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July 30, 2001

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-12320

Dear Ms. Wideman:

Enclosed for filing, please find the original and 15 copies of the Reply Comments of The Competitive Local Exchange Carriers Association of Michigan, Its Members, Long Distance of Michigan, Inc., and The Association of Communication Enterprises to Ameritech Michigan's Checklist Informational Filing in the above-captioned proceeding. Proof of Service upon the parties of record is also enclosed. Thank you.

Sincerely,

CLARK HILL PLC



Leland R. Rosier

LRR/kag

Enclosures

cc: Parties of Record

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17712/081471

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) Case No. U-12320
the Federal Telecommunications Act of 1996.)
_____)

**REPLY COMMENTS OF THE COMPETITIVE LOCAL EXCHANGE CARRIERS
ASSOCIATION OF MICHIGAN, ITS MEMBERS, LONG DISTANCE OF MICHIGAN,
INC., AND THE ASSOCIATION OF COMMUNICATION ENTERPRISES TO
AMERITECH MICHIGAN'S CHECKLIST INFORMATIONAL FILING**

On May 9, 2001, Ameritech Michigan filed its Notice of Intent to submit a Section 271 application to the FCC no sooner than the fourth quarter of 2001, and proposed a filing by Ameritech of a Checklist Informational Filing with a public comment period to follow with regard to whether Ameritech has met the checklist requirements subject to successful OSS testing. On May 15, 2001, pursuant to Ameritech's request in the Notice of Intent and to a response to the Notice of Intent filed by several CLECs, the Commission issued an Opinion and Order establishing a filing schedule, with comments to the Checklist Informational Filing due 45 days after filing, and response comments due 30 days after the initial comments.

Ameritech filed its Checklist Informational Filing on May 15, 2001. Ameritech's filing took the form of a proposed brief it would intend to file at the FCC, supported by proposed affidavits that were unsigned because they are not in final form. Ameritech indicated the proposed affidavits were "in substantially the form that Ameritech intends to subsequently file them at the FCC."

Initial comments to Ameritech's Checklist Informational Filing were filed on June 29, 2001 by: (1) the Competitive Local Exchange Carriers Association of Michigan, Long Distance of Michigan, Inc. ("LDMI"), and the Association of Communication Enterprises ("ASCENT"). (Collectively "CLECA" unless specific members are referenced as to specific statements.); (2) WorldCom; (3) AT&T Communications and TCG (collectively "AT&T"); (4) McLeodUSA; (5) XO Communications; (6) MichTel; (7) the Attorney General; (8) Michigan Pay Telephone Association; (9) Michigan Consumer Federation; (10) Z-Tel; (11) Sprint; and (12) the Michigan Cable Television Association.

Consistent with the Commission's May 15, 2001 Order, these Reply Comments are addressed to portions of the twelve sets of comments filed on June 29, 2001.

COMMENTS

After review of the initial comments, CLECA's position remains that the Commission should deny Ameritech's request for early checklist approval, and deny Section 271 approval entirely. The initial comments only amplify the positions taken in CLECA's initial comments.

In addition to denying Section 271 approval, the initial comments also demonstrate the need for the other key concept of CLECA's initial comments: the Commission must also take affirmative action to force Ameritech to eliminate Ameritech's continued unlawful behavior and anti-competitive acts. The Commission must take action *now* to order the illegal and anti-competitive actions to cease immediately. Competition is being thwarted in Michigan by Ameritech. The Commission must take action now, to assure the promise of true competition and fairness for Michigan consumers and business customers – competitive actions for which the Commission is charged to provide under Michigan law, and which the Commission has committed to provide to Michigan citizens.

CLECA's reply comments fit into two categories. First, CLECA will point out that it and its members are not alone in comments as to specific shortcomings by Ameritech. It is important for the Commission to note that problems reported from multiple sources tend to show a pattern of behavior contrary to Ameritech's claims as to the checklist. In other words, where there's smoke, there's fire. Second, CLECA will point out that where comments of other parties go to areas not addressed by CLECA's comments, often those comments are complementary to CLECA's comments.

1. CLECA'S COMMENTS ARE SUPPORTED BY COMMENTS OF OTHER PARTIES

A. Ameritech's Filing Is Premature

CLECA pointed out in its initial comments that it is premature for the Commission to, in essence, validate compliance with the checklist based on affidavits and without testing. CLECA is not alone in this concern. The Attorney General went so far as to determine that even comments on the subject were premature as the Attorney General at this point had only Ameritech's opinions and no test results on which to base an opinion. The Attorney General went on to indicate that comments on the public interest could not be made without an adequate history of satisfactory performance measures being met, and not just in the aggregate.

Sprint also expressly points out that Ameritech's procedure is backwards, stating that a contemporaneous, successful OSS testing and performance measure review is necessary, and that review of the checklist without this information will not give the Commission valid information with which to make an informed decision on the checklist.

