROPOULOS: C-e-m-m-e-l. O.K.,
2 I'll send it to you.

3 MR. FIORETTI: Thank you, Todd.

4 Otherwise on FOC we have already included
5 all of the things in our current Michigan rules with
6 respect to --

7 MR. TRABARIS: Hello. This is Doug
8 Trabaris.

9 MR. FIORETTI: Hi, Doug.

10 MR. ISIOGU: Doug, who are you with?

11 MR. TRABARIS: With AT&T.

12 MS. MOORE: This is Karen Moore from
13 AT&T. I apologize for being late.

14 MR. FIORETTI: Bob Klipstein from AT&T was
15 right on target and covered you.

16 MS. MOORE: Good. I knew he would.

17 MR. TRABARIS: Hi, Karen. It's Doug.

18 I'm an hour late too. I thought it was starting at 10:00
19 our time.

20 MR. FIORETTI: Do I need to just
21 quickly -- no? Just to explain what the document is.

22 Karen and Doug and Jim, we're basically
23 going through the document that I sent. And what I have
24 attempted to do with the document is to identify the
25 things that we didn't -- hadn't yet incorporated into the

1 Michigan Business Rules that were in the agreed-by-
2 Ameritech-in-the-other-states column from the joint
3 matrix.

4 UNIDENTIFIED VOICE: O.K.

5 MR. FIORETTI: And obviously the only
6 things that haven't been included yet are things we either
7 missed or things that have happened or will happen since
8 we filed the joint motion.

9 MS. MOORE: Sal, this is Karen.

10 Can I ask sort of a practical question?
11 Are we on the record here?

12 MR. KERN: Yes, we are.

13 MS. MOORE: So I need to identify myself
14 when I speak then?

15 MR. KERN: Yes.

16 MS. MOORE: Thank you.

17 MR. FIORETTI: Everyone else have that
18 note?

19 O.K. And we have already kind of walked
20 through the first four measures. We just finished No. 5.

21 And basically again, I have out outlined
22 for you that are looking at this document on your
23 computer screen, outlined in red, what are the things that
24 we haven't either yet agreed on or missed in the
25 incorporating and need to close on. And when we close on,

1 we'll incorporate into the Michigan Business Rules as a
2 future change, future being "near-term future," in our
3 next motion to the Michigan commission.

4 No. 6. Average time to return FOC. I
5 don't think there's any changes we have made there that we
6 haven't incorporated in Michigan. Again, I would expect
7 that the group -- and we'll go through it again, just to
8 go through this and make sure that there are not -- any
9 time that you see no issues pending in Michigan, that
10 means I was not able to find any differences in what we
11 have agreed to elsewhere versus what we already proposed
12 in Michigan.

13 No. 7. We have some project language --
14 MS. MOORE: Sal, this is Karen Moore from
15 AT&T.

16 Can we briefly go back to No. 5 --

17 MR. FIORETTI: Sure.

18 MS. MOORE: -- which is FOC returns.

19 The last time we met I asked if we could
20 include in the FOC measurement Measure 94 for LNP and LNP
21 with loop.

22 Do you have a plan on how we're going to
23 handle it in Michigan? Are we going to keep 94 and just
24 add what's missing from 94 from 5?

25 MR. FIORETTI: Well, I think -- you mean

1 with respect to disaggregations? You know what, Karen, I
2 don't have that note included here for some reason. But I
3 need to add that.

4 MS. MOORE: You remember what I'm talking
5 about, right?

6 MR. FIORETTI: Yeah, but I have to go
7 back to my other matrix to understand what it was. Or
8 actually, I think I took that in a note at the end of a
9 meeting.

10 MS. MOORE: You were going to take it
11 back and see what you could do.

12 MR. FIORETTI: So it wasn't in my matrix.
13 But I'm glad you pointed that out to me. I'll add that to
14 the matrix and go back and review that.

15 And again, I would expect again the
16 output of this meeting, once we have run through these
17 notes, I expect we'll produce a redline version that's
18 based on the document that is to be filed with Michigan,
19 the business rule document that we filed with Michigan
20 that has these additions redlined, O.K.?

21 MS. MOORE: O.K.

22 MR. FIORETTI: I'll add that. That was
23 in Ohio, right?

24 MS. MOORE: This is Karen Moore. Yes.

25 And Sal, do you have an answer to my

1 question? Do you think it will be possible?

2 MR. FIORETTI: You mean to incorporate
3 the -- to change 94 into a disaggregation of five? I know
4 that was part of the question.

5 MS. MOORE: Right. And what's missing in
6 94 are things like the how long it takes to return the
7 FOCs that take longer than --

8 MR. FIORETTI: The valuation of the tail?

9 MS. MOORE: Right.

10 MS. MOORE: In other words, just to make
11 sure that what's in five is also being reported for 94.

12 MR. FIORETTI: Yeah. Now I understand
13 why that is not included here is because we just got that
14 request and we haven't really agreed to do that yet. But
15 we are reviewing it.

16 MS. MOORE: Have you found out whether
17 you could do it or not?

18 MR. FIORETTI: I still have questions
19 pending on that.

20 MS. MOORE: O.K.

21 MR. FIORETTI: So I'll just add myself a
22 note under the Open Issues column for that.

23 MS. MOORE: O.K.

24 Bob, I have to drop off for a second. I'll
25 be right back.

1 MR. FIORETTI: O.K.

2 MR. KERN: Sal, hang on for a minute.

3 MR. FIORETTI: O.K.

4 (There was a brief pause in the
5 proceedings.)

6 MR. KERN: O.K., Sal. Thank you.

7 MR. FIORETTI: O.K. Again, No. 6, I don't
8 think we have any differences that we've established in
9 Michigan that we've identified from the Michigan measure
10 that we've already adopted from other states.

11 MR. TRABARIS: This is Doug Trabaris from
12 AT&T.

13 Sal, is it possible to either speak louder
14 or get closer to the microphone?

15 MR. FIORETTI: Well, I'll speak louder.

16 MR. TRABARIS: I'm having trouble hearing
17 you.

18 MR. FIORETTI: How's that, Doug? Is that
19 any better?

20 MR. TRABARIS: No, not at all.

21 Is anyone else on the phone having the same
22 problem I am?

23 UNIDENTIFIED SPEAKER: Yes.

24 UNIDENTIFIED SPEAKER: Yes.

25 MR. FIORETTI: How is that, any better?

1 MR. TRABARIS: Not really.

2 MR. KERN: That's just in the room. You
3 have to get closer to the phone.

4 MR. ANDERSON: John, shall we move down to
5 the center of the table?

6 MR. FIORETTI: I'll move closer.

7 MR. KERN: He's moving closer, Doug.

8 MR. ANDERSON: The problem is, if we move
9 closer, we lose electrical power.

10 MR. TRABARIS: Can he hold the phone in his
11 lap?

12 MR. KERN: I'm not sure you want that.

13 MR. FIORETTI: Can we just move us down
14 toward --

15 MR. TRABARIS: Dishman when he put on his
16 big show in Chicago in June had a microphone he carried
17 around with him. Maybe that would work.

18 (There was a discussion off the record.)

19 MR. FIORETTI: O.K. Are we better now?

20 MR. TRABARIS: It's perfect. Thank you
21 very much for moving.

22 MR. FIORETTI: O.K. It will be on your
23 bill.

24 O.K. On Performance Measure No. 7, percent
25 mechanized rejects returned within one hour of completion

1 in ACIS, I did notice that there were some differences in
2 project language that was either in Michigan and not in
3 the other states or in the other states and not Michigan,
4 so we'll have to sync that up.

5 Again, all of these things that I'm
6 identifying that we've identified differences, I would
7 expect that we don't necessarily need to debate them since
8 Ameritech is going to agree to incorporate them into the
9 Michigan agreement. And so therefore all I'm doing is
10 noting what they are or what the areas are so that you'll
11 be aware of them and then we could follow up with redline
12 business rules.

13 So again, for those folks who joined late,
14 I really don't expect that we'll be having great, detailed
15 discussions, debates about what should or shouldn't be,
16 but, you know, we might have some conversation as to what
17 it was or not. O.K.?

18 Measure 7.1, I did not see anything among
19 the things that were identified in the business rules that
20 we agreed on that we didn't already include in Michigan.
21 We had two new measures that we agreed to elsewhere that
22 we've also agreed to implement in Michigan and in fact
23 have identified them in terms of Michigan 12 and adding
24 some disaggregation for CPO. But we've already
25 incorporated those things in Michigan. In fact, we've

1 collapsed these two new measures into one and proposed a
2 new measure that we've agreed on, O.K., already in the
3 Michigan plan.

4 No. 8, average time to return mechanized
5 completions, again no issues pending in Michigan. Oh, by
6 the way, that's another area that we don't have measures
7 in other states, and we will go through this, I'm sure,
8 the same type of exercise where we include things that
9 we're adding in terms of completion notification on
10 maintenance, for example, that aren't in the Texas
11 measures and wouldn't be in the other states. That would
12 be a third area of difference. But it's difference for
13 the other states, not for Michigan.

14 Performance Measure 9, percent rejects,
15 again didn't find anything that wasn't already in the
16 Michigan Business Rules. Remember, these early measures,
17 we had discussion early on in the game in the other states
18 and so we've attempted to incorporate all of those into
19 the business rules that we've proposed in Michigan.

20 MS. SCHNEIDEWIND: Sal, can I go back to
21 No. 8?

22 MR. FIORETTI: Sure.

23 MS. SCHNEIDEWIND: At this point the
24 Ameritech column says you're proposing to eliminate it,
25 but what you're telling me is that instead you're going to

1 add it to the other states.

2 MR. FIORETTI: Right. All we talked about
3 doing -- and the only reason I left that -- I thought I
4 would take that out completely, but we did talk about the
5 expectation in the other states that where we have
6 measures that are doing the same thing and provide two
7 different ways to look at that, we would review on the
8 six-month review and think about which of them is most
9 applicable and try to get rid of some measures. And
10 that's the only reason I even left it in there, just so
11 that we had the sense of that was something we talked
12 about and we never talked about in Michigan.

13 MS. SCHNEIDEWIND: But in Michigan we're
14 going to leave it in for now?

15 MR. FIORETTI: We're not going to leave it
16 in -- we're not going to get rid of it in the other states
17 either. Basically what this said was we would wait till
18 the first six-month assessment before we addressed it.

19 MS. SCHNEIDEWIND: Thank you.

20 MR. FIORETTI: And it was just to get that
21 kind of note noted here in Michigan.

22 No. 9, percent rejects, no issues different
23 in Michigan either. We've addressed both of those things
24 that we agreed on.

25 No. 10, 10.1, 10.2 and 10.3, we haven't

1 closed on this. We're going to come back to this from our
2 Ohio discussion about whether -- really it has to do with
3 cleaning up that measure and whether or not we wanted to
4 collapse it all into one measurement with separate
5 disaggregations, because it's essentially -- 10.1, .2 and
6 .3 are essentially the same measure, just different
7 disaggregations, and we're just still trying to work that
8 out with our -- the only concern we have about changing
9 measure numbers at all is we'd like to be planning on
10 doing a regional -- having one group do our remedy plan,
11 and if things work out in that manner, then we'd kind of
12 like to keep numbers very similar so we don't mess up how
13 you calculate the remedies on the back end of this. So
14 for the time being we're going to leave them numbered the
15 way they are. However, there still might be some sync-up
16 that we have to do with them, and that's why I've listed
17 just in 10 discussion of collapsing measures into one
18 measure with disaggregations pending, because I think we
19 still want to revisit that. That was a discussion we had
20 in Ohio, O.K.

21 And that really goes for 10, 10.1, 10.2,
22 10.3. Otherwise we've addressed the same measures there.

23 The same kind of thing, and it's not really
24 noted -- I think we talked about doing the same kind of
25 thing in 11, and I'm going to put a note in there as well.

1 So 11, 11.1 and 11.2, we'll look at the same kind of
2 process, and that's something we just have to go back with
3 and we've got a history of discussion in Ohio that we did,
4 and we'll close up on that hopefully before -- I'm sure
5 we'll close up on that before we have to file something
6 here.

7 No. 12 was no different.

8 No. 13 was no different.

9 No. 14, billing accuracy, was no different
10 than what we've agreed to elsewhere.

11 There are some open items on 13 or on 14 --
12 I'm sorry. Mary?

13 MS. CEGELSKI: Yes, Sal. Back on 13, we
14 had asked about the total number of orders versus the
15 total number of orders that flow through.

16 MR. FIORETTI: We already have a measure in
17 Michigan for total percent flowthrough.

18 MS. CEGELSKI: O.K.

19 MR. FIORETTI: So again, that's something
20 that really we talked about in Michigan that we have to
21 bring to the other states, O.K. So again, I think we're
22 ahead of the game on that one in Michigan where we
23 actually have something.

24 MS. CEGELSKI: Now, do you see that
25 Michigan measure being rolled into 13 here or keep them

1 separated?

2 MR. FIORETTI: No, because they're separate
3 senses of what --

4 MS. CEGELSKI: O.K.

5 MR. FIORETTI: I would look at it being
6 different. In fact, I think we've identified it as 14.1
7 in Michigan, if I'm not mistaken.

8 No, we haven't. But we'll probably
9 renumber it to something like 14.1.

10 MS. CEGELSKI: Or 13.1.

11 MR. FIORETTI: Or I'm sorry, 13.1.

12 MS. CEGELSKI: O.K.

13 MR. FIORETTI: And again, the right-hand
14 column, I've identified some areas when I look at 14,
15 billing accuracy, where we just the other day it seemed --
16 it wasn't last week, but it was the week before -- where
17 we talked about resolving a couple of open issues that we
18 identified on the billing measures in Ohio. I expect that
19 we'll resolve those, and if there's changes to the
20 business rule, we'll add them to Michigan, O.K.? And
21 they're on the far right column in terms of open issues.

22 And I had noted that in 15, percent
23 accurate and complete formatted mechanized bills, so that
24 we don't forget that we still have these open issues, and
25 if we resolve any of those, they'll jump into the agreed-

1 to column and we'll address Michigan similarly.

2 Now, we've gone through 15 measures rather
3 quickly actually. I just want to make sure from a CLEC
4 perspective, we're on track for what we want to do, do you
5 agree, Mary, Karen?

