

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion,)
to consider AMERITECH MICHIGAN's compliance)
with the competitive checklist in Section 271 of) Case No. U-12320
the Federal Telecommunications Act of 1996.)
_____)

AFFIDAVIT OF MARK IANNUZZI

ON BEHALF OF THE CLEC ASSOCIATION OF MICHIGAN

June 29, 2001

AFFIDAVIT OF MARK IANNUZZI

I, Mark Iannuzzi, being of lawful age and duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. My name is Mark Iannuzzi. I am the President of Telnet Worldwide, Inc., a member of the CLEC Association of Michigan (“CLECA”). My business address is 5455 Corporate Drive, Suite 206, Troy, Michigan, 48098. I am offering this affidavit in support of the comments of CLECA.

2. I have personal knowledge of the facts contained herein, except as to matters stated as being based upon information and belief, and as to these matters, I believe them to be true. If called as a witness, I can competently testify to the matters stated herein.

PROFESSIONAL EXPERIENCE

3. I have fifteen years of broad-based engineering experience, including software development in high-growth, technology/service oriented companies. I spent 12 years as a senior manager at VSA, a software development and consulting organization. There, I headed up a team of more than 30 to develop engineering analysis software for the product development industry. In this capacity, I pioneered breakthroughs in variational analysis, receiving recognition in the form of NSF grants for my research, and awards for contributions. I continually educate myself on the latest technology to better the company’s needs.

4. I am the founder and President of Telnet Worldwide, Inc., a CLEC authorized to serve local service customers in territories traditionally served by Ameritech. My company has an interconnection agreement, and is directly impacted by Ameritech’s behavior in providing service to CLECs.

PURPOSE OF AFFIDAVIT

6. The purpose of this affidavit is to present the experience of Telnet Worldwide, Inc. in dealing with Ameritech in order to support CLECA's opposition to Ameritech's claims that it has met the requirements of the Section 271 checklist.

INTERCONNECTION

7. Item 1 of the checklist requires that Ameritech provide interconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1). That is, Ameritech must provide all legally required forms of interconnection, including interconnection trunking and collocation arrangements. That is not consistent with Telnet's experience. Although Telnet has an interconnection agreement with Ameritech, that agreement recently had to be renegotiated. This successor interconnection agreement took over 15 months to complete. Ameritech changed its lead negotiator four times, which consumed the vast majority of this time. Each instance it was like starting over again. The last individual assigned was clearly incompetent and overburdened in this task. The result – heavy penalty to Telnet in lost time and money. Ameritech continues to deliver the necessary network access in a slow manner. Quite often capacity limitations are cited. Overall, this protracted interconnection has cost TelNet dearly in market penetration, momentum and income.

NONDISCRIMINATORY ACCESS TO UNES AND UNE COMBINATIONS

8. TelNet has been actively pursuing the employment of Ameritech's UNE and UNE-P's. We have made no progress on this matter specifically due to the lack of support by Ameritech personnel to advise us on any aspect of this capability, from what is available, how to order, how much does it cost, why isn't something available, etc.

NONDISCRIMINATORY ACCESS TO DATABASES AND DIALING PARITY

9. Item 10 of the checklist requires Ameritech to provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion. Item 12 requires nondiscriminatory access to allow for local dialing parity. Telnet has experienced problems with Ameritech on both of these fronts, and has been a difficult and protracted process. It took 6-months to establish a-links to the SS7 database, which were required to allow TelNet to commence operations in additional Michigan LATAs. At times we have had to go through great pains to determine “local dialing parity”. Ameritech withdrew tools used to determine this information, making it much more difficult and error prone to determine it. There is no indication that these problems have been solved.

RESALE

10. Item 14 of the checklist requires that services be available for resale. Ameritech technically makes resale available, but the process of beginning resale is so laborious it not funny. Difficulties abound, from incorrect guidance on ordering and pricing to expensive methods for order and service transaction processing. Ameritech provides no access to the electronic records necessary for TelNet to bill its customers. Ameritech provides no advance notice of changes to their ordering system. Telnet has lost time and money sending staff to training classes, only to be told the class was canceled.

RELIEF

11. Overall, TelNet’s experience with Ameritech has been painful, costly, and troublesome. First and foremost is that Ameritech has not tooled itself to address the needs and

requirements of a CLEC. What this means is that Ameritech can put a CLEC like TelNet out of business by the amount of delay, defects, incompetence, and indifference that they impose. Any entrepreneurial CLEC strives to provide better, different and less expensive services to the market. However, we are drowning in a sea of red tape and incompetence. This condition over-arches all that we do with Ameritech. Unless there is some meaningful change, the viability of TelNet providing an alternative is in jeopardy. We do not and cannot waste the magnitude of money that Ameritech does and exposes a CLEC to endure. For the reasons stated herein, the Commission should find that Ameritech is not in compliance with Section 271 or with the Competitive Checklist.

VERIFICATION

I Declare under penalty of perjury that the statements in this affidavit are true and correct to the best of my knowledge and belief.

Executed on the ___ day of _____, 2001.

Mark Iannuzzi

STATE OF _____

COUNTY OF _____

Subscribed and sworn to before me on this __ day of _____, 2001.

Notary Public
My Commission expires: _____