

October 30, 2002

Via Hand Delivery

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

**Re: In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.
Case No. U-12320**

Dear Ms. Wideman:

Please find enclosed for filing the original and 15 copies of *SBC Ameritech Michigan's Compliance Plan Proposal* and *Proof of Service*.

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

Very truly yours,



William J. Champion III

WJC/mds
Enclosures
cc: Parties of Record

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

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

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to consider Ameritech Michigan's compliance)
with the competitive checklist in Section 271 of) Case No. U-12320
the federal Telecommunications Act of 1996.)
_____)

AMERITECH MICHIGAN'S COMPLIANCE PLAN PROPOSALS

On September 5, 2002, Michigan Bell Telephone Company, d/b/a SBC Ameritech Michigan ("SBC"), filed a "Request For Commission to Direct KPMG Consulting to Issue a Draft Report and to Schedule the Review Process of Such Report" ("September 5 Request") with the Michigan Public Service Commission ("MPSC" or "Commission"). In response to SBC's September 5 Request, the Commission entered an Opinion and Order on September 16, 2002 ("September 16 Order") that, in part, directed KPMG Consulting, now known as BearingPoint, to file a draft and final OSS test report and established a procedural review of such reports. The September 16 Order also directed SBC to file any compliance plans that it wished to propose by October 30, 2002.

Consistent with the September 16 Order, SBC hereby files its proposed compliance audit plans. The compliance audit plan proposals in this filing are based on the draft OSS test report submitted by BearingPoint on September 23, 2002 ("Bearing Point September 23 Report") and input from the technical workshops held during the week of October 14 through 18, 2002, at the Commission's offices. Since SBC has not reviewed BearingPoint's final report, which is to be

issued today, it reserves the option to modify or supplement the compliance audit plans proposed herein upon review of BearingPoint's final report.¹

I. COMPLIANCE PLAN BACKGROUND

SBC recognizes the importance of continued compliance with the requirements of Section 271. Therefore, SBC's September 5 Request proposed a compliance process, in the form of a compliance audit plan, to provide the Commission with assurance that future technical or operational concerns that may have an impact on SBC's compliance with the competitive checklist will be successfully resolved. The purpose of this filing is to propose two compliance audit plans that address operational concerns that are addressed in BearingPoint's September 23rd Report, and that were discussed during the recent technical workshops discussing that draft report.

As represented in its September 5 Request, SBC's proposed compliance audit plan process is structured as follows. First, the compliance plan process proposed by SBC requires SBC to define management assertion statements that specify the corrective action(s) that the Company plans to implement to satisfy the specified operational concern(s). These assertion statements are included in Section II below. Second, SBC will utilize an independent, qualified, third party to

¹ The Commission's September 16 Order also addressed the filing and review of Ernst & Young LLP performance audit reports. This compliance proposal filing is limited to BearingPoint's report. SBC's commitments regarding further auditing by E&Y were discussed at the October 14, 2002 technical workshops and are contained in SBC's "Submission of Three Consecutive Months of Actual Performance Results and Independent Performance Audit Reports Issued by Ernst & Young LLP" at p. 8, and in Mr. James D. Ehr's supporting Affidavit at ¶ 202, both of which were filed in this docket on October 21, 2002.

validate specific SBC assertions regarding its future response to the identified operational concerns. Hewlett-Packard Company (“HP”) has been selected by SBC to perform these two compliance audits.

Assuming these proposals are acceptable to the Commission or Commission Staff, SBC will provide the final assertions to HP. HP will use those assertions to develop appropriate audit or validation work steps. SBC will then review HP’s audit plan with the Commission Staff. After such review, SBC will implement the corrective actions, and HP will verify such implementation.

The results of these compliance audits can be used to validate SBC’s assertions related to the resolution of the two compliance plans described in Section II below. Upon completion of HP’s review, a compliance audit report will be issued by HP to SBC, which would also be provided to the Commission or its Staff.

In addition to proposing two compliance audit plans in Section II below, this filing also outlines the current status of the few remaining open exceptions associated with BearingPoint’s Process and Procedure Review (“PPR”) and Transaction Verification and Validation (“TVV”) testing. As described in Section III below, SBC does not propose any compliance plans for these test items. Finally, Section IV below describes the status of BearingPoint’s Performance Metric Review (“PMR”). Because PMR testing is on-going, no compliance plans are proposed at this time.