AT&T also points out that the Checklist Informational Filing is premature and inadequate. WorldCom goes a step further, pointing out that the procedure is improper under

this Commission's orders and comparing it to approving a car on inspection without starting it or even taking a test drive.

All of these comments support CLECA's position. The point is that Ameritech is seeking conditional approval of something that can only be approved after it has been used in the field. It does no good, for example, for interconnection services to be available on paper in an interconnection agreement. The service must be available in actual practice, and Ameritech must demonstrate an ability to work with CLECs to make those services work in practice. Ameritech is seeking a paper approval made in a vacuum. That is simply not appropriate, and the Commission should give great weight not only to CLECA's concerns on this point, but to the concerns expressed in the comments of other parties as well.

B. Nondiscriminatory Access to Network Elements

In its initial comments, CLECA set forth numerous indications that Ameritech is not providing nondiscriminatory access to network elements pursuant to Checklist Item 2. These indications related to quality of service problems, the failure to provide UNE Combinations, and discriminatory behavior. These indications were set forth using a CLECA member's, LDMI's, experiences.

Quality of Service

Filings by other parties bolster the comments made by CLECA. McLeodUSA, MichTel, XO, and Z-Tel, for example, detail several quality of service concerns. Michigan Cable Television Association also refers to a pattern of missed deadlines and nonfulfilled orders that result in delays and inhibited deployment of services. Such matters include: delays by Ameritech in provisioning and repairs, denial of new customer orders under UNE Platform, service problems that cause customers to revert back to Ameritech (sometimes because they are

incorrectly told the problem lies with the CLEC when it actually lies with Ameritech), failure to meet firm order commitments (or changing or even canceling the commitments), consistently providing faster service to Ameritech's retail customers than to CLECs, inadequately provisioned unbundled local loops, inadequate support on processing orders, inadequate billing to UNE-P providers, inaccurate or unavailable line loss reports, errors in processing orders, and unlawful termination of CLEC customers. XO, in fact, points out that Ameritech meets repair and maintenance commitments only 60% of the time, and only 10% of the time on T1 lines. WorldCom reports on yet another new reason for disconnections called "work in the way." WorldCom will send an order to change a feature, and Ameritech will send back a notice that the customer will be disconnected absent an order not to disconnect the customer, a process that has resulted in wrongful disconnections.

Nondiscriminatory access to network elements cannot happen until the quality of service by Ameritech has improved dramatically over what present evidence indicates. CLECA made that point in its comments, and the comments of other parties underlines the point.

UNE Combinations

CLECA's initial comments explained how Ameritech has unduly limited UNE combinations under tariff, how Ameritech has unilaterally refused to comply with this Commission's clarified "usually combined" standard for existing combinations and reverted to the "connected through" standard this Commission specifically rejected, that certain switch features such as voice mail are not allowed with UNE combinations, and numerous problems with the implementation of UNE combinations.

Again, the comments of other parties support CLECA's contentions. MichTel details refusals of Ameritech to provide UNE-P. Z-Tel reports incorrect billing to UNE-P providers and

provides another example – Privacy Manager – of a switch feature available to Ameritech customers that is not available through UNE-P. Indeed, Z-Tel reports that Ameritech uses that very unavailability under UNE-P to target UNE-P customers to its Winback program by promising that Ameritech only can provide the service. WorldCom identifies call control and talking call waiting in addition to Privacy Manager as switch features not available under UNE combinations.

In addition, AT&T, at page 22 of its comments, also supports CLECA's point regarding the flow through of CLEC orders through Ameritech OSS without manual intervention. CLECA pointed out that these orders are not currently flowing through. AT&T supports CLECA's observation, and also concludes that flowing through of orders is an absolute necessity. AT&T also points out its own difficulties with access to UNE combinations and shared transport at pages 30-31 of its comments and in Ms. Massura's affidavit, with difficulties different from, but entirely consistent with, the problems outlined by other CLECs. WorldCom, at pages 21-22 of its comments, also supports CLECA's point regarding the flow through problem, and establishes that Ameritech does not even count these properly because it exempts contract orders. This nonsense, which is completely consistent with CLECA's observations, must stop.

WorldCom, in a manner similar to CLECA, addresses Ameritech's failure to provide UNE combinations under the ordinarily combined standard. WorldCom goes on to establish that New York, Wisconsin, Ohio, Georgia, and Indiana commissions all require new or ordinarily combined combinations, and that Illinois now requires them by statute (p. 7).

Ameritech has delayed effective competition through UNE combinations long enough. A successful track record of offering effective UNE combinations through the ordinarily combined standard should be an absolute prerequisite to a favorable Section 271 recommendation.

