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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

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REPLY AFFIDAVIT OF
ROBBEN KNIFFEN-RUSU
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

TABLE OF CONTENTS

SUBJECT	PARAGRAPH
INTRODUCTION	1
PURPOSE OF AFFIDAVIT	2
CHECKLIST ITEM (8) WHITE PAGES DIRECTORY LISTINGS	
RESPONSE TO XO COMMUNICATIONS' COMMENTS	4
RESPONSE TO MCLEODUSA'S COMMENTS	10
CONCLUSION	14

List of Attachments

Attachment A

XO Communications Michigan listing transactions,
Jan-June 2001 (submitted electronically, via ACES)

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Attachment B

Detailed Timeline of XO Communications Michigan
Listing Trouble Report dated July 6, 2001.

I, Robben Kniffen-Rusu, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is Robben Kniffen-Rusu. My business address is 100 East Big Beaver, Floor 13, Troy, Michigan 48083. I am Director - CLEC Strategy for Ameritech Advertising Services (“AAS” or “Publisher”). I am the same Robben Kniffen-Rusu who sponsored an Affidavit filed with Ameritech Michigan’s Brief in this proceeding before the Michigan Public Service Commission (MPSC) 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, with the following clarification. In paragraph 6 of my May 15th affidavit I stated, “Geographic scope is in turn based on the Ameritech serving exchanges that are selected for inclusion in that specific directory.” Another criterion for inclusion in a directory may be community.

PURPOSE OF REPLY AFFIDAVIT

2. The purpose of this Reply Affidavit is to respond to certain claims made by other parties in their affidavits, testimony or comments submitted in response to Ameritech Michigan’s May 15, 2001 § 271 checklist informational filing with the MPSC in this proceeding. Specifically, I respond to claims made by XO Communications (“XO”) and McLeodUSA (“McLeod”) regarding white page directory listings.
3. In this Reply affidavit I demonstrate that each of XO’s claims are unfounded and inaccurate. Specifically: Ameritech Michigan *does not* incorrectly input 30% of XO’s new or revised

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listings submitted to Ameritech via the ACES software package; all CLECs, including XO, *do* have multiple listing verification tools available to allow them to ensure the accuracy of their end-user customers listings published in Ameritech 's White Page Directories; and the ACES software *does not* disrupt XO's employee's work on a weekly basis. Further, I clarify that the ACES PC-based software is not a full electronic operating support system, but simply a transitional alternative that XO has chosen to implement instead of Ameritech Michigan's LEX or EDI systems or the Publisher's EDI system. Finally, I demonstrate that Ameritech Michigan does fulfill its obligation to provide white page listings to McLeod in support of checklist item (8). In short, Ameritech Michigan satisfies the requirements of checklist item (8).

CHECKLIST ITEM (8) WHITE PAGE DIRECTORY LISTINGS

RESPONSE TO XO's COMMENTS

4. XO and its affiant, Ms. Baldwin, make three allegations regarding Ameritech Michigan's provision of white page listings. Based on these unsupported allegations, XO concludes that Ameritech Michigan "fails to provide white page listings for customers of XO with the same accuracy and reliability that is (sic) provides its own customers," as required by checklist item (8). I demonstrate below that each of these claims is inaccurate; Ameritech meets its obligations to provide white pages listings to XO in accordance with the Act and FCC rules.
5. First, XO claims that Ameritech Michigan does not input 30% of the new or revised listings XO submits to Ameritech via the ACES software package, even though XO receives a confirmation that Ameritech received the request (Baldwin affidavit, paragraph 4). As an initial matter, XO provides no data or evidence to support its claim that Ameritech Michigan

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does not input 30% of the listings XO submits electronically via the Ameritech Customer Entry System or “ACES”. Ameritech Michigan’s directory publishing affiliate, AAS, receives and inputs all listing orders, from Ameritech Michigan and CLECs. AAS’s records show that during the first 6 months of 2001 (Jan-June), AAS accepted, via ACES, ** ** XO Michigan listing transactions. Of these transactions, ** **%, or ** **, updated the WP publishing database completely electronically, within 24 hours, without any manual intervention. AAS manually completed the remaining orders. AAS consistently fine-tunes its processes. These efforts have resulted in significant flow through improvements. Flow through of XO’s electronically accepted ACES Michigan listing transactions increased to ** **% for the four months of March through June 2001. See attachment A for supporting details.

6. Second, XO claims that it is not allowed to view the most current customer record contained in Ameritech Michigan’s listing database, to verify the accuracy of XO’s customer listings (Baldwin affidavit, paragraph 5). That statement is simply wrong. XO has inquiry access to verify its listings via the same tool that AAS provides to other CLECs and to Ameritech Michigan’s wholesale and retail business offices. This tool, called TCListLink, is a website with an easy-to-use graphical user interface (“GUI”). As posted directly on the website listing inquiry screen, AAS states that “The listing information on TC Listing Link is current as of three (3) business days after Ameritech advertising services’ receipt of a correct listing order.” AAS instructs CLECs to submit a Listing Trouble Report to AAS if they find inaccurate listing data on the TCListLink website following the three day update timeframe. From January 1 to July15, 2001, AAS received only one Listing Trouble Report (“LTR”) from XO documenting erroneous Michigan listings on TCListLink. As detailed in the

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timeline provided as Attachment B, the errors associated with the listings documented on this LTR originated with two sequential XO order submission errors. As stated previously in this Reply Affidavit, AAS consistently fine-tunes its processes. Therefore, AAS investigated XO's LTR and identified two new types of errors that could be rejected electronically to CLECs as part of the ACES front-end interface processing. AAS has scheduled an upgrade to the ACES interface for mid-August to incorporate the additional error codes and reject processing.