6 MS. CEGELSKI: I think so.

7 MR. FIORETTI: Janeen?

8 MS. SANDERS: Yeah. I have a question when
9 we get to 27.

10 MR. KLIPSTEIN: Yes.

11 MR. FIORETTI: Because really all we're
12 talking about is bringing the things we have agreed to
13 elsewhere into Michigan.

14 No. 16, usage records, again there are some
15 open issues that we wanted to talk about that we
16 identified in Ohio a week and a half ago that we will
17 bring any resolution of those and agreements into
18 Michigan.

19 No. 17, billing completeness, we've got the
20 same measure today in Michigan that we have elsewhere.

21 Eighteen is the same, billing timeliness.

22 Nineteen, we have a couple of issues.

23 Eighteen we have a couple of issues to resolve, and one of
24 those that I'll just mention on 18 is adding a
25 disaggregation for BDT, which might be a new mechanism to

1 send some of this billing information that we're adding
2 from Texas. So additionally that will be a new
3 disaggregation as we complete our investigation of when
4 will that be in place and what would we do to measure that
5 similarly to the way they're doing it in Texas. But this
6 is one of the SWBT or Southwestern Bell or SBT systems
7 that we will but haven't yet brought to Ameritech as far
8 as I know, but we're going to be implementing that.

9 No. 19, daily usage feed timeliness, we've
10 already got the same measurement in Michigan.

11 Unbillable usage, No. 20, we changed to
12 nowhere. In fact, as I recall, that's one additional one
13 that at six-month review we talked about getting rid of
14 because it is one of the more meaningless measures.

15 No. 21, these are -- from 21 to 26 we just
16 talked about for the first time in Ohio a week and a half
17 ago, so there are a couple where we have some unresolved
18 issues in the far right column.

19 Twenty-one, local service center speed of
20 answer.

21 Grade of service today, 22, we have the
22 exact same measure that we have elsewhere.

23 No. 23, we did have some additional
24 requests for measurements that we are looking into that
25 were requested by Rhythms and COVAD that we will be

1 responding to prior to again our resolution here, and
2 should we agree to incorporate anything additionally
3 there, we will incorporate it into Michigan.

4 MS. CEGELSKI: Sal, a question on that.
5 Does that include the whole time?

6 MR. FIORETTI: That was really the request.

7 MS. CEGELSKI: That's great. Thank you.

8 MR. FIORETTI: On 24, 25 and 26 are the
9 local operations center, basically the maintenance and
10 provisioning center, speed of answer, grade of service and
11 percent busy. Again we've got a couple of areas where
12 we're doing some additional discussion and looking into a
13 disaggregation for the LOC, but right now we have exactly
14 the same measures. There may be some changes there that
15 come out.

16 MS. KINARD: And Sal, these are all your
17 help centers? You don't have a special one for --

18 MS. SCHNEIDEWIND: Is that Karen Moore?

19 MS. KINARD: Karen Kinard from WorldCom.

20 MR. FIORETTI: These are our operations
21 centers, our ordering and provisioning center and
22 maintenance center.

23 MS. KINARD: These are all the centers a
24 CLEC would call in your region, everything going to be
25 covered in the disaggregation?

1 MR. FIORETTI: I won't say that, because
2 there is an additional help desk that is going through a
3 fair bit of transition at this point, but we've never --
4 in fact, as far as I recall, never really talked about any
5 measurements for that, and that was our resource center.

6 Typically, as I understand it, that is --
7 typically you'll call into the service center and if
8 there's an issue that the help desk has where you haven't
9 already established some kind of connection with them,
10 they will do a warm transfer to that center initially, but
11 ongoing -- you know, once you've got a ticket, if it
12 requires opening a ticket with them or establishing some
13 change that has to be made, you might call directly into
14 there after that. But the initial contact into there
15 typically is done initially through the service center, as
16 I understand the process.

17 MS. CEGELSKI: The CLEC can call directly
18 into that depending on the nature or what the issue is.

19 MR. FIORETTI: Right. But my sense is most
20 of the time you'd normally end up --

21 MS. CEGELSKI: I don't know.

22 MR. FIORETTI: If you haven't already
23 established a ticket, for example, typically you're going
24 to go through the service center.

25 MS. CEGELSKI: It depends on the nature of

1 the issue. I mean if you're working a PON and there's a
2 problem, I would call the LSC first, who could then
3 transfer you over. But if you're in our IS Department
4 working on an issue, they would call directly -- even
5 though they may not have a ticket, they would call
6 directly into the resource center first call. They
7 wouldn't call into the LSC.

8 MR. FIORETTI: O.K.

9 MS. KINARD: Yeah, I think we need
10 disaggregation by every center we would call into. We
11 have that in Bell Atlantic for every 800 number. We have
12 a different one for hot cuts and a different one for GUI
13 problems.

14 MR. FIORETTI: So you're proposing a new
15 measurement here?

16 MS. KINARD: Well, a disaggregation under
17 that one to cover that center as well. That helped us.

18 MR. FIORETTI: O.K. Well, I mean I'm
19 certainly not foreclosing it, but I hadn't anticipated we
20 would talk about generating new measures in this forum
21 today. I mean I'll take that back and, you know, kind of
22 evaluate it, but it's really not come out in any of the
23 discussions that we had previously, at least as I recall,
24 anywhere that we've discussed it. But we'll take a note
25 on that.

1 MS. KINARD: Yeah. I mean it wasn't until
2 I saw the breakout on provisioning and maintenance under
3 LOC. I had originally thought you had broken out all your
4 centers.

5 MR. KERN: Karen, you really need to
6 identify yourself before you speak.

7 MS. KINARD: I'm sorry. Karen Kinard,
8 WorldCom again.

9 MR. FIORETTI: I'm writing, so please bear
10 with me.

11 MS. CEGELSKI: Sal, as we're going on
12 forward, in the six-month review would you see -- I know
13 that these measures mirror each other and you have
14 separate measures for the LSC and the LOC. Would you see
15 them rolled into one for different disaggregations? Would
16 that be easier?

17 MR. FIORETTI: Well, again it could be done
18 that way. You know, the format of how they were
19 originally done is in some cases, I would agree, somewhat
20 illogical, because sometimes you have a 14.1 and sometimes
21 you just have another disaggregation. So we haven't quite
22 made -- you know, have a good understanding of how they
23 work.

24 Again, I would expect over some time that
25 we will try to roll things together where we could. But

1 again, I want to be able to look at -- one of the things
2 that I wanted to get done at least for the Ameritech
3 region is this sync-up of measures before I started
4 renumbering things, just so that I could understand where
5 I would, you know, put numbers in and not try to use them
6 the same in different states for different things.

7 So even if I can't sync it up with Texas, I
8 would sure like to be able to sync it up numberwise with
9 the rest of the Ameritech states, and that's why you
10 haven't seen me doing a lot of that. I don't think I've
11 done any of it. And that's why I gave the Michigan
12 numbers -- the additional measurements separate numbers
13 MI-1 through -16, because I just didn't want to confuse
14 anybody at least initially as to what they were, O.K. But
15 I would expect over time we'll figure out a numbering
16 scheme that actually makes sense and the disaggregations
17 just like you said. These are three measures or six
18 measures where you could effectively have three with
19 disaggregations, you know. We have not really worked
20 through that yet.

21 O.K. That's one through 26, and almost all
22 of those, the work that we did there were a product of
23 discussions that we had in Ohio, and we had some very
24 significant discussions on that set of measures in Ohio,
25 and the Michigan business rules already reflect those

1 discussions for the most part.

2 Performance Measures 27 through 54 we had
3 some initial discussions on in the Ohio collaborative. We
4 went through them, both CLECs and Ameritech, as an initial
5 run-through. CLECs had a call schedule, I believe, for
6 yesterday to talk about these. These were the initial
7 discussions on these measures, and we have a call
8 scheduled for next week.

9 MS. SANDERS: Our call is scheduled for the
10 9th.

11 MR. FIORETTI: Yeah, next Tuesday.

12 MS. SANDERS: Wednesday.

13 MR. FIORETTI: Wednesday, where we will,
14 CLECs and Ameritech, go through what their proposed
15 changes were.

16 What you see here in the left-hand comment
17 basically are those notes that I took back from the
18 initial discussion in Ohio. There's really not anything
19 that we could say today we've absolutely agreed or
20 disagreed that's different from what's in Michigan,
21 because we haven't necessarily got to that, but we've had
22 now the beginnings of discussions on those and those would
23 go on till next week. After our call next week where I
24 would clear up any questions I have on the issues that
25 CLECs are proposing, we would determine, all right, of

1 what you've proposed, what can I do, what can I
2 effectively do or what would I agree to do, and we'll
3 create a matrix of what would we agree to do. We expect
4 to take that back to -- I think we're taking that back to
5 the Illinois collaborative on the 16th, and we'll
6 basically hash it out and talk about it and may make some
7 additional agreements or, you know, do some work there
8 based on the discussions and come out with all right,
9 here's what we agree to do.

10 Anything that we come out with on that we
11 would also incorporate into this Michigan agreement.
12 That's why you won't see much as to differences that we've
13 already established. All we have here is comments, and
14 that's why I broke this section out in this manner. We
15 really haven't completed the discussions on 27 through 54,
16 but they are in progress. So again, to hash them out here
17 independently probably isn't the right thing to do, nor
18 are we all probably prepared to do that.

19 So I will go through these relatively
20 quickly. Almost all of these are -- again, even where I
21 have 27 is mean installation interval, we identified three
22 issues that we wanted to investigate up front in Ohio. I
23 would expect to see those issues already identified in
24 something that the CLECs would send me and probably have
25 those ready to be answered next week or the following week

1 when we're in Illinois. So we don't have any differences
2 in 27.

3 We don't have any differences in 28 to
4 speak of in terms of what the measurement looks like today
5 either, although we have open issues that we are adding.

6 Twenty-nine, we didn't even identify
7 anything that we wanted to change back in Ohio. Not to
8 say that the CLECs haven't identified anything since then
9 to propose to change, and again those would show up.

10 I might be able to go through these more as
11 a group.

12 Again, 30, 31, they say "See open issues."
13 Again, we'd like --

14 MS. SANDERS: Excuse me.

15 MR. FIORETTI: Sure.

16 MS. SANDERS: This is Janeen with WorldCom.

17 Sal, I think on 30, wasn't that the measure
18 that we had some outstanding questions on? I'm just
19 wanting to check if you ever responded maybe in another
20 forum. There were some questions on capacity and
21 alternate intervals?

22 MR. FIORETTI: No. That was collocation,
23 and Karen, you got my e-mail from yesterday on the
24 collocation stuff?

25 MS. KINARD: Yes, I did.

1 MR. FIORETTI: O.K. And, you know, I
2 imagine you'll want to hook up with your SME, and if we
3 need to talk again, either send me an e-mail or call and
4 we'll go through whatever we need to go through with
5 respect to that.

6 MS. KINARD: Yes. I've sent it to him.

7 MR. FIORETTI: O.K. That was Karen Kinard.
8 So I think we did get that but it wasn't
9 relative to this measure.

10 MS. SANDERS: O.K.

11 MR. FIORETTI: In fact, I think that was an
12 open item from the Michigan work that we did. Actually we
13 talked about it elsewhere but we talked about it
14 specifically in Michigan, and I'm glad Karen sent that to
15 me yesterday because I had the information, I just hadn't
16 sent it to her yet.

17 MS. KINARD: This is Karen from WorldCom.

18 I was hoping, since you took so long, it
19 would be a yes, but it wasn't.

20 MR. FIORETTI: Sorry. So again, 30, 31,
21 32, these are delay day measures.

22 Thirty-three -- and by the way, this whole
23 section 27 through 54 is based on provisioning and
24 maintenance measures for resale, POTS and specials. So
25 these are resale-specific measures. That's why we see no

1 reds on any of these, because we really haven't changed
2 anything to what we have.

3 Does anybody have any questions through 54?
4 I mean I'm not sure what I can talk about on those since
5 we've just started talking about them, and the comments
6 you see might only reflect the state of the state as of
7 the meeting in Ohio, which was really not planned for Ohio
8 but we had some extra time and we walked through these.

9 MR. KERN: Sal, am I correct that there's
10 really no issues for Michigan at this time until you
11 complete these discussions?

12 MR. FIORETTI: Right.

13 MR. KERN: And you would expect that to be
14 before September 15th?

15 MR. FIORETTI: Yeah. We really have it
16 scheduled for August 16th in Illinois.

17 MR. KERN: O.K.

18 MR. FIORETTI: 16th, I think.

19 MS. CEGELSKI: Yeah, 16th and 17th.

20 MR. FIORETTI: 16th and 17th in Illinois.

21 MR. KERN: O.K. So we would expect you to
22 come back on August 24th with a revised matrix which shows
23 how these would or would not affect Michigan measures?

24 MR. FIORETTI: Right. Right. So this
25 whole section we've not -- you know, we just are getting

1 to and there's no changes today.

2 MR. KERN: O.K.

3 MR. FIORETTI: I could launch into 55
4 through 69, if that's the right thing to do. Do you want
5 me to go through those?

6 MR. KERN: As opposed to breaking for
7 lunch?

8 MR. FIORETTI: Yeah. But I just want to
9 make sure I understand what your timing is.

10 Fifty-five through 69 are UNE measures.
11 Most of these include areas where we have made some
12 modifications or some modifications pending with respect
13 to both line sharing and DSL. They're identified here.

14 You know what, it's only quarter to 11:00
15 in Illinois, for example. Maybe we could go through as
16 many of these or you pick a time when you think you want
17 to stop.

18 MR. KERN: We'll stop at noon or 11:00
19 Central time.

20 MR. FIORETTI: On 55 we have some project
21 language that we agreed to in Illinois in our last meeting
22 there. We also have some open issues that we agreed to
23 follow up with based on our Illinois discussion, and
24 they're listed on the right. How they got blue I don't
25 know. They should just be black, but they're blue in your

1 electronic document.

2 55.1 is average installation intervals for
3 UNEs. There is a 55.1 that is specific to DSL for the
4 same process, and there there are four -- items No. 2, 3,
5 4 and 5 are separate disaggregations that we have to
6 include into Michigan that are loops with line sharing (no
7 conditioning), loops with line sharing (requiring
8 conditioning), loops with no line sharing with no
9 conditioning, and loops with no line sharing (requiring
10 conditioning). So that's where we get the four different
11 disaggregations for DSL and line sharing for this
12 particular measure, O.K. Those would be both additions
13 for advanced services.

