

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
WILLIAM C. DEERE
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

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I, William C. Deere, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is William C. Deere. My business address is 604 Lasater Court, Keller, Texas 76248. I am a consultant working for SBC Communications and Ameritech. I am the same William C. Deere who sponsored an Affidavit filed with Ameritech Michigan’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 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.

PURPOSE OF REPLY 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 particular, I will respond to the comments of Mr. Charles Gary regarding interconnection trunking and Mr. Michael Lehmkuhl regarding CNAM updates for ported numbers, filed on behalf of WorldCom, Mr. Scott L. Finney concerning line sharing over fiber-fed loops, filed on behalf of AT&T and Mr. Mark Iannuzzi concerning SS7 access and dialing parity, filed on behalf of the CLEC Association of Michigan. As I demonstrate below, contrary to these allegations, Ameritech is in compliance with checklist items (i) interconnection, (iv) unbundled loops, (x) access to databases and (xii) local dialing parity.

I. CHECKLIST ITEM (i): INTERCONNECTION

WorldCom – Delay in Providing Interconnection Trunking

3. Mr. Charles Gary, filing on behalf of WorldCom¹ stated “Ameritech is providing unacceptably poor service in provisioning interconnection trunking to WorldCom. Almost all of the orders are past due when provisioned. ...There are many orders which

¹ Affidavit of Charles Gary Regarding Interconnection Trunking, filed on Behalf of World Com, Page 2, line 12 through line 18. This complaint is repeated in the Response of WorldCom to Ameritech's May 15, 2001, Checklist Filing at pages 66 and 67.

have not yet been provisioned, and several others are still awaiting an ASR from Ameritech. An acceptable time frame for receiving an ASR is 4-6 business days at the most. Yet Ameritech takes several weeks to over a month to get this step done.” Ameritech has methods in place to process orders on a timely basis, but these methods require that the CLECs provide Ameritech with accurate information.

4. Each time that WorldCom has called and requested the Ameritech account team to help with orders in the Ameritech region the account team has investigated the cause of the problem. These investigations found that in each case WorldCom had issued their orders incorrectly. On May 31st a service representative in the Local Service Center (“LSC”) contacted Linda Smallwood, the account manager, to request her help with getting WorldCom to issue their orders correctly. Ms. Smallwood called Charles Gary to request his assistance and he agreed that the orders were issued incorrectly, he also asked her to help because they were having system problems that were causing some fields to automatically override what his people put in the fields. The LSC had agreed to work with WorldCom, allowing them to put this information in remarks until they could get their system fixed.
5. In addition, weekly conference calls have been scheduled to work through orders that are specific to a large augment on the new Detroit switch. The conference calls were scheduled due to WorldCom’s claim of delays in order processing. These delays were due to the fact that WorldCom placed the orders with due dates without requesting a project be put into place. The ordering requirements state that all orders that over 97 trunks require negotiated due dates. By not following the guidelines, these orders were sent without a project name and were not assigned dates nor were they project-managed,

as they should have been. Ameritech was contacted on April 30th to request this project implementation, but at that time orders (some with due dates already provided) had already been sent to Ameritech. Linda Smallwood, account manager, advised WorldCom to advise her of the augments prior to sending orders in the future.

6. The account team has also reported several occasions where Ameritech has provisioned service and has had technicians available for trunk test and turn-up only to have the orders canceled due to the lack of proper equipment at WorldCom's premise.
7. Timely provisioning of trunks requires the joint cooperation of Ameritech and the CLEC involved. Accurate orders and coordination are a must. Ameritech has responded to each request from WorldCom for coordination.

WorldCom - Port Problem in the Pontiac Tandem

8. Mr. Gary also states; "For about one year now, Ameritech has generally refused to allow orders to be submitted for interconnection trunking at the Pontiac Tandem. ...Ameritech claims that this problem will be relieved with the opening of the Tyler tandem in July 2001. In anticipation of this our Traffic Department issued an order log on June 5, 2001 to add many (Confidential: xxxx) trunks at the Ameritech Pontiac tandem. (Confidential: P.O number xxxxxxx) was sent to Ameritech on June 8 2001 requesting these trunks with a due date of July 13, 2001. As of today, we have not received the firm order conformation. The lack of trunking could cause a blocking situation with our existing local/toll trunks."²

² Affidavit of Charles Gary Regarding Interconnection Trunking, filed on Behalf of World Com, Page 3, line 4 through line 16. This complaint is repeated in the Response of WorldCom to Ameritech's May 15, 2001, Checklist Filing at page 67.