Discriminatory Activities

CLECA's comments set forth numerous examples of discriminatory activities taken against CLECs by Ameritech, such as forcing the use of expensive special access where an EEL could be provided, and use of various long term contract gimmicks to tie up competition before the CLEC can offer service. Nothing in the comments of other parties suggests that these are in any way isolated incidents.

McLeodUSA cites several examples of discriminatory behavior, including refusing purchases from the ULS and ULT tariffs, improper special construction charges, failure to make a remedy plan available, needless conversions to resale prior to a second conversion to UNE-P, refusing white page listings in the interconnection agreement, and limiting CLEC access to collocation. MichTel adds that Ameritech refuses to pay reciprocal compensation correctly, and that Ameritech is not providing local number portability or UNE combinations as required.

The reports of other CLECs bolster the discrimination claims made by CLECA. These activities must stop before the Commission recommends Section 271 approval.

Public Interest

CLECA's initial comments as to the public interest issues focused on Ameritech's wrongheaded attempt to equate the public interest in another long distance provider, Ameritech, with the public interest in having open and thriving local service competition. CLECA was not alone in this concern either. Customers of Ameritech's various services also saw through Ameritech's sleight of hand. The Michigan Consumer Federation correctly points out the recent decline in the number of CLECs and the declining service quality from Ameritech, and that Ameritech has been raising rates for local service, an action consistent with a monopoly and not with emerging competition. The Michigan Pay Telephone Association establishes that its

member businesses have numerous alternatives for long distance service now, and that what is needed is more local competition. Only when local competition is opened up should the perceived need for another long distance competitor be considered. It is local service competition that is lacking in this state, and granting premature approval to Ameritech to enter the long distance market will not address that lack.

2. COMMENTS OF OTHER PARTIES COMPLEMENT CLECA'S COMMENTS

A. OSS Systems

AT&T, in its comments, at pages 18-25 and in the affidavits of Ms. Samonek and Ms. DeYoung, go into great detail about Ameritech's deficient OSS systems. AT&T points out that Ameritech's OSS is basically unchanged since its 1997 application to the FCC, which was rejected, and that Ameritech's support on OSS does not provide facts on which to judge whether the OSS system actually works in practice. AT&T describes an example of how Ameritech only haphazardly implemented its March 2001 electronic interface, and how CLECs were not given the information necessary to prepare to take advantage of the release and followed few if any of the timeframes for implementing the release. CLECs must have certain requests handled manually, while Ameritech's service to a retail customer can be handled electronically.

Ms. DeYoung also points out that the Ameritech OSS is not comparable to the OSS in states where SBC has obtained Section 271 approval, that it is deteriorating and markedly inferior to the OSS in those states. Ms. Moore sets out Ameritech's inadequate implementation of the performance measurements agreed to in the collaborative.

WorldCom also points to systemic OSS flaws, including missing service order completion notices, at pages 11-21 of its comments.

These OSS flaws are very similar to (and in some cases identical to), and complementary to, the provisioning and quality of service problems set forth by CLECA. Nondiscriminatory access to network elements cannot happen until these OSS flaws, as well as the quality of service flaws identified by CLECA, have improved dramatically over what present evidence indicates.

B. UNE Loops

CLECA's initial comments detailed at length Ameritech's failures and incompetence in providing UNE combinations, both on a policy basis and on an implementation basis. Based on other comments in this case, Ameritech's shortcomings are not limited to UNE combinations but are common to UNE loops as well.

At pages 26-30 and in the affidavit of Mr. Van de Water, AT&T details how Ameritech has failed to meet commitments to implement enhancements to its processes for provisioning UNE loops. These enhancements included faster notice as to where additional facilities modification is necessary to provide a loop, conducting of end-to-end testing, and to provide "non-coordinated" a/k/a "frame due time" hot cuts to CLECs. AT&T points out that Ameritech has not implemented these changes or that changes have been delayed, making it impossible to determine if Ameritech is in practice providing access to UNE loops.

WorldCom, beginning at page 37 of its comments, details its own problems with UNE loop provisioning. These problems consist primarily of an inordinate number of past due orders and the extreme lengths of time in processing orders.

The common thread here is the anticompetitive effect of the failure to provision UNE loops, just as the failure to offer UNE combinations has an anticompetitive effect. The Commission should require Ameritech to correct both problems before it considers a favorable Section 271 recommendation.

C. OS/DA Pricing

WorldCom, at page 31 of its comments, establishes that Ameritech is violating the Commission's order in Case U-12622 to provide OS/DA at TSLRIC rates. In fact, WorldCom reports that additional charges not addressed by the Commission have been added in Ameritech's tariffs.