14 MR. ANDERSON: Sal, is five, and when you
15 say loops with no line sharing, those are DSL loops?

16 MR. FIORETTI: They are DSL loops. I'm
17 sorry.

18 MR. KERN: And Sal, let me just go back
19 to this whole section generally.

20 You have agreement in Ohio and Illinois
21 on all this stuff, unlike the previous session where you
22 didn't have agreement, but you still haven't done the
23 analysis of what impact it has on Michigan?

24 MR. FIORETTI: No. Here's what we've
25 got.

1 Specifically in Ohio, but we followed it
2 up with a similar discussion in Illinois, and it was one
3 of the few times that we kind of double-dipped and talked
4 about the same items in both different states.

5 We had spent a day in Ohio talking
6 specifically about CLEC-proposed DSL and line-sharing
7 measures. We took those back and said here's what we
8 think we can agree to right now. But we also know
9 that there's some agreements that are going to be made in
10 Texas about additional things that we might want to agree
11 to measure but, you know, we didn't know enough about them
12 timingwise at the time.

13 And what's actually transpired is they
14 made some additional agreements in Texas. They also were
15 ordered to do some other things that they really weren't
16 agreeing to. And so what we have got to do and we have
17 got it sometime, we're trying to carve out back in our
18 Ohio collaborative back at the end of the month, this
19 month, to understand what's really happening there and
20 what additional things from there can we incorporate that
21 we haven't already talked about.

22 We have simply agreed so far -- if I had
23 to just give you kind of a broad brush of what we have
24 agreed to do on the part of DSL and line-sharing advanced
25 services -- is we have agreed to do some basic measures on

1 FOC for those performance measures. We have agreed to do
2 some -- we have already incorporated some things on loop
3 makeup information from an interface perspective, a
4 preorder interface perspective.

5 There's a specific measure, that's
6 average installation interval -- that's specifically for
7 DSL and that's why you see the additional modifications
8 here in both the benchmark and project information that we
9 have talked about doing.

10 But then there were some additional --
11 and then the rest of the I&M-type measures, I'll call
12 them, which is 56 through 69, I&M type measures for UNEs,
13 we have agreed to establish separate disaggregations for
14 DSL with and without line sharing, and we may have made
15 some additional modifications there. But from an advanced
16 services perspective we have agreed to incorporate those
17 as a baseline of, hey, at least these are the things that
18 jump out at you that are the things that probably are
19 necessary initially to do to establish how we're doing on
20 DSL and line sharing.

21 Beyond that there are some additional
22 discussions and agreements and things that were ordered
23 from Texas. We're taking the rest of that in and
24 evaluating it and seeing, all right, what from that bulk
25 can we also do? All of those things were incorporated

1 into what the CLECs or DSL providers had asked us to look
2 at.

3 And so what you're seeing here is -- I
4 hate to keep using the word -- but what you're seeing here
5 is basically the baseline DSL measures that we have
6 already agreed to do. And I expect that there will be
7 some additions. I'm not sure how many at this point. But
8 there will be some additional things that we'll put into
9 these categories for advanced services. But at a minimum,
10 here's what we have already done on advanced services.

11 And I think from a practical perspective,
12 if we only add three or four additional things we have a
13 reasonable baseline to move forward and then identify, do
14 we need to do more, and obviously take that more into
15 account in further review.

16 MR. KERN: So unlike the other sections,
17 when I look at the third column here, the industry is in
18 agreement on what should be done, either through an
19 Illinois collaborative or through an Ohio collaborative or
20 through a Texas order; the industry is in agreement?

21 MR. FIORETTI: Well, they are in
22 agreement, but it doesn't reflect all of the requests that
23 have been made. So it's not -- we may see additions to
24 this. But on these things, you'll see agreement, I think,
25 from everyone. The CLECs have asked us to do these

1 things. And we have been able to assess them and
2 understand that we need to do them. And at a minimum we
3 can do these. We think there are other things that came
4 out of Texas that they either voluntarily agreed to do
5 or were ordered that we might be able to incorporate. We
6 just haven't looked at it in enough detail to have it
7 incorporated into this column yet.

8 We do expect to have at least some things
9 that we will have done that for by the time we're done
10 with this and add to this section.

11 But I think from an advanced-services
12 perspective the charge that we would have today, the
13 things that you'll see on 55 through 69 and some of the
14 other things that we saw just scattered in the earlier
15 measurements address what I call minimum expectations
16 for -- and it's probably not even minimum, but it's
17 adequate representation of what needs to be done. There
18 may need to be some additional things and we'll talk about
19 those again in Ohio at the end of the month.

20 MS. KINARD: This is Karen Kinard from
21 WorldCom.

22 Maybe you can refresh my memory. When
23 you say you are breaking out the DSL loop, they are not
24 mixed in with other digital loops. You're going to have
25 digital with what ISDN is in and then you are going to

1 have DSL loops. Is that what you said you have agreed to?

2 MR. FIORETTI: The current
3 disaggregations in those measures already establish some
4 of that. As you can see if you look at 58, for example,
5 we did agree to make some changes to ISDN loops and
6 compare like for like, O.K.

7 MS. KINARD: So this list here is a
8 further breakout of the two-wired xDSL loop?

9 MR. FIORETTI: Right. That's correct.
10 In fact --

11 MS. CEGELSKI: I know we had talked about
12 breaking out the DSL from the others so we would have
13 a --

14 MR. FIORETTI: I think that for some of
15 these measures it's in the other DSL provider request that
16 we are still looking at what we can do there.

17 But a lot of this, just to provide some
18 groundwork as to what you'll be seeing in terms of what we
19 agreed, a lot of these things will depend on specifically
20 what we can expect to break out from how we identify some
21 of these things and how we can actually disaggregate them.

22 And if we can, likely, we would agree to
23 do it. If we have real trouble figuring out from a
24 reporting perspective how to break them out, well, we
25 might disagree but say let's talk about it further

1 because we may have some changes coming in our system in
2 the near future that would allow us to do that.

3 I don't think, from my perspective
4 anyway, just in the way I would like to proceed from a
5 performance measure perspective, I really don't expect to
6 put anything on here that I agree to that I don't really
7 know that I can measure in the near future. In other
8 words, I don't want to put anything on here, a
9 disaggregation that says I'm going to take out XYZ
10 product and disaggregate it, if I don't think that before
11 the next six-month review I could implement it.

12 So that's really one of the things that's
13 going to keep me from saying I'll do that is if I do some
14 investigation today and say, gee, you know what, from a
15 reporting perspective when I start looking at this stuff,
16 I can't really tell the difference or I've got to do a
17 system change or back-end system change to do this work.

18 I don't want to have pending work carry
19 over. I would much rather have us establish a list of
20 open issues that we agree to carry over to the next six
21 month review and address it then when we might have some
22 better view of can we do it. But a lot of times that's
23 really what the determining factor for us is. It's
24 already in the measure that you're getting and I just
25 can't split it out today. If you'll work with me on the

1 next time around, maybe we'll have some changes to do
2 that.

3 MS. CEGELSKI: I just want to make sure
4 I'm hearing you right on this.

5 Is it that you won't start any of this
6 measurement, that it will take you a long time to do,
7 maybe seven or eight months to do it, but until the next
8 six months -- or will you be in the stream of
9 implementation but not have any data for the six-month
10 review?

11 MR. FIORETTI: My hope on all of these,
12 my hope and expectation on all of these things that I
13 agreed to, is that we will be able to implement them in
14 enough time prior to the next six-month review that we
15 will have some historical data. Now, whether that will be
16 five months or two or three months, I really can't note
17 until I get into the requirements and development cycle
18 of, O.K., what's it going to take?

19 What we try to do as an up-front look is,
20 where is the data source? How is it identified? Can we
21 get to the data? Do we have a current feed to get to that
22 data? Is it just from a real high level perspective work
23 we could expect to do in that kind of time frame?

24 So my hope would be that I don't carry
25 over something I say I'm going to do and not have it done

1 before the next six-month review. That's my expectation,
2 O.K.

3 MS. CEGELSKI: I'm just concerned on
4 those things that it might take a long time because we're
5 having the six-month time frame limitation that they will
6 never get measured -- if we all agree that it's something
7 important.

8 MR. FIORETTI: I think if we do end up
9 with something like that, I think we're going to have to
10 talk about it and that's why I wouldn't close the door on
11 that. But if I had my druthers, I wouldn't want something
12 that said O.K., I'm going to do this, and I show up at
13 the next six-month review and haven't done it yet.

14 MS. CEGELSKI: I would have no problem if
15 you would identify that it takes that long a time period
16 and you would have it ready for data by whatever the date
17 is. I would have no problem with that.

18 MR. FIORETTI: I think we would have to
19 establish that as we're moving forward. But today in my
20 current thinking that's one of the things that's going to
21 stop me from saying, gee, I'm going to do something.
22 Because I also have expectations based on our
23 conversations earlier of how we're going to incorporate
24 some of these things into the master test plan. So if I
25 knew something like that today, I think I would ask to

1 hold or something.

2 MS. CEGELSKI: If we could identify those
3 because it might be something that the CLECs really would
4 like and I think we could work it out.

5 MR. FIORETTI: On the other hand, there
6 might be some where I really would say, gee, I would have
7 to do this work -- it's huge work that I would have to do,
8 at least as we have identified it -- and there might be
9 some that we say and we don't see the benefit, so we
10 wouldn't agree to do anyway.

11 But typically, if it's a disaggregation,
12 I'll come back with something there that makes some sense.

13 A lot of times to me -- and I don't
14 recall getting any feedback yet from our folks on the
15 question of a DSL or xDSL at this point, so I don't know
16 how to address that question in particular.

17 But even to the extent -- my original
18 opinion was if, for example, we had established the same
19 benchmarks for DSL loops versus other loops, you know, you
20 might be able to make the case that, gee, if you're a DSL
21 provider and that's all you're ordering, then why do I
22 have to disaggregate it into DSL loops.

23 But there are people that are ordering
24 both types of loops and for different purposes. So for
25 that reason, it makes some sense and I can see that.

1 There might be other things where you
2 say, you know, there are minimum differences between
3 products and services. Hey, it's in your measure already.
4 You know, if we need to do some additional work on, from
5 the service side, to understand performance on those, we
6 might be willing to do that.

7 But that's some of the thought process
8 anyway that I think we go through as we assess some of
9 these things.

10 MS. KINARD: On your point about
11 disaggregation, and we know that if we're ordering it's
12 important to have the disaggregation on the retail side to
13 compare like to like, to chip away the part we're not
14 ordering, so it can't mask results from what we are
15 ordering.

16 MR. FIORETTI: Right. And, again, that's
17 why some of that will actually drive it, saying no, I
18 don't think we want to do a disaggregation there either if
19 you're comparing to the same thing, if the product is like
20 enough.

21 So, anyway, Karen, I don't disagree with
22 you.

23 MS. KINARD: O.K.

24 MR. FIORETTI: It's just that we have to
25 take them one at a time.

1 What you'll see in every one of these 58,
2 we have DSL with line sharing and with no line sharing.
3 We have geographic disaggregation because -- that should
4 really be black because that one is already actually
5 incorporated in Michigan.

6 There are some changes to the
7 like-for-like that we agreed to in Illinois for ISDN on 58
8 as well that will be incorporated here.

9 Fifty-nine. Trouble reports within 30 days
10 of installation. Again, we have got DSL with line
11 sharing, DSL with no line-sharing breakout. The others
12 are already addressed.

13 There is an ongoing question of -- one of
14 the open issues in Texas was they had this in their
15 initial performance measure discussion in Texas and what
16 was proposed there -- they had this disaggregation that
17 was talking about a broadband service product. But they
18 really didn't -- and it was supposed to be a measure of --
19 it was some type of assessment of Project Pronto, but it
20 wasn't defined at all.

21 And so in those sessions that we had
22 relative to DSL, I said, gee, until I get a good
23 definition of this, I'm going to put it in as open issue
24 product even though they have agreed to do it. Because it
25 seemed to me that was something that they agreed to do as

1 a future product that might come along that wasn't even
2 defined yet. And I don't see the value in that.

3 If we get a product that comes along
4 that's defined, well, let's throw it in there. But I
5 don't want to just throw something that I am always
6 reporting zeros in until I figure out what it is. So
7 we've got some additional open issues on that. And that
8 appears throughout in the right-hand column, O.K. Just
9 to let you know what that is. That's really what that
10 represents.

11 MR. KERN: Sal, is this a good time to
12 break for lunch?

13 MR. FIORETTI: Sure. Any time is good in
14 my book.

15 MR. KERN: We're going to break for an
16 hour and we'll see everybody back at that time

17 (At 12:00 Noon, a recess was taken until
18 1:00 P.M. of the same day, Wednesday, August 2, 2000.)

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1 we're recording these proceedings.

2 MS. EMCH: Yes.

3 MR. KERN: O.K., thank you.

4 Sal, you left off somewhere between 67 and
5 69?

6 MR. FIORETTI: Yeah.

7 MR. KERN: Oh, I'm sorry; 57 through 69.

8 MR. FIORETTI: Yeah. I was just going to
9 run through from 55 through 69, specifically focusing on
10 what other than the disaggregations for DSL with line
11 sharing and DSL with no line sharing. Again remember all
12 we're doing is looking at what from the other states we've
13 already agreed to to incorporate into the Michigan
14 Business Rules that aren't already there.

15 Marsha, do you have this document?

16 MS. EMCH: Yes, I do. Thank you.

17 MR. FIORETTI: O.K. So I'll start at 59.
18 We have modifications for DSL with and without line
19 sharing. Again we talked about earlier the broadband
20 service product that we're still discussing and trying to
21 define, and hopefully our friends from Texas will help me
22 a little bit with that. But we've not agreed to do that
23 at this point here but certainly have agreed at a minimum
24 to do the DSL with line sharing and without line sharing
25 for 59, also for 60, 61. Again, all I'm really mentioning

1 are the differences between what Michigan has currently in
2 their business rules.

