

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
TIFFANY A. HUSTON
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

TABLE OF CONTENTS

SUBJECT	PARAGRAPH
INTRODUCTION	1
PURPOSE OF REPLY AFFIDAVIT	2
THE “WIN-BACK” PROCESS	4
CONCLUSION	10

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

INTRODUCTION

1. My name is Tiffany A. Huston. My business address is 112 Grand River, Port Huron, MI 48060. I am Senior Analyst, ALWB Processes for Ameritech. I am responsible for the implementation and execution of Ameritech’s Access Line Winback (“ALWB”) process and communication. I hereby verify, based upon my personal knowledge, the accuracy of each and every fact contained in the Reply Affidavit I am filing today, July 30, 2001, in Michigan Public Service Commission Case No. U-12320.

PURPOSE OF REPLY AFFIDAVIT

2. The purpose of this Reply Affidavit is to respond to Z-Tel Comments regarding the process of migrating a competitive local exchange carrier (“CLEC”) customer back to Ameritech¹, which is also know as “win-back.” Z-Tel submitted these comments in response to

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.

Ameritech's May 15, 2001 § 271 Checklist compliance filing with the Michigan Public Service Commission ("MPSC") in this proceeding.

3. As discussed below, Ameritech Michigan's win-back process and procedures are designed to be in full compliance with all applicable rules for migrating customers from a CLEC's service to Ameritech Michigan's retail service. It is Ameritech's policy and practice to complete these conversions in the timeliest manner, consistent with any applicable rules, and subject to the receipt of necessary information or facilities of the CLEC currently providing service to the customer. In fact it is counter-intuitive to claim, as Z-Tel does, that Ameritech would drag its feet when a customer wants to move back to it. We clearly welcome these customers back.

THE "WIN-BACK" PROCESS

4. Z-Tel claims that Ameritech Michigan's entry into the interLATA service market will not further the public interest because Ameritech Michigan impedes the creation of a competitive local market by taking 30 to 45 days to switch a customer from a CLEC, such as Z-Tel, back to Ameritech Michigan. (see Comments of Z-Tel at page 10). Z-Tel also claims that Ameritech Michigan is responsible for these "lengthy delays" in re-instituting service to customers, citing an email from Ameritech Michigan's Scott Alexander (see Z-Tel comments at Exhibit G). Finally, Z-Tel claims that Ameritech blames the CLEC for this delay by telling customers that the CLEC is "holding their lines or TNs (telephone numbers)."
5. As an initial matter, Z-Tel's claim ignores the obvious. The completion of a customer migration from one carrier to another involves both carriers. Z-Tel's contentions overlook

the fact that several of the steps required in the process of moving an end user customer's retail telephone service from a CLEC to Ameritech are completely out of Ameritech's control, and depend on the CLEC that had been providing service to that customer. For example, the CLEC, who is not subject to the same requirements as Ameritech with respect to providing access to its OSS, or providing needed information subject to well defined performance measurements, may in certain situations control releasing existing loop facilities that may be needed to serve the customer, or releasing the telephone number for porting back to Ameritech. Ameritech has experienced varying degrees of cooperation from CLECs in this regard. Therefore, some of the delay in the winback process is within the control of the carrier about to lose its customer. Notwithstanding that the CLECs can and do delay migrating their customers to Ameritech, Z-Tel is wrong when it alleges that Ameritech service representatives "blame" the delay on the CLEC. They do not.

6. Additionally, and contrary to Z-Tel's claims, Ameritech has always processed win-back orders as quickly and efficiently as possible. However, as explained in the February 28, 2001 email from Ameritech Michigan to Z-Tel, there is a series of events that must be completed in order for a customer to switch from a CLEC back to Ameritech Michigan.
7. For example, under Ameritech Michigan's prior interpretation of the Federal Customer Proprietary Network Information ("CPNI") rules, Ameritech Michigan's retail service center would not access a customer's account until the customer's signed letter of authorization ("LOA") had been received authorizing Ameritech Michigan to access the customer's records with their current carrier. Without accessing the account Ameritech could not quote a specific due date to the customer because Ameritech would not know what type of service

the CLEC was providing (e.g., UNE loop and number portability, UNE-Platform, etc.). The type of underlying service arrangement determines the process and timeline for the winback order. If a customer asks how long it will take to switch back to Ameritech's local service, Ameritech's service representatives quote the longest possible due date, which is up to 45 days. Once it is determined what type of winback order will be required the service representative can process the customer's order and provide a specific due date. Therefore, a key element in determining how long it would take to switch a customer back to Ameritech was how long it took for the customer to sign and return the LOA.

8. Effective June 11, 2001, based upon subsequent analysis of the Federal CPNI rules, Ameritech Michigan implemented – for both CLECs and itself – the use of a third party verification (“TPV”) process to verify customer consent to access account records. Using TPV, Ameritech receives authorization from the customer within one day. After the Ameritech agent takes the customer's order to return their service to Ameritech, the customer is transferred to TPV. TPV protects the customer by confirming and documenting, via a voice response unit, that the caller has the authority to make decisions regarding this telephone service and that they wish to return their service to Ameritech. Each day a TPV report is received and compared to the orders from the previous day. Only until after a successful TPV is matched to a customer's order, will that customer's order be processed.
9. With TPV, the timeframe for converting customers from a CLEC back to Ameritech is significantly less than the prior LOA process, with most customers being returned in less than 10 business days. However, Ameritech representatives can not access a customer's records until after a successful TPV, therefore representatives can not determine a more

accurate due date while they are taking the customer's order. In order to provide the customer with the most accurate information possible without creating false expectations, Ameritech retail service representatives inform the customer that it *could* take from 30-45 days to return their service to Ameritech.

CONCLUSION

10. In short, there is no evidence to support Z-Tel's claim that Ameritech Michigan's procedures impede the creation of a competitive local market due to a long win back process. To the contrary, delay can and does occur due to the actions of the losing CLEC. In addition, Ameritech just recently implemented a process to reduce a significant portion of the interval based on the portion of the process that it can control. Future process enhancements will be implemented as appropriate.
11. This concludes my affidavit.