II. PROPOSED COMPLIANCE PLANS

There are two open Exceptions (33 and 52) for which compliance plans are proposed. Exception 33 was identified in test point TVV4-27 of BearingPoint’s September 23 Report.

Exception 52 was identified in test point TVV4-1 of BearingPoint's September 23 Report. The current status of testing results and SBC's compliance proposal for each is summarized below.

A. Customer Service Record (CSR) Accuracy (Exception #33)

1. Test Status as of October 28, 2002

- BearingPoint, in its latest retest, has reported that SBC updates its CSRs accurately and timely 92 % of the time for Michigan CLEC orders versus a BearingPoint test benchmark of 95%.
- SBC believes that all system issues identified in BearingPoint's testing have been corrected and verified. Accordingly, as outlined below, the compliance plan's corrective actions will focus on service representative training and process improvements.

2. CSR Accuracy Compliance Plan: SBC Assertions

- SBC will develop a Service Order Quality informational package to share with its Local Service Center ("LSC") Service Representatives by the end of this year.
- Beginning in January 2003, all Service Representatives will receive training via review of this informational package.
- SBC will design and implement a quality review process for validating the accuracy of the Ameritech Customer Information System ("ACIS") Customer Service Inquiry ("CSI") record updates, using sampling of UNE-P and Resale orders for SBC Michigan.
- SBC will identify the root cause(s) of errors determined by the quality review process, when frequent and significant, and implement the appropriate changes to the process or systems.
- Upon completion of the above actions, the accuracy of ACIS CSI record updates will be improved (as compared to BearingPoint's test results) based upon a sampling of CLEC production UNE-P and Resale orders to be selected and reviewed by HP.

B. Directory Listing Accuracy (Exception #52)

1. Test Status as of October 28, 2002

- In its latest retest, BearingPoint reported that 88.6% of directory listings sent electronically by the Test CLEC accurately updated the SBC Directory Assistance database versus a BearingPoint test benchmark of 95%.
- Many of the listing errors identified would not impact the ability of a directory user to obtain the listing and are consistent with errors found in Retail, however SBC recognizes the benefits in improving the overall accuracy.

2. Directory Listing Accuracy Compliance Plan: SBC Assertions

a. System Assertions

- SBC will install vendor software updates to allow automated daily transfers of Mechanized Order Receipt (“MOR”) files to Advance Listing Products and Services System (“ALPSS”), by December 31, 2002 (pending timely receipt of vendor software).
- SBC will implement an interim manual work process by December 1, 2002, to resolve ALPSS errors identified in the “Skipped Section Report” within three business days.²
- SBC will implement a long term mechanical process to route orders identified by the “Skipped Section Report” into the already established ALPSS error handling process by March 1, 2003

² This report identifies orders that were not processed by ALPSS for one of a variety of reasons. Certain of the errors identified in Exception 52 were caught by this report.

b. Quality Assurance Review Assertions

- SBC will develop a Service Order Quality informational package to share with its LSC Service Representatives by the end of this year.
- Beginning in January 2003, all Service Representatives will receive training via review of this informational package.
- SBC will design and implement a quality review process for validating the accuracy of the ACIS directory listing record updates, using sampling of UNE-P and Resale orders for SBC Michigan.
- SBC will identify the root cause(s) of errors determined by the quality review process, when frequent and significant, and implement the appropriate changes to the process or systems.
- Upon completion of the above actions, the accuracy of directory listing updates will be improved (as compared to BearingPoint's test results) based upon a sampling of CLEC production orders to be selected and reviewed by HP.

III. NO COMPLIANCE PLANS ARE PROPOSED FOR THE OTHER TVV AND PPR EXCEPTIONS

In considering potential compliance plan proposals, SBC reviewed each of the TVV and PPR Exceptions addressed in this Section. Four Exceptions (119, 122, 160, and 171) are either in the final stages of retesting or awaiting BearingPoint's final test analysis. In each situation, SBC is confident that these items will be resolved successfully and, therefore, no compliance plans are anticipated for any of these four test items. These are described in Section III.A. below.

