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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

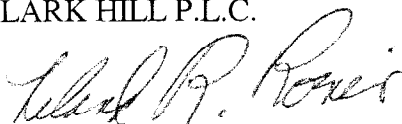
Re: MPSC Case No. U-12320

Dear Ms. Wideman:

Enclosed for filing please find the original and 15 copies of McLeodUSA Telecommunications Services, Inc.'s Reply Comments in the above-entitled matter. Proof of Service upon the parties of record is also enclosed.

Sincerely

CLARK HILL P.L.C.



Leland R. Rosier

LRR/dg

Enclosures

cc: Parties of Record

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of on the Commission's own motion,)
to consider Ameritech Michigan's compliance with) CC Docket No. U-12320
the competitive checklist in Section 271 of the)
Federal Telecommunications Act of 1996.)
_____)

REPLY COMMENTS OF MCLEODUSA

McLeodUSA Telecommunications Service Inc. ("McLeodUSA") submits these Reply Comments concerning the Application by SBC Communications, Inc., Ameritech Michigan, and Ameritech Long Distance (collectively "SBC" or "Ameritech") for Provision of In-Region, InterLATA Services in Michigan, which Ameritech has styled as a "Checklist Informational Filing" ("Application").

Since McLeodUSA filed its Comments concerning SBC's Application on June 29, 2001 ("Comments"), McLeodUSA has experienced no improvement in SBC's performance with respect to the numerous issues and problems that McLeodUSA has experienced with SBC in Michigan. The numerous comments filed by other parties to this case, which not only echo, but significantly add to, the problems encountered by McLeodUSA with SBC in Michigan, greatly reinforces McLeodUSA's position that the Commission should deny SBC's request for early checklist approval, and that SBC's Application be denied in its entirety.

The comments filed by other competitive carriers in this proceeding, indicates that many other competitors have experienced problems with SBC similar to those experienced by McLeodUSA, and demonstrates that SBC has engaged in a systematic pattern of anti-

competitive conduct that has thwarted competition and denied consumers competitive choices in Michigan. As a result, SBC should hardly be rewarded the brass ring of 271 approval for its anti-competitive efforts. The comments submitted in this proceeding by both big and small carriers alike paint a grave picture of the state of the competitive telecommunications environment in Michigan.

McLeodUSA agrees with the Competitive Local Exchange Carriers Association of Michigan ("CLECA"), that the comments submitted by various parties do more than just demonstrate that SBC's present Application be denied: the comments demonstrate the immediate need that "the Commission must also take affirmative action to force Ameritech to eliminate Ameritech's continued unlawful behavior and anti-competitive acts."¹

If SBC's inadequate service quality levels and discriminatory and anti-competitive behavior cannot be overcome through a functional separation of SBC's wholesale and retail operations, and McLeodUSA has seen no indication yet from SBC that this may happen, then McLeodUSA fully supports structurally separating SBC's retail and wholesale operations, as called for by AT&T in its comments.²

McLeodUSA also strongly agrees with the many other parties, notably CLECA, AT&T, Sprint and the Attorney General of Michigan, who have all commented on the premature nature of SBC's Application, both substantively and procedurally. SBC has essentially asked this Commission to recommend that its Application be approved without the benefit of testing. As Sprint notes, it is necessary that an adequate test of SBC's operational support systems ("OSS")

¹ CLECA Reply Comments, p. 2. McLeodUSA has reviewed CLECA's Reply Comments and generally supports and concurs with same.

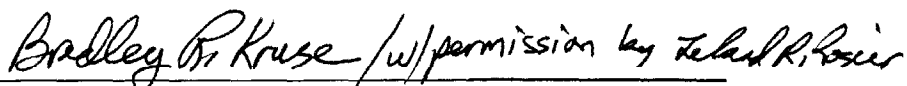
² AT&T Comments, pp. 32-36.

and an adequate performance measure review take place before an evaluation on SBC's Application can be made. Otherwise there is not enough information to adequately evaluate checklist compliance.

The comments submitted in this proceeding to date underscore the need for SBC's actual real world performance be tested and evaluated. As CLECA suggests: "It does no good, for example, for interconnection services to be available on paper in an interconnection agreement. The services must be made available in actual practice, and Ameritech must demonstrate an ability to work with CLECs to make those services work in practice."³

Thus, for the reasons stated above and in its Comments, McLeodUSA respectfully requests that the Commission deny SBC's Application or, in the alternative, that the Commission withhold approval of SBC's Application until SBC is in compliance with the Competitive Checklist and is able to demonstrate that its provision of interLATA service is in accordance with the public interest.

Respectfully submitted,


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³ CLECA, Reply Comments, p. 4.
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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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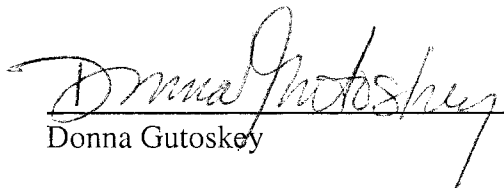
CC Docket No. U-12320

STATE OF MICHIGAN)
)ss
COUNTY OF MICHIGAN)

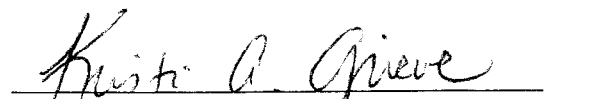
Donna Gutoskey, being first duly sworn, deposes and says that she is an employee of Clark Hill PLC and that on July 30, 2001, a copy of the Reply Comments of McLeodUSA was served upon:

See attached service list

Except as otherwise noted on the attached list, service was accomplished by depositing same in a regular mail depository, enclosed in envelopes bearing postage fully prepaid and addressed properly and via electronic mail.


Donna Gutoskey

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



Kristi A. Grieve, Notary Public
Ingham County, Michigan
My Commission Expires: November 12, 2004

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U-12320**

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