This is entirely consistent with Ameritech's cavalier disregard to the law set forth in CLECA's own comments with regard to UNE-P and ordinarily combined UNE combinations. Regardless of the positions of parties on how OS/DA should be priced (and there are different views), once the Commission has spoken, Ameritech should obey. Ameritech's behavior, unfortunately, is all too consistent in flaunting Commission orders. The Commission should take this into consideration before even considering recommending Section 271 approval.

D. Special Access

Beginning at page 39 of its comments, WorldCom addresses several problems with Ameritech's provisioning of special access arrangements. WorldCom reports that Ameritech's provision of special access is substandard, with long waits for service, and extremely poor percent on time performance. WorldCom recommends that Ameritech be directed to dramatically improve its special access performance and cease all anticompetitive activity, with minimal standard set by the Commission along with an audit procedure.

CLECA also addressed special access in terms of its outlandish pricing in light of the similar functions of EELs, which Ameritech will only make available in a special access conversion or as part of the Mi2A. WorldCom's critique of Ameritech's special access also raises similar deficiencies, and CLECA thereby endorses WorldCom's proposals regarding special access, at least where special access is used in conjunction with offering local service.

E. Structural Separation

At pages 32-36 of its comments, AT&T concludes by recommending that the Commission require Ameritech to structurally separate its wholesale and retail operations prior to a favorable Section 271 recommendation.

This recommendation is consistent with everything stated in CLECA's comments. CLECA has set forth numerous references to Ameritech's abysmal quality of service, its refusal to provide UNE combinations and to intentionally leave out switch features so that end user services using UNE combinations will be less competitive. CLECA has also pointed out discriminatory and anticompetitive behavior by Ameritech.

As Mr. Gillan points out in his affidavit, the magnitude of such problems grow "exponentially when the entity whose responsibility it is to implement nondiscriminatory access is itself the sole beneficiary of the exclusive access that exists today." Mr. Gillan affidavit, at ¶ 15. Ameritech alone benefits from the problems with OSS, with UNE-P, and with the discriminatory acts. Ameritech causes the problems and then reaps the benefits. There is no real incentive for Ameritech to change so long as it can benefit from its current behavior. Only if the Ameritech retail division must meet the same obstacles will the Ameritech wholesale division have an incentive to treat the CLECs fairly. Consequently, CLECA endorses the structural separation proposal set forth by AT&T.

RELIEF

The initial comments contradict the rosy picture of local competition that Ameritech seeks to show by its Checklist Informational Filing. The Commission has heard from CLECs large and small, through the filings of CLECA, AT&T, WorldCom, McLeodUSA, XO, Z-Tel, MichTel, and Sprint. The Commission has heard from the cable providers. The Commission has heard from consumers (the Michigan Consumer Federation), and from small business end users (Michigan Pay Telephone Association).

All of the commenting parties have clear points to make, and those points are not flattering to Ameritech. Clearly, Ameritech has utterly failed to show that it has met the checklist requirements. Indeed, the conclusion to be reached from these damning comments is that Ameritech should be investigated further on several issues (as recommended by WorldCom) and that structural separation appears to be required before Ameritech can meet the checklist requirements (as recommended by AT&T).

The Commission should not limit itself, however, to merely finding that Ameritech has not met the checklist requirements. CLECA's comments, and the comments of other parties, have established a pattern of behavior by Ameritech to thwart competition in local exchange service. The Commission, therefore, in addition to denying Section 271 approval, must take affirmative action to force Ameritech to eliminate the unlawful behavior and anti-competitive acts described in the various comments. The Commission must take action *now* to order the illegal and anti-competitive actions to cease immediately. The Commission must take action

now, to assure the promise of true competition and fairness for Michigan consumers and business customers – competitive actions for which the Commission is charged to provide under Michigan law, and which the Commission has committed to provide to Michigan citizens.

Respectfully submitted,



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Dated: July 30, 2001

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter, on the Commission's Own Motion,)
to Consider Ameritech Michigan's Compliance) MPSC Case No. U-12320
with the Competitive Checklist in Section 271 of)
the Federal Telecommunications Act of 1996.)
_____)

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF INGHAM)

Kristi A. Grieve, being duly sworn, deposes and says that she is an employee of Clark Hill P.L.C., and that on July 30, 2001, a copy of the Reply Comments of The Competitive Local Exchange Carriers Association of Michigan, Its Members, Long Distance of Michigan, Inc., and The Association of Communication Enterprises to Ameritech Michigan's Checklist Informational Filing was served upon:

See attached service list

Service was accomplished by depositing same in a regular United States Postal Service mail depository, enclosed in envelopes bearing postage fully prepaid and addressed properly and via electronic mail.

Kristi A. Grieve
Kristi A. Grieve

Subscribed and sworn to before me
this 30th day of July, 2001.

Donna Gutoskey, Notary Public
Ingham County, Michigan
My Commission Expires: September 29, 2001

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U-12320**

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