

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 ) MPSC CASE NO. U-12320
of the federal Telecommunications Act of )
1996.

AFFIDAVIT OF
JOANNE C. SAMONEK

STATE OF ILLINOIS )
) s.s.
COUNTY OF COOK )

The undersigned, being of lawful age and duly sworn on oath, hereby certifies,
deposes and states the following:

I have caused to be prepared the attached written testimony in support of AT&T
Communications of Michigan, Inc. in the above referenced docket. This
testimony is true and correct to the best of my knowledge, information, and belief.

Further Affiant sayeth not.

Handwritten signature of Joanne C. Samonek
Joanne C. Samonek, Affiant

Subscribed and Sworn to before me
this 26th day of June, 2001.

Handwritten signature of Margaret M. Plucinsky
Notary Public



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**AFFIDAVIT OF JOANNE SAMONEK**

**ON BEHALF OF**

**AT&T COMMUNICATIONS OF MICHIGAN, INC. AND TCG DETROIT**

**JUNE 29, 2001**

## **I. Introduction and Summary**

1. My name is Joanne Samonek. My business address is 222 West Adams, Suite 1100, Chicago, Illinois 60606. I am providing this affidavit in this matter on behalf of AT&T Communications of Michigan, Inc. and TCG Detroit, which I collectively refer to as “AT&T.”

2. I am employed by AT&T as District Manager for the Southwestern/Pacific/Ameritech region of the Local Services and Access Management Organization. In that role, I am responsible for the development of Operational Support System (“OSS”) processes and business functions between AT&T and Ameritech; I am also responsible for long-term OSS planning. My role is to negotiate acceptable OSS interfaces, acting as a liaison between AT&T internal user groups and Ameritech. In order to facilitate AT&T’s ability to provide local service, I manage projects related to the implementation of systems interfaces between AT&T and Ameritech.

3. I have a total of nineteen years of experience in the telecommunications industry. Prior to joining AT&T in 1999, I was employed by MCI Telecommunications Corporation (“MCI”) in positions of increasing responsibility, including Network Planner, Regional Access Service Manager, Senior Manager of Carrier Management, Chicago Branch Service Manager, and Senior Manager of OSS. I have a Bachelor’s of Science degree from the University of Michigan.

4. I have also been an AT&T representative in the regional OSS collaboratives that began in October of 1999, following the completion of the SBC/Ameritech merger.

5. The purpose of my affidavit is to address, in a preliminary way, significant problems and concerns relating to Ameritech's Operational Support Systems ("OSS") that have been identified to date. As the Commission is aware, adequate OSS are crucial to the ability of competitive local exchange carriers ("CLECs") to enter the local market, because they are the systems that are used by Ameritech Michigan – and that must be accessed by CLECs – for preordering, ordering, provisioning, maintenance, and billing with respect to CLEC customer orders. Generally, I will respond to the following Ameritech representatives on the indicated topics: Mr. Mark Cottrell (access to electronic OSS generally), Justin W. Brown (local services center and local operations center), Denise Kagan (billing), Ms. Robben Kniffen-Rusu (white pages directory listings), and Mary Pat Regan (account management).

6. To summarize my testimony: Ameritech's representatives have provided this Commission with statements that are laced with generalities if not platitudes concerning its OSS capabilities. Ameritech has failed, however, to provide the Commission with factual information or data on which the Commission could make judgments on whether it is actually meeting its OSS obligations. Instead of rushing to make some ill-defined preliminary evaluation of Ameritech' OSS, the Commission should allow the processes it has put in place (e.g., third-party testing, performance reporting and evaluation) as well as actual CLEC commercial experience to proceed so that it will have access to the facts necessary to reach informed conclusions on the state of Ameritech's OSS.

7. In fact, third-party testing is just now commencing. Ameritech's performance measures have yet to be audited, and Ameritech has not begun to produce

the three months of performance data that the Commission has required. No CLEC, as I will discuss, has yet to use Ameritech's vaunted March 2001 electronic interface release given the problems with Ameritech's change management handling of that release. It is only through testing and real world experience that the parties will be in a position even to say what the real issues are. In fact, as highlighted below, AT&T has just begun its own market entry trial with Ameritech, and that process has already identified fatal problems with Ameritech's March 2001 electronic pre-ordering and ordering release that will have to be remedied. In the circumstances, the Commission should refrain from engaging in provisional or preliminary evaluations of Ameritech's OSS and instead should wait until reliable factual information becomes available.

8. Finally, there are other problems with the way Ameritech's systems are "designed" that must be corrected prior to any ultimate 271 approval. Perhaps the most significant concerns Ameritech's process for providing CLECs access to directory listings. That process, which requires facilities-based CLECs and UNE-loop based CLECs to use a separate interface, is fraught with inefficient manual processes and is blatantly discriminatory (Ameritech's retail operations are not similarly encumbered). It is a recipe for disaster, especially with increased order volumes endemic to a truly competitive market. This problem, which CLECs have been raising since the outset of the collaboratives, must be addressed and resolved.

9. Generally, my testimony is structured as follows:

- In Section II, I describe how critical OSS are to market entry.
- In Section III, I point out that Ameritech has provided the Commission with no evidence whatsoever that its OSS perform as described in its extremely general

witness statements. I also describe why it is so important for the Commission to first be provided empirical information concerning the performance of Ameritech's OSS before it makes any determinations concerning them.

- In Section IV, I briefly provide the Commission a summary of AT&T's Market Entry Trial, which will provide important real-world commercial experience prior to AT&T's entry into the Michigan local residential market via UNE-P.
- In Section V, I explain that Ameritech's March 2001 release and implementation of the so-called A-AA enhancements are a giant leap forward for Ameritech, whose OSS have remained stagnant and behind industry standards since 1997. The significant leap these enhancements represent should lead the Commission to tread carefully as it evaluates their performance.
- In Section VI, I provide the Commission factual evidence concerning the haphazard manner in which Ameritech implemented its March 2001 release. The lack of any identifiable change management process to this release made it impossible for CLECs to be ready to take advantage of it at the time of its release, or even today. Certainly, Ameritech has not shown that it follows a well-defined change management process, as it must.
- In Section VII, I describe the significant problems AT&T has encountered thus far in its early attempts to begin use of the March 2001 release. These problems have been caused by a total lack of preparedness by Ameritech to facilitate CLEC use of this release and further demonstrate the need for the Commission to take a "wait and see" attitude before accepting Ameritech's OSS claims at face value.

- In Section VIII, I respond to Ameritech's claims that its account team and other CLEC support mechanisms provide the CLECs adequate support. In fact, these support mechanisms often only add to CLEC confusion and Ameritech representatives are often ill prepared to respond to CLEC questions and concerns.
- In Sections IX, X, and XI, I switch gears and provide the Commission with a preview of three significant 271 issues concerning Ameritech's OSS. First, Ameritech provides a blatantly discriminatory and otherwise inefficient process for CLECs to access and order directory listings. Second, the Commission should carefully monitor Ameritech's flow through capabilities and documentation. And third, Ameritech's current billing systems are outdated, inefficient, and scheduled to be replaced in October of 2001. This October enhancement must be carefully monitored and tested.

## **II. OSS Are Critical For Market Entry and They Must Be Adequately Tested And Proven Reliable To Support Entry**

10. The importance of well-functioning OSS cannot be overstated.

Ameritech's OSS truly are the gateway through which Michigan CLECs must pass to enter the local market. No matter what a particular CLEC's entry strategy may be (e.g., UNE combinations, UNE loops, DSL Loops, or facilities basis), at some point every CLEC must rely upon Ameritech's OSS to process orders for their Michigan local customers as well as for maintenance and billing. If Ameritech's systems and processes do not function properly, and CLEC customer orders are delayed, lost or mishandled, the customers are likely to blame the CLEC, thereby irreparably harming the CLEC's reputation and relationship with its customers. In practice, the CLEC is placing its business reputation in the hands of its chief competitor: the ILEC. CLECs like AT&T

cannot afford to accept on faith that Ameritech's OSS can handle the volumes and order types they will encounter with full-scale entry. AT&T will not put its name at risk unless and until it can be assured that Ameritech's OSS are adequate to the task.

11. The importance of well functioning OSS becomes all the more important as the volume of orders increases with wide-scale entry. Ameritech has yet to face any mass-market entry in its territory. By its very nature, mass-market entry by any carrier or group of carriers entails large order volumes at the outset, as they (hopefully) quickly gain a base of customers. When faced with entry on that scale, Ameritech's systems will truly be put to the test.

12. This Commission has recognized the importance of fully testing Ameritech's OSS capabilities, rather than simply accepting at face value Ameritech claims concerning what their OSS can do.<sup>1</sup> The Commission has directed KPMG to conduct a thorough third-party test of Ameritech's OSS and related processes and procedures. That test is just under way and transaction testing is yet to begin. Additionally, as I will discuss below, AT&T has taken initial steps toward launching a "Market Entry Trial" as a precursor to its anticipated broad local entry in Michigan by the end of this year. The Commission should closely monitor the results of third-party OSS testing as they become available, and accept input from CLECs as they prepare for and begin to enter the Michigan local market. All of this information is relevant and necessary to a Commission determination as to whether Ameritech is providing

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<sup>1</sup> Likewise, the FCC has "concluded that operations support systems and the information they contain are critical to the ability of competing carriers to use network elements and resale services to compete with incumbent LECs." *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, interLATA Services In Michigan*, CC Docket No. 97-137, ¶ 130 (August 19, 1997) ("Ameritech Michigan 271 Order"). Indeed, as the FCC points out, Ameritech itself recognized that "[o]perational interfaces are essential to promote viable

nondiscriminatory access to its OSS and whether those systems are capable of sustaining robust and irreversible competition.

