

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)
the Federal Telecommunications Act of 1996)

Case No. U-12320

REPLY AFFIDAVIT OF
MARK COTTRELL
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

TABLE OF CONTENTS

SUBJECT	PARAGRAPH
INTRODUCTION	1
PURPOSE OF AFFIDAVIT	2
OVERVIEW	3
ACTUAL PERFORMANCE RESULTS AND OSS TESTING	4
AT&T "TEST"	5
AMERITECH OSS	14
Pre-2001 OSS Enhancements	14
March 2001 Release and A-AA Enhancements	19
Ameritech Backend Systems	22
LSOG 4 IMPLEMENTATION	23
CONNECTIVITY	29
CORBA Documentation	33
Joint Testing Issues	34
FLOW THROUGH	35
LINE LOSS REPORTS	40
WORLDCOM ISSUES	41
Reject after Firm Order Confirmation	41
900/976 Blocking	44
EBTA	45
ENHANCED VERIGATE	46
DSL LOOP QUALIFICATION	49
DIRECTORY LISTINGS ORDERING	51
LINE SPLITTING AND THE OSS TEST	65
LDMI DATA TRANSMISSION ISSUE	66
CONCLUSION	74

List of Attachments

Attachment A

New Circuit Request Form

Attachment B

E-mail Notification of Testing Quiet Period

I, Mark Cottrell, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is Mark J. Cottrell. My business address is 2000 W. Ameritech Center Drive, Hoffman Estates, Illinois, 60196, Room 4G50. I am Strategic Director-Long Distance Compliance-Operations Support Systems (“OSS”) for Ameritech. I am the same Mark Cottrell who sponsored an Affidavit filed with Ameritech’s Brief in this proceeding on May 15, 2001. I hereby verify, based upon my personal knowledge, the accuracy of each and every fact contained in the affidavit I am filing today, July 30, 2001, in Michigan Public Service Commission (“MPSC”) Case No. U-12320. I further verify, based upon my personal knowledge, the accuracy of each and every fact contained in the affidavit I filed on May 15, 2001 in Case No. U-12320 with the following clarifications: the period for viewing closed trouble reports via EBTA is thirty (30) days instead of 120 shown in the table following paragraph 185, and the hours of availability for the EDI ordering gateway and Enhanced LEX, shown on Attachment B to my affidavit as 0600-2359 hours, should have been 0600-2259.

PURPOSE OF AFFIDAVIT

2. The purpose of this Reply Affidavit is to respond to certain inaccuracies and claims made by other parties in their affidavits or comments submitted in response to Ameritech’s May 15, 2001 §271 Checklist Informational Filing with the MPSC in this proceeding. In this Reply Affidavit, I will provide correcting facts in response to the affidavits of AT&T witnesses De Young and Samonek, provide additional information related to the issues raised by WorldCom witness Lichtenberg, and

respond to single issues from each of the XO brief, the McLeod brief, the LDMI Finebrock affidavit, and the Z-Tel brief.

OVERVIEW

3. The intent of the Ameritech Checklist Informational Filing was to describe “what is provided” regarding its Operations Support Systems (“OSS”). In almost none of their comments do the CLECs suggest that there is necessary or required OSS functionality not offered by Ameritech. Most of the CLEC response is anecdotal in nature, and describes instances where the OSS and associated processes may not have performed as the CLECs expected or desired. In some cases, the processing of a single order is cited, or a particular occurrence is described without sufficient information for Ameritech to investigate and respond. Therefore, the scope and extent of the OSS Ameritech makes available are not seriously challenged. In this Reply affidavit, I attempt to respond to each OSS issue raised in the June 29 CLEC comments, including some items where the claims are so factually-challenged that basic fairness requires that the record be corrected.

ACTUAL PERFORMANCE RESULTS AND OSS TESTING

4. Of course, the actual performance of Ameritech’s OSS will be determined through the objective evaluation of actual performance results from commercial operations. Additionally, in most cases, KPMG’s independent third-party OSS test results will be available at a later stage of this proceeding. At that time, performance and test results, rather than vague CLEC claims over of individual orders, will demonstrate “how” Ameritech’s OSS perform.

AT&T “TEST”

5. Before I address the specific issues raised regarding Ameritech’s OSS, it is important to address AT&T’s troubling revelation that they intend to conduct their own “test” for the benefit of the MPSC and KPMG.
6. Ms. Samonek (¶¶ 28-31) indicates that AT&T plans to conduct its own “test” of Ameritech’s OSS, separate and in addition to the test now being conducted under the auspices of the MPSC Staff by KPMG pursuant to the Master Test Plan (“MTP”) developed in the collaboratives in Case No. U-12320. While Ms. Samonek provides only limited information regarding AT&T’s plans, she says that AT&T will seek to submit the results of this “test” to the MPSC in connection with the MPSC’s consideration of Ameritech’s anticipated 271 application to the FCC for interLATA authority. I am concerned about the conduct of the AT&T “test,” particularly its potential implications and its possible adverse impacts on the ongoing third party independent test already being conducted by KPMG, on other wholesale customers and CLECs, as well as Ameritech’s retail customers.
7. A “test” conducted by a competitor undermines the fairness and integrity of the independent 3rd party test. The Commission’s February 9, 2000 Order in Case No. U-12320 required an independent third party test of Ameritech’s OSS. As contemplated by that Order, selection and retention of the independent third party vendor and the development of the MTP were conducted through the collaborative process, similar to the process used in other jurisdictions which have addressed 271 applications. The obvious reason for an *independent third party* to conduct the test is to assure that no interested party skews the results of the test to serve their particular

interests. A suggestion that a party like AT&T could or should conduct an “independent” test, the results of which the MPSC could be expected to rely upon, is simply not credible.

