

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
JEFFREY A. MONDON
ON BEHALF OF
AMERITECH MICHIGAN

DATED: JULY 30, 2001

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

INTRODUCTION

1. My name is Jeffrey A. Mondon. My business address is 2600 Camino Ramon, Room 2S650BB, San Ramon, California. I am Area Manager - Network Regulatory - Numbering. I am the same Jeffrey A. Mondon who sponsored two Affidavits filed with Ameritech Michigan's Brief in this proceeding on May 15, 2001; one addressing number portability and one addressing number administration. 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 affidavits 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 only claim regarding local number portability made by a single party in its affidavit, and comments submitted in response to Ameritech's May 15, 2001 § 271 Checklist Informational Filing with the MPSC in this proceeding. This is the only allegation of non-compliance with checklist item (xi), and as shown below, it is totally unfounded and should be given no weight.

CHECKLIST ITEM (xi) LOCAL NUMBER PORTABILITY

3. MichTel, Inc. ("MichTel"), through its affiant Mr. Olsen, claim that it has been their experience, that in practice Ameritech is unable to provide local number portability involving local loops. More specifically, Mr. Olsen references an attempt to have his home

residential telephone numbers, 248-478-4301 and 248-478-4302, ported from Ameritech to MichTel (see Comments of MichTel at page7-9 and the Olsen affidavit), and that Ameritech refused to do so. Mr. Olsen further claims that Ameritech has insisted that MichTel first install a new loop to the customer demarcation point and that then, Ameritech would port the number to the new loop. Mr. Olsen also claims that "Ameritech customer service agents have been unable to provide any explanation for their inability to provide local number portability to MichTel over existing loop service."

4. These claims are wrong. Ameritech continues to meet its obligations to provide local number portability when appropriate port requesting procedures are followed. Proper implementation of these procedures, as discussed at ¶24 of my May 15 Affidavit, are required of all CLECs initiating a local number portability request:

"To initiate a Number Portability request, a service provider will issue a Local Service Request ("LSR") to Ameritech to port out the number(s). Once Ameritech's Unbundling Service Center receives the LSR, it is processed and a firm order confirmation ("FOC") is returned to the requesting service provider, generally within 24 hours. After the service provider receives the FOC, it must input a create message to the Number Portability Administration Center ("NPAC") indicating its intent to port the telephone numbers ("TNs"). Ameritech will also create a matching message concurring with the service provider's intent to port the TN(s). Once these steps have been completed, the requesting service provider may activate the ported Telephone Number (TN) on the due date. The NPAC SMS will then broadcast the TN(s) with the associated LNP routing information to all of the LNP capable service providers' Local Service Management Systems ("LSMS")."¹

5. In the instance commented on by Mr. Olsen in his Affidavit, the above procedure was not followed. Specifically, Ameritech received a request from MichTel to port only one of Mr. Olsen's telephone numbers, 248-478-4301. Ameritech has no record of any request to port

¹ Mondon LNP Affidavit ¶24

the other number, 248-478-4302. Ameritech's records demonstrate that a request to port 248-478-4301 was submitted electronically via Electronic Data Interchange ("EDI") on May 7, 2001 and was rejected by up front system edits because of invalid or missing information. By way of example, one of the reasons the request was rejected was for an invalid Network Channel Interface ("NCI") code. This code is one of many required fields that must be provided by the requesting service provider, in this case MichTel, when submitting a request to port a telephone number. The NCI code has alphanumeric edits and if it is not filled out correctly the request will be rejected by the system before the request reaches a service representative. MichTel submitted their initial request on May 7, 2001. The request was rejected by the system within minutes of being submitted. Subsequent to the request being rejected, a message was sent back to MichTel indicating the reasons for rejection. On June 29, 2001, MichTel resubmitted its request to port 248-478-4301 and again it was rejected by the system for invalid or missing information. Again, upon the request being rejected, a message was sent back to MichTel indicating the rejection reasons.

6. MichTel's claim that Ameritech insists that a new loop be installed before Ameritech will port a TN is simply wrong. Ameritech does not require the installation of a new loop for a telephone number to be ported. In the instance referenced by Mr. Olson, MichTel stated it was requesting to port with loop by indicating "BB" in the Req. Type field on the request form. The "BB" designation means port with loop. If MichTel's intent was to port only the telephone number they should have coded the Req. Type field on the request form as "CB," not BB. The "CB" designation means port number. These designation codes are pursuant to industry standard.

7. Also, it should be noted that on May 17, 2001, a representative from MichTel contacted their Ameritech Account Manager for general assistance in processing LNP request orders. The Account Manager had one of our Customer Care and Service Managers work with the MichTel representative by answering questions as well as guide them to our website "CLEC On Line", which has a help function that contains information on processing requests. Moreover, if additional training is required, Ameritech does offer training to CLECs, however, a request to initiate training must come from the CLEC.
8. The claim that Ameritech's customer service agents could not provide an explanation on providing local number portability to MichTel over existing loops may have been the result of a simple misunderstanding. Depending on how the question may have been presented, there is a possibility that the Ameritech representative may have understandably misunderstood MichTel's question given that the request MichTel submitted stated "port with loop."

CONCLUSION

9. As demonstrated in this Reply Affidavit, the claims of MichTel fail to demonstrate any noncompliance with the requirement of checklist item (xi). As demonstrated in my May 15 affidavit, Ameritech Michigan satisfies the § 271 checklist items pertaining to providing local number portability.