Two closed Exception (74 and 112) and one open Exception (131) involve functions for which SBC believes its current performance is satisfactory, but acknowledges that further improvements could be made. For each of these situations, SBC outlines in Section III.B. below its internal improvement plans. SBC does not believe it is necessary to engage a third-party firm to monitor progress in these areas. For example, the Line Loss Exception 74 closed successfully;

however, because this is an important issue to SBC and the CLECs, SBC is committed to an internal improvement plan that does not require a third party review. Therefore, no compliance plans are proposed for these items.

Finally, there are seven Exceptions (29, 30, 44, 48, 49, 97 and 116) that SBC does not believe require further testing or improvement plans. As summarized in Section III.C. below, SBC has provided its Response to each of these open issues as part of the normal testing process. Therefore, no compliance or internal improvement plans are proposed for these seven items.

A. Open Exceptions in retest, successful conclusion anticipated.

Four open Exceptions (119, 122, 160, and 171) are currently in retest. Each of these remaining open Exceptions has a specific retest plan, and it is anticipated that successful results will be provided through the normal test process. Each is summarized below.

1. Accuracy/Formatting of CABS Bills (Exception #119)

- Based upon interviews with SBC personnel, BearingPoint concluded that, unlike resale bills, CABS bills do not undergo an ongoing, systematic verification process before being distributed to wholesale customers, nor is there a check performed for format errors.
- SBC is confident that it has demonstrated that a process does exist and expects this exception to close successfully after BearingPoint has reviewed the responses and supporting information provided by SBC.

2. CABS Rate Table Documentation (Exception #122)

- BearingPoint asserted that Ameritech did not have a documented timeline for uploading CLEC contract rates into the rate tables for the Carrier Access Billing System (CABS). A documented timeline was developed and provided to BearingPoint on October 6, 2002. On October 7, 2002, SBC began implementing internal procedures to support the end-to-end timeline. BearingPoint issued additional clarifying questions regarding the documented timeline on October 25, 2002. SBC's response was sent to BearingPoint on October 29, 2002. SBC will post a high level description of the aforementioned timeline/process on the CLEC OnLine Website by December 1, 2002.
- SBC is confident that the additional information supplied to BearingPoint, combined with the results of the additional interview(s), will demonstrate that this exception should be closed.

3. Flow Through (Exception #160)

- Flow through rates for designed-to-flow through orders reported in August by BearingPoint for Michigan were 90.2% for Resale, 88.81% for UNE-P, and 90.74% for LNP versus a BearingPoint test benchmark of 95%. UNE-Loop results were not reported as part of this Exception because BearingPoint judged UNE-Loop flow through results satisfactory.
- BearingPoint began a retest of flow through for Resale, UNE-P and LNP on September 9, and will complete that retest shortly. As of October 29, 2002 no test failures have been reported, SBC Ameritech anticipates a successful conclusion of flow through testing.

4. Late Order Status-Provisioning Query (POSQ) pre-order responses (Exception #171)

- Through this Exception, BearingPoint reported that SBC's EDI and CORBA pre-order systems returned late POSQ responses. SBC's investigation determined that the POSQ pre-order function is unused by commercial CLECs, and that BearingPoint's results were significantly affected by the inclusion of an optional capability of the transaction.

- SBC has provided additional information regarding this Exception in response to questions from BearingPoint, and anticipates reaching closure through the normal testing process.

B. Internal Improvement Plans Proposed.

Three Exceptions, two of which are closed (74 and 112) and one that is open (131), are areas in which SBC believes that its current performance is satisfactory, but is committed to attempting to further improve its performance. For each of these Exceptions, SBC outlines below its internal improvement plans and plans to provide quarterly updates to the Commission or Commission Staff on the Company's progress.