8. Nor is it necessary. AT&T has been an active participant in the collaboratives in Case No. U-12320 in connection with the selection of the test vendor (KPMG), a pseudo CLEC (Hewlett Packard), and the development of the MTP. AT&T’s participation in the development of the MTP, and their ongoing involvement in the test process with KPMG and the MPSC Staff, has made them privy to information about the legitimate test, some of which has not been available to Ameritech personnel. AT&T is one of Ameritech’s, as well as SBC’s, most sophisticated competitors in the local exchange marketplace now and in the long distance marketplace in the future, with significant resources, as well as a knowledge and understanding of Ameritech’s OSS and testing processes in general. In short, AT&T is already participating in the Commission’s approved independent evaluation.
9. Because of this participation, and with this type of information, a competitor may, through the timing, volume, and/or the nature of fictitious transactions involved, devise its own “test,” designed to produce skewed results, not only in the competitor’s own “test,” but also in the legitimate KPMG test.
10. It’s impossible for AT&T’s test to be as open, legitimate and as safe as the independent 3rd party test. The OSS evaluation ordered by the MPSC, monitored by its Staff, and being administered by KPMG represents months of planning by multiple parties representing years of cumulative OSS and testing experience, including 271-related OSS testing in other states. This OSS evaluation is controlled

and guided by a collaboratively-developed Master Test Plan, which defines the scope of the test and many aspects of how the test is to be performed. The MPSC, its Staff, Ameritech, and CLECs all were involved in the formulation of the MTP. These same parties are also not only able to monitor almost every aspect of the OSS evaluation, all are active participants during the execution of the evaluation. This evaluation is being administered by KPMG, an independent party in this proceeding, and experienced in the execution of this type of test. Firm criteria for this evaluation have been established through the performance measures and statistical methodology, both of which have received the scrutiny of the MPSC. All of these factors, none of which apply to AT&T's "test", are important considerations in establishing the validity of the KPMG evaluation.

11. While Ameritech does not have specific information at this time regarding the orders that may be submitted in connection with AT&T's "test," the following are some of Ameritech's specific concerns:

- The OSS evaluation being conducted by KPMG includes a concept of "blindness" which precludes Ameritech from having detailed information regarding when, where, and what test orders may be submitted. However, the same degree of blindness does not extend to CLECs. It was recognized in connection with the development of the MTP that CLECs, including AT&T, may have access to certain information regarding the specifics of the KPMG test, and some types of orders which are part of the test may be submitted through actual CLECs, rather than the pseudo CLEC. It is at least possible that certain aspects of the AT&T "test" could be timed and designed to coincide with the legitimate aspects of the KPMG test to assure Ameritech receives failing results in the AT&T "test", as well as to possibly skew the results of the legitimate KPMG test.
- The KPMG test will minimize the potential adverse impact on actual CLEC orders relating to real end user customers, as well as orders relating to Ameritech's own retail customers. However, the AT&T

“test” is not subject to the same types of constraints which were embodied in the MTP, nor to the oversight of the independent third party test vendor, KPMG, and the MPSC Staff.

- Ameritech is also concerned about the potential impact of fictitious orders, transactions, or calling volumes on critical services such as 911 or services provided to actual customers such as medical facilities, police, or other customers with implications for public health, safety, and welfare issues. This particular concern is over and above the potential impact on Ameritech’s overall service quality provided to both its retail and wholesale customers relating to real orders.

12. Given the lack of procedural control, including MPSC oversight, the AT&T “test” will not provide results that in any way add to a record that will already include the results of the KPMG evaluation and Ameritech’s performance results. Because the AT&T “test” is not independent, any use of their “test” would be unreliable and should not be considered by the MPSC. Moreover, because the AT&T “test” has the real potential to disrupt the MPSC’s test and actual customer service, the MPSC should require AT&T to fully explain how it will avoid these concerns. If AT&T is unable to provide the MPSC with adequate assurance that this “test” will not harm the MPSC’s test or actual customer service, then AT&T should be required to stop this “test” before such concerns become reality.
13. It is important to note that Ameritech is ready and willing to work with AT&T on a true “market entry test,” as we would with any carrier. However, dozens and dozens of CLECs have entered the local market in Michigan and other Ameritech states, including large sophisticated carriers similar to AT&T. In none of these cases, did a CLEC need 800 to 1,000 phony lines terminated to a single location. Reliable market

entry testing can be accomplished with 20 -25 lines. AT&T's "test" is unfortunately designed for other purposes, and to that extent should be stopped.

AMERITECH OSS

14. **Pre-2001 OSS Enhancements.** Although AT&T witness Samonek (¶¶ 32-33) suggests otherwise, Ameritech has engaged in a program of regular enhancement of its OSS interfaces. Ms. Samonek claims that Ameritech's OSS were "frozen" in time. Of course, that is not the case, nothing in this industry has stood still for the past five years. Instead, Ameritech's interfaces have been constantly enhanced since their original implementation in 1996. A few examples of these enhancements include: Direct TCP/IP Ordering (implemented 9/98), Customer Service Record (CSR) Retrieval via TCNet (9/98), Combined Order for Unbundled Loop with LNP (6/99), New Pre-order Transaction – Carrier Availability (9/99), UNE-P/CPO Ordering (10/99), and New Pre-order Transactions – NC/NCI Validation, Connecting Facility Assignment (CFA) Inquiry, Service Availability, and DSL Loop Qualification (4/00).

15. AT&T's claim is based on its assertion that Ameritech did not implement a change tied, by name, to a specific version of the Local Service Ordering Guide ("LSOG") between 1997 and March 2001. LSOG versions, as defined by the Ordering and

Billing Forum (“OBF”), each include a variety of changes to previous versions¹.

Through the LSOG guidelines, the OBF provides a “language” to be used between telecommunications carriers when ordering products and services from one another.

The LSOG is a recommendation with much flexibility and many options.

Implementing companies must make choices regarding which portions of the guideline apply to their systems and products, and must, in some cases, choose between the options presented by the guidelines. Through Ameritech’s change management process, CLECs participate in this transformation of the OBF’s guidelines into an interface specification suitable for implementation.