9. It is true that the Pontiac Tandem is exhausted, however Ameritech has worked with WorldCom throughout this year to provide them the trunks needed at this tandem. The Ameritech implementation manager held back 32 T1 ports at the Pontiac tandem to ensure WorldCom would have what they needed for their new switch. It should be noted, that even though Ameritech held these ports for WorldCom, the WorldCom switch was not ready on the proposed due date.
10. Part of the reason for the exhaust of the Pontiac Tandem is that some CLECs have ordered more trunks than they require at the present time. As a result Ameritech must add a new tandem and continue to rearrange existing capacity to serve all customers. For instance, on Feb 22, 2001 WorldCom encountered blocking on one of their trunks groups to the Pontiac tandem. Through joint discussions it was agreed that Ameritech could disconnect trunks from another one of WorldCom's groups that was under-utilized. However, the order to connect the new trunks went into a "customer not ready" status based upon the report of a technician at WorldCom. Ameritech held the facilities and equipment to be reused at the Pontiac tandem until June 6, 2001. WorldCom eventually cancelled the order because they did not have proper equipment at their end. On March 21st an augment for additional trunks to an end office completed. This relieved the blocking at the tandem and the original augment to the tandem was no longer needed.
11. On June 8th, 2001 WorldCom placed another order to another tandem group. Ameritech took trunks from one of its own trunk groups to fill the WorldCom order.
12. The new tandem that has been introduced to help alleviate the Pontiac tandem is called the Troy tandem (not Tyler as stated by Mr. Gary) and has been turned up during July

2001. Turning up this tandem in July does not mean that the Pontiac tandem has the same relief date. Once the new tandem is installed, trunk groups will be moved from the Pontiac tandem, but this has not been done yet, nor has WorldCom approached the account team to negotiate a due date for orders to augment the Pontiac tandem. Again according to the interconnection guidelines, any order for over 97 trunks requires the due date to be negotiated.

13. The relief of the Pontiac tandem is dependent upon the move of trunk groups for certain end offices from the Pontiac tandem to the new Troy tandem. The prompt release, by the CLECs and other telephone companies currently using the Pontiac tandem, of the old trunks on the Pontiac tandem will facilitate the relief of trunk groups remaining on this tandem.
14. Ameritech provided orders for trunks from the Troy tandem to WorldCom on three separate occasions for the same group of trunks and DS1 transmission facilities in an attempt to receive a firm order confirmation from WorldCom. Without a confirmation Ameritech was not able to complete the provisioning process. When WorldCom did response, it provided Ameritech with facility assignments that could not be used because the facilities were already in use. This further delayed the provisioning process. By continuing to work with WorldCom, Ameritech has been able to provide WorldCom with accurate order numbers and due dates for the installation of these trunks and facilities.
15. Currently, Ameritech has pending orders for trunks from WorldCom to the Pontiac Tandem. There was some confusion on WorldCom's part as to how the service should be ordered. They wanted to reuse switch ports from a downsized group of AMI (Alternate

Mark Inversion)³ facilities only to find out that they needed B8ZS⁴ switch ports. This confusion did delay the installation of trunks, but the proper types of switch ports are now available and WorldCom has been provided with new due dates for additional trunks and facilities.

WorldCom – Problem Obtaining Grand Rapids DS3s

16. Mr. Gary presents a lengthy complaint concerning alleged problems in obtaining DS-3 facilities for trunking in Grand Rapids.⁵ In this section of his testimony, Mr. Gary claims that there were repeated attempts to contact Ameritech's Implementation Manager concerning the need for a number of DS-3 facilities. He also states that the Ameritech Implementation Manager was contacted and the need for the DS-3s was explained. He also stated that as of June 27, 2001, no orders were issued by the Ameritech Implementation Manager. Ameritech has no record of any such problem.
17. Mr. Thomas Grzadzinski was Ameritech's Implementation Manager until May 2001 and Mr. Gary Clark assumed this position in May of 2001. Neither of these managers have any records or memory of any contact by WorldCom concerning facilities for Grand Rapids. In addition, Mr. Grzadzinski is now the Director - Network Interconnections for Ameritech and is the person designated to WorldCom as the best route for expediting

³ AMI is a T1 transmission encoding technique which uses bipolar pulses to represent logical 1 values. It is therefore a three level system. A logical 0 is represented by no symbol, and a logical 1 by pulses of alternating polarity.

