

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
PATRICK L. FOSTER
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

TABLE OF CONTENTS

SUBJECT	PARAGRAPH
INTRODUCTION	1
PURPOSE OF AFFIDAVIT	2
ORDER CLOSING PROCESS	4
UNILATERAL TESTING	6
CENTER RESTRUCTURE	7
TREATMENT OF CNR IN ON-TIME PERFORMANCE (OTP) REPORTING	8
OTP AND BACKLOG	10
LACK OF FACILITIES	11
“HOLD TIMES” FOR CALLS TO TEST CENTERS	12
TEST CENTER RESPONSE TO ESCALATIONS	14
MEAN TIME TO REPAIR (MTTR)	15
OFFERED INTERVAL	16
CONCLUSION	17

I, Patrick L. Foster, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is Patrick L. Foster. My business address is 2000 W. Ameritech Center Drive, Room 4E24, Hoffman Estates, IL 60196. I am Director – Operations Support for Ameritech. I am the same Patrick L. Foster 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 (“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.

PURPOSE OF REPLY AFFIDAVIT

2. The purpose of this Reply Affidavit, is to respond to certain inaccuracies and claims made by the Michigan Cable Telecommunications Association, WorldCom and XO regarding Ameritech’s provisioning and maintenance of high capacity unbundled network elements. These claims were contained in their affidavits and/or comments submitted in response to Ameritech’s May 15, 2001 § 271 Checklist Informational Filing with the MPSC in this proceeding.

3. As mentioned in my May 15 affidavit, designed telecommunications facilities that are provided as unbundled network elements (“UNEs”) are provisioned and maintained by the Special Services Group within Ameritech’s Network organization. The Hicap Provisioning Centers (“HPC”) and the Interexchange Control Center (“IECC”) in this Group therefore handle both high capacity unbundled network elements, such as high capacity loops and

interoffice transport; and Special Access services, which Ameritech provides pursuant to its state and federal access tariffs. My Reply is limited to general claims regarding the HPC and IECC or specific allegations regarding high capacity unbundled network elements. Where it is unclear whether the comment is addressing Ameritech's provision of either a network element or a special access service, in the interest of completeness, I have provided a response. As more fully discussed in Mr. Fioretti's Reply Affidavit, Ameritech's provisioning of special access services is not relevant to its compliance with the Section 271 competitive checklist. Therefore, if a comment is clearly addressing Ameritech's provision of special access service pursuant to tariff, I have not addressed that claim in this Reply affidavit. To the extent a CLEC or IXC has concerns with the special access services provided they should contact the member of their Ameritech Account Team who is responsible for special access services. I have forwarded the comments relating solely to special access to the Vice President of Access Operations for a response through normal channels for our access service customers.

ORDER-CLOSING PROCESS

4. XO Communications, Inc. ("XO") and its affiant Mr. Routhier object to what they refer to as Ameritech's "negative response approach" to closing installation orders for high capacity circuits ("hicaps") (see the Routhier affidavit at pages 2-3, paragraph 6). This is a situation in which Ameritech attempts to contact a customer to close out a provisioning order and leaves a message if no one answers that the order will be completed by the end of the business day if a callback is not received. Mr. Routhier expresses frustration that when this

occurs and the new circuit has trouble, then XO must subsequently open up a trouble report with Ameritech to fix the problem.

5. To the extent that Mr. Routhier's comments address the provisioning of high capacity unbundled network elements, I provide the following in response. What XO fails to point out is that in this completion notification process, Ameritech performs all the required end-to-end tests necessary to ensure that the facility is operable. Only after passing these provisioning tests does Ameritech attempt to contact the customer to let them know the unbundled network element is ready for use. Even then, Ameritech provides the customer with ample opportunity (up to 24 hours) to request additional testing with Ameritech without opening a trouble ticket. In other words, the customer may work directly with Ameritech's provisioning organization to do additional testing as long as the request is made within the prescribed time interval. The necessity of opening a trouble ticket on the part of XO indicates that they are not ready to accept the unbundled network element on the day on which it is completed.