16. In fact, due primarily to the dynamic nature of the competitive local service industry over the last five years, OBF guidelines have generally lagged the business needs of the incumbent and competitive local exchange carriers (respectively “ILECs” and “CLECs”). There has always been a need for ILECs and CLECs to exchange information in ways not included in OBF guidelines. As a result, some ILECs constructed proprietary interfaces to provide for these information exchanges, or chose to use manual methods for those functions and products not supported by OBF guidelines.

¹ The Ordering and Billing Forum (“OBF”) is a subcommittee of the Alliance for Telecommunications Industry Standards, which is a body. Most ILECs, many CLECs, and many Interexchange Carriers (“IXCs”) participate regularly in the OBF. The OBF provides guidance to the industry for the ordering and billing of both local and access services. One output of the OBF is guidelines for the ordering of local services in the form of the Local Service Ordering Guide (“LSOG”). While the OBF has been issuing guidelines for access services since 1984, it has only more recently (four years ago) begun issuing ordering guidelines for local services. As a result, for instance, the fifth iteration of the LSOG was released late in 2000, while the current release of the equivalent guidelines for access services, the Access Services Ordering Guide (“ASOG”) is version 23.

17. Ameritech's strategy, beginning with the initial implementation of its pre-ordering and ordering EDI interfaces, was to not constrain the products and functions supported on its interfaces to only those for which an OBF guideline existed. In many cases, Ameritech implemented support for ordering and pre-ordering functionality in a manner consistent with the existing industry guidelines, however in advance of the actual issuance of a guideline by OBF. As an example of the benefit of this practice, CLECs were able to order resale DS1s electronically from Ameritech long before the OBF issued a guideline for DS1 ordering.
18. This willingness to implement functionality in advance of industry guidelines as necessary, coupled with a program of regular enhancement, means that CLECs operating in the Ameritech region have been provided EDI ordering and pre-ordering interfaces with a very current level of functionality, counter to the characterization of AT&T's witness Samonek.
19. **March 2001 Release and A-AA Enhancements.** Ms. DeYoung (¶ 12) claims that the March 2001 LSOG 4 release is "seriously flawed." but fails to provide any support for that claim. Ameritech completely disagrees with that assessment. In any event, that is the point of KPMG's OSS evaluation. Ms. Samonek also acknowledges the "ambitious" undertaking represented by the A-AA enhancements, but alleges that Ameritech has failed to correctly implement three of those items. I will discuss two of them below in detail, flow through and directory listings; Mr. Justin Brown will address Ameritech's compliance with hot cut process improvement commitments. Contrary to AT&T's comments, the ordering and pre-ordering enhancements identified during the MPSC-sponsored OSS collaborative

meetings during 2000 (the A-AA list) have been implemented. As described in my May 15th affidavit, most were implemented prior to or as part of the March 2001 LSOG 4 release. The June 2001 release included an additional item, the directory listings ordering enhancement, which will be further discussed below.

20. None of the CLEC-requested A-AA items await the implementation of the LSOG 5 release in March 2002. That release will be used to bring an *additional degree of uniformity to the interfaces of the multiple regional companies within SBC*, and to implement the next version (LSOG 5) in the continual progression of OBF guideline versions. However, the currently implemented interface version (LSOG 4) includes all the functionality that the CLECs and Ameritech jointly reported to the MPSC would be implemented by this time and which were identified as needing to be included in the OSS test.
21. Although the March 2002 LSOG 5 release is not germane to the consideration of Ameritech's 251/271 OSS requirements or its current compliance with those requirements, a factual inaccuracy in the AT&T DeYoung (¶¶35-38) affidavit should be corrected. While it is true that the LASR² application, presently used in the Southwestern Bell Telephone ("SWBT") and Pacific Bell ("PB") regions of SBC, will be implemented in the Ameritech region for the processing of LSOG 5 orders, the systems and interfaces being presently tested will remain in place for the processing of LSOG 4 orders until LSOG 6 is implemented. LSOG 6 has not yet

² LASR stands for Local Access Service Request. LASR is the system in SWBT and PB that receives LSRs from LEX and EDI and performs one editing process on the LSR information.

been issued by OBF, and is consequently not yet scheduled for implementation by Ameritech, but would likely not be implemented before year-end 2002.

22. **Ameritech Backend Systems.** Ms. DeYoung makes much of the fact that Ameritech's backend systems are different than those in SBC's SWBT region. (¶¶15-17) Ameritech acknowledges that fact, but points out that it has placed no general reliance on the Texas 271 approval as reflecting favorably on Ameritech's OSS. Only in those selected instances where a process, procedure, system, or interface function is identical to that examined by the FCC in the Texas 271 application has Ameritech made that comparison. So Ms. DeYoung's protest, although correct, has no bearing on any information presented in my May 15 affidavit.

LSOG 4 Implementation

23. AT&T claims that Ameritech's implementation of LSOG 4 was "seriously flawed." (DeYoung ¶7) This premature and incorrect conclusion is based on the following claims: that Ameritech did not follow the timetable outlined in the Change Management Process ("CMP"), that Ameritech's documentation is incomplete, specifically the documentation for establishing connectivity with Ameritech and for implementation of a CORBA pre-order interface; and that AT&T was blocked from access to the Ameritech joint testing environment. Although each of these issues will be evaluated by KPMG, I will provide a response to each.
24. During last year's OSS collaborative discussions, the parties agreed upon a CMP and a timetable under that CMP for the March release. This agreed upon CMP, and CMP timetable or schedule, was that CMP associated with the FCC Uniform and

Enhanced OSS Plan of Record, and a then-current draft of the 13-state CMP with specific timetables established for the POR releases, including the March 2001 release. That agreement was reached in the summer of 2000, before a uniform 13 – state CMP was agreed upon. In December 2000, a 13-state CMP was agreed upon. Upon the request of the CLECs, Ameritech agreed to a substitution of the CMP that had been agreed upon for the March Release with the just agreed upon 13-state agreement. However, all parties were careful to note that the exchange of change management plans would not change the existing notification and implementation schedules to ensure that the March release would be deployed on schedule. This is reflected in the December 27, 2000 Joint Progress Report filed in this case.