3 Sixty-two is a DSL with and without line-
4 sharing modification.

5 Sixty-three the same way.

6 Sixty-four, there was an issue of
7 modification in benchmarks where we change -- I guess I
8 wasn't as clear on this one as I could have been.

9 There were two levels of disaggregation
10 where we were going to change the benchmark, one with
11 parity with POTS business and the other with parity with
12 our affiliate for DSL for line sharing. I believe that
13 was for DSL and for DSL with line sharing.

14 MR. KERN: I'm sorry, that was 64?

15 MR. FIORETTI: That was 65.

16 MR. KERN: Oh, 65.

17 MR. FIORETTI: Sixty-four, I don't think we
18 established geography in Michigan -- I'm sorry to move
19 back to 64 -- on 64 specifically, but we need to go back
20 and establish that as well.

21 MS. MOORE: Sal, this is Karen Moore. Is
22 geography on target for June data?

23 MR. FIORETTI: I knew you were going to ask
24 me as I was flying up this morning. I think it is but I
25 haven't gotten, you know, a last couple of days update.

1 I'll check on that. I should really send something out on
2 that.

3 MS. MOORE: Thank you.

4 MR. FIORETTI: Yeah. I believe so, but ...

5 Where am I, 66? Again we have DSL with
6 line sharing and without line sharing and the same
7 benchmarks reflected in 66.

8 Sixty-seven, again we have DSL with and
9 without line sharing that we've not addressed, as we do in
10 68 and 69.

11 There was in 69 a question about Sprint had
12 offered an exclusion, a clarify exclusion, but we agreed
13 last time in Ohio to ignore that after we talked about it
14 a bit. So I'm not sure why I put that in red, but we
15 should be O.K. there.

16 Or actually, we talked about that in
17 Illinois, I think.

18 Moving on to measures 70 through 121.
19 All of these were products of discussions in the Illinois
20 collaboratives. At several different points we discussed
21 70 through something -- 70 through 107 and 107 through
22 122, I think.

23 MS. MOORE: That sounds right. Karen
24 Moore.

25 MR. FIORETTI: No. 70, there was some

1 discussion about just adding some clarification to some of
2 the trunk blockage. There were also some ongoing
3 discussions that we're trying to have. Just for those of
4 you who will be in the Illinois collaborative, as soon as
5 I get the date from my trunk people -- we had some
6 outstanding questions there -- I would like to establish
7 one of the two days in Illinois as the day that they will
8 come in and address some of the questions. They just
9 haven't told me which day is correct for them yet that
10 they can make it, but it will be one of those two days in
11 the Illinois collaborative where we will have that
12 additional discussion. Anything, of course, that comes
13 from there we will also incorporate here.

14 MS. MOORE: This is Karen Moore.

15 Sal, did we ever come to closure on the
16 question about the idea that this measure measures all
17 trunks and all blockage together?

18 MR. FIORETTI: That's really the
19 discussion that we're going to have, Karen, there.

20 MS. MOORE: O.K.

21 MR. FIORETTI: There is some additional
22 discussion that we want to have with respect to how this
23 lays out in Illinois in particular. But it kind of gets
24 wrapped up in the entire discussion. So as soon as I get
25 from them -- I expect today or tomorrow I'll get something

1 from them saying which of those two days -- I'll send an
2 e-mail so that we could plan to talk about that at
3 Illinois.

4 MS. MOORE: This is Karen Moore.

5 Just for the record, Sal, AT&T believes
6 that this is not the way to measure call blockage. It
7 really needs to be at an end office or at a trunk level,
8 because if you combine every single trunk and measure the
9 blocked calls you'll never reach 1 percent. You can't
10 really measure what you're intending to measure.

11 MR. FIORETTI: Again, I don't want to
12 debate it here. But I think the difference that we are
13 probably debating is the perspective you are using in
14 looking at this measurement. It could be looked at as a
15 reflection of what's happening operationally, which you
16 really should be looking at on an office-by-office and
17 trunk-by-trunk basis. This is really to report overall
18 performance. And so that's some of the discussion that I
19 think we'll have in Illinois.

20 MS. MOORE: Great. Thank you, Sal.

21 MR. KERN: Sal, can I back up just for a
22 minute?

23 So 70 through 122 are under discussion in
24 Illinois. There are no conclusions yet?

25 MR. FIORETTI: No. We do have some of

1 changes that we have made in Michigan. We are debating --
2 you know, part of the debate that we're having in Illinois
3 is the applicability of the market region for these
4 measures. And that's really how we got to the discussion
5 that Karen and I were reiterating just a couple minutes
6 ago.

7 Seventy-six, we just had some clarification
8 of the business rule. And again, the disaggregations that
9 we talked about earlier that we need to add to Michigan.

10 Seventy-seven, we also have those
11 disaggregations.

12 And 78 was the same. Seventy-eight and 79
13 were both the same measures that we have had and we have
14 already incorporated anything that we were to agree to do.

15 Moving on to Performance Measure 80.
16 This is Directory Assistance, average speed of answer.

17 One of the things that we talked about in
18 Illinois was the applicability of the state-specific
19 benchmarks for these measures. And we would incorporate
20 the state-specific measure benchmark for Michigan. I
21 don't know that we have got it. If we do -- I mean, I
22 don't know that we have got it in the benchmark today in
23 the business rule. If we don't, if we happen to, it's
24 purely coincidental that we do.

25 This would be one of the tie-ins to kind

1 of the service quality where we put the same benchmark in
2 this measurement as we did for in the service call.

3 Operator Services grade of service. It's
4 the same measurement that we have today.

5 Again, we might need to make a speed of
6 answer -- oh, I'm sorry. The first one is Directory
7 Assistance. No. 82 is speed of answer.

8 Again, the same issue with regard to
9 benchmark and incorporating the Michigan-specific
10 benchmark that we should be incorporating there.

11 MR. ANDERSON: I don't know that we have
12 a Michigan-specific speed of answer for Directory
13 Assistance or operator service.

14 MR. FIORETTI: I thought I read it in one
15 of those.

16 MS. SCHNEIDEWIND: I don't remember.

17 MR. FIORETTI: I think I read it in one
18 of those. Otherwise, I think our default would be what we
19 already filed. For whatever reason, we put that in there.
20 That was maybe -- I think what we have in there is
21 probably either the Texas rule or the Ohio rule, depending
22 on -- actually, it's probably the Illinois rule since
23 these came from Illinois, these particular ones came.

24 MS. SCHNEIDEWIND: We didn't have a
25 Directory Assistance measure at all.

1 MR. ANDERSON: Right. I believe the
2 Illinois rules are much more detailed in that area. I
3 don't think Michigan addresses those kinds of things.

4 MS. SCHNEIDEWIND: We certainly didn't in
5 our first set of measurements. I can't recall if the new
6 ones did or not.

7 MR. FIORETTI: Right. Eighty-three is
8 percentage of abandoned calls for operator services.
9 There were no changes to those.

10 Eighty-four, 85 and 86 are the ones that I
11 mentioned at the very beginning of the call where we in
12 discussing these, the CLECs proposed to delete this
13 measure. If we chose, if we were to choose so, we would
14 continue reporting these in Michigan until the six-month
15 review just so that we didn't propose to start measuring
16 something and then immediately thereafter propose to
17 eliminate it. But I think that's the difference there
18 that we need to really address.

19 Eighty-seven, 88, 89 and 90 were some of
20 the technically infeasible ones that we identified early
21 on in the process. So obviously there is no change to
22 those since we are not doing those.

23 There were no changes differently in 91
24 than what we have already documented or 92 and 93.

25 Ninety-four shows no modifications. But I

1 did take that note that Karen reminded me of back on No. 5
2 as to the disaggregations and trying to put this together
3 with 5.

4 MS. MOORE: This is Karen Moore.

5 Sal, just to be clear, I don't really
6 care whether you eliminate 94 and put it all in 5 or not.
7 I just want them to be measured the same way.

8 MR. FIORETTI: Right. It's to get them
9 in sync with respect to the measurement itself, with the
10 tail and so forth.

11 MS. MOORE: Right.

12 MR. FIORETTI: So I did take that note on
13 5.

14 MS. MOORE: Thank you.

15 MR. FIORETTI: I had a note on 95 that we
16 were going to follow up -- I believe this was in Illinois
17 -- with some discussion on syncing up some of the manual
18 and electronic disaggregations with the FOC measures. I
19 think it was based on some of the discussion we also had
20 in Ohio on the FOC measures that we didn't have in
21 Illinois, and so we felt that there had to be some sync-
22 up. I had some notes in my matrix on that. So we'll have
23 to review that and there may be a change there.

24 In 96 we did a lot of the -- we had a lot
25 of discussion on 96, 97, 98, 99, 100 in our Illinois

1 collaborative where we brought in our folks that were
2 working through the hot cuts process for Wisconsin. Right
3 now our measurements are the same as those that are in
4 Illinois and Ohio. They haven't closed on the hot cuts
5 process, although we've agreed to incorporate both the
6 provisioning trouble report and the 114.1 hot-cut measure
7 as proposed in Michigan. So I think we're O.K. there.

8 MS. CEGELSKI: Can I back up for just a
9 minute?

10 MR. FIORETTI: Sure.

11 MS. CEGELSKI: On the LNP-only orders -- I
12 know, Sal, you and I had a discussion as we passed each
13 other in Chicago -- with a 10-digit trigger and with an
14 LNP-only order, Ameritech is going to auto-complete the
15 order between 5:00 and 6:00 o'clock at night even though
16 the CLEC may not activate it, that LNP, until 10:00 P.M.,
17 and how would we restore that, especially you would show a
18 completed order when in fact it's not completed yet.

19 MR. FIORETTI: We did some investigation
20 into that. I'm trying to recall. That should be in here
21 and it's not.

22 MS. CEGELSKI: Yeah, I didn't see that.

23 MR. FIORETTI: You know, I'll just put that
24 in the open issues. I think we've talked about it
25 somewhere, but I don't -- I mean maybe last time we talked

1 about it was here just to remind us that that was an
2 issue.

3 MS. CEGELSKI: And there are still open
4 issues regarding that whole process about how are they
5 going to restore the services for the customer, what time
6 frames, how a CLEC would then be required to submit
7 another order. So that whole issue is still very muddy.

8 MR. FIORETTI: Yeah, I understand. I need
9 to put something in here as far as open issue. I guess
10 I'm just looking at where shall I put it. Ninety-seven
11 maybe or premature disconnect?

12 MS. CEGELSKI: It's not a premature,
13 it's --

14 MR. FIORETTI: I'll put it in 97 just to
15 have it here.

16 MS. CEGELSKI: Well, I think I would call
17 it a premature completion.

18 MR. FIORETTI: Yeah. I'll put a note in
19 here. I'm not sure why I didn't pick that up from my
20 other matrix or if it's on there, because where we talked
21 about it, maybe it's not on there. But I do remember the
22 conversation. I'll put it on 97.

23 MS. CEGELSKI: And then I would be
24 concerned about that because it would show that, according
25 to your records, that you would have an on-time order

1 completion when in fact it wasn't, causing trouble to the
2 end user, and we'd have to then submit another order. So
3 I just don't feel comfortable about how it may skew the
4 measures.

5 MR. FIORETTI: I think the note I took was
6 auto-complete at 6:00 P.M. I'm not intending to address
7 the process issues there necessarily, just to understand
8 what the implications are and make sure that we've
9 accommodated them in the performance measures.

10 MS. CEGELSKI: And I would like to take it
11 another step, and whatever the process that's going to be
12 designed to restore that customer and the time frames
13 associated to that, you know, we may end up having some
14 additional measures.

15 MR. FIORETTI: Well, and I think again I
16 don't know that that process work is all done.

17 MS. CEGELSKI: Well, they rolled it out, so
18 I don't know --

19 MR. FIORETTI: I know they rolled out
20 provisioning trouble reports but I'm not sure they rolled
21 out anything on restoral.

22 MS. CEGELSKI: No, but they rolled out the
23 process for the auto-completion, and that's what my
24 concern is.

25 MR. FIORETTI: But I'll capture it on 97

1 and we'll make sure that we try to address it.

2 MS. CEGELSKI: Thank you.

3 MS. KINARD: This is Karen Kinard from
4 WorldCom.

5 Sal, I don't think I've asked you before,
6 but we do a lot of special access for local instead of
7 using a UNE loop but we do LNP with it. Now, the special
8 access wouldn't be captured in your reporting here, but
9 I'm just wondering where our LNP part of that goes. Does
10 that get picked up as LNP only or does that go into hot
11 cuts with LNP?

12 MR. FIORETTI: Well, depending on the
13 measure, you're right, it gets either in the coordinated
14 cutovers or as LNP only.

15 MS. KINARD: So the special access hot cuts
16 and LNP, it would still go under hot cuts?

17 MR. FIORETTI: Right, but we're not -- I
18 want to be clear -- we're not reporting on the special
19 access piece at all.

20 MS. KINARD: But how do you pick up the LNP
21 part?

22 MR. FIORETTI: It's under the coordinated
23 conversions if it's identified as such. Otherwise it's
24 under the LNP only.

25 MS. MOORE: This is Karen Moore.

1 So Sal, if I'm to understand you correctly,
2 if it's coordinated, it will be under LNP-only
3 coordinated; if it's not coordinated, it will be under
4 LNP?

5 MR. FIORETTI: Can you say that again so I
6 can make sure I -- if it's identified as a coordinated hot
7 cut, it will be in the hot cuts measures. If it's an LNP-
8 only, it will be addressed under these LNP measures.

9 MS. MOORE: This is Karen Moore.
10 LNPs are counted two different ways, one if
11 they're coordinated and one if they're not.

12 MR. FIORETTI: Well, they have different
13 measures.

14 MS. MOORE: Right.

15 MR. FIORETTI: But the LNPs that -- for
16 example, the LNPs that are part of the hot cut -- for
17 example, 97, percentage of time Ameritech applies the 10-
18 digit trigger prior to the LNP order due date -- they're
19 in there too.

20 MS. MOORE: Well, if they're coordinated,
21 how could they be in there?

22 MR. FIORETTI: But the 10-digit trigger is
23 set anyway.

24 MS. MOORE: But I mean I don't understand,
25 Sal. Ten-digit trigger to me implies not coordinated.

1 MR. FIORETTI: No. Any LNP that you do has
2 a 10-digit trigger associated with it and therefore we're
3 measuring it in that category. Any one of them.

