

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

PUBLIC VERSION

**AFFIDAVIT OF CHARLES GARY
REGARDING INTERCONNECTION TRUNKING**

I, Charles Gary, being first duly sworn under oath, do state that if called upon to be a witness in this matter that I would be competent to testify to the following:

My name is Charles Gary. My position is Manager, Local Switch Network Provisioning, Central Region, within WorldCom. In this position I help oversee or am a Manager for all aspects of provisioning of interconnection trunking including that for the WorldCom subsidiary companies MCImetro Access Transmission Services, Inc., MCI WorldCom Communications, Inc., and Brooks Fiber Communications of Michigan, Inc., in the states of Michigan, Illinois, Indiana, Ohio, and Wisconsin. I have been in the Telecommunications Industry since March of 1991. I have worked in Customer Service, Data Entry, Carrier Account Rep, Premier Account Rep, Local Switch Provisioner, Circuit Designer and Manager.

As the Manager of the Local Switched Network Provisioning Group Central Region, my responsibilities include the daily management of WorldCom Switch Provisioners and Circuit Designers. Our main objective is to assure the timely turnup of circuits for Local Switch Interconnection in the Ameritech Region. We interface on a daily basis with Ameritech issuing

1 ASRs (Access Service Requests) and TGSRs (Trunk Group Service Requests) for
2 Interconnection. We are also responsible for maintaining an accurate account of all Switch
3 Ports, CFA assignments, and T1 quantity within our trunk groups.

4 This present affidavit focuses on certain issues regarding WorldCom's experience with
5 Ameritech for provisioning of interconnection trunking. I have attempted to limit this affidavit to
6 focus on four issues: 1.) The delay in Ameritech provisioning interconnection trunking in
7 Michigan; 2.) The port problem in the Pontiac tandem; 3.) The runaround for ordering
8 interconnection trunking in Grand Rapids; and 4.) The Bell Shelf problem in Detroit.

9 **THE DELAY IN AMERITECH PROVISIONING**
10 **INTERCONNECTION TRUNKING IN MICHIGAN**

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12 Ameritech is providing unacceptably poor service in provisioning interconnection
13 trunking to WorldCom. Almost all of the orders are past due when provisioned. There is also a
14 large gap between the due date (as provided by Ameritech) and the actual installation date for the
15 interconnection trunking which has been installed. There are many orders which have not yet
16 been provisioned, and several others still are awaiting an ASR from Ameritech. An acceptable
17 time frame for receiving an ASR is 4 to 6 business days at the most. Yet, Ameritech takes several
18 weeks to over one month to get this step done.

19 There are several consequences for this type of poor performance on the part of
20 Ameritech. Call volumes are restricted and the incidence of non-connected calls increases. This
21 means that there are inappropriate restrictions in the volume of calls which can be handled
22 between WorldCom and Ameritech customers. Since Ameritech is the dominant carrier, this

1 restriction imposes a competitive barrier to a carrier such as WorldCom from entering the local
2 market.

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4 **THE PORT PROBLEM IN THE PONTIAC TANDEM**

5 For about one year now, Ameritech has generally refused to allow orders to be submitted
6 for interconnection trunking in the Pontiac tandem. Ameritech claims that there is no capacity for
7 competitors and that the only way for a competitor to obtain interconnection trunking is if an
8 circuit is disconnected. This severely impairs the ability of competitors to provide unblocked
9 service in the Pontiac area.

10 Ameritech claims that this problem will be relieved with the opening of the Tyler tandem
11 in July 2001. In anticipation of this, our Traffic Department issued a order log on June 5, 2001 to
12 add many (**Confidential: xxxx**) trunks at the Ameritech's Pontiac tandem. (**Confidential: P.O**
13 **number xxxxxxxx**) was sent to Ameritech on June 8, 2001 requesting these trunks with a
14 requested due date of July 13, 2001. As of today, we have not received the firm order
15 conformation. The lack of trunking could cause a blocking situation with our existing local/toll
16 trunks.