25. Through the period between the summer of 2000, when agreement was reached on the POR CMP, and the March 2001 release, although there was uncertainty about the adoption of the 13-state CMP due to disagreement only on the quorum requirement for OIS voting, the actual change management process and its associated timetables for change management deliverables were never in disagreement. In implementing the March 2001 release, Ameritech did not miss any of these agreed upon change management notification dates, contrary to what the AT&T witness Samonek states. The final requirements were issued November 22, 2000, well within the 110 to 130 day calendar day window required by the 13-state CMP. The final requirements walkthrough took place November 30 and December 1. Though several changes were made to the March 24 release requirements after the final requirements were released, these changes were a result of additional collaborative walkthrough sessions which were held at the request of CLECs. Following each collaborative

walkthrough session with CLECs, Ameritech distributed, via accessible letter, the updates to the requirements based on CLEC input. The CLECs were given information in a manner that provided them with the specifications, and would allow them the time to make changes, enhancements and upgrades to their systems to accommodate the upcoming March 2001 release, either through attendance at collaborative walkthrough sessions and/or by receipt of the accessible letter update information to the final requirements. All changes to the requirements were discussed at length and in ample time for AT&T (and any other CLEC) to ready its systems.

26. During the collaborative walk-through sessions AT&T did not express any confusion as to which change management process or timetable Ameritech was following. Throughout the March 2001 release process, Ameritech adhered to the precepts and timelines agreed to in the CMP, as well as to the notification requirements of the POR CMP. Additionally, a 60-day test window was provided to the CLECs per the requirements of the 13-state CMP and the POR CMP.
27. All Change Management notifications were issued on time in advance of the March 24, 2001 release, per the CMP and CLECs were provided the required comment periods. Notification milestones are outlined below³:
 - *The Release Notification allows for a 7-day CLEC comment period and therefore must be issued at least 7 days prior to Initial Requirements.*
 - Accessible Letter CLECAM00-050, dated 9/29/00, provided the Release Notification and the 7-day CLEC comment period.

³ All Ameritech Accessible Letters may be found at CLEC Online at <<https://clec.sbc.com/acletters/home.cfm>>.

- *Initial Requirements allow for a 21-day comment period and therefore must be issued at least 21 days prior to Final Requirements. A CLEC walk-through is held during the 21-day comment period, generally between day 14 and day 19.*
 - Accessible Letters CLECAMS00-052 and 053, dated 10/13, provided the Initial Requirements for the Pre-Ordering and Ordering Releases respectively. A 21-day CLEC comment period was provided (CLEC comments were due 11/3/00).
 - The Initial Requirements walk-through was originally scheduled for October 25th but was re-scheduled for November 13th. Ameritech extended the CLEC comment period to November 16th, to accommodate the rescheduled walk-through.

- *Final Requirements are issued 110 days prior to implementation. Walk-throughs are held if significant changes have occurred since the publication of the Initial Requirements.*
 - Accessible Letters CLECAMS00-067 and 068, dated 11/22/00, provided the Final Requirements for the Pre-Ordering and Ordering Releases respectively. These letters were published 122 days prior to release implementation (12 days ahead of schedule). As required by CMP, another walk-through was held to discuss changes from the Initial Requirements. Due to the size of the release, this walk-through was scheduled for 2 days (11/30 and 12/1).
 - Updates to the Final Requirements resulting from CLEC input at the walk-throughs were issued on 12/15, (CLECAMS00-074 and 075 for Ordering and Pre-Ordering respectively). An additional walk-through was scheduled for January 3rd at CLEC request.
 - Accessible Letters CLECAMS01-007 and 008, dated 1/22/01, provided the updates resulting from the January 3rd walk-through.
 - Accessible Letter CLECAMS01-012, dated 2/6/01, provided additional Pre-Ordering updates.
 - Accessible Letter CLECAMS01-035, dated 3/13/01, provided Pre-Ordering clarifications.

28. Ameritech followed the Change Management Process in the implementation of the March 2001 release. If any CLEC, including AT&T, had a significant concern with either the finalization of release requirements or the implementation of the release, they could have requested a vote, as provided by the CMP, on whether the release should proceed. No CLEC did so.

Connectivity

29. The AT&T witness (Samonek ¶54) has wrongly blamed Ameritech for the delays AT&T experienced in establishing Ameritech Remote Access Facility (“ARAF”) connectivity with Ameritech. Both the time period claimed (almost six months) and the issues that arose are mostly due to AT&T not following Ameritech’s documented CLEC OSS Interconnection Procedures, as announced and included in Accessible Letter CLECAM00-056, dated October 24, 2000. The CLEC OSS Interconnection Procedures document lists the requirements to be met by the CLEC before connectivity can be established.
30. The AT&T witness states that it was not until December that Ameritech informed AT&T that the equipment required to support the T1 pipe must be compatible with existing Ameritech equipment. That statement is incorrect: Appendix 1 of the CLEC OSS Interconnection Procedures document clearly states that the CLEC must provide equipment compatible with Ameritech equipment, and includes the equipment manufacturer and model numbers.
31. The CLEC OSS Interconnection Procedures document also itemizes the respective responsibilities of the CLEC and Ameritech. Included in this list is an item describing CLEC responsibility to arrange for the ordering, shipping, and delivery of the circuit equipment necessary for the connection. Installation at the Ameritech site is Ameritech’s responsibility. The AT&T witness (Samonek ¶64) states that these efforts took from January 4 until February 27 to complete, yet fails to mention that equipment was not received at the Ameritech site until February 12, and that Ameritech’s installation efforts covered just 15 of the 54 calendar days cited. In

addition, Ameritech's installation work might have progressed quicker but for a delay that occurred due to AT&T providing private IP addresses rather than the required public IP addresses. This requirement is documented on the New Circuit Request Form (Attachment A – see "General" tab) that AT&T completed when requesting the circuit connection to Ameritech.

32. Clearly, AT&T must bear a large portion of the responsibility for the time required to implement their connection to Ameritech's ARAF.