4 There are some additional measures that we
5 do for coordinated conversions that don't get measured
6 otherwise.

7 MR. BARTON: Because the 10-digit trigger
8 is industry standards.

9 MR. FIORETTI: It's just a method by which
10 you execute an LNP port. So the 10-digit trigger
11 performance measures are applicable to all LNPs regardless
12 of whether they're part of a hot cut or not.

13 MS. MOORE: O.K.

14 MR. FIORETTI: O.K.?

15 MS. KINARD: And this is Karen Kinard from
16 WorldCom again.

17 So if we have a hot cut with special access
18 and there is a provisioning trouble that has to do with a
19 translation issue, it would be counted, but if it was a
20 loop issue it wouldn't in the hot cut section?

21 MR. FIORETTI: If it was a loop issue on --
22 you mean a trouble with a special access circuit?

23 MS. KINARD: You're able to tell whether
24 it's translation or facilities and separate that out so
25 that does get picked up even though it's special access if

1 it's a translation issue?

2 MR. FIORETTI: Well, wait a minute, Karen.
3 I would expect -- let's not mix and match here. I would
4 expect that if you have a special access circuit going in,
5 you're not going to use that coordinated hot cut. You're
6 going to get that circuit in, up and working, tested, and
7 then you're going to do the LNP-only based on the 10-digit
8 trigger at the time you want to do the cut.

9 If you want to coordinate those two, you'll
10 do the coordination based on having that circuit in place
11 and coordinating the cutover.

12 So I think most often those would not be
13 considered coordinated cuts by you or by us because
14 there's no reason to coordinate the conversion as there
15 was with LNP, as there was when it was interim number
16 portability. We did a lot more hand-holding there because
17 of the nature and the timing required for interim number
18 portability. But when you have 10-digit trigger available
19 you don't need to do that. And so therefore they're not
20 in there.

21 MS. KINARD: But even if you took the 10-
22 digit trigger down earlier --

23 MR. FIORETTI: That would count. I mean
24 that would be counted based on the LNP stand-alones.

25 MS. KINARD: O.K.

1 MR. FIORETTI: O.K.?

2 MS. KINARD: But if we were doing it
3 together as a hot cut -- I know we do a lot of special
4 access with hot cuts --

5 MR. FIORETTI: I don't know if we still do
6 a lot of those.

7 MS. KINARD: Maybe we don't do as many as
8 we did before, but you could still pick out if the problem
9 had to do with the LNP part.

10 MR. FIORETTI: Well, and if it was a
11 problem with LNP, I think we've got it accommodated. But
12 I honestly don't think -- I think we consider those now
13 LNP stand-alones, because we don't coordinate the two.
14 We've got different service centers, for example, that you
15 order the special access service through, and so I don't
16 believe we do that coordination and count those as hot
17 cuts. And, you know, I think that's --

18 MS. CEGELSKI: Sal, that would be the
19 difference between like the LSR and ASR ordering process.
20 Follow my thought. With the local services, even though
21 right now we can get unbundled loop through TELIS, it
22 still would fall within this category. But if it's a true
23 access service, you're not measuring that at all.

24 MR. FIORETTI: Not at all. Not at all.
25 That's not what we're intending to measure here, or

1 required to measure.

2 MS. CEGELSKI: Now, you are measuring
3 things that currently the CLEC has the capability of
4 ordering unbundled loop through TELIS.

5 MR. FIORETTI: Unbundled loop is an
6 unbundled element --

7 MS. CEGELSKI: And those are still --

8 MR. FIORETTI: And those are in. So that's
9 why I didn't want to make that differentiation on TELIS.

10 MS. CEGELSKI: Yeah. Just wanted to make
11 sure.

12 MR. FIORETTI: So, you know, I just want to
13 be clear with that part.

14 MS. CEGELSKI: Yeah.

15 MR. KERN: I think it's safe to say that
16 this issue is still under discussion in Illinois?

17 MR. FIORETTI: Really the only issue that's
18 outstanding is this premature completion issue. I would
19 say that we have not already reached an agreement of some
20 sort in Illinois.

21 MS. KINARD: Now, Sal -- this is Karen
22 again -- in Michigan where we had the complaint that we
23 had to buy special access because we couldn't get the
24 transport and the loop, for maintenance issues going
25 forward are those special access lines going to be

1 included in the report? Are they now considered -- I
2 guess they're something more like EELs with the transport
3 and loop together?

4 MR. FIORETTI: I'm not aware of the details
5 of that complaint, Karen, but I'll tell you this way:
6 From a performance measurement and reporting perspective,
7 if I have them marked as unbundled elements, they're
8 counted. If I have them marked as special access, they're
9 not counted.

10 MS. KINARD: Well, can you check and see if
11 the things -- the special access that you had to go back
12 and give us the monetary difference between UNEs and
13 special access on are now counted as UNEs in the reporting
14 for future maintenance issues?

15 MR. FIORETTI: Can you give me some
16 examples of circuits?

17 MR. ANDERSON: Karen, this is Craig
18 Anderson. I believe what happened there is the Commission
19 ruled that we could not reject an order that was submitted
20 for unbundled network elements if there were not
21 electronics available to provide the circuit.

22 Now, there were some incidents prior to
23 that where MCI WorldCom ordered instead special access
24 circuits using the special access order process, but I
25 guess I don't understand. I mean today you'd order them

1 as unbundled network elements, and the Commission just
2 clarified in its order when we have to fill those orders.

3 So if they're ordered as UNEs, we provide
4 them as UNEs. If they were ordered as access, they would
5 be provided as access.

6 MS. KINARD: Things that were installed as
7 access because we couldn't order them for maintenance
8 going forward, they're not covered in this plan?

9 MR. ANDERSON: Well, but there were 16
10 orders and they are done with. They are in, converted,
11 and that's it. I mean it's not a going-forward issue.
12 It's historical strictly.

13 MS. KINARD: Because I know we have
14 complaints that we had the right to have the transport and
15 the loop together in our contracts, I know in Bell South
16 territory, and they've all been transferred, you know,
17 made UNEs now, even though they were special access
18 before, and maybe this Michigan complaint was a little
19 different. I don't know all the details.

20 MR. ANDERSON: Yeah, it was different.
21 It's not the issue of conversion of special access circuit
22 to EELs. That's a different issue.

23 MS. KINARD: O.K. Well, in either case we
24 consider, even if it was only 16, if they were supposed to
25 be UNEs to begin with, they should be part of the

1 maintenance reporting for UNES.

2 MR. FIORETTI: And if as a result of that
3 complaint -- and I don't know that this is fact or not --
4 but I would only tell you if as a result of that complaint
5 we were required to go back and change those two UNES,
6 then they're in my UNE base today. I don't know the
7 specifics, Karen.

8 MR. ANDERSON: Yes, they were. Those 16
9 orders were converted to UNES and they're in there now.

10 MR. FIORETTI: So then from a maintenance
11 perspective they already are, Karen.

12 MS. KINARD: O.K.

13 MR. FIORETTI: But I don't know the details
14 of the case.

15 MS. KINARD: Well, if they definitely are
16 in there now, that's what we wanted.

17 MR. FIORETTI: The next set, 102, 103 and
18 104, are the 911 measures. Again, as we stated earlier,
19 these probably will be differences between Michigan and
20 the other four states only because we opted to have the
21 Michigan measures here for 911. As we look to sync up the
22 other states with the additions from Michigan, you know,
23 you may decide that you want the others to be Michigan as
24 well. But right now we've got a difference here that
25 Michigan is using the Michigan-specific measures.

1 105-106 are poles, right-of-way and
2 conduit, and we had a little bit of discussion in
3 Illinois. We talked about these but we didn't make any
4 modifications that aren't already reflected in the
5 Michigan measures.

6 107 begins the section on collocation.
7 Remember we have an additional measure here in Michigan
8 that's not on here on collocation.

9 I don't believe there are any differences
10 in 107 and 108. I did make a note, although it's somehow
11 turned black since I sent this, I did make a note that in
12 Illinois when we talked about percent of requests
13 processed within tariffed timelines, we had a note in our
14 matrix that said it's 10 calendar days in Illinois,
15 Indiana and Ohio, 10 business days in Wisconsin and
16 Michigan. By virtue of our discussion, I want to make
17 sure I go back and check that to make sure it's accurate
18 and that we've accommodated that, if so, in our Michigan
19 rule. But that should be red, that No. 1 issue there on
20 No. 109.

21 110 began the updates into OS and DA, and
22 it's really 110, 111.

23 112 and 113 are all OS/DA database issues,
24 and we've already incorporated any modifications that
25 we've done.

1 Again just as a note, in Illinois we've got
2 some syncing-up to do with this whole parity versus
3 benchmark issue with all the other states, if we're going
4 to do that or not, and there is one of those or one part
5 of one of those that we have a little different benchmark
6 in Illinois. Otherwise it's the same in the other states.

7 114, we've got the same measure that we've
8 got elsewhere.

9 114.1 we've adopted here in Michigan as
10 well for coordinated cutovers.

11 115 is exactly the same as it is elsewhere.

12 116 was another technically infeasible
13 measure so we don't have anything to say there. We're not
14 doing that one.

15 117, 118 and 119 are NXX measures, NXX
16 loading measures, and we've got the same measurements in
17 Michigan. They were both off exactly the same business
18 rules that we agreed to in Illinois and we'll agree to in
19 Ohio.

20 120 and 121 are bona fide request
21 measurements, and I did have one item that I wasn't sure
22 was in the business rules and it has to do with a question
23 on calendar versus business days, and we might have to
24 modify the business rules to be in sync with that. That
25 might have been just something that we missed in updating,

1 so I need to go back and investigate that and, you know,
2 we'll close on that elsewhere.

3 For some reason in your document I think
4 you have got a whole other section that was a product of
5 cut-and-paste expertise on my part. And so you can ignore
6 that in your next version. You won't see that. I was
7 trying to use both documents at once while I was putting
8 this together and obviously I didn't do as well as I could
9 have done there. But 121 basically ends the comparison.

10 Any questions?

11 MR. McNALLY: Sal, this is Todd with
12 McLeod.

13 I don't know if you can answer this or
14 not, but I saw in the Ohio minutes regarding special
15 construction discussions that the CLECs were going to
16 convene a subcommittee to make proposals regarding
17 possible performance measures concerning special
18 construction.

19 MR. FIORETTI: Right.

20 MR. McNALLY: Is there any more news on
21 that?

22 MR. FIORETTI: Well, here's how I recall
23 the discussion. We talked about -- when we brought out
24 the special construction policy, there was a note in there
25 that said none of these -- performance measures should not

1 apply to these.

2 And basically our discussion in Ohio was
3 that if we think that we need to have some -- because of
4 the fact that we're now giving you some things that we
5 were never giving you before in that special construction
6 policy -- if we think that there are some things that we
7 should be excluding from performance measurements based on
8 that, we should bring them to the table in Ohio when we
9 next meet.

10 If at the same time CLECs think that
11 there are other measurements that might come up by virtue
12 of this special construction policy, they should convene
13 this subteam to talk about those and close on that before
14 that meeting. And we're going to try to have our special
15 construction product marketing guy, the guy that came out
16 and did the overviews in different states, attend our Ohio
17 meeting.

18 So therefore we thought that would give
19 us the opportunity to make any modifications that we think
20 are required or to discuss any potential modifications
21 based on that policy.

22 The point about CLECs convening a
23 subteam, I'm not sure who said that they were going to
24 coordinate. It might have been Julia Dorian --

25 MS. MOORE: I think so -- this is Karen

1 Moore -- I think it was her.

2 MR. FIORETTI: -- who was representing
3 Rhythms who was going to coordinate that among the CLECs
4 to come up with, if there's anything that you think needs
5 to be modified.

6 MS. CEGELSKI: Well, one concern that
7 CoreComm has is that anything that's fitting into the
8 conflicts modification, which includes all the DSL, that
9 would be eliminated from the performance measurements and
10 that is not acceptable.

11 MR. FIORETTI: So I think those are the
12 kinds of issues that we want to talk about. And the idea
13 was just to make sure that we had all understood what the
14 issues were and not to have different positions maybe.

15 MR. McNALLY: O.K. I'll try to reach
16 this Julia Dorian.

17 MR. ANDERSON: And this is Craig
18 Anderson.

19 There's a related issue to that that is
20 Michigan-specific in the context of the order that was
21 mentioned in the MCI complaint case. The Commission
22 stated in there that orders for unbundled local transport,
23 where electronics needed to be added, should be included
24 in performance measurements.

25 However, I believe the current

1 performance measurements don't contemplate time frames in
2 which you would have to add electronics.

3 MR. FIORETTI: Well, I don't think that
4 there are any exclusions identified in the performance
5 measures to exclude those.

6 MR. ANDERSON: O.K. And I think that is
7 our thought. That is a Michigan-specific area that
8 perhaps we need to identify an exclusion.

9 MR. FIORETTI: I thought what you said is
10 we shouldn't be excluding them.

11 MR. ANDERSON: No, we shouldn't. Well,
12 we should be disaggregating them and identifying them
13 separate.

14 I think the standard was, according to
15 the Michigan order, that they should be provided in the
16 same time frame, this service on a parity level, if
17 you will, with special access services. Special access
18 services of this nature are typically provided in the time
19 frame that it takes to add the electronics.

20 MR. FIORETTI: I think in our performance
21 measures we already compare unbundled local transport to
22 DS1 and DS3.

23 MS. MOORE: Sal, I'm having a hard time
24 hearing you.

25 MR. FIORETTI: Sorry. I think we have

1 accommodated that, Craig. But we may need to go back and
2 review that. So I think we have got that one
3 coincidentally covered, but I think we'll just need to
4 make sure of that.

5 MR. KERN: Anything else for Sal on his
6 matrix?

7 Why don't we spend a few minutes talking
8 about an issue that MCI raised that actually came out of
9 the tariff collaborative, I believe, and this is the
10 process of syncing up performance measures with the
11 Commission's residential billing and service quality
12 rules.

13 And Janeen, I don't know if you are
14 prepared to speak on the issue.

15 MS. SANDERS: There were two measures
16 that we were looking actually to propose: the suspend and
17 restore measure and then there was also one for rate of
18 service.