⁴ Binary 8 Zero Suppression is an alternate line coding parameter (setting) option to AMI, with relation to editing of T1 transmission services.

⁵ Affidavit of Charles Gary Regarding Interconnection Trunking, filed on Behalf of World Com, Page 3, line 19 through page 5, line 6. This complaint is repeated in the Response of WorldCom to Ameritech's May 15, 2001, Checklist Filing at pages 67 through 69.

facility needs in Michigan. Mr. Grzadzinski has no records or memory of any contact concerning facilities for WorldCom in Grand Rapids.

18. In addition, Ms. Linda Smallwood is the account manager assigned to WorldCom and she also has no record or memory of any contact by WorldCom concerning facilities for Grand Rapids.

WorldCom – Bell Shelf Problem

19. Mr. Gary also states “On April 4, 2001 a purchase order (Confidential: number xxxxxxxx) was issued to Ameritech for several (Confidential: xxx) DS3’s to Ameritech Detroit Bell central office. The requested in service date was April 18, 2001. The firm order conformation was received from Ameritech on April 26, 2001 with a FOC May 16, 2001. A major problem within a DACS (Digital Access Cross Connect System) unit at Ameritech caused a delay in the installation of the last few DS3’s. These last DS3’s were installed and accepted on June 25 2001, nine weeks after the requested due date and about five weeks after the FOC date.”⁶
20. While Mr. Gary’s statement is true, it neglects to include information that shows how Ameritech worked with WorldCom to meet their immediate need for circuits. On April 25th. Ken Ess of WorldCom contacted Linda Smallwood, the Ameritech Account Manager, concerning the fact that an order had been placed for a number of DS3’s in Detroit and that WorldCom had been advised that, due to a DACS problem, Ameritech could not process the orders at this time and that it would be at least the end of May 2001

⁶ Affidavit of Charles Gary Regarding Interconnection Trunking, filed on Behalf of World Com, Page 5, line 8 through line 16. This complaint is repeated in the Response of WorldCom to Ameritech’s May 15, 2001, Checklist Filing at page 69.

before this order could be completed. Ms. Smallwood worked with the implementation manager, the Hi-cap center and the project coordinator and they were able to turn up one-half of the DS3's on May 8, 2001 with an agreement that the other one-half would be turned up once the DACS problems had been resolved. The FOC date on the additional facilities was May 16, 2001, however WorldCom was advised that this date was tentative based upon DACS problem being resolved. Ameritech was advised by WorldCom that as long as they had the first one-half DS3's that this would take care of their capacity issue until at least September.

CHECKLIST ITEM (iv): LOCAL LOOPS

AT&T – Line Sharing over Fiber-fed Loops

21. On pages 21-25 of Mr. Finney's affidavit, he argues that Ameritech is in violation of the FCC's rules because it does not support line sharing over fiber-fed loops.⁷ Mr. Finney is wrong.

22. The legal issues will be fully addressed in Ameritech Michigan's brief. However, it is necessary to point out that, while the *Line Sharing Reconsideration Order* states that the FCC's requirement that ILECs provide access to the HFPL, as defined by the FCC, applies to loops that include fiber, that Order does not impose any particular "fiber-sharing" obligations on incumbent LECs. In addition, it certainly does not impose any "fiber-sharing" conditions on the DSL-related Project Pronto facilities that Ameritech Michigan plans to deploy. To the contrary, the FCC specifically found that an ILEC's obligation to provide access to the HFPL over fiber loops would depend on what the

⁷ Affidavit Of Scott L. Finney On Behalf Of AT&T Communications Of Michigan, Inc. And TCG Detroit