### **III. Ameritech's OSS Claims Are Unsubstantiated**

13. The statements Ameritech has submitted concerning OSS in its “informational filing” are short on information concerning how Ameritech’s OSS are performing in the current commercial environment, and long on generic descriptions of the systems and processes that Ameritech currently has in place today, or will have in place in the upcoming months. Ameritech representative Mr. Justin Brown, for example, provides what amounts to a detailed history of how Ameritech’s Local Operations Center (“LOC”) and Local Services Center (“LSC”) began and evolved over time. He then describes the manner in which CLEC orders are processed by Ameritech’s representatives and databases. In a similar fashion, Ameritech representative Mr. Cottrell’s statement is a self-described process flow of how CLEC orders are handled by Ameritech’s representatives and electronic systems.

14. While this information does provide useful background on how Ameritech’s OSS are designed to work, that is all that it provides. The Ameritech affiants impart no information whatsoever on whether Ameritech’s OSS are working “as billed.”

15. Indeed, after reading Ameritech’s OSS affidavits one is at a loss as to what, exactly, Ameritech is asking of the Commission with respect to OSS at this point. The Commission has never, to my knowledge, suggested that it could make determinations concerning Ameritech’s compliance with its OSS obligations at least until

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competitive entry.” *Id.*, n. 317 (quoting Letter from Antoinette Cook Bush, Counsel, Ameritech, to William Caton, Acting Secretary FCC (July 10, 1996)).

completion of the KPMG-led third-party test. Nevertheless, Ameritech's Mr. Cottrell goes so far as to suggest that Ameritech has met its 271 checklist obligation concerning OSS. (Cottrell, at 14.)<sup>2</sup>

16. In its brief, Ameritech argues that the Commission should take a "two step" approach to determining OSS compliance: (1) a determination of whether Ameritech has developed sufficient electronic and manual interfaces to allow competing carriers equivalent access to all of the necessary OSS functions, and (2) whether the OSS are operationally ready. (Ameritech Brief, at 26-27.) Ameritech requests that the Commission sign off on the first part of this analysis, and determine the second part at a later date, after receiving empirical data from testing and commercial experience. Ameritech cites to various FCC 271 orders to support its contention.

17. Ameritech's analysis is flawed. Any analysis of Ameritech's OSS capabilities (whether interface availability or functionality) is necessarily tied to testing and commercial experience. This Commission cannot reasonably conclude that Ameritech's interfaces provide CLECs access to all of the necessary OSS functions until those systems are adequately tested both by KPMG and in the marketplace. That has not yet occurred. KPMG has just begun its test and CLECs have not yet to begin using Ameritech's March 2001 EDI pre-ordering and ordering interface.

18. In fact, the FCC describes the first level of OSS inquiry – development of sufficient electronic and manual interfaces to allow competing carriers equivalent access to all of the necessary OSS functions – as including an analysis of the ILEC's OSS specifications, business rules, and "other formatting information," as well as an assessment of whether the ILEC's systems are "designed to accommodate both current

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<sup>2</sup> I note that my references to Ameritech's statements are to the page numbers.

demand and projected demand for competing carriers' access to OSS functions.”<sup>3</sup> The Michigan third-party test designed by KPMG provides for the testing of all of these items. KPMG is reviewing Ameritech's specifications and OSS documentation and has, in fact, released observations concerning this information.<sup>4</sup> I have attached to my testimony, as JS-1, a copy of KPMG's observations to date and refer the Commission to observation numbers 3, 4, 5, 6, 7, 9, 17, and 24, which show that Ameritech has been missing several key pieces of information concerning its March 2001 release and its business rules are often vague and self-contradictory.

19. While certain of these observations have since been corrected by Ameritech, others remain open. What these observations show, however, is that Ameritech's documentation and business rules concerning its March 2001 release were incomplete and incorrect from the start. Moreover, the KPMG review process has just begun. Clearly, until it is complete the Commission can have no confidence that Ameritech's documentation and process problems are behind it.

20. KPMG, as part of its review of Ameritech's collaborative commitments, is to confirm that Ameritech's interfaces meet industry standards. See Bell Atlantic New York 271 Order, ¶ 88 (“the Commission continues to encourage the use of industry standards as an appropriate means of meeting the needs of a competitive local exchange market.”). See also December 27, 2000 *Joint Report of the Participants Regarding Resolved OSS Enhancements and Process Improvements*, Case No. U-12320, at 2 (“The

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<sup>3</sup> See, e.g., *In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York*, CC Docket No. 99-295, ¶ 88 (rel. December 22, 1999) (“Bell Atlantic 271 Order”); Ameritech Michigan 271 Order, ¶ 137.

<sup>4</sup> KPMG issues observations and exceptions when it encounters an issue in the course of the test. An “observation” is created if KPMG determines that one of Ameritech's practices, policies, or system failures might result in a negative finding in the final report. An “exception” is created if KPMG determines that

parties agree that the industry standard ‘LSOG 4’ and ‘GUI Deployment,’ ‘interfaces’ and ‘OSS functionalities’ will be deployed and tested in Michigan.”) KPMG will also assess whether the systems are designed to meet current and future demand.<sup>5</sup> Past experience illustrates the importance of this particular test in the market. For example, soon after Bell Atlantic received 271 approval in New York (and even after KPMG had concluded testing), Bell Atlantic’s ordering and provisioning systems literally crashed, as they were unable to handle the large volumes of CLEC UNE-P orders. Thousands of CLEC orders were lost somewhere within Bell Atlantic’s systems. The Michigan Commission should assure that similar problems do not happen in Michigan, to the detriment of end-users and CLEC reputations.

21. Finally, I would note that although the FCC has set up a two-step inquiry to analyze an ILECs’ OSS capabilities, the FCC conducts that two-pronged analysis at one time, *after* having the full experience of third-party testing and CLEC commercial experience before it. Nothing in the FCC’s analysis indicates that any OSS conclusions

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one of Ameritech’s practices, policies, or systems is not expected to satisfy one or more of the evaluation criteria defined for test. *See* Michigan Master Test Plan, p. 5.

<sup>5</sup> At a June CLEC forum meeting, a problem with capacity was identified for one of the new Ameritech system enhancements supporting “street address validation.” Specifically, during the week of June 11th, RCN noticed a substantial increase in the number of orders being rejected by Ameritech for “invalid street address.” On June 15th, the issue was brought to Ameritech’s attention since RCN was unable to identify the errors in its own documentation. After an investigation that lasted until June 19, 2001, Ameritech informed the CLECs that an undetected increase in the number of unbundled loop orders had “maxed out” the capacity of the links feeding the Ameritech MOR system. The CLECs expressed concern that there seemed to be no process in place to monitor capacity issues at Ameritech today. CLECs believe this problem would have gone wholly undetected until enough CLECs spoke up concerning their efforts to correct orders rejected by Ameritech in error. Ameritech claimed once the problem was identified calls were made by the OSS account team representatives to their respective CLECs informing them of the problem. However, not one CLEC at the forum received such a call. The CLECs then requested that an expanded process for monitoring internal capacity be developed by Ameritech and an expanded process for CLEC notification be put in place immediately. Ameritech is forming a subcommittee of CLECs to work on identifying a new method of communicating issues such like this one to the CLEC community, however there has been no commitment to develop capacity audit procedures. AT&T will continue to inform the Commission of the outcome of these discussions.

can be drawn without the necessary empirical data, as provided by the test and commercial experience.

22. At this point, there is no basis for presuming that Ameritech's March 2001 interfaces will provide CLECs the functionality Ameritech claims they will provide. Perhaps the Commission could be more confident had Ameritech conducted a major OSS release within the last five years. It has not. Importantly, Ameritech has just completed an upgrade to its OSS that literally leapfrogs Ameritech's systems from 1996 to 2001 vintage, bypassing two levels of industry standards established over that time. Ameritech is upgrading its electronic pre-ordering interfaces from LSOG 1+ to LSOG 4; it never deployed industry standard versions of LSOG 2 or 3. LSOG 2 became available for industry use in April of 1997 and LSOG 3 has been available since April of '98. Because of the haphazard nature of Ameritech's release of these interfaces (which I describe below), CLECs are still scrambling themselves to upgrade their systems to take advantage of these significantly altered interfaces and at this point literally have no idea whether Ameritech's systems will perform as described.

23. In fact, as I explain more fully below, AT&T's experience with Ameritech's March 2001 release indicates that they are not likely to work yet "as billed." Ameritech's release of the March interface was fraught with documentation problems. Ameritech failed to adhere to any Change Management Process for this release, and as a result it was impossible for CLECs to prepare to utilize that interface at the time of its release. AT&T has just begun its own market-entry trial of the March release's upgrade to its electronic pre-ordering and ordering interfaces. As I explain below, even the

minimal experience that AT&T has had to date has uncovered serious flaws in the release.

24. KPMG has not even begun transaction testing to date.<sup>6</sup> Yet in the course of the testing that KPMG has conducted, it has uncovered serious problems with Ameritech's OSS and related process and procedures that have yet to be fixed. I have attached to this affidavit as JS-1 copies of the observations that KPMG has conducted thus far and their current status.