19 And I think, Sal, you had some
20 understanding of what we were looking for there, but we
21 can go over it again and maybe you can give us your
22 response.

23 MR. FIORETTI: I think on suspend and
24 restore there's some specific items identified in the
25 rules in terms of when you disconnect what you have to

1 accommodate in terms of days. I think the suspend and
2 restore, this applies for us on resale and CPO.

3 And we have got the carrier disconnect
4 type of policy which is really what addresses suspend and
5 restore. And those are flowthrough orders when you do
6 carrier disconnects, so they happen the same day if you
7 get them in by 3:00 o'clock.

8 And so the only issue on that that I can
9 even see being an issue are two things. No. 1, when
10 you decide to suspend a customer, you know what the
11 parameters are from an ordering perspective that we have
12 in terms of getting the order in. So you just need to get
13 it in the day that you expect to get it in.

14 MS. CEGELSKI: I have a question about
15 the flowthrough of this. Does that even have a
16 hierarchy? If it's a business customer that has hunting,
17 would it still flow through?

18 MR. FIORETTI: You're going to suspend
19 and restore a --

20 MS. CEGELSKI: If we're suspending
21 somebody that's a business customer, it has hunting and
22 hunting does not flow through, so that has a hierarchy, so
23 it would flow through, that type of an order?

24 MR. BARTON: Jeff Barton, SBC Ameritech.
25 We're not disconnecting the hunt group.

1 We've just going to temporarily suspend the number. We're
2 not pulling it out.

3 MS. CEGELSKI: So that has a priority and
4 will flow through even though some of those things listed
5 on the flowthrough as not having the capability of
6 flowing through on this type of a suspend order would
7 still flow through.

8 MR. FIORETTI: What Jeff is saying is it
9 is not a change to the hunting, so it does flow through.

10 MS. CEGELSKI: Just clarifying. Thank
11 you.

12 MR. FIORETTI: So practically speaking,
13 there's really no effect there. And of course, you
14 understand the rules. The rules apply to how you would
15 disconnect a customer and apply them.

16 I know there's one that says -- and I'm
17 not recalling it exactly -- but I know here's one that
18 says that you can't suspend somebody if you don't expect
19 to have people working the next day to restore them.

20 So you shouldn't send us an order on
21 Friday afternoon at 3:00 o'clock, for example. So I don't
22 think that -- I think that we can accommodate that without
23 any necessary changes in the business rules, you know,
24 from a greater service perspective -- was it operator
25 services?

1 MS. SANDERS: This was actually per
2 product loop that we were looking for this.

3 MR. FIORETTI: I'm not sure I recall what
4 that one was.

5 MS. KINARD: This is Karen Kinard with
6 WorldCom.

7 I mean, with all the things that fall out
8 of flowthrough for other reasons, even if suspend and
9 restore is supposed to flow through and we put a request
10 in at 3:00 P.M. on Thursday, if it falls out and the
11 restore wasn't -- the customer cannot be restored within
12 the rules -- I think we're not covered under that. I
13 think we need to see at least the reporting on the speed
14 for suspend and restores in general.

15 MR. FIORETTI: But Karen, what you're
16 talking about isn't an overall performance measurement
17 issue. Again, this borders on -- this whole discussion
18 borders on, how do you operationally execute these things?
19 And so if you send us a restore order on Thursday and the
20 order doesn't get restored, operationally speaking that's
21 no different than if you sent us an order to put something
22 in on Thursday that didn't get put in.

23 I mean, we would have the appropriate
24 business rules associated with it. But if you felt that
25 there was a claim relative to any particular instance

1 where something didn't get done, that's purely a
2 case-by-case basis operationally that you'll need to claim
3 with us. And we don't need a performance measure to
4 identify every individual obligation that we might have
5 down the line.

6 The whole issue there is, you're going to
7 be required to compensate your customer in some manner and
8 likely you're going to come back to us and expect
9 compensation and we're going to have to compensate you.

10 And so do we need performance
11 measurements on those things? I would say not. I think
12 it avails itself in different ways for different things.
13 But performance measurements in this sense is not intended
14 to be, how do you resolve those individual operational
15 issues? They are performance measures on the whole. How
16 are we performance in support of you.

17 And these are issues -- there are
18 individual customer issues that really get handled on an
19 operational level. And I don't really think that there's
20 a connection to the overall performance plan in this
21 sense.

22 MR. ANDERSON: And, Karen, this is Craig
23 Anderson.

24 When we talked about this in the tariff
25 collaborative, the point was made that we would need to

1 address here in the performance measurements collaborative
2 any situation where we had established a benchmark for a
3 particular activity or process and where we, if we met the
4 benchmark, that still might cause you to not be able to
5 meet the requirements in the billing standards.

6 For example, if we had a set of
7 benchmarks for putting the customer back in service after
8 suspend -- I don't even know if there is such a thing.

9 MS. KINARD: Service must be restored
10 within one day after the cause of the shutoff has been
11 resolved.

12 MR. ANDERSON: You're right. That's a
13 billing standard. But I guess I'm thinking you have to
14 fill in the customer's order for service within 10 days
15 or something, and we have a standard -- just to use a
16 hypothetical -- that says 12 days, and that would cause
17 you to not meet a billing standard, we ought to adjust the
18 performance measurements to reflect that.

19 MR. FIORETTI: And most of those are
20 parity. And so you're benefiting in that vein by exactly
21 the same type of performance we expect to provide
22 ourselves which are compliant with the same rules.

23 So the issues, I think, just avail
24 themselves in a little different way. But I didn't see
25 any performance measurements that were in conflict, if you

1 will, with the requirements in the --

2 MS. KINARD: What about for non-emergency
3 troubles 100 percent of the time. They have to be
4 restored in 36 hours as a parity measure. I mean
5 shouldn't the -- to measure parity, but also have that as
6 -- but it should never be more than 36 hours for that type
7 of trouble.

8 MR. FIORETTI: Isn't the measure the
9 average time to restore, it has to be 36 hours? And maybe
10 there is requirement for individual customers that have to
11 be restored in 36 hours. But that would then avail itself
12 again over some kind of claim by you to be reimbursed for
13 whatever you had to rebate the customer.

14 MS. MOORE: This is Karen Moore.

15 Sal, one of the measures is the number or
16 the percent of customers restored within 24 hours.

17 MR. FIORETTI: I don't know if that's a
18 Michigan measure. Well, Michigan, there's a
19 customer-specific 24-hour measure, I believe. And there
20 are some rebates to be, I think, to be had at varying
21 levels.

22 Is that right or am I mixing up Ohio?

23 MS. MOORE: The point is the parity
24 measure. So if you were missing 15 percent for retail and
25 12 percent for wholesale and the objective is what's the 5

1 percent, you have met the measure, but you're failing the
2 state regulation.

3 So is it your position then that it's up
4 to the CLEC to come to Ameritech and say, you know,
5 whatever we are being fined by the Commission you have to
6 pay?

7 MR. FIORETTI: Well, those particular
8 claims, if you will, happen on a customer-specific level,
9 not on an aggregate level. So it would seem to me that I
10 could meet aggregate of 90 percent or 95 percent and you
11 would still come to me with claims on individual
12 customers. And that's why I say it's an operational issue
13 that has to be resolved by a claim process if you expect
14 to be reimbursed. That's the process, not in the
15 performance measures.

16 Because it's carrier-to-customer
17 specific, not an aggregate kind of measure that we're
18 talking about here. There is a difference in how this
19 whole plan plays out.

20 MS. MOORE: Well, I know in Illinois
21 customers on the aggregate -- you must restore customers,
22 95 percent of your customers, within 24 hours.

23 And, Karen Kinard, correct me if I'm
24 wrong, but what Karen is suggesting is parity rates, but
25 you can't fall below the state law average or the state

1 law requirements.

2 MR. FIORETTI: But, Karen, here's what
3 I'm saying. I could be meeting the state requirement and
4 still have customers, individual customers, who make
5 claims for being out of service for over 24 hours, for
6 example. And I would still have to have a claims process
7 where you would claim, hey, we had this customer out of
8 service over 24 hours and I had to pay the customer this
9 much money. And we say, oh, yeah, you did, and it was our
10 fault because we had the report for 35 hours, and we would
11 provide the appropriate rebate. So that's the way that
12 individual customer --

13 MS. MOORE: I understand that, Sal, and I
14 appreciate you explaining that to me. What I'm suggesting
15 is that for measures where there is a state requirement
16 and the measure is parity, we need to consider having, if
17 you will, two standards. One is parity and one is the
18 state standard. And you have to meet both.

19 MR. FIORETTI: And I don't agree, No. 1,
20 that that's the way we should be interpreting this
21 whole process. And secondly, I don't agree with having to
22 live to two standards.

23 MS. MOORE: Well, the retail has to live
24 to the standard. And if retail has to live to the
25 standard, then wholesale should too.

1 MR. FIORETTI: And the requirement of
2 wholesale is that we provide you parity service with
3 retail -- and of course we're attempting to make the same
4 benchmarks -- so by virtue of that you've got our
5 objective to be at least that good. On the occasion that
6 it falls below that, it's the individual claims that we
7 would do that.

8 And in the case where we haven't at least
9 provided you what we provide in retail, we will pay you
10 based on the recommend plan. So that's the recovery there
11 when we are talking about the aggregate.

12 MS. CEGELSKI: This is Mary from
13 CoreComm.

14 I'm agreeing with Karen. I think that
15 whenever we have parity, if we are all doing a bad job,
16 it's still a bad job. But we could say it, O.K., you have
17 parity. So I would almost like to see where are we going
18 to set our goal?

19 I'm going back to when I was in grade
20 school and on my report card I had a red line. This is
21 what I should meet. If everybody falls below that, we're
22 still in parity, but we're not meeting our goals.

23 I would almost like to see some sort of
24 an acceptable thing and using the state guideline seems to
25 be a good thing.

1 MR. ANDERSON: I have some serious legal
2 concerns about that. I mean, fundamentally --

3 MS. MOORE: This is Karen Moore.

4 I cannot hear what you're saying.

5 MR. ANDERSON: Sorry, Karen. This is
6 Craig Anderson.

7 MS. MOORE: Thank you, Craig.

8 MR. ANDERSON: From a legal perspective,
9 I think that gets into an area where the carriers are
10 saying give us a higher standard of service than you give
11 yourself. You get into issues of superior service. I
12 mean, parity is the rule. That is the requirement --

13 MS. KINARD: In the Telecommunications
14 Act I think Michigan has a pretty broad service call, the
15 authority over local. And if they think setting the
16 standard will raise the boat for all customers whether
17 they are directly on your network or with a CLEC -- it
18 depends on your network, I think -- they have authority to
19 do that.

20 MS. MOORE: This is Karen Moore.

21 I completely agree with Karen Kinard.
22 The Telecommunications Act sets you up for parity, that's
23 true. But that does not supersede the state law.

24 Now, I'm not sure what the law is in
25 Michigan. But I know in Illinois 95 percent of the time

1 you must restore within 24 hours. Your obligation to do
2 that is not waived.

3 UNIDENTIFIED VOICE: But the rules in
4 Michigan are between the provider and the customer, as I
5 understand them. And so what we're saying is we have
6 processes and are willing to live up to those processes
7 and obligations with regard to compensating you for those
8 individual cases where we didn't meet those objectives.

9 But on the aggregate, the requirement is
10 that we do parity or better. And that's where the
11 Telecommunications Act comes in. And that's where these
12 measurements come in.

13 This other piece is a separate and
14 distinct piece of it where we have agreed that we're going
15 to compensate you where you have had to compensate your
16 customer. And, in fact, you can consider it to say, well,
17 yeah, we're kind of double-dipping in terms of our
18 reimbursement of you.

19 But if in the aggregate we met the
20 measure, but on the individual basis we missed for some
21 customers and it was our fault, we're going to agree to
22 compensate you based on that, on what you have had to
23 compensate the customer.

24 MR. ISIUGU: To bring this to the
25 practical level, how would you deal with a situation where

1 in providing services to the CLEC, it happens that you do
2 not always -- it's done in such a way that a CLEC cannot
3 provide good service to its customer? And of course you
4 figure, well, maybe for one reason or the other you don't
5 mind compensating the CLEC for whatever the cost of the
6 call. So we get -- the cost of doing business is such
7 that now it's just pay the CLEC.

8 How do we address the fact that now the
9 customer is at the end saying, look, my service is really
10 horrible. And it's O.K. that I'm getting a discount -- 50
11 bucks off my bill -- but I want this thing to stop, this
12 service to improve.

13 MR. FIORETTI: And I would again go back
14 to the different scenarios that we would compensate there.
15 Where it's the individual customer, we're not going to be
16 paying these other remedies, but we will be paying this
17 other piece. And it's a case of the circumstance --

18 MR. ISIOGU: I'm talking about a pattern,
19 not just one individual customer. It's a pattern of
20 conduct.

21 MR. FIORETTI: And that's part of -- that
22 competition-affecting type service that we provide is
23 where we pay remedies in our plan both to the state and to
24 the CLEC based on performance below the objectives that we
25 have set. If it happens to be an objective, that's

1 parity, then it's a parity objective.

2 And so I think that accommodates it. It
3 doesn't accommodate it to the extent that CLECs want the
4 better of the two worlds. In other words, if the state
5 regulation is 95 percent and we're performing at 95
6 percent, but somehow performing at 97 percent for retail,
7 I mean that would be out of parity and we would have to
8 pay for that in the parity standard.

9 But again, I think we address it in those
10 terms. We look at -- our record plan is based on two
11 tiers: one to the state and one to the CLEC. And the
12 CLEC one is for the -- it's based on all of the
13 performance in the individual measures by which we pay
14 remedies where we don't meet the objective.

15 If on an aggregate in a particular
16 measurement we're doing really bad, we're also going to
17 pay the state because we're not meeting those same
18 objectives.

19 I don't think any of the objectives are
20 in conflict in that when we say parity, we are required to
21 live up to those same objectives. Therefore, you're going
22 to get our best effort again to meet those levels of
23 service regardless of whether it's a parity or benchmark
24 comparison.

25 MS. KINARD: But, Sal, if things are all

1 aggregated together where do you put suspend and restores
2 now with other average intervals when they are shorter
3 intervals and we need to see them even if you don't use
4 the standard, so we can tell if we're getting long
5 intervals and come to you to work on that problem before
6 we have trouble.