CORBA Documentation

33. The AT&T witness (Samonek ¶61) also states that Ameritech caused delays in setting up CORBA connectivity during April and May due to lack of detailed documentation. Again, AT&T is not taking advantage of the documentation Ameritech makes available to it. Appendix 6 of the CLEC OSS Interconnection Procedures document lists CORBA hardware and software requirements. In addition, the Local Service Pre-Ordering Requirements ("LSPOR") document, issued in Accessible Letter CLECAM01-007 dated March 24, 2001, describes in sections 1.2 and 1.3 the CORBA protocol standard, version number, and high-level CORBA formatting rules. Section 3.0 of the LSPOR identifies the CORBA interfaces supported, the corresponding technical reference to the ATIS T1M1 document that contains the Interface Definition Language ("IDL") used by the interfaces, technical inter-operability subscription information, and CORBA security parameters.

Joint Testing Issues

34. The CMP provides for a period of joint testing prior to the implementation of a new interface software version. This Joint Testing period allows an opportunity for CLECs to test the functionality of the new version in order to confirm the operation of both the CLEC's and Ameritech's interface software. The 13-state CMP requires a seven day "quiet period" between CLEC joint testing and the actual software release implementation into production for all releases.⁴ Although this quiet period is a requirement of the collaboratively-developed CMP, Ms. Samonek (¶¶ 73-74) suggests that this quiet period was unexpected and unannounced. On the contrary, AT&T along with all other CLECs engaged in joint testing at the time, were notified directly by their OSS support manager and/or by their account manager of the freeze period for the June release. Attached is a copy of the E-mail that was sent to Ms. Samonek with that notification (see Attachment B).

Flow Through

35. AT&T witnesses provide discussion regarding the Ameritech flow through exceptions matrix, which they refer to as the "flow through list". (DeYoung ¶ 29, Samonek ¶¶ 111-123) In that discussion, they question the accuracy of that list. Ameritech has internally reviewed the list with its subject matter experts, and has updated the list with the results of that review. Ameritech has also updated the list based on feedback from CLECs received during collaborative discussion as part of

⁴ From the 13-State Change Management Process – "**3.3.7.5 SBC Freeze of Code** - Testing must be scheduled to end at least seven (7) calendar days prior to the scheduled implementation date, unless otherwise agreed between SBC and the CLEC. This seven-day period is to accommodate the software freeze in preparation of the release, and to provide CLECs an opportunity to invoke an OIS, if necessary as a result of release testing, as described in Section 7.0 of this document."

the recent joint flow through planning. As documented in its OSS status report to the MPSC on June 26, Ameritech completely complied with the flow through planning steps outlined in the December 27 Joint Report of the OSS collaborative participants. Ameritech's flow through capabilities, including a comparison of order types that actually flow through versus those expected to flow through, are included in the third-party OSS evaluation.

36. WorldCom witness Lichtenberg (pp. 16-17) discusses UNE-P flow through and specifically orders on accounts including contracts such as intraLATA toll plans. As stated by Ms. Lichtenberg, documentation supplied by Ameritech does point out that orders on accounts with contracts will not flow through. Such orders, which request early termination of an intraLATA toll contract, require manual handling to determine the amount of the termination charge or even if a termination charge should be made. These orders are reported as having not flowed through in Ameritech's diagnostic performance measure on total flow through, PM 13.1. Therefore, there is nothing misleading or "fatally flawed" about Ameritech's flow through reporting.

37. This particular flow through exception applies in limited circumstances. The order would need to be a conversion order, *i.e.*, an order changing service provider on an account. It would not occur on subsequent activity, such as changes made to the account to add features or lines, in cases where the customer moves, or when the account is disconnected. These intraLATA toll contracts would not be found on accounts 'owned' by other CLECs, so any conversion to WorldCom from another CLEC would not be subject to manual intervention due to the presence of an

intraLATA toll contract. Finally, obviously, this would only occur if the customer had an intraLATA toll contract. Insufficient information was provided by Ms. Lichtenberg to understand how applicable her study of “about 62 orders” really is to the body of residential customers in Michigan.

38. As described above and reported to the MPSC in an OSS Status Report on June 26, Ameritech has engaged in a cooperative effort with CLECs to prioritize and plan flow through enhancements for the next twenty-four months. In that process, the scheduling of these enhancements is reviewed regularly for adjustment in case business priorities change. Ameritech is working with all CLECs on cooperatively planning future flow through enhancements as part of its OSS change management meetings, which is the proper venue for WorldCom to address this issue.
39. Mr. Finefrock’s extensive discussion of questions about flow through (pp. 10-17) has a single, simple response. LDMI’s interest in flow though is a timely one. Ameritech has held numerous discussions regarding flow through with CLECs as a group over the last 90-120 days. In those meetings, with multiple Ameritech subject matter experts present, many of the very same questions raised by LDMI were discussed with CLECs. Each of these meetings was announced in advance via an E-mailed Accessible Letter⁵. Flow through planning will again be a topic of discussion

⁵ Ameritech distributed a list of current flow through exceptions to the CLECs on April 13, 2001. This list was attached to Accessible Letter **CLECAM01-105**. On March 30, 2001 Ameritech, via an Accessible Letter, **CLECAMS01-044**, requested the CLECs develop a prioritized flow through list by product and order type. These lists were exchanged during the April 19th Change Management Process meeting held in Chicago. On April 27th, Ameritech held a conference call to discuss the 24-month flow through enhancement proposal with the CLECs (see Accessible **Letter CLECAMS01-052**, dated April 20, 2001). Ameritech scheduled conference calls and discussed details of its flow through enhancement plan on May 3 (see Accessible Letter **CLECAMS01-057**). A conference call was scheduled for May 10 to further discuss the flow through enhancement plan (see Accessible Letter **CLECAMS01-061**). To finalize the flow through plan and CLEC prioritized lists a subsequent conference call with CLECs was scheduled for May 21 (see Accessible Letter **CLECAMS01-070**).

at the next Ameritech OSS Change Management meeting on August 16th, and LDMI's participation is encouraged.