1. Test CLEC Line Loss (Exception #74)

- In its Disposition Report for Exception 74 of October 14, 2002, BearingPoint reported that, based on their testing associated with this Exception and the resulting 96.2% success rate, "the issues identified in this Exception Report have been addressed." This finding, coupled with BearingPoint's test results associated with Exception Report 94 which also related to line loss testing³, confirm that the process improvements implemented by SBC during the period of the OSS evaluation have had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs.⁴
- As a result of discussions with its CLEC customers, however, SBC has determined that some improvement is needed in the method of communicating the status of the

³ From the Disposition Report for Exception 94 issued by BearingPoint on August 20, 2002 – "During TVV4 testing, KPMG Consulting has reviewed 8073 commercial CLEC service order images and found 7717 had accurate line loss notifications associated with those orders, resulting in an accuracy rate of 95.6 percent. KPMG Consulting has determined that the issue raised in this Exception Report has been addressed."

⁴ See SBC's reports and responses to the MPSC in this docket regarding Line Loss Notification for description of the comprehensive actions taken by SBC to insure proper delivery of line loss notifications.

line loss notification process. Specifically, this would be the means by which SBC would notify CLECs should any future interruption of the line loss notification process take place, and would be used to communicate such information as period of interruption and intended corrective action.

- In order to insure all affected CLECs are promptly notified should any future unintended interruption of line loss notifications occur, the following will be undertaken:
 - Upon determining that an interruption of significance has occurred, SBC will issue an Accessible Letter to the affected community of CLECs including the pertinent information available at that time.
 - Once it has determined those CLECs specifically affected, SBC will contact those CLECs directly using the currently-designated customer contact maintained by its OSS Support organization.
 - As soon as such information can be determined and confirmed, SBC will issue an Accessible Letter to the affected community of CLECs regarding the specifics of the interruption, including the cause, impact, and intended corrective action.

2. Volume Testing (Exception #112)

- During the course of volume testing, SBC made system enhancements that addressed all of the functional issues and most of the timing issues to BearingPoint's satisfaction. Most of these enhancements were retested by BearingPoint in subsequent volume test iterations and BearingPoint's most recent analysis has confirmed that there are presently no unsatisfied determinations for the functionality evaluation criteria, and few issues with timeliness.
- SBC has noted that, if BearingPoint's time intervals were adjusted to reflect SBC's position that protocol translation processing time is not included in the existing PM2 performance benchmarks,⁵ SBC's pre-order transaction timeliness would be found satisfactory based on the approved performance benchmarks, and should be found to meet the testing requirements.

⁵ SBC's position is that the existing performance benchmarks for PM2 do not include protocol translation processing time is fully documented in SBC's responses to Exception 113. In addition, this performance measure and associated business rule issue are being discussed with CLECs during the current Performance Measure six-month review. Any disputes regarding PM2 can and should be resolved through the dispute resolution process for the on-going six month reviews.

- SBC Ameritech does not believe there is significant need for improvement of EDI pre-order timeliness. This assessment is based on current performance results, and takes into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces, rather than the EDI interface for pre-order inquiries. However, in response to the interest of parties to this OSS evaluation, SBC has continued to examine alternatives to improve EDI pre-order timeliness.
- SBC, working with the software supplier, has recently made a change to the configuration of its pre-order EDI translator software. Preliminary results show a decrease in translator processing time.
- Additionally, SBC will upgrade the existing SBC commercial EDI translator to the most recent version of software in 2003. The performance tuning, as outlined above, will be carried over to the upgraded version.
- Sterling Commerce is scheduled to release a completely new version of their EDI translator software in late 2002, which possibly could provide further performance improvement. SBC is committed to working with the vendor to evaluate this new translator software once it is available, and to consider implementation of the software dependent on the results of that evaluation.

3. Trouble Report Closure Codes (Exception #131)

- BearingPoint recently reported that, during retesting in July, SBC technicians correctly coded the Cause Code on Test CLEC trouble tickets at performance levels of 91.4% for Resale, 82.4% for UNE, and 69.7% for Special Circuits versus a BearingPoint test benchmark of 95%. SBC's own analysis of the retest results disputes several of the reported failures and indicate that current performance is 94.3% for Resale, 92.6% for UNE, and 97% for Specials. This has been conveyed to BearingPoint in our response dated October 22, 2002.
- The same SBC technicians that handle wholesale trouble reports also handle retail trouble reports. The technicians use the same closure coding techniques for retail and CLEC-initiated trouble reports. SBC implemented a number of initiatives in August to improve the accuracy of trouble report coding.
- SBC is committed to further improving coding performance by implementing additional initiatives across each of the four operational work functions involved in trouble ticket closures and coding: Local Operations Center ("LOC") personnel; Installation and Repair ("I&R") work forces; Special Services Center personnel; and Central Office personnel.
- These initiatives include:
 - New Awareness Sessions will be conducted with all Special Services Center personnel to reinforce proper closure techniques. These sessions will be

completed by November 25, 2002. In addition, these processes will be included in the internal ISO audits that are conducted every 3 months.