UNILATERAL TESTING

6. XO Communications, Inc. and its affiant Mr. Routhier claim incorrectly that Ameritech's practice of "unilateral testing" causes additional delays in getting XO's customer's circuit repaired (see the Routhier affidavit at page 2, paragraph 5). They state that Ameritech performs automated testing that causes the customer to lose service, when instead XO has requested a "test assist", a procedure in which XO tests the circuit jointly with Ameritech. To the extent that Mr. Routhier's comments address the maintenance of high capacity unbundled network elements, I provide the following in response. Ameritech uses remote,

automated testing capability wherever and whenever it can to more efficiently maintain and repair its network and its customers' circuits. Significant advances have been made in this technology, and it is being widely deployed in Ameritech's network. Remote, automated testing frees technicians for trouble cases, which require human intervention. Contrary to XO's claim, this testing is intended to improve intervals, not extend them. If XO wants to avoid any service interruptions, it needs to make that request when it opens such a trouble ticket. A jointly performed, end-to-end test is referred to as "head-to-head testing" by Ameritech's test centers is necessarily a procedure that causes a customer to lose service. However, XO is able to request "non-intrusive" testing if it does not want that situation to occur. On the other hand, it can also request "head-to-head testing" if it desires a coordinated effort with Ameritech.

CENTER RESTRUCTURE

7. XO Communications, Inc. and its affiant Mr. Wall complain about efforts by Ameritech to reorganize its high capacity circuit test centers (see the Wall affidavit at page 3, paragraph 7). As Mr. Wall notes, Ameritech is in the midst of reorganizing this function and has accomplished phase one to date. The second phase will complete in the fall of 2001, and will result in a greater ability for Ameritech to focus on the needs of its CLEC customers. The fact that Ameritech is reorganizing its work centers to respond to the provisioning and maintenance needs of its CLEC customers, to provide for greater efficiency and better service, is a good thing. There is nothing wrong, as Mr. Wall seems to imply, when a business reorganizes to serve its customers in the best and most efficient manner.

TREATMENT OF CNR IN ON-TIME PERFORMANCE (OTP) REPORTING

8. Affiant Mr. Beach of WorldCom claims that instances in which a customer is not ready on the due date of a circuit (known as Customer Not Ready, or “CNR”) not be included when reporting Ameritech’s On-Time Performance (“OTP”) results (see the Beach affidavit at pages 7-8). He argues that Ameritech regards the CNR situations as on-time delivery of a service, but that WorldCom believes those situations should be removed from OTP statistics. He also describes a hypothetical situation to illustrate how Ameritech uses this practice to inflate performance reporting.

9. Because Mr. Beach’s specific claim involves special access service; I have referred this issue to Ameritech’s Vice President of Access Operations. To the extent Mr. Beach’s claim was intended to apply to the provision of high capacity unbundled network elements, Ameritech disputes Mr. Beach’s assertion. Under the performance measures that apply to unbundled network elements, Ameritech is not penalized or held accountable for a condition created by WorldCom’s end user or WorldCom itself which is beyond Ameritech’s control. These CNR orders should not count against Ameritech’s on-time performance since Ameritech did indeed show up on the appointed due date and attempt to install the requested service. However, Ameritech does provide measurements to WorldCom, which both include and exclude CNR orders from the on-time performance base. These measurements have been identified and described in testimony provided by Mr. Salvatore Fioretti on behalf of Ameritech, which was submitted in the Checklist Informational Filing on May 15,

OTP AND BACKLOG

10. In the brief by the Michigan Cable Telecommunications Association (“MCTA”) and the affidavits by Messrs. Hussey and Beach of WorldCom, comments are made about Ameritech’s results in terms of On-Time Performance (“OTP”) and backlogged orders for special access hicap provisioning. The focus of their comments is on DS-1 provisioning. However, as Mr. Hussey concedes 95% of these are ordered by WorldCom from the special access tariff. Because Ameritech’s provisioning of special services is not relevant to this proceeding, I have referred Mr. Hussey’s concerns to Ameritech’s Vice President of Access Operations.

LACK OF FACILITIES

11. WorldCom’s Mr. Hussey and the MCTA express frustration at the “shortage of facilities” issue that they say adversely affects Ameritech’s provisioning of high capacity network elements (see the Hussey affidavit at pages 2-3 and the MCTA Comments at page 13). To the extent Mr. Hussey is addressing special access services, I have referred his concerns to Ameritech’s Vice President of Access Operations. To the extent that the MCTA’s and Mr. Hussey’s comments address the provisioning of high capacity unbundled network elements, I provide the following in response. To address this situation of a shortage of facilities, Ameritech has committed substantial resources. It has created an entire Network organization -- Infrastructure Maintenance -- with the mission to stabilize the outside plant network in order to reduce service interruptions and shorten provisioning intervals

“HOLD TIMES” FOR CALLS TO TEST CENTER

12. Affiants Mr. Wall (XO) and Mr. Hussey (WCOM) make misleading statements about the hold times experienced when calling the Ameritech test center for status of provisioning orders. They indicate that they commonly experience hold times of up to 45-60 minutes (see the Hussey affidavit at page 3 and the Wall affidavit at page 3, paragraph 7). However, the extensive record keeping on hold times that Ameritech collects through its Automated Call Distribution (ACD) system indicates otherwise. For the month of June 2001, the average hold time for a call to the provisioning department at the IECC-East for a Michigan order (the source of the affiants’ complaints) was 121 seconds (or 2 minutes).¹
13. However, there may be instances in which a caller experiences a long hold time, such as calling after 6:00pm or on a day that has a particularly high volume of activity. But in fact, these occasions are the exception, as shown by the much lower average hold time for all callers.