25. Finally, the recent experience at the FCC concerning the veracity of SBC/Ameritech's OSS claims should give this Commission great pause before relying upon Ameritech's untested (and here unsworn) OSS claims. In its Kansas/Oklahoma 271 application, SBC filed sworn affidavits in support of its application that contained inaccurate information concerning the capabilities of Ameritech's pre-ordering OSS. After the FCC granted that 271 application -- relying upon SBC's untested claims about its systems capabilities -- SBC disclosed that its affiants before the FCC provided "inaccurate" information concerning its pre-ordering OSS capabilities. I have attached as JS-2 a copy of the SBC letter informing the FCC of this fact. Soon thereafter, on June 8, 2001, SBC disclosed a second inaccuracy. I have attached as JS-3 the SBC June 8, 2001 letter informing the FCC of this second inaccuracy concerning its OSS capabilities. During the Texas proceedings nearly two years ago, SBC told the FCC that it had fixed a problem in its back-office systems that had made it harder for rivals leasing parts of SBC's network to request repairs of damaged phone lines. But in its Missouri application

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<sup>6</sup> In transaction testing, the third-party tester acts as a CLEC and sends Ameritech simulated test orders through an OSS interface constructed by the third-party (in this case HP acting as a subcontractor for KPMG). Transaction testing was originally scheduled to begin in March of 2001. That start date has been

earlier this year, the company revealed that the problem had only recently been corrected, sparking questions about the accuracy of the Texas filing. It is my understanding that the FCC is now investigating these issues.

26. Putting aside the question of whether SBC's witnesses knowingly submitted erroneous or misleading information, this experience demonstrates that issues concerning OSS are complex, difficult and highly fact-specific, and by their very nature they demand an exhaustive factual inquiry and testing of assertions and conclusions. The Commission cannot blindly accept Ameritech's OSS allegations, lest it find later that Ameritech's self-titled "draft" application and unsworn OSS claims prove incorrect.

27. The Commission has correctly determined that Ameritech's OSS are appropriately assessed in a third-party, military style test conducted by KPMG. AT&T and other CLECs are actively participating in that test. Additionally, various CLECs have announced or begun to attempt to pursue entry plans for business and residential markets using UNE-P. As discussed elsewhere, AT&T has just begun UNE-P based entry for business customers in Michigan, and it plans residential entry by the end of this year. I agree with Ameritech that the Commission should look to all of these sources of information in pursuing its inquiry into the state of Ameritech's OSS. (Ameritech Brief, at 27-28.)

#### **IV. AT&T's Market Entry Trial Will Provide Additional, Valuable Information For Assessing Ameritech's OSS**

28. Ameritech is necessarily some months away from completion of its third-party test. During this time, various activities will take place outside of the third-party test that should be taken into consideration by the Commission as it evaluates

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indefinitely delayed because Ameritech has yet to provide KPMG the bed of simulated customer test

Ameritech's OSS. For example, as mentioned previously, WorldCom and AT&T (for business customers) have entered the Michigan market recently using the UNE Platform.

29. Additionally, in preparation for its planned UNE-P based entry into the residential market later this year, AT&T has very recently initiated a "Market Entry Trial" with Ameritech. In that trial, AT&T will be doing the following:

(1) AT&T will establish connectivity with Ameritech's systems so that AT&T can utilize Ameritech's March 2001 release of LSOG 4 (as noted to my knowledge no CLEC is presently utilizing LSOG 4);

(2) AT&T then conducts cooperative-- testing, which is the process CLECs use to validate that the documentation provided by Ameritech concerning its release has been properly mapped into the AT&T systems. Additionally, by cooperative testing, AT&T assures that its systems are properly configured to reflect the Ameritech business rules governing the required fields in the Local Service Request ("LSR") envisioned by the new Ameritech release; and

(3) AT&T will then order a substantial number (800) lines from Ameritech. AT&T will send a variety of UNE-P orders that are representative of the various functions and features AT&T plans on providing to its local customers. AT&T will document Ameritech's performance in this test and share and track problems with Ameritech in order to eliminate any problems that are encountered.

30. The Market Entry Trial is an essential tool that AT&T has used in other jurisdictions (such as New York) before entering the residential market in mass volumes. This trial is an important complement to the third-party test. In the first place, this trial assures real market conditions, something the third-party test by its segmented nature can

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accounts. At this point, we have no idea when transaction testing will begin.

never fully accomplish. The lines AT&T orders are not “test” lines, but actual residential lines that Ameritech provisions to AT&T. It also provides real world order volumes that are not contemplated by the third-party test (most KPMG test beds are limited to between 35-140). In addition, this trial truly tests Ameritech’s systems on an end-to-end basis, through actual implementation of service, changes to that service, and termination, all with billing.

31. AT&T will be documenting the results of this trial by capturing Ameritech’s performance on a weekly and monthly basis. AT&T will provide the Commission the results of its trial for comparison with the results documented by KPMG.

**V. Ameritech’s March 2001 Release and A-AA Enhancements Represent An Extremely Ambitious Undertaking from a Systems Perspective**

32. For some two and one-half years prior to its merger with SBC in October of 1999, and in fact until March this year, Ameritech’s OSS were virtually frozen in time. They were quite literally the same interfaces with virtually the same functionality that was in place in August of 1997 when the FCC rejected its 271 application for Michigan -- in part for failure to provide adequate OSS. Ameritech’s work on this old interface dates to 1996, before the industry standards-setting body, ATIS,<sup>7</sup> had adopted standards for pre-ordering and ordering. Subsequent generations of the so-called LSOG industry-

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<sup>7</sup> Alliance for Telecommunications Industry Solutions is the organization that publishes industry standards, guidelines and operating procedures used by interexchange and local carriers to support interoperability of the carriers. Its key committees whose work establishes the standards for pre-ordering and ordering are the Ordering and Billing Forum (“OBF”) and the Telecommunications Industry Forum (“TCIF”), and the standards are known as the Local Service Ordering Guides (“LSOG”) and the Electronic Local Mechanized Specifications (“ELMS”).

standards have come and gone. LSOG Version 3 standards were adopted by the industry in May, 1998, and LSOG 4 conventions became the industry standard in June of 1999.<sup>8</sup>

33. Thus, for well over three years, Ameritech's systems remained static while updates and advancements to the industry standards were made. During that period the CLEC community worked with other RBOCs – including Ameritech's parent company SBC -- to migrate to the evolving and improving standards as they evolved, recognizing that incremental changes toward full compliance with the standards is preferable to huge “leaps” that skip over generations or versions of the industry standards. Up until March 2001, Ameritech's pre-ordering/ordering interfaces were a pre-LSOG 2 version<sup>9</sup> and thus they lagged a full two versions behind the current industry standards.

34. It was against this background that the state commissions in Illinois and Ohio reviewed the SBC/Ameritech merger application. It is not surprising, therefore, that during that review these commissions found that Ameritech's OSS lagged behind the industry and needed a jumpstart.<sup>10</sup> In arguing for approval of the merger, SBC committed that, if the merger were approved, it would move expeditiously to update Ameritech's systems to industry standard. In fact, as a condition of approval of the

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<sup>8</sup> The industry standards serve three purposes: (1) they define what transactions types can be exchanged and what those transactions mean (i.e., the business function they are to accomplish); (2) they specify what data elements are necessary to accomplish the transactions; and (3) they establish what the characteristics of the data elements should be (e.g., number of characters in a field, whether the field is to contain alphabetic or numeric characters, and whether the field is required, optional or conditional). When an RBOC's specifications are said to be “compliant with the standard,” it means that all three characteristics have been achieved.

<sup>9</sup> Ameritech lists the previous Ameritech ordering interface as LSOG 2, but that is not consistent with AT&T's experience, which is that it in fact is on an “enhanced” version of LSOG 1.

<sup>10</sup> See *Joint Application for Approval of the Reorganization of Illinois Bell Telephone d/b/a Ameritech Illinois, and the Reorganization of Ameritech Illinois Metro, Inc. in Accordance With Section 7-204 of the Public Utilities Act and For All Other Appropriate Relief*, Illinois Commerce Commission Docket No. 98-0555, September 23, 1999 Order, at 257-259; *In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Ameritech Ohio for Consent and Approval of a Change of Control*, Public Utilities Commission of Ohio Case No. 98-1082-TP-AMT, April 8, 1999 Opinion and Order, at 10-17.

merger, the Illinois and Ohio commissions ordered Ameritech to update its OSS and engage in state OSS collaboratives, beginning in November of 1999, to discuss those updates with the CLECs.<sup>11</sup> Those OSS collaboratives soon spread to the other Ameritech states, including Michigan.

35. I personally represented AT&T in the collaboratives in Michigan and throughout the region. At the outset, Ameritech indicated its commitment to implement its own non-industry compliant “version” of LSOG 4 pre-ordering and ordering in September of 2000. However, the CLECs identified as one of the issues that were most important to them that Ameritech’s upgrade of its OSS be to an “industry compliant” version of LSOG 4, which would include all the functionalities of LSOG 4.<sup>12</sup> Eventually, Ameritech agreed to scrap its wholly cosmetic, patchwork September 2000 release and provide CLECs a fully functional LSOG 4 release in March of 2001.

36. There were many other issues discussed in the state OSS collaboratives. The list of CLEC OSS issues eventually became known as the “A-AA” list, with each issue being designated by a letter of the alphabet. For a year of collaboratives, Ameritech refused to move on the issues that the CLECs identified as their highest priority items. Ameritech, for example, refused to provide any detail regarding its plans to improve flow through in the region; it refused to incorporate changes to its hot cut process and procedures that would allow for end-to-end testing of a UNE loop prior to the loop being cutover to the CLEC; it refused to change its facilities modification policy; and it refused to provide promptly directory listing access and ordering via one integrated interface

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<sup>11</sup> *Id.*

<sup>12</sup> Ameritech, for example, refused to provide a “parsed” or “fielded” CSR as part of its LSOG 4 release, despite the fact that such functionality is part and parcel of an industry compliant OSS release. Ameritech eventually relented, only after months of negotiations at the FCC and the five state commissions.

(instead directing CLECs to keep a separate interface with its advertising affiliate Ameritech Advertising Services (“AAS”).