- LOC management personnel will conduct ongoing monthly quality reviews of at least 2 trouble ticket closures per (involved) employee. The results of these reviews will be documented in each employee's file, as well as any required coaching/success plans. In addition, new Awareness Sessions will be conducted with all LOC personnel to reinforce proper closure techniques. These sessions will be completed by November 10, 2002.
- The current monthly quality reviews conducted by I&R field managers will be updated to ensure that at least 2 trouble tickets are reviewed per technician for coding accuracy and narrative completeness. These reviews will be noted in each employee's file. In addition, I&R management personnel will implement a monthly "staff audit" consisting of a review of 5 trouble tickets in each of the (approximately) 70 manager areas in the Ameritech region.
- Central Office management personnel will conduct new Awareness Sessions with all central office technicians to instruct and reinforce the need for complete closure narratives and OSS Log notations. These sessions will be completed by December 1, 2002. In addition, these processes will be included in the internal ISO audits, which are conducted every 3 months.

C. Actual Performance Does Not Justify Further Retesting.

There are seven exceptions (29, 30, 44, 48, 49, 97 and 116) that SBC does not believe require further testing. SBC has provided its Response to each of these open issues as part of the normal testing process. Based on its consistent satisfactory commercial performance, SBC is not proposing either compliance or internal improvement plans for any of these functions.

1. Mechanized Completions (Exception #29)

- BearingPoint reported on October 25 that SBC returned 95.6% of mechanized Service Order Completion ("SOC") transactions to the Test CLEC within one day of work completion as compared with a 97% benchmark for this function.

- In each of the last four months (June-Sept 2002, PM 7.1), SBC has provided SOCs within one day for over 99.35% of all UNE-P orders, which represent approximately 90% of all CLEC commercial order activity in Michigan.

2. Mechanized Rejects (Exception #30)

- In its initial test, BearingPoint reported that 92% of Mechanized Reject Responses were received within one hour versus a BearingPoint test benchmark of 97%. Upon retest, 94.7% of the Mechanized Reject Responses were received within one hour.
- BearingPoint's assessment was based upon PM 10.1, which contained a benchmark of 97% for responses received within one hour. A new, revised benchmark (PM 10), which has been agreed to in principle with CLECs, changes the response timeframe to two hours, which is equivalent to the present benchmark for Firm Order Confirmation responses.
- BearingPoint's retest data indicated that SBC returned responses within the new, proposed benchmark timeframe for 98.5% of all Reject Responses observed.

3. Non-Mechanized Reject Responses (Exceptions #44, 48 & 116)

- Non-Mechanized Reject Responses for both electronic and manually-submitted orders were reported by BearingPoint as returned within the five hour timeframe were 86.5% for WebLEX GUI orders, 94.9% for EDI orders and 84.2% for manual orders versus a BearingPoint test benchmark of 97% which was based on the benchmark currently contained in performance measures 10.2 and 10.3.
- Proposed revised benchmarks for PM 10 require that 95% of all reject responses on manually-processed orders be returned within 8 hours for electronically-submitted orders and within 24 hours for manually-submitted orders.
- BearingPoint's test data indicates that SBC is exceeding the proposed benchmark by returning 95.8% of WebLEX GUI orders, 97.6% of EDI orders and 95.8% of manual orders submitted within the required period.