ILEC *actually deployed* in its existing network and the technical capabilities of that network, *not* on what CLECs would like the ILEC to deploy in its network. While Ameritech Michigan will provide “fiber sharing” where it is found to be technically feasible, neither the FCC nor this Commission has ordered any specific fiber sharing obligations on Ameritech Michigan. Accordingly, Mr. Finney’s claim that Ameritech Michigan is in violation of FCC rules lacks merit.⁸

23. Ameritech’s advanced services offerings in Michigan are entirely consistent with the *Line Sharing Reconsideration Order*. Ameritech allows CLECs in Michigan to line share over copper facilities. In order to access the copper facility in situations where the end user is served by digital loop carrier, Ameritech permits CLECs to access the copper facility at a remote terminal or other accessible subloop access point, and purchase available dark fiber or subloop fiber feeder facilities.
24. The *Line Sharing Reconsideration Order* is clear that CLECs may access the High Frequency Portion of the Loop (“HFPL”) utilizing Digital Subscriber Line Access Multiplexer (“DSLAM”) equipment located in either the central office or the remote terminal (“RT”). The CLEC has the option of utilizing either or both locations if technology permits. AT&T however, tries to rewrite the *Line Sharing Reconsideration Order* to impose a blanket requirement for Ameritech to provide actual line sharing over the fiber portion of the loop in all situations. As stated above, the FCC has not imposed any particular “fiber sharing” obligations and any future obligations will depend on the

⁸ Line sharing over a fiber facility connected to a digital loop carrier is not technically feasible in most cases. This is because the total bandwidth allocated to each line is only 64 kilobits/second and all of this is used for the voice signal.

technical capabilities of the network. . With today's technology, the facility between the DSLAM equipment and the end user's location must be all copper in order to line share. This is true whether the DSLAM is located at the central office or the RT. DSL technology today does not allow a CLEC to directly access a fiber-fed loop via their central office located DSLAM equipment.

25. Ameritech does allow CLECs to locate their DSLAM equipment at the central office or at a remote terminal location, just as the FCC stated in paragraph 11 of the *Line Sharing Reconsideration Order*. In cases where Ameritech has both all copper loops and DLC loops serving a particular customer, the CLEC may choose to provide service to the customer via a DSLAM located at either the central office or the RT. In this way, Ameritech fully complies with the obligations of the *Line Sharing Order*⁹ and the *Line Sharing Reconsideration Order*.

II. CHECKLIST ITEM (x):

ACCESS TO DATABASES AND ASSOCIATED SIGNALING

TelNet – Problem Obtaining SS7 A-links

26. Mr. Mark Iannuzzi, on behalf of the CLEC Association of Michigan, stated “Item 10 of the checklist requires Ameritech to provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion.” He claims that TelNet has experienced problems with this item. Mr. Iannuzzi states: “It took 6-months to

⁹ *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Third Report and Order in CC Docket No. 98-147, Fourth Report and Order in CC Docket No. 96-98, 14 FCC Rcd 20,912 (1999) (“*Line Sharing Order*”).

establish a-links to the SS7 database, which were required to allow Telnet to commence operations in additional Michigan LATAs.”¹⁰

27. While it did take several months to install the additional A-links¹¹, Mr. Iannuzzi fails to note TelNet’s changing service requests in his description of the interactions between Ameritech and TelNet. Ameritech and TelNet entered into negotiations for additional interconnections facilities in May of 2000. TelNet indicated it would be using Ameritech for SS7 signaling services. A pre-planning letter that described the work to be done for these new interconnections was issued in September 2000 (upon resolution of outstanding TelNet issues regarding exact building location, and network/trunking architecture). Ameritech issued orders for interconnection trunks from Ameritech’s switches to TelNet’s switches shortly thereafter. TelNet did not submit the order (ASR) for A-links until January 2001. At that time TelNet requested that four new switch point codes be pointed to existing A-links that terminated on the TelNet Southfield switch. This meant that TelNet was requesting Ameritech to open multiple new point codes on A-links to an existing switch. Ameritech advised TelNet that this was not common practice; however, Ameritech agreed to follow their instructions.¹²

¹⁰ Affidavit of Mark Iannuzzi on behalf of The CLEC Association of Michigan, paragraph 9. This complaint is repeated in the Comments Of The Competitive Local Exchange Carriers Association Of Michigan, Its Members, Long Distance Of Michigan, Inc., And The Association Of Communication Enterprises To Ameritech Michigan’s Checklist Informational Filing at page 38

¹¹ There is no “SS7 database” as referred to by Mr. Iannuzzi. The A-links are data transmission facilities that connect the TelNet switches to the Ameritech Signaling Transfer Points. See paragraphs 232 through 240 of my May 15, 2001 affidavit.