7. In addition to XO's access to the TCListLink website for listing verification, as stated in my May 15 affidavit, "Prior to the publication of a directory, Ameritech offers CLECs the option of receiving two pre-Business Office Close (pre-BOC) white page verification review reports." XO has had access to at least one pre-BOC report showing its customer's listings prior to each directory close since XO began providing local service in Michigan, and now has access to two pre-BOC reports for each directory. XO has multiple verification options available to ensure its end-user customers receive accurate listings in Ameritech's white pages.
8. Finally, XO claims that the ACES software package it utilizes for submitting listing orders experiences "run time errors" at least three times a week, forcing the XO employee to reboot his/her computer (Baldwin affidavit, paragraph 6). Again, XO's claim is unsupported and contrary to the facts. As described in my May 15 Affidavit, CLECs, including XO, currently have several options for submitting their end user listing information. CLECs may submit their listing updates via Ameritech Michigan's electronic operations support systems: LSR Exchange ("LEX") or EDI. Additionally, switched-based CLECs, including XO, may

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submit end user listing information directly to the Publisher either via the Publisher's EDI interface, using the DSR format based on OBF industry standards, or via fax by submitting the Manual Listing Input Form to the Publisher's Listing Services centers. Finally, XO, and some other CLECs, have chosen to implement a PC-based software package offered by AAS. This software, called Ameritech Customer Entry System or "ACES", is designed to be a manual data entry system that can be used as an alternative to faxing hand written listing updates prior to the CLEC's implementation of one of the above described electronic operations support systems. The ACES PC software offered by AAS is not meant to be a full electronic operating support system. Although the software has won national industry awards for innovation, it is intended to be a transitional alternative a CLEC can choose to use until it is prepared to implement Ameritech Michigan's LEX or EDI systems or the Publisher's EDI system.

9. In her affidavit, Ms. Baldwin (paragraph 6) claims that XO is experiencing run time errors while using ACES "at least three times per week." This statement contrasts sharply with the evidence. From January 1 to June 30, 2001, AAS received only two notices of claimed run-time errors from XO. AAS expeditiously resolved both errors. The second error, reported in April, was determined to be the result of a training issue, and AAS referred the XO representative to the ACES training material for the correct processing information.

RESPONSE TO MCLEODUSA COMMENTS

10. McLeodUSA, Inc. ("McLeod") and its affiant Ms. Harding (paragraph 4) claim that while negotiating SBC's proposed 13-state interconnection agreement, SBC refused to commit to publish white page directory listings for McLeod's customers, directing McLeod to deal

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with SBC's publishing company, Dontec (sic). McLeod concludes that SBC has failed to provide white page directory listings for McLeod USA customers and is in violation of checklist item (8), because McLeod is required to negotiate its white page directory agreement with the publisher of the white pages

11. First, Ms. Harding acknowledges in her affidavit that McLeod's current interconnection agreement with Ameritech Michigan provides for white page directory listing (paragraph 4). The basis for McLeod's claim that Ameritech Michigan is not complying with checklist item (8) is that SBC refused to negotiate the inclusion of white page listing services in a proposed 13 state interconnection agreement, referring McLeod to "SBC's publishing company Dontec (sic) (Harding Affidavit paragraph 4)." On this point, Ms. Harding is mistaken or confused. DonTech is not and never has been "SBC's publishing company." DonTech is a yellow pages advertising sales entity operating in Illinois, not Michigan.
12. Second, Ameritech Michigan does not publish the white page directories that include listings for McLeod's customers. As has been the case since 1994, Ameritech Michigan's directory publishing affiliate, AAS, publishes the white page directories on behalf of Ameritech Michigan. Since 1998, McLeod and AAS have been parties to a directory agreement in Michigan. As a result of this successful contract negotiation there are over ** ** listings of McLeod customers in AAS' white page publishing database as of June 30, 2001. AAS publishes McLeod listings in 43 different Ameritech white page directory titles across the state of Michigan. Further, McLeod, like all other CLECs, receives all of the other white page directory services described in my Affidavit, filed May 15, 2001. These facts

demonstrate that McLeod's customer's white page listings are in Ameritech white page directories as required by checklist item (8).

13. In fact, McLeod does not allege that it has not been able to place its customer's listings in the white page directories published by AAS. Rather it appears to prefer to negotiate with Ameritech Michigan, rather than AAS, the publisher. This request seems odd. AAS as the white page directory publisher is an appropriate Ameritech affiliate to negotiate the terms and conditions relating the publication of those white page directories. This arrangement is not unique to Ameritech. McLeod also publishes white page directories in Michigan. The publisher of those white page directories is McLeodUSA Publishing Company, an affiliate of McLeodUSA Telecommunications Services, Inc., a telecommunications carrier. The McLeod publishing affiliate, rather than its telephone operations, makes the arrangements to obtain and publish listings in its directories. AAS is no different.

CONCLUSION

14. As demonstrated in my Affidavit, filed May 15, 2001, and in this Reply Affidavit, Ameritech Michigan satisfies the requirements of checklist item (8) because it: (1) provides nondiscriminatory appearance and integration of white page directory listings to competitive LECs' customers; and (2) provides white page listings for competitors' customers with the same accuracy and reliability that it provides its own customers.

This concludes my reply affidavit.