37. It was not until literally the morning of the hearing date in the Wisconsin OSS arbitration (November 28, 2000), a full year after the collaboratives began, that Ameritech finally began to accept many of the CLEC OSS proposals for increased functionality and improved process and procedures. Eventually, that Wisconsin agreement was put to writing and was imported to Michigan and jointly filed with the Commission (in case No. U-12320) on December 27, 2000 as the *Joint Report of the Participants Regarding Resolved OSS Enhancements and Process Improvements* (“OSS Joint Report”). In addition, the parties agreed that as an exit criterion of the third-party test, KPMG must test the agreed-upon A-AA enhancements Ameritech finally acquiesced to provide.

38. I find it ironic, therefore, that Mr. Cottrell and Mr. Brown, neither of whom participated in the collaboratives, now tout the A-AA enhancements, after Ameritech attempted to avoid doing any of them for over a year. The A-AA enhancements include significant advancements in functionality that must be fully tested. They include Ameritech commitments to the following:

- Synchronized pre-ordering and ordering data elements and documentation of the business rules for non-synchronized preordering and ordering data elements.
- Abbreviated address validation, which would lessen the extent of orders being rejected based on an incorrect address.
- Significantly improve flow through rates for certain product and order types identified by the CLECs.

- Provide, in June 2001, an integrated directory listing ordering interface that includes the functionalities of Ameritech's March 2001 LSOG 4 release.
- Make significant improvements in its use and performance of the CLEC account teams.
- Synchronization of Ameritech's street address databases (the Street Address Guide and the Customer Service Record databases).
- A revised facility modification process by which Ameritech agreed to provide CLECs notice of a facilities problem 24 hours after it sends a Firm Order Commitment ("FOC") on a UNE-loop order.
- A wholly revised hot cut process for the provisioning of UNE loops, which includes end-to-end testing of the loop and the associated ported number.

39. As Ameritech now seems to agree, based on the numerous references by Mr. Cottrell and Mr. Brown to these enhancements, the A-AA enhancements as enumerated in the OSS Joint Report are material and, if shown to be properly implemented, will have a positive affect on Ameritech's OSS capabilities. At this point, however, we know very little concerning whether Ameritech has properly implemented them.

40. At the same time, there *is* direct evidence that Ameritech has *failed* to implement certain of its A-AA commitments. To take one example, the Michigan OSS settlement, which was hatched in November, included an agreed-to process for the provisioning of so-called loop "hot cuts." OSS Joint Report, at 20-22.<sup>13</sup> Four months later, between March 20 and March 22, 2001 KPMG, the independent third-part test

administrator, observed 18 hot cuts in four Ameritech central offices. As reported by KPMG in April, **in every instance**, the Ameritech technician failed to conduct **any of the activities** required by the new hot cut process. Specifically, on each and every hot cut observed, the Ameritech technicians failed to conduct ANI tests, failed to conduct dial tone tests, and failed to advance the jumpers in the manner specified by the agreed-to process. This observation is shocking. AT&T affiant Mr. Van de Water describes Ameritech's failures to follow this hot cut as well as its related facilities modification process in greater detail in his testimony. In addition, below I describe how Ameritech failed to meet its A-AA commitments concerning flow through and directory listings. These examples call into serious question whether the A-AA commitments have been properly implemented, and the "hot cut" example demonstrates that without testing we cannot accept Ameritech's claims that it has met its A-AA commitments.<sup>14</sup>

41. In all, the breath of Ameritech's OSS upgrades, from the A-AA enhancements and the LSOG 4 release, should give the Commission considerable reason to follow the course it has already set out and conduct further fact finding, including its third-party test and evidence on CLEC use of LSOG 4, before it can conclude anything concerning Ameritech's OSS.

## **VI. Ameritech Failed To Adhere To Any Change Management Process In Implementing The March Release**

42. Ameritech's "case" for compliance with the OSS checklist item as set forth by Ameritech's Mr. Cottrell hinges its March 2001 release of a new pre-ordering

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<sup>13</sup> A "hot cut" is the conversion of an Ameritech customer's UNE loop and associated telephone number to a CLEC, which utilizes that loop, in conjunction with its own switching and transport facilities, to provide service to that customer.

and ordering electronic interface based on LSOG 4.<sup>15</sup> As I noted previously, no CLEC has yet to begin actually using Ameritech's LSOG 4 release, and this is because the manner in which Ameritech rolled out this release made it virtually impossible for CLECs to be in a position to use it at the time it was implemented.

43. There was, first of all, considerable question as to what Change Management Process ("CMP")<sup>16</sup> governed the release (e.g., the FCC Uniform and Enhanced CMP, the agreed-to 13-state CMP, or the previous 5-state Ameritech old process). This uncertainty stemmed from the fact that, as Mr. Cottrell concedes, the now governing 13-State CMP was not officially implemented by Ameritech until March of 2001, *commensurate with the release itself*. (Cottrell, at 90-91.) Before that time, the CLECs were at a loss concerning which CMP process was being followed for the release. Ameritech cannot seriously argue that its LSOG 4 release complied with any change management process that was clearly defined in advance.

44. Mr. Cottrell states that Ameritech implemented its LSOG 4 release in accordance with "many aspects" of the 13-State CMP. (Cottrell, at 90.) Although I am not sure what "aspects" of this plan Mr. Cottrell is referring to, I can assure the Commission that Ameritech followed few, if any, of the timeframes in the 13-State CMP in implementing the massive March 2001 release. The CMP provides specific timelines and intervals for the provision by Ameritech of information and specifications for the CLECs' use. Those timeframes are intended to allow CLECs sufficient time to prepare

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<sup>14</sup> KPMG has recently reported that Ameritech's technicians, as of June 2001, appear to be performing hot cut testing in accordance with the stated policy. AT&T welcomes this fact, but questions why it took this observation to get Ameritech to comply with its A-AA commitments.

<sup>15</sup> Cottrell, at 7, 31-60.

<sup>16</sup> The term "Change Management Process" refers to written agreements that exist in the various RBOC regions that govern the timeframes and process by which the ILEC is to initiate changes in its systems. The

for the release themselves, i.e., by using the specifications to change their own systems in preparation for the new release. It is my experience that CLECs require final release requirements at least seven weeks prior to implementation of such a significant release in order to complete computer coding and testing on their side of the interface.

45. The CLECs experience in the change management process for the LSOG 4 release was entirely unsatisfactory. Assuming the 13-State CMP was the governing CMP, Ameritech missed its deadlines time after time, and in fact, the *only* deadline that was met was the publication of its Initial Release Requirements. All others (i.e., Final Release Requirements publication dates, CLEC comment periods and the CLEC testing ‘window’), were missed by days or weeks. While the CMP does allow Ameritech in certain circumstances to take “exception” to the set timeframes, the exceptions in the LSOG 4 release swallowed the rule and made a mockery of the entire change management process. Certainly there are times when slippage of the date in question is appropriate, but that Ameritech met so few of its dates in rollout of the most significant release in the history of this region is grounds for serious concern.

46. For example, the now finalized 13-state CMP provides that an Ameritech release is to take place: “within 110 to 130 calendar days from the date of the Final Release Requirements. This implementation interval for the release will not begin until all related documentation is provided.” Section 4.2.4.3 13 State CMP. Moving backward, that would mean that Ameritech should have provided Final Release Requirements (and all related documents) for the March 2001 LSOG 4 release in mid-

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process is intended to protect CLECs from being forced into a change that they may not be prepared for, or to which they might object.

November 2000. Mr. Cottrell himself identifies the release of “final requirements” as the end of the CMP process, at least as far documentation is concerned. (Cottrell, at 92.)

47. In regard to the March release, however, the CLECs quickly found that Ameritech’s so-called “final” release requirements were only the start of the process. Ameritech provided what they referred to as “final release requirements” in an Accessible Letter (CLEC AMS00-068), dated November 22, 2000. That iteration was followed by a series of review sessions (November 30<sup>th</sup>, December 1<sup>st</sup> and January 3, 2001), but Ameritech still never provided a complete and accurate set of LSOG 4 ordering and pre-ordering requirements with corresponding business rule documentation. In response to CLEC inquiries, Ameritech continually advised that we should receive the missing documentation in a “couple of weeks.” In fact, CLECs continued to receive clarifying information and additional requirements for LSOG4 well past the March 24<sup>th</sup> implementation date. *See* Accessible Letters CLECAM01-051, April 20, 2001 and CLECAM01-046, April 6, 2001.

48. As recent as June 14,2001 in an e-Mail from Nancy Benner (Ameritech Methods and Procedures Subject Matter Expert) CLECs were given a clarification previously requested, documenting the process CLECs were to follow when converting UNE-P residential customers to a UNE-P business customer. This is the type of documentation that should be part and parcel of a complete set of release documentation, yet has just been provided by Ameritech three months after its March release.

49. Mr. Cottrell in fact concedes that Ameritech’s so-called “final” specifications continued to change almost up until the release itself, as CLECs continued

to provide comments and uncovered missing documentation. (Cottrell, at 93.) The fact is, these specifications continue to be fine-tuned.

50. The message from Ameritech became clear: the CLECs were going to get LSOG 4 on Ameritech's own timeline, without regard to change management and regardless of whether they were ready. Although the CLECs – in order not to delay the upgrade of Ameritech's OSS systems -- did not object to Ameritech going forward with its release in March, Ameritech's actions made it essentially impossible to plan for this release or be in a position to take advantage of it in March.