7 This is a sensitive point to us because
8 of our experience in New York and now in Texas, where in
9 New York the commission was coming to us about customers
10 complaining about how they were cut off and not restored.
11 And some of it was Bell Atlantic cutting people off after
12 they migrated to us because they hadn't paid their bills
13 to Bell Atlantic.

14 And we have an even worse problem with
15 SBC on this issue. And then we were responsible for
16 getting the customer restored and we were not getting them
17 restored in time.

18 So it took a very long complaint
19 proceeding to show to the commission that it wasn't our
20 fault, that we weren't the ones causing all this trouble.
21 But these people were coming to the commission in droves
22 complaining about it. So that's why we are very sensitive
23 to this.

24 And we're afraid in your region, in
25 particular SBC now, and we're going to them -- they don't

1 even listen to us. They transfer a customer to us and
2 then they SNP them.

3 And another thing, you are talking about
4 flowthrough. I'm not even sure, do you have the
5 documentation for doing SNPs. I know we had to do a lot
6 of work to get that type of activity included in New York
7 and we're still working on it in Texas.

8 MR. KERN: Karen, could you define SNPs,
9 please.

10 MS. KINARD: Suspend for nonpayment. I'm
11 sorry. The mass market people have captured me on the
12 acronym.

13 MS. CEGELSKI: If a carrier disconnects.

14 MR. FIORETTI: if a carrier disconnects,
15 which we again have, and I believe it's well documented in
16 the ordering process --

17 MR. BARTON: It was.

18 MR. FIORETTI: So again, I don't agree
19 that we're in conflict here. I think that what we have
20 got before us in terms of the remedy plan that we're going
21 to establish -- we don't have performance measures that I
22 have been able to tell that are in direct conflict with
23 the requirements of Michigan in terms of the benchmarks
24 that have been set. And we do have the provision on the
25 individual basis to do some kind of claims process.

1 So I guess I'm not seeing where we are in
2 conflict with the plan.

3 MR. KERN: Let's back up.

4 Janeen, you had said that WorldCom wanted
5 to propose two new measures.

6 MS. SANDERS: The other one was for grade
7 of service.

8 My understanding in Michigan we may be
9 called upon to provide measurements to evaluate service
10 where we have to go back to Ameritech and request a
11 report.

12 MR. FIORETTI: Don't you keep any data
13 based on the day-to-day transactions we do with you
14 for every transaction?

15 MS. CEGELSKI: Well, let me just say from
16 CoreComm's perspective there's times that we have placed
17 orders that we have not -- what we have requested was not
18 delivered although it got completion orders from it.

19 So when you say "quality of service," I'm
20 not sure if that's the same description that you want.

21 MR. FIORETTI: Again, we've got to be
22 talking about the specific items that are involved in the
23 Michigan rule. I mean, if you place an order with us for
24 a service, a custom-calling feature, for example, that
25 somehow doesn't give provision, I mean, that's part of our

1 normal claims process and that shouldn't work its way back
2 into these rules.

3 And so we shouldn't -- and I don't think
4 you intended to do this -- so we shouldn't distort it to
5 mean that any service that you might purchase from us
6 would have to be reported on. We're talking about
7 day-to-day transactions where you order, we provision, we
8 send you completions.

9 You've got the data yourselves. There is
10 nothing -- certainly no state commission that's requiring
11 you to be responsible as the responsible carrier to report
12 to them -- isn't going to wait for 20 days after the end
13 of the month for you to send them a report based on a
14 performance report.

15 These are operational reports that you're
16 going to be required to provide basis on day-to-day data
17 that you collect, not that you get from us.

18 Now, should you have some difficulty in
19 terms of investigation and need additional data from us,
20 that's available from us through the normal channels by
21 which you get that data. But you shouldn't rely on us to
22 do that kind of reporting for the commission.

23 MR. ISIOGU: Is grade of service the same
24 as quality of service?

25 MS. SANDERS: My understanding is it is.

1 Karen Kinard, can you comment on that.

2 MS. KINARD: I think that basically the
3 issue we brought up about is there's a state standard and
4 you shouldn't be able to dip below it. There's a lot of
5 things where we have to provide data on troubles and
6 things like that and to respond to the commission's rules.
7 And we want to make sure that's covered with our access to
8 data when we do.

9 I know we have been talking about that in
10 other states, not Michigan.

11 MR. FIORETTI: Right. But I would
12 suspect, Karen, that you would not rely on us as the
13 primary source of that data. You know, I would certainly
14 expect that you are going to report anything that you have
15 to report from your records and, if necessary, come back
16 to us to validate, to do the investigation and to do
17 the --

18 But it is certainly not our expectation
19 that we're going to respond to your commission inquiries
20 as the first line of defense. I mean that, I think, is
21 your obligation as a carrier.

22 MR. KERN: Let me make this suggestion:
23 Maybe WorldCom, if you could draft up these two new
24 measures that you would propose with some corresponding
25 business rules, and if you could document that, and then

1 we'd give Ameritech and other parties an opportunity to
2 comment on it, because we're kind of free-flowing here.
3 I'm still not sure I know exactly what specific rule you'd
4 be proposing, and I'd like Ameritech to do the research
5 and do an analysis based on the proposed rule and how it
6 fits in with the Commission's rules.

7 MR. ANDERSON: Well, and I guess I'd ask
8 too, to the extent you're basing it on a specific
9 requirement of the Commission, let us know what that is,
10 too. I'd like to know what the basis is.

11 MR. KERN: You want them to cite the
12 Commission rule which the performance measure would be
13 addressing?

14 MR. ANDERSON: Yes.

15 MS. KINARD: So if there's a rule, which
16 there is here, on installations where if it falls below 90
17 percent for three consecutive months and it's UNE-P, so
18 you're doing all the installations, you would have to do
19 the corrective action report on that.

20 MR. FIORETTI: Then that's what I would
21 expect. The corrective action report, you would work with
22 us to develop that if you felt that that was our issue.
23 But I mean there are many scenarios that I can envision
24 where you might not be in compliance and it wouldn't be
25 our fault at all. And so I would --

1 MS. KINARD: But I'm saying if your
2 intervals -- say you're below 80 percent, there's no way,
3 you know, even if it was our fault, we could do better
4 than that.

5 MR. FIORETTI: Well, yeah.

6 MS. KINARD: I mean I could see where you
7 had a point where you're reporting, you know, 95 percent
8 or right on 90 percent and we're below that, that we would
9 have to prove that it wasn't our fault.

10 MR. FIORETTI: Well, Karen, I guess I would
11 suggest this: that, you know, as John suggested, if you
12 could draft up what you need to draft up and cite where
13 you think we need to consider different rules than we
14 have, but I would also ask you to consider in that which
15 of those might be more better addressed either
16 operationally on a customer-to-customer basis or with
17 respect to reporting and/or investigation and
18 documentation afterwards through, you know, access to raw
19 data versus ongoing reporting of different levels of
20 service. I'd just ask that you consider that as you're
21 developing that, because it seems to me they're two
22 different things.

23 MS. KINARD: And I'm not sure if I've seen
24 the latest tariff language on this issue indemnifying us
25 if it's your fault.

1 MR. KERN: And I think, Karen, you need to
2 work with Jim Denniston on that because I think he has
3 that type of language. And these issues really came from
4 the tariff collaborative, so it might be helpful to work
5 with him as you do your drafting.

6 MR. FIORETTI: Yeah, that particular piece
7 I would think we'd want to kick back to them.

8 MR. KERN: Well --

9 MR. FIORETTI: I mean the performance
10 measure piece, I could see how, you know, they wouldn't
11 want to address that. But that particular piece I think
12 we'd want to kick back to them.

13 MR. ANDERSON: And the discussion, John, to
14 go back to the tariff collaborative, is what we kicked
15 over to the performance measurements collaborative was the
16 issue is there anywhere where we have set a benchmark or
17 some level of service that is inconsistent with the rules,
18 and I guess I've still not seen where we've come up with
19 anything identified for us, a rule that is inconsistent
20 with the benchmark.

21 MR. KERN: Yeah. And I guess my point is,
22 as I heard the tariff collaborative, it was all the
23 parties agreeing that one should not put another carrier
24 in violation with the Commission rules. I mean I heard
25 the commitment from Ameritech to the CLECs to that effect,

1 and I heard CLECs to Ameritech say, "Thank you. We want
2 your help so that we're not in conflict with Commission
3 rules based on the fact we have this carrier-to-carrier
4 relationship."

5 So I don't really care if it's in the
6 tariff collaborative or the performance measures
7 collaborative. If parties are in agreement that working
8 together should not put one party in violation of the
9 Commission rules, let's find a way to fix it, and if by
10 getting there we start by getting, you know, WorldCom to
11 put on paper what their proposed solution is, then give
12 you an opportunity to respond to that proposed solution,
13 that would at least get us a piece of paper to be working
14 from. And again, we can always kick it back to the tariff
15 collaborative, we can keep it here, I really don't care,
16 but we've just got to find a place to resolve the issue.
17 And it may not be performance metrics, that may not be the
18 way to resolve it, but it's an open issue and we've got to
19 start addressing it.

20 The other issue that's come up, which was
21 not on my agenda but Karen Moore did mention that she
22 wanted to talk about it, as did Mary Cegelski, is change
23 management process for performance measures, and I will
24 turn it over to Karen and/or Mary to talk further about
25 what exactly you're looking for.

1 MS. MOORE: This is Karen Moore from AT&T.
2 Actually, John, the requirement for a
3 change management process for performance measures is in
4 the Michigan master test plan documentation, and KPMG has
5 said in there that Ameritech should be presenting what
6 their proposal is. So I'm interested in hearing what
7 Ameritech has to say.

8 MR. FIORETTI: Well, Karen, if you'll
9 remember, you provided us with a copy of what AT&T
10 envisioned would be possible. You provided us with a
11 paper copy -- I've yet to see the electronic copy -- of
12 what AT&T would envision as to be the kinds of issues we
13 would address in that, and we committed to showing up at
14 the next Ohio collaborative with our proposal on that. I
15 would greatly appreciate if you'd send us that electronic
16 version so that we could use it to incorporate it in our
17 proposal as is necessary. But we have committed --

18 MS. MOORE: So what you're saying, Sal, is
19 that Ameritech Michigan doesn't have a proposal yet other
20 than the sort of general outline I gave to you?

21 MR. FIORETTI: No, we're working on an
22 internal proposal and in fact we've got a document that
23 we've generated already that outlines our change
24 management process internally, and we are adding the
25 section that really your document targets, which is

1 specifically focused on notification, and we're working on
2 that as we speak. But we've already got a document that
3 we have documenting our internal process for change
4 management performance measures, and, you know, we just
5 want to make sure that we address the second piece which
6 you've outlined, which is notification, and that's not
7 quite done yet. But we've got the rest of that document
8 that we can make available if that's something that -- I
9 mean it's going to be available by virtue of the third-
10 party test. It's got to be tested.

11 MS. MOORE: Right.

12 MR. FIORETTI: It just doesn't incorporate
13 the next piece of that, which is notification, as yet, and
14 we're working on that.

15 MS. CEGELSKI: And the second issue, then,
16 with change management is measures governing the change
17 management process for OSS.

18 MR. FIORETTI: Which we already have in
19 Michigan. We have noted at the bottom of that
20 measurement, however, "This is a draft," because the 13-
21 state hasn't been done yet. I just talked to Kathy King
22 the end of last week about the 13-state process and
23 finalizing that so I can finalize my performance
24 measurement on that but was -- when we talked with CLECs
25 about that issue in particular, I did offer to measure the

1 existing Ameritech process and was told absolutely not,
2 it's got to be the 13-state process, and so we've got to
3 wait for that to finish.

4 So that's one area where, you know, we're
5 somewhat deficient in terms of the performance measure.
6 Documentation might not be exactly in sync yet, but I want
7 to get it firmed up relatively quickly so if I have to
8 make changes before the 15th, I'll do that based on Kathy
9 King's latest version, even if it's not the final version
10 of the change management process. But that process itself
11 hasn't been implemented as yet because it's not done, as I
12 understand it.

13 MS. KINARD: And this is Karen from
14 WorldCom again.

15 I thought in Indiana we had agreed to
16 implement what you were doing now for notices.

17 MR. FIORETTI: No.

18 MS. KINARD: And then go to the 13-state.

19 MR. FIORETTI: No, no. That's what I was
20 pushing, Karen, but nobody wanted to agree. They wanted
21 us to do the 13-state and only the 13-state.

22 MS. MOORE: This is Karen Moore. I think
23 at the time we insisted on that, we didn't think it would
24 take this long.

25 MR. FIORETTI: Neither did I.

1 MS. CEGELSKI: Neither did I. I'm on the
2 13-state drafting team for the change management process.
3 So we have a meeting this week and one of the issues was
4 the transition plan, which Kathy King says she'll have
5 ready for us. So the whole idea was to follow the
6 guidelines and time frames of the 13-state even prior to a
7 common platform so we'll all be working on the same time
8 frames.

9 MR. FIORETTI: Yeah. The only concern I
10 have with that relative to performance measurements is,
11 for example, if we adopt the 13-state change management
12 process today, it would require notification of some
13 things that should have already happened and hasn't come
14 out, and so it would have to be kind of a forward-looking
15 --

16 MS. CEGELSKI: No. And that's why the
17 transition plan is so important because it will be
18 releases that would be implemented -- where the first
19 notification of that release would be implemented after
20 the acceptance of this process.

21 MR. FIORETTI: And so, you know, that's
22 part of the transition plan that we've got to understand
23 in terms of the performance measurement.

24 You know, my expectation is we'll still
25 measure release notices. If they happen to come out now

1 and should have come out six months ago and we just now
2 implemented the process, well, we'd just kind of consider
3 it an exceptional report on it anyway. But that's the
4 part that we kind of have to figure out how to do.

5 MS. KINARD: Marsha, are you still on?

6 MS. EMCH: Yes.

7 MS. KINARD: Isn't Texas going -- I know we
8 don't want the Texas measurement, but aren't they
9 measuring what they're doing now and then moving to the
10 13-state process, their change control metric?

