

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
DENISE KAGAN
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

TABLE OF CONTENTS

SUBJECT	PARAGRAPH
INTRODUCTION	1
PURPOSE OF AFFIDAVIT	2
BILLING FORMAT and AUDITABILITY	3
CABS UNE-P RELEASE SCHEDULE	10
VERIFICATION STEPS TAKEN BY AMERITECH	12
ACCESS TO ELECTRONIC RECORDS	16
CONCLUSION	18

List of Attachments

Attachment A	WorldCom Data Elements Matrix
Attachment B	WorldCom Usage Requirements Matrix

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

INTRODUCTION

1. My name is Denise Kagan. My business address is 2001 Lakewood Boulevard, Location 5L511F, Hoffman Estates, IL 60195. I am the same Denise Kagan 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, with a clarification to the last statement found in paragraph 44 of the affidavit.¹

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 compliance filing with the MPSC in this proceeding. Specifically, I am responding to the claims regarding billing matters made in the WorldCom Brief, Mr. A. Earl Hurter Affidavit, CLEC Association – Mark Iannuzzi Affidavit, and AT&T Joanne Samonek Affidavit. As I demonstrate below, none of these allegations have any merit. Ameritech Michigan's current billing processes and procedures satisfy all OSS requirements.

BILLING FORMAT and AUDITABILITY

3. The affidavits filed on behalf of AT&T, Mr. Hurter's affidavit, and the WorldCom Brief claim that the current Ameritech Electronic Billing System (AEBS450) bill detail format is a non-industry standard format causing issues related to audibility of the bills.
4. These claims regarding bill format are wrong. Ameritech's wholesale bills contain the necessary data elements to enable a CLEC to audit its bills. AEBS is a standardized format for providing billing detail. It is based off of a former Bellcore guideline format that has been used in the Ameritech region for over five years. The format is standardized, documented and is subject to a controlled change process. User guidelines for AEBS are documented on the SBC/Ameritech CLEC web site, and CLECs are given advance notification of any format or system changes by Ameritech.
5. AT&T and its affiant Ms. Samonek (paragraphs 123 – 126) more specifically claim that the October 2001 CABS UNE-P release is to achieve industry standards for UNE billing that have been in place for more than two years.
6. Ms. Samonek further states "Ameritech is overhauling its billing system and beginning sometime in October 2001 carriers who purchase Ameritech UNEs will be operating under a new billing system. Ameritech can only guess at this time that these new systems will operate efficiently and accurately." [Samonek ¶ 126]

¹ The following statement was not accurate in its entirety: "Ameritech will deliver BDT via the CLEC's chosen option, either by means of Connect: Direct, floppy disk, magnetic tape, or microfiche." Ameritech does not offer BDT via floppy disk or microfiche. BDT is currently available only via Connect: Direct or magnetic tape.

7. The industry standards for UNE billing referenced in the AT&T affidavit are the Ordering and Billing Form (OBF) guidelines. The use of the CABS format is a recommendation contained in the OBF guidelines; it is not a requirement. The primary focus of the OBF guideline regarding CABS billing for local service is that particular data elements are to be exchanged, as opposed to a required format of that exchange. It is the data content exchanged that determines the audibility, not the format. Ameritech currently offers CLECs the choice of receiving billing information for ULS and UNE-P in either the AEBS450 format or the EDI811 format. Both of these formats provide the required data elements and related detail to sufficiently audit bills. Attachment A to this affidavit contains the Data Requirements Matrix for WorldCom, which defines the data elements to be exchanged in a UNE-P environment. For each data element, the matrix identifies the data file exchange method available and the release dates effective for this capability.² Attachment B to this affidavit contains the Usage Record Requirements Matrix for WorldCom, which defines the usage records to be exchanged in a UNE-P environment.
8. Attachment A shows CLECs have all the necessary data elements to audit their UNE-P bills. These elements have been made available through the AEBS450 since October 2000, EDI 811 beginning January 2001, and will continue to be available in CABS. Attachment B shows the necessary usage records to be exchanged for UNE-P have been available since October 2000 and will continue to be available with the billing migration to CABS. The two

² I note that the same information as provided in my Attachment A was provided to the MPSC on October 23, 2000 as Exhibit TMG-1 (Exhibit of Mr. Timothy Gilles) as part of Ameritech Michigan's Response in the combinations dispute resolution proceedings handled in this docket.

attachments show that all the necessary data elements for auditing the UNE-P bill are made available by Ameritech.