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19 **THE GRAND RAPIDS RUN-AROUND**

20 WorldCom has recently run into a string of problems in ordering DS-3 trunking in Grand
21 Rapids. We were in need of (**Confidential: xxx**) additional DS3's interconnection trunks at our
22 Grand Rapids locations. We have (**Confidential: xxx**) active routes in Grand Rapids, all of
23 which are full to capacity. We are not able to place any T1 order for interconnection without
24 these additional DS3's, which in turn limits the amount of capacity WorldCom can deliver to all

AFFIDAVIT OF CHARLES GARY
PUBLIC VERSION
JUNE 29, 2001

1 of its customers. The delay in installing, or the failure to install these interconnection trunks,
2 causes a strain on all future revenue coming into WorldCom.

3 In May 2001 our internal reporting showed a need for additional DS3 interconnection
4 trunking in Grand Rapids. These type of DS3's are provisioned and maintained by Ameritech.
5 Provisioning of this type of trunking requires us to first contact Ameritech's Implementation
6 Manager. Upon being contacted, he is then to begin the process to have the order placed and sent
7 to the WorldCom Traffic Engineer.

8 One of my Local Switch Network Provisioners, Zemetria Collier, attempted to reach
9 contact Ameritech's Implementation Manager several times, leaving voice mails, paging, etc., in
10 early May 2001, but was no reply. Ms. Collier then escalated the issue up to me, and I in turn
11 left a message on the voice mail of contact Ameritech's Implementation Manager. Finally, he
12 returned by call, but pointed us in the wrong direction. He told WorldCom to contact the
13 Ameritech Transport Manager for the WorldCom interconnection trunking needs.

14 The Ameritech Transport Manager informed WorldCom that she would not be
15 responsible to initiating this order, and that this is not a part of her departmental function. She
16 stated that this order would have to go back to contact Ameritech's Implementation Manager and
17 the order must be initiated out of his office.

18 Ms. Collier then phoned contact Ameritech's Implementation Manager again, but the
19 calls went unanswered. Ms. Collier started the escalation process once again. We were able to
20 reach contact Ameritech's Implementation Manager at this point. We informed him of the
21 current immediate need for the DS3 trunking in Grand Rapids. We explained that were in need
22 of 3 additional DS3's at our Grand Rapids locations. We explained that we were not able to place

AFFIDAVIT OF CHARLES GARY
PUBLIC VERSION
JUNE 29, 2001

1 any customer order without these DS3's, which in turn will not allow WorldCom to offer service
2 to customers. We explained that this will cause a strain on all future revenue coming into
3 WorldCom. He apologized for not returning the calls stating he was involved in training, but
4 that he would handle the issue right away.

5 As of June 27, 2001, we still have not received an order from contact Ameritech's
6 Implementation Manager to order up the **(Confidential: xxx)** additional DS3s in Grand Rapids.

7

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BELL SHELF PROBLEM

9 On April 4, 2001 a purchase order **(Confidential: number xxxxxxxx)** was issued to
10 Ameritech for several **(Confidential: xxx)** Ds3's to the Ameritech Detroit Bell central office.
11 The requested in service date was April 18, 2001. The firm order conformation was received
12 from Ameritech on April 26, 2001 with a FOC of May 16, 2001.

13 A major problem within a DACS (Digital Access Crosscontrol System) unit at Ameritech
14 caused a delay in the installation of the last few **(Confidential: xxx)** DS3's. These last DS3's
15 were installed and accepted on June 25, 2001, nine weeks after the requested due date and about
16 five weeks after the FOC date.

**AFFIDAVIT OF CHARLES GARY
PUBLIC VERSION
JUNE 29, 2001**

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2 FURTHER AFFIANT SAYETH NOT

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4 _____

5 Charles Gary

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7 Subscribed to and sworn to before me this

8 _____ day of June, 2001

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10 _____

11 Notary Public

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AFFIDAVIT OF CHARLES GARY

JUNE 29, 2001

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2 FURTHER AFFIANT SAYETH NOT

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Charles Gary

5 Charles Gary

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7 Subscribed to and sworn to before me this

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25TH day of June, 2001

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Diane M. Coppola

11

Notary Public

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