51. At this point, the Ameritech CMP cannot be relied upon to perform the function Mr. Cottrell describes, i.e., "to facilitate change while ensuring that standard methods and procedures are followed." (Cottrell, at 90.) Certainly CLECs view change management as the mechanism by which they can prepare for releases as they come out. It did not serve that important function here. As discussed by AT&T affiant Ms. DeYoung, Ameritech's disregard for the timeframes of the CMP is not an SBC "standard" practice; rather, the sloppy manner in which Ameritech rolled out this release is unprecedented within the SBC territory. Consequently, AT&T has serious concerns about the manner in which Ameritech will handle future significant releases, particularly those on which that AT&T and other CLECs will be hinging business plans and their customers' service.

52. In short, AT&T believes that the Commission should not and cannot find that Ameritech's CMP passes muster from a 271 standpoint until Ameritech rolls out a significant OSS release in which: (1) there is a defined CMP process *from the start*, and (2) Ameritech follows the timeframes in that process in a way that allows CLECs to take

advantage of the release when it is implemented. *See, e.g.*, Bell Atlantic New York 271 Order, ¶ 102 n. 280 (“Demonstration of an adequate change management process to which the BOC has adhered over time is also part of the BOC’s obligation to provide competing carriers with the specifications necessary to instruct competing carriers on how to modify their systems in a manner that will enable them to communicate with the BOC’s legacy systems and any interfaces utilized by the BOC for such access.”), *citing to* Ameritech Michigan 271 Order, ¶ 137.

## **VII. AT&T’s Experience With Ameritech’s LSOG 4 Release Thus Far Confirms That It Is Faulty and Not Well Implemented**

53. As mentioned previously, AT&T has just recently begun preparations for a Market Entry Trial with Ameritech using the LSOG 4 interface. Although we are only in the initial stages and have little experience thus far, what we have learned gives rise to considerable concerns and supports the view that this release, as it stands, is seriously deficient.

### **Establishing connectivity to LSOG took six months**

54. At page 24 of his statement, Mr. Cottrell correctly notes that the first step toward using an Ameritech interface such as LSOG 4 is for the CLEC to establish “connectivity” with the interface. As he explains, there are several preconditions to establishing connectivity. First of all, each CLEC has a connectivity point for gaining access to Ameritech’s OSS. That point is generally referred to as the Ameritech Remote Access Facility (“ARAF”). The ARAF is nothing more than the connectivity “pipe,” commonly a T1 line, over which the CLEC will send its orders. In addition, the CLEC must have in place a “Remote Access Facility” consisting of network connectivity hardware, which allows CLECs to connect to Ameritech’s data network. A redundant

firewall is also necessary to prevent unauthorized access to and from Ameritech's internal communications network.

55. What Mr. Cottrell failed to mention is that CLECs accessing LSOG 4 are now required to establish their ARAF using "direct" connectivity with Ameritech in Chicago. Previously, AT&T's connectivity point was in Southfield Michigan. In other words, in order to access LSOG 4 functionality, AT&T must first establish connectivity via a T1 line to this new, centralized Chicago ARAF location.

56. Accordingly, as the first step in starting its Market Entry Trial of LSOG 4, AT&T sought to conduct connectivity testing with Ameritech at the new Chicago ARAF. Normally, establishing a simple T1 connection should not be difficult or time-consuming. AT&T fully expected that connectivity would be up in place in a matter of two to three weeks. However, it took six months to establish the ARAF connectivity with Ameritech.

57. From October, AT&T worked with the Ameritech Account team OSS managers to formulate a plan for AT&T to follow to insure proper connectivity would be in place and tested to take advantage of the March 24, LSOG4 release as soon as possible. Our experience has identified multiple problems with Ameritech's process (or, more accurately, lack thereof) for this basic step.

58. First of all, Ameritech account management personnel seemed to have no process to follow to establish ARAF connectivity. Second, Ameritech failed to provide, on a timely basis, documentation and specifications, which would allow us to establish ARAF connectivity and a firewall. Finally, the process itself was fraught with errors and

delays caused by Ameritech's lack of internal processes for establishing ARAF connectivity.

59. CLECs were first notified of the need to switch to the new ARAF to access the new release via an October 24, 2000 Ameritech published Accessible Letter (CLECAM500-056).

60. After receiving this notice, AT&T began immediately working with its Ameritech account team to try to understand fully the implications such new connectivity would have to existing systems as well as what new and/or old functionality would be supported on the new ARAF connection. The Ameritech account team were unprepared to answer our questions. Numerous e-mails posing our questions were sent to the Ameritech account team during the two months following the release of the accessible letter. In fact, only after AT&T escalated the lack of responsiveness to Ameritech's director of OSS Industry Markets on November 20, 2000 did Ameritech begin to answer our questions. Those answers were provided on December 2, 2000 and only then could AT&T begin accessing the impact of this new configuration to its own network.

61. It was also not until early December that Ameritech informed AT&T that the equipment necessary to support this new T1 pipe had to be of a particular type provided by a particular vendor of Ameritech's choice. Earlier conversations and documentation from the Ameritech account team never raised this requirement.

62. On December 20, 2000, AT&T sent Ameritech a list of additional questions concerning the ARAF. By those questions, AT&T asked for specific information that had yet to be provided, but was necessary for AT&T to proceed with the

project.<sup>17</sup> For example, AT&T needed Ameritech to identify the proper identifications and passwords to support the new connectivity.

63. After Ameritech supplied incomplete answers to these questions, on December 21, 2000, its lead account team representative on these issues went on vacation until January, directing AT&T to seek answers from another Ameritech representative. When AT&T contacted that second representative, she indicated that she know nothing about the AT&T questions.

64. During the period of January 4 to February 27, 2001, AT&T managed the ordering shipping, delivery and installation of the equipment required by Ameritech. Turn-around commitments were continually missed by Ameritech. At one point we were told connectivity testing could begin only to find out the equipment had not been unpacked or installed in the Ameritech central office. It was also during this time that Ameritech provided AT&T circuit information and IP addresses that were to be loaded in the AT&T side of the connectivity. IP addresses and circuit information are basically strings of numbers that AT&T must code into its system to assure that its orders will pass through the ARAF connectivity pipe to the appropriate place in Ameritech's systems. Each carrier is provided a separate IP address.

65. On February 27, 2001 (a total of 102 days after the release of the Accessible Letter giving notice of the new ARAF) AT&T was finally ready to actually test connectivity, or at least we thought so. However, our first attempt to test was met with the realization that Ameritech has supplied us an improper IP address that had

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<sup>17</sup> The requested information included: (i) what the name of the site contact was at the location the T1 was to be delivered, (ii) whether Ameritech provided a secure location to store equipment before installation, (iii) whether the site had a switch with available analog ports, (iv) what are the appropriate LAN/Gateway.

pointed our systems back to the old connectivity point in Michigan rather than the new ARAF destination in Chicago.

66. At this point, in late February, Ameritech sent AT&T to an SBC connectivity expert to complete the project. The SBC representative instantly identified the erroneous information AT&T had been provided by the Ameritech account team and notified us of the changes that would have to be initiated in order to access the proper ARAF port. The SBC representative also indicated that the securing of a proper IP address for AT&T would take some time.

67. On March 3, 2001, after escalating the IP address issue, Ameritech told AT&T that it could take a number of days longer. Not until March 19 did AT&T receive the new IP address information that then had to be reloaded in AT&T systems prior to commencing connectivity testing.

68. On April 6, 2001 AT&T successfully completed connectivity to the Ameritech ARAF, nearly six months after notification of the new ARAF and two weeks after the March 2001 LSOG 4 release.<sup>18</sup>

69. In addition to the extended time it took AT&T to establish ARAF connectivity, AT&T faced additional problems as we tried to access the COBRA application Ameritech also was offering as part of its March 2001 release. As described by Mr. Cottrell, Ameritech's March 2001 release allows CLECs to choose which type of programming language/protocol it wishes to utilize when accessing the new pre-ordering functionalities via an electronic interface. The CLEC can choose between LSOG 4 or so-called CORBA (Common Object Broker Architecture) protocols. Generally, CORBA

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<sup>18</sup> This is the reason AT&T could not raise issues during the proper change management window. AT&T could not get to the application to test, let alone identify problems with the actual release documentation.

upgrades correspond to the LSOG upgrades. In this case, AT&T chose to use the CORBA protocol for accessing the new pre-ordering functionalities.

70. Even though CORBA pre-order functionality was promised as part of the March 2001 release, because of the problems incurred establishing initial ARAF connectivity, it was not until early April that AT&T began approaching Ameritech for support to activate a CORBA pre-ordering interface. Once again, AT&T was faced with the same problems when attempting to gain clarifying information and final IP address information for the CORBA release.

71. Countless E-mails were exchanged between AT&T and the Ameritech system support team trying to gain detailed documentation. And again, only after AT&T was directed to the SBC CORBA expert did we close all open documentation issues.

72. On June 11<sup>th</sup>, when all documentation questions had been answered and supplied, the IP addresses loaded in its systems, AT&T then contacted Ameritech to begin testing. At this meeting, SBC's connectivity specialist told us that SBC had changed the IP address (which AT&T had been previously supplied by the Ameritech Account team) to an SBC IP address. Because of this, AT&T would have to reprogram its systems with the new IP address. Ameritech gave no explanation for the change in direction, nor was any compensation made for the delay this would cause AT&T's project.

73. In addition to this abrupt change in direction, the SBC connectivity expert informed AT&T that the entire Ameritech test bed configuration would be unavailable from May 18<sup>th</sup> to May 25<sup>th</sup> in preparation for the Ameritech 4.01 release. This disclosure prompted a host of questions from AT&T: (i) What accessible letter did

CLECs receive informing us of the "freeze," (ii) Is just the Ameritech test bed or all SBC test beds affected, and (iii) Why should this freeze affect functionality already deployed. The SBC connectivity expert could not answer these questions and referred us back to the Ameritech account team.