Line Loss Reports

40. Z-Tel, in their brief at pages 4-6, states that they have experienced difficulties in receiving line loss reports, which are actually individual EDI transactions. Ameritech system support personnel worked diligently to identify and resolve this issue. Additionally, during the period of this interruption in distribution of the EDI loss notifications, Ameritech provided line loss information to Z-Tel through special reports. As reported by Z-Tel witness Williams (Brief, Attachment B), this problem was resolved on June 12. The functioning of Ameritech's loss notification transaction will be validated by KPMG in the OSS test.

WorldCom-specific Issues

41. **Reject after Firm Order Confirmation ("FOC")**. All CLEC orders must move through a number of Ameritech systems and work groups between the time they are received and when they are ultimately completed. Billing systems must be updated, maintenance system databases must be updated, various provisioning systems must act on the order, and so on. Each of these systems have their own rules, or "edits", to which the received order must conform or it will be rejected. In order to reduce the chances of a CLEC order being rejected by one of these downstream systems or work groups, Ameritech has reproduced in its upfront interface system many of the edits that will be performed later in the provisioning process. If the CLEC order fails one of these edits, the CLEC receives a reject and they must correct and resubmit

their order. If the CLEC order passes these edits, they receive an FOC and the order progresses into the provisioning process.

42. Because it is not possible to check every single condition applicable to a given order prior to issuing the FOC, in limited circumstances it is possible that a CLEC will receive a notice that an order is rejected after receiving an FOC. If the order is rejected, the reason for the reject is returned to the CLEC so a correction can be made. While it is true, as stated by Ms. Lichtenberg, that Ameritech will be making a change in March 2002 to allow a CLEC to correct an order in progress if an error is found after an FOC is returned, it is also true that this situation may be avoided by WorldCom by avoiding or correcting ordering errors before transmitting orders to Ameritech.
43. As we have informed WorldCom, Ameritech is willing to work with WorldCom to further their understanding of how these errors may be avoided.
44. **900/976 Blocking.** On May 30 of this year, Ameritech provided the MPSC its response to this issue in a reply, filed in this docket, to WorldCom's notice to the MPSC. The mentioned permanent system enhancement, scheduled at that time for June 23, was indeed implemented on that date.

EBTA

45. XO Communications witness Hankins (§ 4) claims a continued need to contact the Local Operations Center (LOC) for trouble ticket reporting rather than through the electronic interface. In fact, there is no need to continue this practice: All trouble tickets and status reporting functions that the LOC performs are also available to

CLECs, including XO, through the Electronic Bonding Trouble Administration (“EBTA”) electronic interface as described in the EBTA II GUI-Web User Guide, which is available through CLEC Online.

Enhanced Verigate

46. As described in my May 15th affidavit, Ameritech deployed a new Graphical User Interface (GUI) pre-ordering application, Enhanced Verigate, as part of the March release. Although Ameritech performs many quality assurance steps as part of its development process, CLEC users of this new application have encountered a limited number of problems. Ameritech has worked to resolve these problems expeditiously, and continues to perform additional user testing as a quality control measure. Additionally, the third-party OSS test will provide further validation of the quality of the Enhanced Verigate application.

47. The single Enhanced Verigate problem described by Z-Tel (Comments, page 8), affecting third-number and collect call blocking, was fixed prior to the filing of their comments. The problem was identified through Ameritech’s own testing at approximately the same time as reported by Z-Tel, and was corrected on June 23. Similarly, the three trouble tickets (one ticket number is included twice in Ms. Lichtenberg’s list) cited by WorldCom’s Lichtenberg (Page 23) were quickly resolved after being reported to Ameritech:

- Ticket # 5948627 – User indicated that problem no longer existed at the time she made report on June 27. Ameritech application support personnel investigated to determine what might

have happened. Additional information was requested of reporting user, but no call back to Ameritech. Trouble ticket closed July 3.

- Ticket # 5950433 – Reported to Ameritech on June 27 at 2:15 PM. Problem was corrected at 3:20 PM. User was contacted to confirm and trouble ticket was closed.
- Ticket # 5746719 – Reported to Ameritech on June 1. The user was informed of the resolution on June 6 and trouble ticket was closed.

48. Worldcom brought a single instance of Verigate slow response time to the attention of its Ameritech account team. The investigation of this ticket showed that the IS Call Center advised WorldCom's user to reboot their system and log back into Verigate. The WorldCom user then stated the problem was resolved. The Ameritech account team advised WorldCom if there were any future occurrences of slow response time in Verigate to immediately contact the IS Call Center to enable Ameritech's application development team to recreate the problem that occurred. The Ameritech account team has received no subsequent reports of long response time from WorldCom.

DSL Loop Qualification

49. In its brief, McLeod states that Ameritech “does not provide CLECs with access to the same OSS utilized by the retail operation in evaluating the suitability of loops for DSL service but, rather, only provides access to a system in which much of the pertinent data has been filtered out or is not completely accurate.” This is absolutely

not true, and I note that McLeod offers no proof to support their allegations.

McLeod, and all CLECs, are given access to Ameritech's pre-ordering interface and the included Loop Qualification transaction. This is the same interface offered by Ameritech to its advanced services affiliate, ASI/AADS⁶. In response, Ameritech gives CLECs the same information, on the same form, from the same databases, that ASI/AADS receives.

50. As described in my May 15th affidavit and the May 15th affidavit of Mr. Silver, the information used by Ameritech in response to Loop Qualification inquiries is taken from its Loop Facility Assignment Center System ("LFACS") and Ameritech Records and Engineering System ("ARES") systems. This information is accessed on a 'real-time' basis, *i.e.*, if the requested loop make-up information exists in electronic form in these databases, it is returned to the requesting CLEC. There is no filtering out of pertinent data as suggested by McLeod.

