

**AFFIDAVIT OF MICHAEL HUSSEY
PUBLIC VERSION
JUNE 29, 2001**

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

PUBLIC VERSION

AFFIDAVIT OF MICHAEL HUSSEY REGARDING LOOP PROVISIONING

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

3 My name is Michael L. Hussey. I am a Manager of the Local Carrier Agreements
4 organization within WorldCom, including the subsidiary companies of MCImetro Access
5 Transmission Services, Inc., MCI WorldCom Communications, Inc., and Brooks Fiber
6 Communications of Michigan, Inc.

7 My present title is Senior Manager, Central Region OSC - Local Install, where I manage
8 a group of engineers and technicians who provide lines to customers using WorldCom's own
9 switches in the states of Michigan, Illinois, Ohio, Wisconsin and Indiana to WorldCom's local
10 customers. I have held this position for about one year.

11 Prior to that my responsibilities included negotiating and amending Local Interconnection
12 Agreements of MCImetro Access Transmission Services, Inc. with Ameritech Information
13 Industry Services ("AIIS") and Cincinnati Bell Telephone Company ("CBT"). Additionally, I
14 was responsible for the administration and implementation of those Interconnection Agreements
15 within MCI's Central Region. Among other duties, I was responsible for the monitoring and
16 documentation of telephone company ("telco") service performance to ensure interconnection
17 agreement compliance with appropriate performance benchmarks. I was also responsible for
18 submissions of Bona Fide Request ("BFR") orders to AIIS and CBT for new services and
19 combinations of unbundled network elements.

20 I have been employed by MCI since March of 1988, and have served in various technical,
21 supervisory, and engineering positions. I hold a bachelors of science degree in business
22 management from Calumet College of St Josephs, and received associates in applied science
23 degrees from the Community College of the Air Force and the University of Maryland.

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1 This present affidavit focuses on certain issues regarding WorldCom's experience with
2 Ameritech where WorldCom has submitted orders to Ameritech to provision DS-1 loops. When I
3 use the term DS-1 loops in this affidavit, I am referring to the loops ordered by WorldCom from
4 Ameritech, whether the loop is ordered from the local interconnection agreement or from the
5 special access tariff. Due to a number of factors, about 95% of the loops which WorldCom
6 orders from Ameritech under my supervision are from the special access tariff. These loops are
7 only used for WorldCom local customers. In Michigan, there are roughly about (**Confidential :**
8 **xxxxxxxxxx**) such loop orders per month from WorldCom.

9 Present problems with the way Ameritech provisions loops include the number of past
10 due orders and the length of time it takes for Ameritech to provision loops. A disturbing recent
11 trend are the number of orders being delayed for the Ameritech stated reason of "undertakings"
12 which to me is the same as "No Facilities" but with a new name.

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14 **PAST DUE LOOP ORDERS AND LENGTH OF TIME TO PROVISION DS-1 LOOPS**

15 There are still a large number of past due loop orders with Ameritech in Michigan and
16 Ameritech takes too long to provision DS1 loops. It is my understanding that Michael Beach of
17 WorldCom will be addressing the aggregate numbers on this issue. My focus is how this impacts
18 WorldCom on a day to day basis.

19 The delay in provisioning DS1 loops and the large number of past due orders requires
20 WorldCom technicians to call Ameritech to follow up on these orders. Many of these orders are
21 30 days or more overdue, and Ameritech's late provisioning and relative inaccessibility makes
22 the process frustrating and results in many customers venting anger at WorldCom.

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1 The hold times on these calls are frequently 45 minutes to an hour per call. On May 1,
2 2001, WorldCom management found it necessary to suggest to Ameritech that Ameritech hold a
3 daily call with WorldCom to discuss all past due orders, primarily focusing on those which are
4 past due from 5 to 50 plus days. Beginning on May 7, this call has taken place on all business
5 days at 3pm central. This is a level of cooperation from Ameritech not seen previously. These
6 management calls, however, now consume management time but are the only effective method
7 to give management knowledge as to the status of these order. These daily management calls
8 also do not eliminate the need for WorldCom technicians to place calls on orders which are 1 to
9 5 days late, and the hold times are still excessive on these calls. While these daily calls are an
10 improvement from the prior Ameritech practice, it should be noted that in all other SBC areas of
11 the country outside of the Ameritech region, daily calls are not needed. Additionally, many DS-1
12 loop orders in Michigan are still more than 30 days old and the daily calls have not resolved this
13 issue.

“SHORTAGE OF FACILITIES” AND “UNDERTAKINGS”

14 With an aggravating increasing frequency, Ameritech in Michigan is forcing escalations
15 by claiming “shortage of facilities” or “undertakings” so as not to provision loops by the FOC
16 date. For example, to simply get a loop which crosses a street, Ameritech sometimes states that
17 this will take 2 to 3 months, and claims an inability to find a spare pair. This results in customer
18 aggravation and anger towards WorldCom. The net result of this and other Ameritech
19 weaknesses in Michigan is that loop orders take an unacceptable long period of time to provision
20 in Michigan.
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FURTHER AFFIANT SAYETH NOT

Michael Hussey
Michael Hussey

Subscribed to and sworn to before me this

26 day of June, 2001

Dorothy E. Hauser
Notary Public