TEST CENTER RESPONSE TO ESCALATIONS

14. XO Affiants Mr. Routhier, Ms. Hankins, and Mr. Wall comment that Ameritech’s test center management does not respond to escalations in a timely manner (see the Routhier affidavit at page 3, paragraph 7; the Hankins affidavit at page 2-3, paragraph 9; and the Wall affidavit at page 3, paragraph 7). Ameritech has an escalation process, which it takes seriously. If these CLECs are experiencing issues with their high capacity unbundled network elements maintained by the hicap centers, they should follow existing procedures to resolve their

¹ Due to the record-keeping system, the ACD results presented here represent combined numbers for the states of Michigan and Indiana together, and they cannot at this time be separated.

facility issues. First, it is important that customers attempt to get status through normal provisioning channels before beginning the escalation process. For CLEC customers, this would be through the provided 800 phone numbers. This is the first and best way to get status on an order. Second, it is vital that customers are paging the Ameritech managers instead of leaving voicemail messages. Center managers spend a great deal of time “on the floor” of their centers and away from their office. Because of this, they all carry paging devices that they respond to quickly. Third, customers need to make sure that they have the most current escalation lists with correct contact information. The managers that handle the first and second levels of escalation experience the most job mobility. It is therefore important that customers are paging the correct individual if they need a timely response. All changes in escalation contacts are immediately made available to the customers through Ameritech’s Account Teams. Finally, the escalation guidelines provided to CLECs by the Ameritech Account Teams indicate that there should be a two-hour interval given before proceeding to the next escalation level. Following the escalation guidelines described above will result in a timely response to the customer’s need for status. In addition, Ameritech has formed a team in the test center to perform ongoing evaluation of its escalation procedures.

MEAN TIME TO REPAIR (“MTTR”)

15. Affiant Ms. Hankins of XO Communications comments that Ameritech is only meeting its four-hour commitment for the repair of hicap circuits 10% of the time (see the Hankins affidavit at page 2, paragraph 9). To the extent that the Ms. Hankins’ comments address the provisioning of high capacity unbundled network elements, I will outline Ameritech’s efforts to improve its maintenance performance. Ameritech has implemented or is in the process of

implementing a number of initiatives related to test center re-organization, headcount additions, training, technological advances, management structure, and process evaluation to improve Ameritech's maintenance capabilities also. Further, Ameritech's IECC, the test center responsible for CLECs, has formed teams to evaluate the process for handing off trouble tickets between the test center, field, and central office organizations that are involved in the repair of troubled circuits. Improved hand-off time leads to quicker trouble resolution. Also, daily conference calls have been initiated by these departments to discuss and analyze trouble tickets that required lengthy times to resolve. These efforts demonstrate Ameritech's determination to provide the very best maintenance performance for its customers.

OFFERED INTERVALS

16. In his affidavit, Mr. Beach of WorldCom says that "In WorldCom's experience, the installation dates Ameritech offers in Michigan are significantly longer than Ameritech's target intervals" (see the Beach affidavit at page 6-7 Mr. Beach's comments specifically refer to special access provisioning, so I have referred them to Ameritech's Vice-President of Access Operations. To the extent that Mr. Beach's comments address the provisioning of high capacity unbundled network elements, I provide the following in response. There are reasons why the quoted installation interval might be longer than what Ameritech customarily gives. For example, with respect to unbundled network elements, a common factor is when customer orders a substantial number of circuits at one time, these orders are grouped into a project. When this happens, Ameritech negotiates with the customer what the installation dates will be so as to organize the project in an efficient manner. This usually results in longer installation

intervals than in a situation where a customer orders only one or two circuits. Ameritech clearly communicates this negotiation process for projects with all of its customers. Or another possible reason could be that installation may be longer if facilities don't exist to provision the services and where Ameritech may be required in some circumstances to modify or construct a facility to fill an order for an unbundled network element.

CONCLUSION

17. As I have demonstrated above, Ameritech provisions high capacity unbundled network elements consistent with its checklist requirements.