74. Since then, we were told by Ameritech (again via email) that there was no accessible letter notifying the CLECs of the freeze in testing. In addition, only the Ameritech test bed was taken totally out of commission during the preparation of the 4.01 release.

75. The endless delays, missing documentation, and spotty account team support has made AT&T's attempted move to the new Ameritech release unnecessarily difficult and inefficient. Our experience provides stark evidence that Ameritech is simply not yet ready to support wide-spread CLEC migration to LSOG 4/CORBA.

76. As a support of AT&T's problems with the implementation of the CORBA functionality, KPMG has also identified the lack of documentation surrounding the CORBA functionality as a separate observation. (See JS-1, Observation 24, published June 21, 2001.) Thus, it is not a matter of debate that Ameritech's documentation for its March release was less than complete and accurate. And these mistakes and omissions are likely not to be corrected until KPMG and the CLECs begin to identify them as testing and CLEC commercial experience continues.

77. In short, Ameritech account management personnel seemed to have no process to follow to establish ARAF or CORBA connectivity. Ameritech failed to provide documentation and specifications to allow AT&T to establish such connectivity.

Overall, what should have been a simple process was fraught with errors and delays caused by Ameritech's lack of internal procedures and documentation.

**AT&T's initial connectivity testing uncovered fatal errors in Ameritech's LSOG 4 release that have delayed further testing.**

78. Once AT&T had established ARAF connectivity with Ameritech in early April of 2001, we proceeded to conduct connectivity testing. In connectivity testing, AT&T simply sends an order to Ameritech, Ameritech confirms receipt of that order, and then sends a test order to AT&T. AT&T then validates receipt of that Ameritech order. For Ameritech, we chose to send a simple UNE-P residential order.

79. What we encountered was a host of fatal errors, all which would have led to disaster had AT&T actually been using LSOG 4 for sending commercial UNE-P orders. Specifically, AT&T received four error messages on this single UNE-P order, all of which Ameritech later confirmed were invalid:

(1) AT&T used an "N" value for every feature sent on the order. Ameritech's business rules (LSOR Version 4.01 dated 3/24/01) provide that valid values for feature activity are N, C or D. Despite this fact, Ameritech rejected the order because of the existence of this "N" value.

(2) Ameritech rejected the order as missing a value for "SERVICE\_CENTER, ST," but according to the Ameritech business rules "Service Center" is an "optional" value.

(3) Ameritech rejected the order as having an invalid value for "BILLING\_CONTACT (none)," but AT&T properly sent the Billing Contact per EDI.

(4) Ameritech rejected the order as missing or invalid valued for BILLING\_CONTACT\_TN (none),” but this is the same segment as billing contact and was properly sent in the AT&T order.

80. Once Ameritech was presented with these errors on April 27<sup>th</sup>, it agreed with AT&T that the rejections were improper, the errors were “fatal,” and any further testing should await a fix. It took Ameritech nearly a month (until May 24<sup>th</sup>) to correct these errors.

81. AT&T’s experience with Ameritech’s LSOG 4 release thus far has only served to raise questions concerning its completeness and about the system’s capability for supporting real-world use by CLECs. Had a CLEC relied upon this release to enter the market in March of 2000, its orders would have failed. Ameritech claims *these* problems have now been fixed, but it is anybody’s guess as to what additional errors will be uncovered as we proceed with certification and testing. That is, quite simply, why Ameritech’s systems and interfaces must be fully tested by KPMG and through commercial experience before it can be said that Ameritech has made its OSS available in conformance with the standards for Section 271.

**VIII. Ameritech’s Account Management, CLEC Forums And Change Management Meetings Are Poorly Run And Create Additional Confusion.**

82. Ameritech affiants Cottrell, Brown, and Regan all tout Ameritech’s processes for initiating CLEC relationships and input, including: (1) the CLEC account management team, (2) the regional 5-state CLEC OSS forums, and (3) the regional 5-state CLEC Change Management Meetings. I have personnel experience with all of these groups, however, and quite frankly, they do not perform in the manner Ameritech

describes. The root cause of the problem appears to be a lack of communication between Ameritech and its parent, SBC.

83. The CLEC account managers are Ameritech employees. Immediately after the SBC/Ameritech merger, the CLEC forums and change management meetings began to be run by SBC personnel. The Ameritech account managers rarely attend those gatherings. The result has been that the SBC personnel, although extremely knowledgeable with the SBC and Pacific Bell process and systems, know very little about the Ameritech processes or systems. At the same time, the Ameritech account managers are equally unknowledgeable about the new SBC-type systems and processes that Ameritech is beginning to roll out in this region.

84. The disconnection between Ameritech and SBC is epitomized by the CLEC user forums and change management meetings. As I mentioned, these meetings are run by SBC personnel. SBC's and Ameritech's OSS are not uniform, however, and they are not scheduled to be so until March of 2002; hence, the SBC personnel have limited knowledge regarding the systems and plans in the Ameritech states. When asked specific questions about Ameritech's OSS and plans, they routinely must defer giving answers to a later date, or until the next meeting. As a result, issues remain open for months while the SBC coordinator attempts to flush out the answer. This is not an efficient manner for Ameritech CLECs to air their problems, or have their questions addressed. Usually the answer, when it is provided, leads to additional questions, and the cycle of deferral begins all over again.

85. Many times our account manager will tell us something that is later contradicted by SBC personnel. For example, when AT&T was preparing for its UNE-P

launch into Michigan and Illinois, our Ameritech account manager sent us to a training class for the LSOG4 , SBC/Ameritech GUI. We later found out that that we had been sent to the class in error and that the class was covering training on the forms to be used when ordering service manually via EDI 7.0.

86. Similarly, KPMG has noted an observation that when they went to attend testing for the March 2001 LSOG 4 release, they received testing on the SWBT EDI systems, not Ameritech's. Again, these problems are endemic to the overall issue of coordination between SBC and Ameritech that has yet to be addressed and resolved. *See JS-1, Observation 14.*

87. Additionally, in the last Ameritech Change Management meeting in May of 2001, the CLECs were given a list of potential change requests and were asked by Ameritech to prioritize that list by June 20, 2001. Later, in the SWBT 8-state Change Management meetings, SWBT indicated that the entire prioritization process would be handled by an accessible letter and that letter had not been distributed yet.. Asking Ameritech for further clarification, on June 20, 2001 Ameritech's response was to ignore the direction given in May and wait for the accessible letter.

88. In fact, as I describe above, the problems AT&T encountered in setting up the ARAF and CORBA connectivity appear to have been caused by the fact that the Ameritech account team was unfamiliar with the SBC process for these activities. In both cases, only when an SBC expert became involved were our questions answered.

89. Finally, I would note that CLECs identified problems with their account teams during the regional OSS collaboratives and this issue was designated as Issue "Y" in the A-AA list. Ameritech committed to revising its internal operating guidelines to

broaden the responsibilities of the account team and strengthen their role and authority within Ameritech. OSS Joint Report, at 29-30. KPMG has been directed to test this commitment, and has been provided its own account team. Until KPMG completes testing of this enhancement, the Commission will not be in a position to reach conclusions concerning Ameritech's use of its account teams. In my view, I believe the account teams, the CLEC forums, and the change management forums must be improved substantially to meet Ameritech's commitment.

**IX. Ameritech's Process For CLECs to Access and Order Directory Listings Is Inherently Discriminatory and Otherwise Insufficient to Support Commercial Volumes**

90. When signing up new local service customers, CLECs need to be able to provide their customers white page directory listings. In addition, after the order process is final, the CLEC still needs to access Ameritech's directory listing database to assist customers with questions about the listings that were placed, to facilitate changes to those listings, and to update listing information. In fact, Section 271 of the 1996 Telecommunications Act provides that Ameritech is obligated to provide "nondiscriminatory access to white pages directory listings for customers of the other carrier's telephone exchange service." 47 U.S.C. § 271(c)(2)(B)(viii).

91. Ameritech is not providing nondiscriminatory access to white pages directory listings. Ameritech's processes for CLECs to order and access directory listings are discriminatory on their face and are otherwise burdened with inefficient manual processing that raise the likelihood of fatal errors and delays as order volumes increase.

### **Ameritech has reneged on its A-AA commitment concerning directory listings**

92. In the OSS Joint Report, Ameritech committed to provide, in June of 2001, a single electronic EDI ordering interface that CLECs could use to process both directory listing and local service orders. As the CLECs explained on numerous occasions during the OSS collaborative discussions, the objective of this commitment was to allow a CLEC to have one integrated electronic interface with Ameritech for completing local service requests ("LSRs") and directory listing requests ("DLRs"). Previously, facilities-based CLECs have been required to have one (EDI or manual) interface with Ameritech for LSRs and a separate interface with Ameritech Advertising Services ("AAS") for DLRs.<sup>19</sup> Thus, in the Michigan OSS Joint Report, Ameritech committed to "incorporate the functionalities of its OSS interface and Ameritech Advertising Services' Electronic Data Interchange (EDI) interface so that CLECs can use a single Ameritech interface for service orders for directory listing on or before June 2000." OSS Joint Report, at 13.

93. It is important to understand the background as to how this commitment was eventually arrived at in the state collaboratives. From the outset of those collaboratives, the CLECs asked that Ameritech provide an integrated interface for processing DLRs and LSRs. In August of 2000, Ameritech announced its plan to provide such a single interface as part of its LSOG 5 upgrade then planned for September 2001. That interface would have provided full electronic ordering functionality for directory listing orders. In other words, if a CLEC sent a directory listing order over the planned September 2001 integrated electronic EDI interface, it would have been received all

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<sup>19</sup> CLECs ordering UNE-P and resale have always been able to integrate their LSRs and DLRs on one order sent directly to and process by Ameritech itself.

responses concerning that order from Ameritech (e.g., FOCs, completion notices, reject notices) over that same electronic interface.

