

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 A. HARRISON
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

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

1. My name is Patrick A. Harrison. My business address is 220 N. Meridian Street, Room 1620 Indianapolis, Indiana 46204. I am Associate Director-9-1-1 Database and Technology for Business Communications Services (“BCS”), which is a business unit of SBC Communications. I am the same Patrick A. Harrison who sponsored an Affidavit filed with Ameritech Michigan’s¹ (“Ameritech”) 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 the inaccurate claims made by Michigan Consumer Federation (“MCF”) in their comments submitted in response to Ameritech’s May 15, 2001 §271 Checklist compliance filing with the Michigan Public Service Commission (MPSC) in this proceeding. MCF was the only party to allege any concern with respect to Ameritech’s compliance with the 911 and E911 requirements of competitive checklist item (vii). I show that MCF’s claims are

¹ Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications, Inc. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" pursuant to assumed name filings with the state of Michigan.

completely unfounded and incorrect. Instead, the well-documented facts show that Ameritech has fully complied with the MPSC's Order in the Southfield proceeding and has continually addressed 9-1-1 issues in a manner commensurate with the importance that 9-1-1 services are to the citizens of Michigan.

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3. At pages 19-20 of their Comments, the MCF claims that Ameritech has not met the requirements of checklist item vii for 9-1-1 and E9-1-1 services given MPSC Case No. U-11229 (the Southfield 9-1-1 Complaint) and the purported "longstanding existence of such problems" as raised in that case. MCF further claims that Ameritech is "content to keep paying the daily fines rather than incur whatever cost is necessary to correct what appears to be serious problems of competency". MCF's claims are wholly unfounded and, thus, are inflammatory in nature. MCF fails to offer an affidavit or any other type of evidence in support of their allegations. Why? Because there simply is no evidence to support their allegations. In fact, the data Ameritech filed with the MPSC for the three-year period covered by the September 30, 1997 Order in Case No. U-11229 demonstrates that Ameritech's corrective action and further handling of the 9-1-1 data has been done in a manner commensurate with the importance that 9-1-1 services have to the citizens of Michigan.
4. As way of background, the issue in Case No. U-11229 concerned the handling of competitive local exchange carrier ("CLEC") data in Ameritech's 9-1-1 database, which is the database used to provision E9-1-1 service to municipalities. The City of Southfield had encountered some errors in the data of two competitive local exchange

carriers (“CLECs”) during 9-1-1 calls over a period of time during 1996. In its Order dated September 30, 1997, the MPSC required Ameritech to perform a verification of the entire Ameritech E9-1-1 database for Michigan within 30 days of the order. Ameritech Michigan was also required to perform verification of changes to the database for a period of three years thereafter. The former was conducted on all Ameritech end user records, as well as the records of end users of all telephone companies (both incumbent local exchange carriers and CLECs) that have end users served by Ameritech’s 9-1-1 services to municipalities. The latter was performed on a monthly basis. Results of both efforts were reported in detail to the MPSC as part of public filings in Case No. U-11229. Additionally, the MPSC required Ameritech to pay \$1000 per day per database error not corrected within one business day of being identified to Ameritech. This involved errors that Ameritech could correct on its own from its records. In the event Ameritech required input from another telephone company or the municipality, Ameritech was measured on forwarding the reported error to the party within one business day; although, the other parties were not required to provide a response to the error within any specified timeframe. In fulfilling its error correction requirement, Ameritech Michigan tracked “trouble reports” it received, also known as 9-1-1 ANI/ALI query forms, to determine how long each took to resolve and whether resolution was accomplished by Ameritech or required input from a municipality or another telephone company. This data was reported by month and any fines due were calculated from this data. All of the data reported to the MPSC for trouble report and reconciliation analyses were supported

by affidavits submitted by Mr. Timothy Jenkins (former director of 9-1-1 Operations for Ameritech) and myself.

5. Attachment A to this reply affidavit contains a summary of Ameritech's verification results, covering the full period required by the MPSC's Order in U-11229. The first line provides the summary of the initial 100% verification involved both Ameritech's end users and the end users of all telephone companies who are served by Ameritech's E9-1-1 services to municipalities in Michigan. This process involved each telephone company, verifying the information contained on each end user by comparing the data stored in the E9-1-1 database with that stored in its billing records. This process showed that for this initial review of 100% of the Ameritech Michigan E9-1-1 database, only 2.77% of the 7,132,871 records were found to be discrepant. All discrepant records were immediately corrected.
6. Subsequent to the 100% verification of the entire database, Ameritech instituted the required verification process of 100% of the changes submitted to the database. This process was conducted each month. As shown by Attachment B, of the 17,547,201 record updates processed over the three-year period, only 265 (or 0.0015%) were found to be in error. Of those 265, all but 22 were Ameritech records.
7. These data show that Ameritech competently maintains the E9-1-1 database for its own end users and for the end users of other telephone companies.
8. Attachment C to this reply affidavit contains a summary of Ameritech's analyses and reporting related to "trouble reports". Trouble Reports are also known as 9-1-1 ANI/ALI inquiries and are used by Public Safety Answering Points (PSAPs) to report when they suspect that the data shown (or not shown) on their screen during a 9-1-1

call may be inaccurate. These are submitted both manually (faxed) and electronically (via an Intranet based tool provided to the PSAPs by Ameritech). Over the three years, Ameritech has taken 20,302 trouble reports from PSAPs. Of those, 2,243 experienced resolution that took more than one day. Of those delayed, 108 (or 5%) were due to Ameritech, 1,273 were due to PSAPs/municipalities, and 862 were due to other telephone companies. In total over the three years, Ameritech paid \$390,000 in fines to the State of Michigan for the delayed resolution. As shown by Attachment C, fines were more significant at the beginning of the three-year period and then tapered off and in some months, there were no fines at all. In contrast, the other parties who are also responsible for E9-1-1 database accuracy are not held to any specific requirements.

9. Therefore, the data contained in Attachments A, B, and C show that MCF's assertions that Ameritech is not focused on properly maintaining its E9-1-1 database or resolving any real or perceived errors, and that Ameritech pays daily fines, are wholly without merit and should be rejected. .
10. Additionally, as noted in paragraphs 32-34 of my May 15 affidavit in this proceeding, Ameritech has introduced additional tools for other telephone companies to use in ensuring that their data is accurate and complete in Ameritech's E9-1-1 database. The introduction of these tools was in response to the FCC's order in Ameritech's 1997 271 application, in which issues relating to the Southfield complaint were raised. This fact presents additional evidence that Ameritech has fully responded to all the issues raised in the Southfield Complaint.

11. In sum, Ameritech has fully complied with the MPSC's Order in Case No. U-11229.

Ameritech has amply demonstrated that it can accurately and completely process updates for other telephone companies into its database, which was the key issue of Case No. U-11229. Further, Ameritech has demonstrated that it has properly focused on resolving any real or perceived errors identified in a timely manner.

12. This concludes my affidavit.