9. Ameritech will begin migrating UNE-P billing to its CABS system starting in August of 2001. Ameritech's CABS system has been in place for over 16 years and has been proven accurate, timely, and efficient. While modifications were made to Ameritech's CABS system to accommodate UNE-P billing, the modifications should not be considered a "overhauling its billing system" since the modifications did not impact basic infrastructure. Referring to the resultant change in Ameritech's CABS as a "new billing system" is an overstatement. This release is a commitment to achieve uniformity in the billing system orientation as outlined in the billing section of the Uniform and Enhanced OSS Plan of Record.³

CABS UNE-P RELEASE SCHEDULE

10. Both the WorldCom Brief affidavit and the affidavit of Mr. Hurter imply that Ameritech is moving up the scheduled implementation date for the CABS UNE-P Billing Release to August from October.
11. This is not true. Ameritech's Letter of Accessibility dated June 29, 2001 (Number: CLECAM01-189)³ details the complete conversion timeline from RBS to CABS, which will start mid August and is planned to continue through October.

³ Available at <https://clec.sbc.com/accleaders/home.cfm>.

VERIFICATION STEPS TAKEN BY AMERITECH

12. AT&T also claims that Ameritech “severely overstates the billing verification/audit steps that Ameritech performs for wholesale bills” (Samonek ¶124) They state that Ameritech has never discussed this process of auditing bills in any of the collaborative sessions held to discuss the inability to audit Ameritech-rendered bills.

13. First I believe there is a misinterpretation of process. My May 15 affidavit refers to the verification and audit steps internally processed to ensure bills are rendered correctly. Ameritech has an internal audit and verification process to ensure accuracy and format of bills. Every wholesale bill that is created from the Reseller Billing System (RBS), which also creates AEBS450, is validated and audited before it is released to bill print to be sent to a CLEC. The bills are validated for accuracy and format.

14. In addition to validating each individual bill, a statistical sample of billed USOC’s is provided to the Bill Validation Group each month. This sample is validated against the bill as well as the rate tables that are used for billing. The total sample of USOC’s to be checked must equal 448, which is consistent with internal performance measurements.

15. Finally, the bill format and content, which do drive the auditability issue, were discussed in the Plan of Record (POR) collaboratives, as well as the Michigan collaborative technical “sub-team” by those parties that were interested in participating. As to the POR collaboratives, WorldCom had the opportunity to raise the issue during those collaborative sessions and did not raise the issue during those sessions. There was ample opportunity for

all parties to raise issues and to discuss their issues during POR collaboratives; they apparently simply chose not to at that time. As to the Michigan collaboratives, there were a few telephone conference calls held on the subject, as well as one face-to-face meeting in Chicago on August 3, 2000. This issue was raised as one of the 13 issues that made up the combinations disputes resolution proceeding under this docket and was briefed, with supporting affidavits, by WorldCom (via Mr. Hurter) and Ameritech Michigan at that time. It is my understanding that the MPSC chose not to address the issue at the time of their orders in that proceeding.

ACCESS TO ELECTRONIC RECORDS

16. TelNet and the affidavit of Mr. Iannuzzi states “ Ameritech provides no access to the electronic records necessary for TelNet to bill its customers”. (CLECA Iannuzzi¶10)

17. This is not true. Ameritech records document TelNet’s choice for receiving billing detail (AEBS450 data delivery) is Dial-up FTP. At the time of this writing TelNet has 8 months worth of data available for pick-up. Further, if TelNet requires additional assistance or documentation to assist them in being able to retrieve their data, they simply can look to CLEC OnLine (Ameritech’s on-line handbook for CLECs) and/or consult with their Account Manager, who can direct them to the needed information.

CONCLUSION

18. As demonstrated in this Reply Affidavit, Ameritech Michigan’s current billing processes and procedures satisfy all applicable requirements and negate the claims made by the aforementioned CLEC affidavits.