94. After Ameritech made this commitment, the CLECs in the Ameritech state collaboratives asked that this planned September 2001 enhancement be pushed up to March 2001. Attached as JS-4 is a portion of an AT&T brief in an Illinois OSS arbitration case filed on September 1, 2000 in which AT&T asked for just that. Thus, Ameritech was fully on notice that the CLECs were requesting that this September 2001 release be moved up to March 2001. After much negotiation, in November of 2000, the parties agreed to a compromise in which Ameritech committed to push this implementation date up to June 2001. Never did Ameritech mention during any of the negotiation sessions that the June 2001 release would give CLECs less functionality than what had been planned for September 2001.

95. Yet that is exactly the position Ameritech is taking now. In addition, the September 2001 LSOG release has now slipped to March 2002. Ameritech has thus successfully executed what amounts to a regulatory “bait and switch,” and the CLECs are left with a highly undesirable directory ordering process until March 2002.

96. AT&T first became aware of Ameritech’s construction of its directory ordering commitment from a March 5, 2001 accessible letter. In that letter Ameritech indicated that CLECs will still need to maintain a separate interface with AAS. While Ameritech will accept integrated LSR-DLRs over the EDI interface, AAS will send edits, rejection notices, and completion notices concerning the CLEC directory orders over separate manual interfaces: via fax, phone call, or email. Thus, in violation of the OSS Joint Report, CLECs would still be required to maintain a separate interface for directory

listing orders if they are to process the directory order: (1) One electronic interface for sending the order across to Ameritech, and (2) and several manual interfaces for receiving ordering responses from AAS. Of course, when using Ameritech's EDI interface, CLECs receive all responses from Ameritech electronically.

97. In addition, Ameritech has indicated that CLECs cannot electronically supplement their directory listing orders. Supplementation is a standard functionality that is included in Ameritech's current EDI interface and is important because it allows the CLEC to fix a problem with an order, or revise it, without having to submit an entirely new order. However, pursuant to Ameritech's June 2001 release, if an error is discovered in a CLEC directory order, the CLEC must send Ameritech an entirely new directory listing order, thus starting the process anew.

98. Ameritech argues that it agreed to provide CLECs access to an integrated directory listing interface that incorporated only the limited OSS functionalities previously provided by AAS. This position is a severe after-the-fact retraction of Ameritech's commitment. The plain terms of the commitment provide that Ameritech is to "incorporate the functionalities of **its OSS interface** and Ameritech Advertising Services" into one "single Ameritech interface for service orders for directory listings." By Ameritech's own admission, the single directory listing interface it has provided in June 2001 does not incorporate any of the enhanced functionalities of Ameritech's EDI OSS interface.

99. To the contrary, Ameritech merely has provided in June 2001 a single pipe for CLECs to send a directory listing order to Ameritech. All Ameritech does with this directory order is pass it on to AAS and confirm to the CLEC (via an electronically sent

FOC) that it has passed the order to AAS. For all other directory ordering transactions (rejects, completion notices, supplements), the CLEC must still deal directly and manually with AAS via fax, email, or phone. Ameritech's position undercuts the benefit of the entire settlement on directory listings -- one industry-compliant **electronic** interface for CLECs to complete both LSR and DLR orders.

**Ameritech's directory listing ordering process is discriminatory.**

100. Beyond the fact that Ameritech has failed to live up to its commitment, its directory ordering process is discriminatory and otherwise will not support mass-market competitive entry.

101. First of all, Ameritech's directory listing ordering process discriminates between CLECs. If a CLEC directory order involves resale service or UNE-P services, the CLEC integrates its directory listing order with the LSR and Ameritech processes that order via one interface -- i.e., all completion notice, rejects, etc. are sent by Ameritech to the CLEC electronically over the same EDI interface by which the CLEC sends its directory order. On the other hand, as described above, when a facilities-based CLEC places a directory order with Ameritech, all responses (e.g., completion notices, rejects, and edits) are provided from AAS via fax, phone, or email. Moreover, a facilities-based carrier cannot supplement its directory order electronically, but must instead provide an entirely new order if it wishes to change any of the information in the listing.

102. By providing two separate -- and wholly unequal -- means by which CLECs are to place directory orders, Ameritech is discriminating between CLECs based solely on the market-entry mechanism (UNE-P/resale versus UNE-loop) they choose to use to enter the Michigan local market.

103. Perhaps even more importantly, Ameritech's directory ordering process discriminates in favor of Ameritech itself. For its own retail customers, Ameritech systems enable its service representatives to issue integrated service/directory listing orders. If an error is found in the order, the representative is electronically and immediately made aware of that error and the order is held on the representative's screen until fixed. The representative is not allowed to release the directory order downstream for processing until he/she fixes the error. Only after the order is considered correct is it released for processing and forwarded to the directory listing database system.

Ameritech's discovery responses confirmed that it does not use its affiliate, AAS, for processing directory listing orders for its retail customers. *See* Ameritech Response to ATTAM0010. Quite obviously, the manner in which CLECs must process directory listing orders is not at parity with the manner in which Ameritech processes its own directory listing orders. The Ameritech retail service representative receives real time electronic notices of errors in the directory listing order and does not deal with AAS. The CLEC must await a fax, email, or phone call from AAS to inform it of an error in an order. The Ameritech service representative can supplement the Ameritech retail directory order by fixing errors electronically on the screen, before the order is processed and sent to AAS. The CLEC cannot electronically supplement its directory order to fix errors. Indeed, once Ameritech receives the CLEC directory order, it immediately forwards it to AAS. Ameritech does not conduct any edits on that order, nor does it even allow the CLEC to edit that order by providing a supplement. Instead, the CLEC must begin the process anew by sending Ameritech a completely new order, which Ameritech will then pass on to AAS, starting the manual loop of phones, faxes, and emails.

Certainly, this process does not provide for the processing of CLEC directory listing orders in the same time and manner as Ameritech provides itself. But, as the FCC found, this is exactly Ameritech's obligation:

Although the Commission has not required that incumbent LECs follow a prescribed approach in providing access to OSS functions, we would not deem an incumbent LEC to be providing nondiscriminatory access if limits on the processing of information between interface and the legacy systems prevented a competitor from performing a specific function in substantially the same time and manner as the incumbent performs that function for itself

Ameritech Michigan 271 Order, ¶ 135.

104. As is readily apparent, the process by Ameritech processes its own directory listing orders is entirely electronic and cuts out AAS, while each and every facilities-based CLEC directory listing order is processed by Ameritech and AAS manually. If an error is found in the CLEC directory order, AAS informs the CLEC of the error via fax, phone call, or email. If the order is completed or rejected, AAS informs the CLEC of the completion or rejection via fax, phone call, or email. This manual processing necessitates that the CLEC hire and train employees to be able to respond to these faxes, phone calls, and emails. And it certainly assures that CLEC orders take more time and are prone to more errors. If the ordering process were done electronically, the CLEC could avoid these unnecessary and inefficient costs and lost time. By strapping its competitors with an efficient, manually-driven directory ordering process Ameritech has given itself an advantage in the market.

**Ameritech's directory ordering process is inadequate to support a fully competitive market.**

105. Not only is Ameritech's directory ordering process discriminatory, but its reliance on manual processing for directory listing orders is a recipe for disaster when order volumes increase. Manual intervention in the ordering process leads to any array of potential errors that can be caused by human intervention. AT&T's experience in entering other markets has confirmed once again that an inordinate amount of manual processing cannot sustain a commercially viable offering in the marketplace. In less than a year after the UNE-P became available in New York, Bell Atlantic was processing over 400,000 orders per month. When the incumbent is processing, on average, 20,000 orders per day (with a high number of these orders including directory listings), manual intervention, faxes, phone calls, or emails will produce catastrophic results.

106. As a condition to any 271 application, the Commission should require that Ameritech provide CLECs with access to non-discriminatory, fully electronic directory listing ordering OSS, and assure that it is doing so.

**Ameritech does not provide non-discriminatory access to directory listings.**

107. After the order process is final and the CLEC has retained a new customer with a directory listing, the CLEC still needs access to Ameritech's listing database to assist customers with questions about the listings that were placed, to facilitate changes to those listings, and to update listing information. The listing itself is retained in Ameritech's databases. Access to that listing is commonly referred to as "directory listing inquiries," which is a generally-accepted pre-ordering inquiry.

108. Presently, for its own retail customers Ameritech accesses its directory listings from its own databases as part of its customer service records. Similarly, for

CLECs using UNE-P or resale, access their customers' directory listings directly from Ameritech's databases via a pre-ordering EDI functionality. However, Ameritech does not provide directory listing inquiries for facilities-based CLECs (e.g., CLECs entering the market via the UNE-loop entry strategy). Instead, CLECs that need access to these listings are required to process their inquiries through a separate EDI interface with AAS.

109. This dual interface problem is unduly burdensome to the facilities-based CLEC and discriminates against that CLEC both in relation to Ameritech's retail operations and other CLECs. The facilities-based CLECs must maintain two separate interfaces and train their employees on two separate sets of business rules for these interfaces. Ameritech provides certain carriers less desirable access to directory listing ordering and information based solely on the manner in which that carrier chooses to provide service. This problem clearly gives Ameritech a competitive advantage over these carriers. Moreover, a carrier providing service through resale or UNE-P would also have a competitive advantage over a carrier providing service through UNE-loops, for example. This result is also discriminatory.