11 MS. EMCH: This is Marsha Emch with
12 WorldCom.

13 As of the recent six-month review, they are
14 going to be measuring (unintelligible).

15 MS. SCHNEIDEWIND: Marsha, you have to slow
16 down, please.

17 MR. KERN: And could you repeat that,
18 Marsha?

19 MS. KINARD: For the court reporter.

20 MS. CEGELSKI: Can you repeat that, Marsha?

21 MS. EMCH: I'm sorry, I couldn't hear you.

22 Yes. As of the six-month review,
23 Southwestern Bell does have a new measure. It's No. 123,
24 percent of timely and compliant change management notices,
25 and they are measuring their performance, correct.

1 MS. KINARD: Under the current individual
2 state rules, right?

3 MS. EMCH: Correct. They're not waiting
4 for the 13-state.

5 MR. FIORETTI: Right. Which is really a
6 difference in the direction that we got from the CLECs.
7 That's why we stand where we are.

8 So, you know, at this point, being what I
9 expect to be as close as we are, I don't think it's
10 reasonable to start reporting on something else, but I do
11 expect that it will happen, you know, reasonably soon.

12 MS. MOORE: This is Karen Moore from AT&T.
13 Mary Cegelski, you're on that team, are
14 you?

15 MS. CEGELSKI: Yeah. Right now we have two
16 outstanding issues as far as CoreComm is concerned, and I
17 think as far as all the CLECs are concerned, with the
18 change management process, and that's the quorum majority
19 vote issue for an outstanding issue solution, which is an
20 OIS, and the other one is just to see the transition plan.

21 Now, we're regrouping tomorrow in Dallas,
22 so hopefully when we leave Dallas we'll have a plan. We
23 thought we had one in June. All the draft team members
24 believed we had a verbal agreement, and we found out later
25 that that was not so. So we were very concerned.

1 MS. MOORE: This is Karen Moore from AT&T.
2 Mary, do you think that OIS quorum issue is
3 going to be resolved?

4 MS. CEGELSKI: I don't know. I think that
5 -- well, it will have to be resolved to get it done. The
6 OIS is the only protection that a CLEC has, and the
7 current quorum position, I do not believe that it will
8 give a CLEC any protection at all. So it would make the
9 whole change management document basically null and void.

10 MS. MOORE: This is Karen Moore.
11 I believe it's AT&T's position, subject to
12 check, that without a resolution to that issue, the whole
13 thing is in question.

14 MS. CEGELSKI: That is correct. No CLEC
15 that's on the drafting team will accept it with it as it
16 stands currently.

17 MR. FIORETTI: Well, and should it reach
18 that point, it would be my expectation that CLECs will
19 come to me and say, "All right, implement a measure.
20 Let's talk about implementing a measure and designing a
21 measure based on your current process."

22 MS. KINARD: This is Karen from WorldCom.
23 But it sounded like there is agreement on
24 the notice intervals and things like that.

25 MS. CEGELSKI: Yeah, the notice intervals

1 were all in agreement. The only thing that's outstanding
2 at this point is seeing the transition plan for the
3 Ameritech region and also the issue between the quorum
4 vote for an OIS.

5 MR. FIORETTI: But Karen --

6 MS. KINARD: Yes, I'm saying the transition
7 plan would affect.

8 MR. FIORETTI: And the issue is the change
9 management process has to go into effect for me to measure
10 it, and it seems to me that if not being able to resolve
11 these issues keeps that process from going into effect,
12 I've got nothing to measure, and so we're going to have to
13 address it based on the outcome of those issues, I think.
14 Otherwise, you know, I mean I can finish documenting the
15 measure. I'm just going to have nothing to measure if
16 they haven't implemented the process.

17 MR. KERN: I think it's safe to say that
18 this is being discussed in other places. We'll keep it on
19 our agenda as just an update item. But right now my
20 understanding is that if the change management process
21 falls apart, your 13-state change management process falls
22 apart, then you'd be coming back possibly to this
23 Commission asking for assistance. But until that happens
24 I'm not sure there's a whole lot for this collaborative to
25 do except to keep parties updated on what's going on.

1 MS. CEGELSKI: Well, I also think that the
2 13-state change management process is required to go back
3 to each of the states for acceptance of it. That's my
4 understanding of one of the FCC rulings, that each state
5 has to O.K. that.

6 MR. KERN: And that may be -- you know, I'm
7 not disagreeing. I don't know. If that were to be the
8 case, we could do another joint filing --

9 MS. CEGELSKI: Right.

10 MR. KERN: -- with the September 15th
11 filing if necessary. But I'm just trying to figure out if
12 there's an open issue for us to be working on, and it
13 doesn't sound like there is. It sounds like there's open
14 issues that are being worked someplace.

15 MS. CEGELSKI: Elsewhere, yeah. I agree
16 with that.

17 MR. KERN: Good.

18 MR. FIORETTI: We just need to await the
19 outcome.

20 MR. KERN: O.K. That was all that I was
21 planning on covering today. Do you folks have anything
22 else?

23 MR. FIORETTI: Nothing else.

24 MR. KERN: Well, our next meeting is August
25 24th and 25th. The things that we need to discuss over

1 those two days, we need to do the penalty plan, which
2 Ameritech will be filing on or before August 16th, is my
3 understanding. So I think we would like to see a
4 presentation or at least a summary of Ameritech's plan,
5 and if a CLEC has a counter-proposal, I think we'd like to
6 see that as well.

7 The second thing I'd like to see would be
8 Sal redlining the matrix that he went over today.

9 MS. MOORE: This is Karen Moore. Someone
10 put us on hold and I'm having a hard time hearing you.

11 (There was a discussion off the record.)

12 MR. KERN: Again, our next meeting is
13 August 24th and 25th. Ameritech is going to file their
14 performance plan on -- August 11th?

15 MS. SCHNEIDEWIND: That's what I have.

16 MR. KERN: I thought 30 days was August
17 16th.

18 MR. ANDERSON: Let's ask Sal what he was
19 planning.

20 MR. FIORETTI: I have to go back to my
21 notes, but the 16th sounded like --

22 MS. CEGELSKI: Illinois is the 16th and
23 17th.

24 MR. KERN: But the bottom line is Ameritech
25 is going to be filing in Michigan a penalty plan on or

1 about the 16th of August. I would expect Ameritech to
2 give us a brief overview on the 24th or the 25th of that
3 plan, and if the CLECs have a counter-proposal, if they
4 could get it distributed before the 24th and 25th, that
5 would be helpful.

6 The second thing we would work on is that
7 Sal would redline the matrix he went over today and he
8 would provide us an update, as well as other CLECs, on any
9 new changes, any agreements, or any disagreements that
10 have resulted from other states.

11 The third thing which we would discuss
12 would be these proposed rules that WorldCom will draft so
13 that CLECs will not find themselves out of compliance with
14 Commission rules regarding billing and service quality
15 standards.

16 And the fourth item that we'll cover, again
17 we'll have a brief update on the change management
18 process. We should know by that time if we have any open
19 issues that the Michigan commission needs to address.

20 Does anybody else have things they want to
21 cover during that two-day meeting? We have two full days,
22 by the way. I'm not saying we need to use them all, but
23 we have them booked.

24 MS. MOORE: This is Karen Moore from AT&T.
25 Sal, as part of your remedy plan

1 presentation were you planning on bringing Arthur Andersen
2 again for the benefit of the folks in Michigan and the
3 Michigan staff?

4 MR. FIORETTI: Yeah, I will probably do
5 that, Karen. I haven't firmed that up but I probably will
6 do that.

7 MS. KINARD: And I know we've asked for
8 this in other states, but could you bring examples of what
9 you would have paid out if the plan had been in effect?

10 MR. FIORETTI: I believe I can.

11 MS. KINARD: All CLECs?

12 MR. FIORETTI: I believe I can.

13 MS. KINARD: O.K.

14 MS. MOORE: This is Karen Moore from AT&T.

15 By the way, Sal, I received from our
16 account team the latest amendment proposal dated August
17 1st. So between the time you told us in Ohio and August
18 1st, you know, it hadn't been finished yet.

19 MR. FIORETTI: O.K. Have we changed our
20 expectation of --

21 MS. KINARD: This is Karen from WorldCom.

22 This has been an open issue we'll need to
23 discuss too, whether it should be implemented through a
24 contract amendment or not.

25 MR. FIORETTI: Yeah, I would expect that

1 would be part of that remedy discussion.

2 MR. KERN: I was looking at the schedule.
3 After the 24th and the 25th there is really only three
4 days that we could have another meeting prior to September
5 15th, and two of those days happen to border the Labor Day
6 weekend. So we need to do a lot of work before the 24th
7 and 25th and we have to really be productive on the 24th
8 and 25th, and I would suggest maybe we start work on it --
9 well, I guess it's a little premature to do a draft motion
10 but -- well, maybe not, I don't know. Think about it,
11 Craig.

12 MR. ANDERSON: O.K.

13 MR. KERN: Because Wisconsin is taking up a
14 lot of dates with A through AA. The really only open date
15 we have would be Monday, September 11th, for this group to
16 have another face-to-face meeting. We could do conference
17 calls, obviously, but unless some other dates free up, we
18 just won't have a whole lot of time to meet and resolve
19 anything that we need to get resolved prior to September
20 15th.

21 MR. ANDERSON: I would suggest the real
22 work in terms of being prepared to file the motion -- and
23 as you read the order earlier, it didn't sound like we had
24 to file the motion on the 15th. The plan was that we
25 reach resolution of these issues, or if we can't reach

1 resolution, identify them to go up to the Commission. But
2 it seems the real work is the marking up of the business
3 rules and the matrix. The motion itself I'm not sure is
4 real time-intensive. Unfortunately, it's the details that
5 Sal has to fill in on the matrix.

6 MR. KERN: Let's be a little creative here.
7 I mean the order says that we should reach resolution by
8 September 15th, but then it says we have to file the
9 penalty plan with the Commission no later than September
10 30th. You know, what we could do is just kind of inform
11 the Commission on September 15th that we've got a
12 resolution and we'll explain, you know, what our
13 resolution is as part of the September 30th filing.

14 MS. KINARD: This is Karen Kinard at
15 WorldCom.

16 Realistically our resolution on the remedy
17 plan would be that we've decided to litigate it.

18 MR. KERN: That could easily be the
19 position.

20 MS. KINARD: I think that's the only way
21 you're going to meet that deadline.

22 MR. ANDERSON: Well, Karen, we're going
23 into it with an open mind and a hopeful heart here, so ...

24 MS. MOORE: This is Karen Moore at AT&T.

25 (Unintelligible)

1 MR. KERN: Karen, can you say that again,
2 please?

3 MS. MOORE: This is Karen Moore from AT&T.
4 Craig, is Ameritech going to be putting
5 forth the Texas remedy plan?

6 MR. FIORETTI: For the most part, yes.
7 There may be some modifications that I'm going to suggest.

8 MS. MOORE: Well, hope can die aborning,
9 Craig, when you file that.

10 MS. SCHNEIDEWIND: I think because both of
11 these proposals have to be made to the Commission in the
12 11830 docket, you could do it as one motion. But it looks
13 like we may be saying, as we did in the July motion,
14 Commission, please adopt our resolution on performance
15 standards, and Commission, resolve the issue in regard to
16 an assurance plan and here's the various proposals. So
17 everybody is going to have to be placed on notice, I would
18 think, to be able to develop their support for their issue
19 if that's how we're going to do it.

20 MR. KERN: Would that be a joint motion
21 asking for Commission resolution or would that be separate
22 filings by the parties, do you think?

23 Craig, do you recall how the Commission
24 would anticipate a dispute on performance measures?

25 MR. ANDERSON: It really was not

1 specifically addressed in the order, and we haven't talked
2 about this, but there is a paragraph in the order that
3 expressly addresses the requirement that we propose a
4 performance assurance plan, and I don't know necessarily
5 that it has to be in 11831, because it is in 12320 in a
6 paragraph in the order, and I think it contemplates that
7 we collaborate and if unable to reach resolution, we
8 submit it to the Commission under the standard dispute
9 resolution process in U-12320. And maybe we need to go
10 back and look at the order and think about that.

11 MS. SCHNEIDEWIND: Yeah, I agree that the
12 procedure for resolving issues very quickly was raised in
13 the 12320, but I think that the Commission also addressed
14 the issue of penalties and such in the 11830 docket.

15 MR. KERN: Well, let's do this: Maybe
16 that's the homework assignment for the attorneys.

17 I mean this is the fifth time I've heard
18 that there's a lot of variation between the two camps.
19 Assume that this thing goes to the Commission for
20 resolution. I would encourage the attorneys to get
21 together off line and figure out what the best way is to
22 get the issue to the Commission. Is it in the form of a
23 joint motion with individual parties' positions like was
24 contemplated in the 271 order? Is it something different
25 that would be followed in 11830? I don't know. We've

1 just got to figure out a way to tee it up to the
2 Commission if in fact it goes to hearing.

3 That's what the attorneys are going to work
4 on between now and the 24th, and you will talk about how
5 you think we should raise this to the Commission on the
6 24th.

7 MR. ANDERSON: Well, I don't want to
8 foreclose again the hope that before we're even presenting
9 the proposal here, we're thinking about ways to submit an
10 unresolvable dispute. That's not the way --

11 MR. KERN: Your SMEs know better than I,
12 but on the off chance that it doesn't get resolved
13 amicably, I suggest you and Jim Denniston and Trabaris if
14 he's still on the phone get together, and Tom O'Brien.

15 MS. SCHNEIDEWIND: And I think the issue is
16 the same, Craig. Even if there is resolution to it, where
17 does the Commission adopt this as an acceptable assurance
18 plan, which docket do they do it in.

19 MR. ANDERSON: O.K.

20 MR. KERN: O.K.?

21 MR. ANDERSON: Will do.

22 MR. KERN: That's all I have. Thank you,
23 folks.

24 (At 2:47 P.M., the proceedings were
25 adjourned to 8:30 A.M., Thursday, August 3, 2000.)

C E R T I F I C A T E

We, the undersigned, do hereby certify that we reported stenographically the foregoing proceedings had in the within-entitled matter, being Case No. U-12320, before John Kern, Facilitator, at the Mercantile Building, Lansing, Michigan, on August 2, 2000, and that the foregoing transcript constitutes a full, true and correct transcript of our said stenographic notes.

Dated: August 2, 2000