Directory Listings Ordering

51. The discussion on directory listings ordering in the AT&T Samonek affidavit (¶¶90-110) and then summarized in the AT&T brief (pp. 21-22) is filled with factual inaccuracies. Ms Samonek makes three basic claims. First, she accuses Ameritech of renegeing on its directory A-AA commitment. That is patently wrong. The

⁶ I use a comparison to ASI/AADS, Ameritech's advanced data service affiliate, as Ameritech Michigan does not provide any DSL services itself, and thus, does not use any loop qualification data in the manner described by McLeod.

capabilities provided by Ameritech to CLECs for the ordering and maintenance of directory listings, already in full compliance with applicable regulation, have been further enhanced through the integration of the Ameritech Advertising Services (“AAS”)-provided EDI interface into the Ameritech OSS EDI ordering interface, as described in my May 15th affidavit. Second, she claims the directory listing ordering process is discriminatory to switch-based CLECs. Third, she claims the directory listing inquiry is inadequate for switch-based CLECs. Each of these allegations is also unfounded as demonstrated below.

52. An enhancement was implemented in June 2001 in complete fulfillment of the directory listings ordering commitment made by Ameritech during MPSC-sponsored OSS collaboratives. With this enhancement, switch-based CLECs are able to access through Ameritech’s OSS EDI ordering interface all the same directory listings ordering functionality previously only available through AAS’s EDI interface. Despite the representation by Ms. Samonek (¶98), the development specifications used by Ameritech to develop this enhancement were not changed when the implementation date was moved up from September 2001 to June 2001. The June 2001 enhancement is, in every regard, the same enhancement intended for implementation in September 2001 in response to the commitment made to the MPSC and the OSS collaborative.
53. All directory listings received by Ameritech ultimately reach AAS for processing and inclusion in Directory Assistance and directory publishing databases. This is true for all CLEC listings, whether from a switch-based provider or from a UNE-P or resale provider, as well as for the listings of all Ameritech retail customers. Contrary

to the statement of Ms. Samonek (¶103), Ameritech's response to the AT&T discovery request ATAM0010 stated that Ameritech retail directory listings were and are processed by AAS.

54. Also, although Ms. Samonek (¶101) states otherwise, all directory listing orders received by Ameritech from CLECs via its OSS EDI ordering interface are edited before being sent to AAS. Just as Ameritech retail service reps receive feedback from their order entry system regarding errors in the directory listing information, CLECs are provided the information necessary to edit their orders and detect these same errors before sending their orders to Ameritech. Should they choose not to do so, though, most errors will be detected by Ameritech's ordering interface system and an error message (reject) will be returned to the CLEC. This is true for switch-based orders as well as for other CLEC orders.
55. Ms. Samonek fails to make an important distinction in her discussion of directory listings ordering. When a switch-based CLEC places an order for directory listings, it may do so in two circumstances. If the CLEC is ordering a directory listing at the same time it is ordering an unbundled loop, as is commonly done to serve a customer with CLEC-provided switching, the directory listing portion of that order is held by Ameritech until the network portion of the order is completed (the unbundled loop is installed). The directory listing is then forwarded to AAS. This process is very similar to that followed by Ameritech for CLEC UNE-P and resale orders, and for its own retail service orders.
56. If a switch-based CLEC is only ordering a directory listing, *i.e.*, is not ordering any network product or service from Ameritech, since there is no need to wait for

completion of the network-related work, that order is forwarded to AAS and processed immediately. Since these orders are essentially completed as soon as received, if a CLEC later decides to change or correct information sent on such an order, another order must be sent. This is true for any correction of any type of order received by Ameritech where the CLEC wishes to make a change after the order is completed. A CLEC is able to supplement an order that is not yet completed. This includes the directory listings portion of a combined order for an unbundled loop and directory listings.

57. Once AAS receives an order, there is a limited possibility that an error will be encountered that prevents the completion of processing. This is true of Ameritech retail orders, CLEC UNE-P and resale orders, as well as switch-based CLEC orders. The nature of the error encountered may require a CLEC contact for resolution. This is no different than other steps in the provisioning or completion of an order from a CLEC – sometimes it is necessary to contact the ordering party (the CLEC in the case of a wholesale order and the retail customer in the case of an Ameritech retail order) in order to resolve an issue with an order to insure that it is processed correctly.
58. Although Ms. Samonek attempts to characterize the contacts as something unusual and particularly burdensome to the switch-based CLEC, some facts are helpful in understanding the actual impact. Ms. Samonek repeatedly refers to “faxes, phone calls, and emails”. AAS sends AT&T, and all switch-based providers, three E-mail reports daily. One is a Notification of Loss Report, which lets the CLEC know that another CLEC has taken “ownership” of a listing that previously was “owned” by the

CLEC receiving the loss report, presumably in connection with a change of providers by the end customer. The other two E-mail reports are daily summaries of the orders received by AAS, one of manually-received orders and one for electronically received orders. The only phone calls made by AAS to CLECs in conjunction with received orders are in response to CLEC-to-AAS calls. Finally, that faxed inquiries, which are used by AAS to notify CLECs of errors or questions about their listing orders, are sent to AT&T on less than 1% of their switch-based orders.

59. The capabilities provided by Ameritech to CLECs for the processing of directory listings orders are in no way “discriminatory” as alleged by AT&T witness Samonek. As described above, all directory listings orders are treated in essentially the same manner. In fact, the processes and capabilities provided do not differ materially from those used in the SWBT region of SBC.
60. Ms. Samonek also attempts to portray Ameritech’s directory listings inquiry capability as discriminatory. This is no truer than her similar claim regarding Ameritech’s directory listings ordering capability.
61. Ameritech’s pre-ordering interface directory listings inquiry provides information from Ameritech’s customer service database. The only directory listings information contained in that database is that retained from orders for directory listings provided by Ameritech in conjunction with a TN-based service offered by Ameritech. For example, the unbundled local switching product includes a directory listing provided by Ameritech. Since this product and listing are ordered from Ameritech, although the listing is obtained from AAS, the customer service record includes the listing

information and it is available to the CLEC through Ameritech's pre-ordering interface.