110. Ameritech has provided no good reason why directory listing inquiries could not be provided over one interface for all CLEC and Ameritech requests. In fact, it plans to provide just that in September of 2002. Unless and until Ameritech moves up this date, however, it cannot be said to be providing nondiscriminatory access to directory listings.

**X. The Commission Should Closely Monitor Ameritech's Flow Through Performance**

111. Flow through is the ability of CLEC orders to be passed through Ameritech's legacy systems electronically to the same extent as Ameritech's retail orders.

All CLEC orders do not flow through, but rather some drop out of the electronic process for varying degrees of manual intervention. In fact, Ameritech's performance measures indicate that CLEC orders do not "flow through" Ameritech's legacy systems to the same extent that Ameritech's retail orders do.

112. The importance of flow through cannot be overstated. Manual intervention in the ordering process brings into play a host of potential errors that can be caused by the fallible hands of humans. Flow-through also reduces ordering intervals so that CLEC can more quickly service their customers. Short intervals allow CLECs to know about rejections sooner, and have them corrected sooner rather than later.

113. Flow-through will become all the more important as the volume of CLEC orders increases. As volumes rise, manual processing of CLEC orders will place increased stress on Ameritech's ability to manually process these orders on a timely basis. It goes without saying that as volumes rise, manual processing will increase errors and severely tax Ameritech's wholesale organization. In fact, in regard to UNE-P, Ameritech has acknowledged this potential problem. As Ameritech OSS representative Mr. Gillis indicated at a hearing in Illinois, based on SBC's experience in Texas, Ameritech anticipates high volumes of orders for UNE-P in Illinois. Thus, Mr. Gillis acknowledged the need to improve SBC/Ameritech's flow-through capabilities for processing UNE-P order to 80%.<sup>20</sup>

114. When it last evaluated Ameritech's OSS, the FCC stressed the importance of flow through to competition and the perils of manual intervention. In finding that Ameritech's OSS would not support competition, the FCC focused on the failings of manual intervention:

We find that Ameritech's reliance on manual intervention is substantial and appears to cause significant deterioration in Ameritech's performance as orders increase. Given that the problems currently faced by Ameritech generally have arisen from a limited number of orders for simple POTs service, we are concerned that the problems Ameritech is experiencing will multiply, as more competing carriers enter the marketplace and increase both the total number of orders and the number of orders involving complex services. We identify and discuss below the major problems that have been, at least partially, caused by Ameritech's reliance on manual processing for the ordering and provisioning of resale service.<sup>21</sup>

115. Despite this clear directive, from 1997 until just the fall of 2000, Ameritech made no known improvement whatsoever in its flow through capabilities for unbundled elements. And the improvements Ameritech made in the fall of 2000 only included minor improvements for resale orders (an entry mechanism that has largely been abandoned) and for its UNE-P business offerings.

116. Over the past few years, CLECs have been left in the dark in regard to Ameritech's flow through capabilities. Ameritech refused to provide CLECs a list of order types that do and do not flow through. Indeed, throughout the five state collaborative process beginning in November of 1999, the CLECs constantly requested that Ameritech provide them a list of order and product types that flowed through. Only if armed with this list could the CLECs make an informed evaluation concerning what improvements Ameritech should make to its flow through capabilities. The flow through issue eventually was designated as Issue "S" in the A-AA list.

117. It was not until May of 2000 that Ameritech finally produced a flow through list it claimed was complete. It produced through discovery in Illinois in October

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<sup>20</sup> Illinois Commerce Commission Case No. 00-0592, Transcript p. 526.

<sup>21</sup> Ameritech Michigan 271 Order, ¶ 1731.

of 2000 a second list it claimed to be complete. During hearing in Illinois in October of 2000, it became clear that both of these lists were riddled with inconsistencies and glaring omissions.<sup>22</sup> These omissions lead Ameritech's witness, Mr. Gillis, to admit that the list was not complete. After Ameritech finally acknowledged that it needed to revise and update its flow through list, the parties came to agreement on a process by which Ameritech would improve flow through within the region. That settlement was filed as part of the OSS Joint Report. As enumerated in the OSS Joint Report, the parties agreed that on or before April 15, 2001 Ameritech must provide the CLECs a complete list of flow through exceptions. Based on this list, the CLECs were then to provide Ameritech (in April 2001) a prioritized list of product/order types that CLECs seek to have flowed through over the next 24 months. *See* OSS Joint Report, at 11-12. Thus, the settlement contemplates that once the CLECs are provided a complete list of flow through exceptions, thereby giving them a complete and accurate view of Ameritech's flow through capabilities, the CLECs were then to provide Ameritech their priorities for flow through improvements.

118. Ameritech turned this settlement on its head by demanding in a March 30, 2001 accessible letter that the CLECs define their priorities by April 16, 2001, in advance of its release of a complete list of flow through exceptions. The point Ameritech ignored is that the CLECs must first know what Ameritech does and does not flow through before they can prioritize items for improvement. To make matters worse, Ameritech attempted to implement its flow through commitment via the April CLEC forum, which was run by SBC personnel. These SBC personnel were simply not informed as to the intent of Ameritech's commitment in the Ameritech collaboratives.

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<sup>22</sup> ICC Docket No. 00-0592, Transcript, at 448-458.

119. When these SBC personnel were asked in that forum to supply the “complete” list of flow through exceptions, they referred the CLECs to a list dated January of 2001. This is the same list Ameritech’s Mr. Cottrell now references in his testimony<sup>23</sup> and it is virtually identical to the exceptions list that Ameritech provided in the fall of 2000, which even Ameritech agreed was not complete. It was in fact these deficiencies that led to the commitment by Ameritech to provide a “complete” list of exceptions by April 2001. The CLECs therefore anticipated that Ameritech would conduct an internal review of that list to assure its accuracy.

120. Instead, it appears Ameritech has simply turned around and given the CLECs the same list of exceptions that all the parties, including Ameritech, had previously agreed was deficient. Indeed, Ameritech did not even bother to correct the omissions noted by the CLECs in October of 2000. Those omissions remained in the January 2001 exceptions list now referred to by Ameritech.<sup>24</sup> But the list of omissions to the flow through list is ever growing. As AT&T affiant Ms. Karen Moore states, Ameritech’s performance measure reports directly contradict their flow through list, as they show orders flowing through for products types that Ameritech’s exceptions list indicates are not designed to flow through.

121. Thus, notwithstanding that the intent of the flow through commitment was for Ameritech to provide a “complete” list of flow through orders and exceptions based upon its own investigation, it is safe to assume that Ameritech conducted little if any

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<sup>23</sup> Ameritech attempted to supplement this list and attach a new flow through list to Mr. Cottrell’s statement literally two days before this testimony was due. AT&T has not had a chance to review this newly revised flow through list at this time.

<sup>24</sup> Only after AT&T’s OSS representative pointed out these same deficiencies in the April 2001 CLEC forum did Ameritech agree to revise the flow through exceptions list to correct the deficiencies uncovered over six months ago. These are the so-called “minor” revisions to the exceptions list referred to in

further investigation to assure that this list of flow through orders and exceptions is complete. It is not the CLECs' duty to edit this list; it is Ameritech's duty in the first place to verify that this list is complete and accurate.

122. But beyond the lack of a complete list of flow-through exceptions, during the next few months the Commission should closely monitor Ameritech's flow through performance, especially for popular order types such as UNE-P, UNE-Loops, and UNE-loops with number portability. Ameritech's unaudited performance measures for April of 2001 indicate that its flow through rate for UNE-P orders was less than 1%. Accepting Ameritech's data as accurate, these results must be improved markedly if CLECs are to compete at parity with SBC/Ameritech and this concern will only be heightened if the number of CLEC orders begins to increase exponentially.

**XI. Ameritech Has Not Shown That Its Billing System Is Either Industry - Compliant Or Nondiscriminatory**

123. Ameritech's Ms. Kagan points out that in October of 2001 Ameritech is to implement significant changes to its billing for UNEs, including UNE-P. (Kagan, at 5-6.) What she fails to point out is that Ameritech's implementation is to achieve industry standards that have been in place for more than two years. Ameritech's current UNE billing has been and continues to be a nightmarish collection of data from different systems and different operations that is dumped on facilities-based carriers every month. Ameritech is quick to point out that the so-called CABS billing enhancement (due in October) will put UNE billing on a par with that for access billing, yet does not explain why it has taken since 1996 to make this system modification. CABS billing will

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Ameritech's letter. Ameritech circulated a new exceptions list, with these AT&T-initiated revisions, on April 20, 2000.

eliminate some of the past discriminatory practices by providing carriers with bills that can be audited and verified electronically.

124. Ms Kagan also severely overstates the billing verification/audit steps that Ameritech performs for wholesale bills. Specifically, she does not specify the number of bills that are audited by Ameritech. (Kagan, at 13.) I would suggest that this number is likely very low. In all of the collaborative sessions in which billing was discussed, Ameritech never advised the CLECs or other participants of the auditing that it performs for wholesale bills. There were many discussions about the CLECs' inability to properly audit wholesale bills due to the Ameritech-rendered bills not conforming to current industry standards and formats. Not one Ameritech representative spoke to an ability or practice of bill auditing such as Ms Kagan describes in her statement.

125. The problems caused by Ameritech's poor billing systems result in CLECs spending extraordinary amounts of time and money to verify the charges. Resolution of the lack of parity in Ameritech's billing cannot occur until wholesale bills are provided according to industry standards.

126. Ameritech, in short, has not even completed the reworking of its wholesale billing systems to the operational level that CLECs will use for the foreseeable future. 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.

## **CONCLUSION**

127. There is much work to be done before Ameritech can be said to meet its OSS obligations. The Commission should refrain from making any judgment concerning Ameritech's OSS until is provided empirical information concerning the performance of those systems.

128. This concludes my affidavit.