4. Non-Mechanized Firm Order Confirmations (Exceptions #49 & #97)

- Per BearingPoint, SBC returned 89.3% of manually-processed Firm Order Confirmations (FOCs) for WebLEX GUI orders, and 88.2% for UNE-xDSL orders within their respective deadlines, versus a BearingPoint test benchmark of 95% (PM 5).
- SBC's measured commercial performance in 2002 clearly demonstrates that it reliably returns FOCs on these order types to CLECs within the benchmarks specified in PM 5. For example, results from June through August for PM 5-01 were 98.52%, 99.09% and 97.85% for electronically submitted and manually processed FOCs. Results for manually submitted FOCs for residential and business as reported in PM 5-31 were 100%, 100% and 99.75%.

IV. NO COMPLIANCE PLANS ARE PROPOSED FOR PMR SINCE THAT TEST IS ON-GOING

BearingPoint's PMR testing falls into two categories: PMR 1-3 (which deal largely with documentation and processes supporting the creation and calculation of performance measures results) and PMR 4-5 (which deal with data integrity and actual calculation of the performance measures results). Looking at each target test area individually or as a group, it is clear that the remaining open Exceptions are not competition-impacting, nor should they delay the Section 271 review process in this proceeding. Moreover, SBC believes it has made significant progress working with BearingPoint to define a clear schedule to conclude PMR testing. As a result, no compliance plans are proposed at this time.

PMR 1 testing is largely done. SBC has delivered all of the documentation and information that BearingPoint requested. The remaining steps are for BearingPoint to validate the information by reviewing this documentation, conducting interviews, and submitting data requests to SBC to substantiate SBC's data retention processes. SBC and BearingPoint have

jointly developed a project plan, depicting all of the activities, deliverables, and target dates for each party to execute in order to bring this section of the test to a successful completion. The validation process has begun, and the project activities are being tracked, but the PMR 1 process is not currently anticipated to complete until the end of January 2003. Regardless of the review, SBC's performance measurement data retention architecture now clearly meets regulatory requirements and, therefore, no compliance plans are anticipated.

PMR 2 is complete and fully satisfied.

PMR 3 addresses change management. SBC has delivered all of the documentation and information that BearingPoint requested. SBC is now awaiting BearingPoint's validation of this documentation and enhancements. As with PMR1, the parties have conducted several meetings and have together specified the activities that must be executed in order to favorably dispose of the issues specified in BearingPoint's existing findings. Despite the fact that SBC has addressed all of the current issues relative to PMR 3, it is SBC's understanding that the metrics change management process will continue to be monitored by BearingPoint for the duration of the test.

As to PMR 4-5, resolution of these open issues will take place during the continuation of BearingPoint's on-going review. SBC is in the process of developing a detailed project plan to address each of the activities required to complete PMR 4 in a similar fashion as the plan for PMR 1 was developed. No clearly defined completion date can be identified until that work plan has been completed and thoroughly reviewed by both parties. This work is underway.

For PMR 5, SBC and BearingPoint are in the process of conducting meetings for each Measurement Group, where BearingPoint is providing specific feedback to assist SBC in resolving the issues currently affecting the Measurement Group scoring. SBC and BearingPoint have agreed to move the review of ten of the eighteen Measurement Groups from the January,

February, March data months to the July, August, September data months in order to make additional progress in PMR 5 towards meeting the 95% threshold value for each Measurement Group.

As stated above, SBC has committed to continuing the PMR sections of the BearingPoint OSS Test, subject to future direction from the Commission or Commission Staff and, therefore, additional compliance plans are unnecessary.

V. CONCLUSION

As demonstrated by BearingPoint's overall OSS test results, and as confirmed by SBC's actual performance results, SBC is providing Michigan CLECs with nondiscriminatory access to each of the competitive checklist items. Thus purpose of this filing is to reaffirm SBC's commitment to continue to provide ,and to continue to improve, those wholesale services.

Respectfully submitted,

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and

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Dated: October 30, 2002

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
to consider Ameritech Michigan's compliance)
with the competitive checklist in Section 271 of) Case No. U-12320
the federal Telecommunications Act of 1996.)
_____)

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on October 30, 2002 she served a copy of SBC Ameritech Michigan's Compliance Plan Proposal upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.

Mindy D. Smith (handwritten signature)

Mindy D. Smith

Subscribed and sworn to before me,
a Notary Public in and for said County,
this 30th day of October, 2002.

Kristi A. Grieve (handwritten signature)

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

SERVICE LIST – MPSC CASE NO. U-12320

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