¹² Ameritech assumed that TelNet had some plan for redirecting the point codes to the new switches through the existing switch. However, Ameritech did not consider this a common practice.

28. In late January or early February 2001, upon completion of the A-link order (ASR 0034103667), TelNet advised Ameritech that the plan did not work in their switch as originally anticipated. TelNet informed Ameritech that it would need to establish new separate A-links for each switch and remove the additional point codes from the existing set of links. These new ASRs were sent around mid March 2001 (C2904160972). The orders had multiple errors and Ameritech was advised on April 24, 2001 that TelNet would be ready to work the link orders on April 30, 2001.
29. On April 26, 2001 Ameritech discovered that TelNet had failed to issue the necessary ASRs to remove the point codes from the existing links. Directing a point code to two different A-links could have caused a network failure. TelNet took action to correct the error at that time. Upon receipt of correcting ASR, the A-links for these switches were finally completed in the mid May 2001 timeframe.
30. In short, after each and every request made by TelNet, Ameritech Michigan worked diligently to provide nondiscriminatory access to the SS7 signaling network. However, it is up to each CLEC to execute its orders in a timely and accurate manner. The incident mentioned by Mr. Iannuzzi highlights how Ameritech has worked with TelNet to provide nondiscriminatory access to the SS7 signaling network, and therefore complies with checklist item 10.

WorldCom – CNAM Updates for Ported Numbers

31. Mr. Michael Lehmkuhl, on behalf of WorldCom, complains that in some cases when a customer switches from Ameritech to WorldCom for local service, and their numbers are ported to WorldCom, incorrect CNAM data is transmitted to the called customer.¹³
32. Mr. Lehmkuhl never explains how this is possible, other than to say “the data Ameritech has for the ported number is just plain wrong.”
33. A CLEC has the option of using Ameritech’s CNAM data as described in paragraphs 265 through 269 in my May 15 Affidavit. However, a CLEC may choose to store its CNAM data in a database operated by a third party. In either case, the CLEC is responsible for administering the data stored in the database. The methods available to a CLEC that stores its data in the Ameritech are described in paragraph 270 through 276 of my May 15 Affidavit. If data stored in the CNAM database is incorrect, as alleged by Mr. Lehmkuhl, WorldCom has control of that data and must assist in correcting it. WorldCom has informed Ameritech that it has chosen to use a third party supplier (Illuminet) for its CNAM data storage.
34. In Attachment A to his affidavit, Mr. Lehmkuhl identifies three customers that have experienced incorrect CNAM displays when calling other customers. Two of those have telephone numbers¹⁴ in NPA-NXX codes assigned to WorldCom switches and therefore would not be ported telephone numbers. It appears that WorldCom has not update the

¹³ Affidavit of Michael Lehmkuhl Regarding DAL and CNAM Issues, filed on behalf of WorldCom, page 5, line 1 through page 6, line 7. This complaint is repeated in the Response of WorldCom to Ameritech’s May 15, 2001, Checklist Filing at pages 64 through 66.

¹⁴ The customer names are DER Travel and Household International.

national routing guides for database queries to reach its third party database. Until this routing guide (the CNARG) is updated Ameritech's network cannot retrieve the information from that database.

35. The third number provided by Mr. Lehmkuhl¹⁵ is a ported number that is shown in the Ameritech database as "Name Unknown." Ameritech has no record to indicate how or when this information was entered into the database, or if there has ever been a customer name associated with this number. However, since early this year, Ameritech has been working with WorldCom's CNAM service provider to remove all WorldCom records from the Ameritech database that are stored in the Illuminet database.
36. Prior to April 2001, Ameritech did not purchase CNAM information associated with ported numbers if such CNAM information was stored on a non-Ameritech CNAM Database. Therefore, when the subscribers to those ported numbers called an Ameritech end user, the caller's name did not display on the Caller ID unit. If a CLEC with ported numbers did select Ameritech as their CNAM Database, Ameritech did store the CNAM information. Therefore, when the subscribers to those ported numbers called an Ameritech end user, the caller's name displayed on the Caller ID unit.
37. In March 1999, Ameritech offered a new option to CLECs that stored their name information on another company's CNAM Database. If the CLEC would jointly store its information on both platforms (Ameritech's and the foreign CNAM Database), Ameritech would retrieve the CNAM information from its CNAM Database and forward

¹⁵ The customer name is Allegiance.

it on to the called party for display on the Caller ID unit. Ameritech offered this dual storage ability at no charge.