62. Directory listings provided to the switch-based CLEC are not part of any product ordered from Ameritech. Instead they are separately ordered from and provided by AAS. Consequently, the listing information resides only in the databases of AAS and not in Ameritech's customer service record database.
63. AAS provides access for CLECs to the listings included in its database through TCListLink, described in the May 15th affidavit of Robben Kniffen-Rusu. As a deregulated provider of publishing services, AAS must provide a means of access to its directory listing information appropriate for its customers who may or may not also purchase network services from Ameritech. If a CLEC chooses, they may use TCListLink to access all their listings, both for customers served from their switches as well as those served using Ameritech switch-based services, and thereby giving their service representatives a single interface for accessing their directory listings.
64. Ameritech and AAS have agreed, as described by Ms. Samonek (¶ 110), to integrate some of the directory listings inquiry functionality provided by TCListLink into Ameritech's pre-ordering interface in June 2002. As an added convenience to CLECs who obtain network services from Ameritech and also choose to obtain listing services from AAS, these CLECs will be able to use Ameritech's pre-ordering interface to access their switch-based listings. This enhancement was negotiated by Ameritech with CLECs during last year's OSS collaboratives, and was expressly excluded from third-party OSS testing by all parties.

Line Splitting and the OSS Test

65. The comments by some CLECs regarding Ameritech's support for line splitting will be addressed in the affidavits of other Ameritech witnesses. I would like to note here that, as committed in the December 2000 Joint Report, following the issuance by the MPSC of its Order in U-12540 on March 7, 2001, the functional processes provided by Ameritech in support of line splitting have been added to the KPMG's OSS evaluation.

LDMI Data Transmission Issue

66. LDMI's allegations that Ameritech has not cooperated with LDMI to address transmission difficulties experienced in the receipt of data files from Ameritech is totally unwarranted. On June 11, LDMI informed its Ameritech Account Team that it appeared its Daily Usage Files ("DUF") were not being transmitted to LDMI at a full T1 speed and that Ameritech was causing the "bottleneck". On June 12, the Account Team coordinated several conference calls between LDMI and Ameritech. Ameritech technicians repeatedly checked the processing time on several files and found the transmission speeds to be accurate. LDMI stated that they were not receiving the data at the appropriate speed. Ameritech technicians verified all routing and address locations, finding no errors on any portion of the Ameritech connectivity.

67. Another conference call was held between Ameritech and LDMI on June 13. Ameritech reviewed the routing diagram for the Electronic Commerce Network ("ECN") and still identified no problem. Ameritech also verified that no other customers utilizing the same connectivity/transmission process were experiencing

any problems. Ameritech recommended LDMI look on their side for possible problems with the circuit.

68. Multiple conference calls were held on June 15 between Ameritech and LDMI. LDMI requested Ameritech monitor the file transmission in real time. Ameritech monitored all data files being transmitted to LDMI, not just the DUF files, and determined that all files were being transmitted to LDMI at the same speed. Since different data files are transmitted from different Ameritech locations, and since all were being transmitted at the same T1 speed, it was Ameritech's conclusion that the "bottleneck" was not likely to be related to Ameritech's NDM process. LDMI requested Ameritech to loop the circuit back to test. Ameritech agreed and verified the transfer rate was as fast as the connection. Ameritech again recommended LDMI look on its side of the connection to ensure set up is at T1 transfer speed.
69. Again, on June 20, several more conference calls were held between LDMI and Ameritech. The initial call on this date related to the transmission of LDMI's Ameritech Electronic Billing Service ("AEBS") file. Ameritech informed LDMI that the problem was not with Ameritech's portion of the Connect Direct (CD) or NDM process. Ameritech agreed to test files at night when transmissions were made to LDMI to identify any transmission problem with the circuit. No problems with the circuit or transmission speeds were found.
70. On June 21, Ameritech informed LDMI of the results of its testing and offered several possible areas for LDMI to check on its side of the transmission. It was Ameritech's suggestion that LDMI's transmission problems do not apply to receipt of data from multiple mainframes, but rather center on software configuration problems

between the two companies' servers on LDMI's side. LDMI requested that test files be sent using FTP protocol instead of Connect Direct. As this type of connectivity requires access through Ameritech's firewall in order for LDMI to pull its own data files, special arrangements were made to obtain security passwords for LDMI.

71. The establishment of security passwords for LDMI was completed on June 22, and three conference calls were held between LDMI and Ameritech. Test files were picked up by LDMI using FTP protocol and the testing was successful. This proved that the problem was not with Ameritech's network, and verified also that it was not related to transmissions from multiple mainframes. Ameritech suggested that LDMI check the Connect Direct software and configuration on their system.
72. On June 25, LDMI reported that it had "bulked up" its system and was receiving files at the proper T1 transmission speed.
73. Mr. Finefrock (page 6) states that Ameritech was not aware of this transmission problem until LDMI discovered it. Since Ameritech was transmitting as the process was designed, it would have no way of knowing that LDMI had a problem on its side without LDMI bringing it to the attention of Ameritech. LDMI has also indicated that Ameritech was "bouncing LDMI all around" (Finefrock, page 9) and failed to assign someone to assist LDMI until the problem was solved. Ameritech did cooperate with LDMI to address its transmission issue as is plainly evident from the amount of technical resources and extensive testing provided by Ameritech. Since the trouble was never on Ameritech's side of the network connection, it was never within Ameritech's power to determine the problem's solution. Ameritech continued

to work with LDMI through test after test, even though Ameritech repeatedly asked LDMI to look on its side of the connection to resolve the problem.

CONCLUSION

74. In this Reply affidavit, I have responded to the OSS issues raised in the June 29 CLEC comments and have provided corrections to the record where the ‘facts’ presented by the CLECs were in error. As I stated initially, the CLECs have presented some situations where Ameritech’s OSS may not have performed as the CLEC expected or desired, but the scope and extent of the OSS Ameritech makes available are not seriously challenged. As demonstrated in my May 15th Affidavit and in this Reply Affidavit, Ameritech satisfies the §271 requirement of nondiscriminatory access to OSS.