38. In January 2001, Ameritech began work on enhancements to purchase the CNAM information associated with ported numbers on foreign databases. Ameritech completed those enhancements in April 2001. Also in April 2001, Ameritech stopped accepting requests to jointly store data (because there was no further need). For Ameritech's enhancement to take full effect, however, numbers that had previously been jointly stored need to be removed from Ameritech's CNAM Database.
39. Ameritech has coordinated with WorldCom's CNAM Database provider for such removal. In June 2001, Illuminet issued a "Special Report" that notified its customers that Ameritech would now access Illuminet's database for ported CNAM information. This "Special Report" went to all of Illuminet's CNAM customers and requested that they contact Illuminet for assistance in making the changes necessary for Ameritech to begin accessing their data on Illuminet's CNAM Database. Illuminet agreed to collect the information and forward it to Ameritech, who will in turn delete the numbers from its CNAM Database. Once those numbers have been deleted, Ameritech will query Illuminet for the CNAM information stored on Illuminet's CNAM Database. Ameritech is aware of four CLECs that store data with Illuminet. Two of those CLECs have provided list of numbers to be deleted from the Ameritech database and two have not. WorldCom is one the companies that have not provided the list.
40. What is now needed is for either WorldCom or Illuminet to give Ameritech a list of the numbers that were jointly stored. Ameritech will use that list to remove the numbers

from its Database. With the removal of those numbers, Ameritech will begin querying Illuminet for name information associated with ported numbers. In addition WorldCom must also put the correct routing information into the national routing guides (NPAC and CNARG). Without that correct information, Ameritech's CNAM queries will not reach Illuminet—even if those numbers are removed from the Ameritech database.

III. CHECKLIST ITEM (xii): LOCAL DIALING PARITY

TelNet – Dialing Parity

41. Mr. Iannuzzi also stated “Item 12 requires nondiscriminatory access to allow for local dialing parity. ... At times we have had to go through great pains to determine ‘local dialing parity’. Ameritech withdrew tools used to determine this information, making it much more difficult and error prone to determine it. There is no indication that these problems have been solved.”¹⁶
42. FCC Rule § 51.207 defines local dialing parity to mean telephone exchange service customers within a local calling area may dial the same number of digits to make a local telephone call, no matter the carrier of the customer or the called party. Ameritech's interconnection arrangements fully meet this requirement. The FCC's Second Report and Order, ¶ 71, stated that local dialing parity is also achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements from Section 251 of the Act. As described in its May 15 filing, Ameritech has implemented each of these in accordance with the Act and the FCC Rule.

¹⁶ Affidavit of Mark Iannuzzi of TelNet, on behalf of The CLEC Association of Michigan, paragraph 9. This complaint is repeated in the Comments Of The Competitive Local Exchange Carriers Association Of Michigan, Its Members, Long Distance Of Michigan, Inc., And The Association Of Communication Enterprises To Ameritech Michigan's Checklist Informational Filing at page 38.

43. Ameritech's interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to Ameritech customers. Neither are Ameritech customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC. The interconnection of Ameritech networks and the network of CLECs are seamless from a customer perspective. Since the CLEC central office switches are connected to the trunk side of the Ameritech tandem or central office switches in the same manner as Ameritech and other local exchange companies, there are no differences in dialing requirements or any built-in delays for CLEC customers.
44. Ameritech is unaware of what "great pains" that TelNet has had to go through to determine that it has dialing parity with Ameritech or what "tools" it believes have been withdrawn that it needs to determine dialing parity. In its filings, TelNet has provided no data specifying what either these "great pains" or "tools" are.
45. This concludes my reply affidavit.