

JUNE 29, 2001

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

1  
 2  
 3  
 4  
 5 In the matter, on the Commission's own motion, )  
 6 to consider AMERITECH MICHIGAN's compliance ) Case No. U-12320  
 7 with the competitive checklist in Section 271 of )  
 8 the federal Telecommunications Act of 1996. )  
 9 \_\_\_\_\_)

AFFIDAVIT OF MICHAEL LEMKUHL REGARDING DAL AND CNAM ISSUES

I, Michael Lehmkuhl, 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 present position at WorldCom is Regulatory Specialist for Worldcom's ISN Services & Solutions Group. I have held this position since November of 2000. My present duties include overseeing the company's efforts in obtaining and utilizing Directory Assistance Listings (DAL) data from ILECs and I am also responsible for addressing CNAM (Customer Name and Address) database issues. In this affidavit I use the term "WorldCom" to mean individually or collectively any of the WorldCom companies (unless context indicates otherwise) including MCImetro Access Transmission Services, Inc., MCI WorldCom Communications, Inc., and Brooks Fiber Communications of Michigan, Inc.

After being admitted to the Wisconsin Bar, I practiced telecommunications law before the FCC and other federal agencies for approximately 8 of the last ten years. In 1999, I left my practice at Pepper & Corazzini in Washington, DC and consulted various telecommunications clients until I joined Worldcom last year. Prior to practicing, I was a law clerk for the firm of Goldberg, Godles, Wiener & Wright of Washington, DC, for two year assisting in all levels of their domestic and international telecommunications practice. While I no longer practice law, I

# AFFIDAVIT OF MICHAEL LEHMKUHL

JUNE 29, 2001

1 am responsible for supporting the business and regulatory efforts of Worldcom through its ISN  
2 Services and Solutions Group in the areas of directory assistance and call-related databases.

3 I graduated Drake University Law School in 1990 earning both a Juris Doctorate in Law  
4 and a Master of Arts in Mass Communication. I earned by Bachelor's degree in Journalism from  
5 the University of Wisconsin at Madison in 1987.

6 In this affidavit I discuss WorldCom's experience with Ameritech, with a focus on  
7 Michigan. Specifically I address WorldCom's troubling experience in obtaining accurate DAL  
8 from Ameritech, the failure of Ameritech to take steps to provision the CNAM download as  
9 ordered by the Michigan PSC, and the problems Ameritech has in updating its own CNAM  
10 database for former Ameritech customers who have switched to WorldCom.

11

12

## DAL DOWNLOADS

13 As set forth in an amendment to the current interconnection agreement between  
14 MCImetro and Ameritech Michigan, Ameritech is supposed to provide DAL downloads to  
15 MCImetro. Unfortunately, there are serious problems with the quality of the data which  
16 Ameritech has either been slow to correct or has failed to correct altogether. Of course these  
17 issues with the quality of the data only arise through WorldCom's diligence as it is usually not  
18 Ameritech's practice to notify Worldcom of discrepancies in the quality and content of its DAL  
19 data.

20 WorldCom has a number of issues related to the quality of data we receive from  
21 Ameritech both on a state by state and region-wide basis. WorldCom is concerned that these  
22 issues may be an indication of problems WorldCom may not even be aware of in Michigan.  
23 While Ameritech has generally provided WorldCom with reloads of the DAL data to correct

**AFFIDAVIT OF MICHAEL LEHMKUHL**

**JUNE 29, 2001**

1 these errors, WorldCom has received 5 reloads in the last 13 months. This is more reloads than  
2 WorldCom has needed from any other LEC in the country. For instance, over the past five years,  
3 WorldCom has not had to request one reload of DAL information it has received from either Bell  
4 Atlantic North (now part of Verizon) or Bell South.

5 Of recent and most particular concern, is an unexplained fluctuation in the number of  
6 individual directory assistance listings WorldCom receives for the entire Ameritech region. For  
7 instance, in January 2001, Worldcom received 16,746,422 listings from Ameritech. In February,  
8 the count was 20,117,512, in March 23,699,397 and in April 20,082,492. With a fluctuation of  
9 close to 4 million listings, and an inadequate explanation from Ameritech, WorldCom is  
10 concerned it is not receiving all the data it is entitled to by law and under its Interconnection  
11 Agreement.

12 Another issue of concern is that Worldcom continues to experience "unmatched deletes"  
13 to its DAL data. This occurs when a listing deleted in an Ameritech daily update file is not  
14 found in the WorldCom-Ameritech database. If the original listing was never transmitted to  
15 WorldCom in the first place, the update file has nothing to delete. Once again, this experience  
16 leads WorldCom to conclude that it is not receiving all the data to which it is entitled by law or  
17 under the Interconnection Agreement.

18 Another recent instance of bad data involves the random insertion of question mark  
19 characters in the data WorldCom received from Ameritech in its update feeds. After Ameritech  
20 failed to take the proper corrective action, WorldCom was forced to expend a considerable  
21 amount of time and money to "scrub" or clean the data listings on its own.

22

**AFFIDAVIT OF MICHAEL LEHMKUHL**

**JUNE 29, 2001**

1           As Worldcom continues to experience problems with the quality of data it receives from  
2 Ameritech, WorldCom is increasingly concerned about the overall quality of data it receives for  
3 the Ameritech region. While WorldCom is diligent in checking the data it receives from carriers  
4 like Ameritech , Ameritech has done nothing to report problems like these to WorldCom. Along  
5 with a degraded quality of service, WorldCom is also concerned about the anti-competitive  
6 effects these problems may have with regard to WorldCom’s provision of DAL data in the  
7 Ameritech region. This fear of anti-competitive behavior is rooted in the fact that there appears  
8 there is no incentive for Ameritech to correct the problems. This requires WorldCom to discover  
9 the problems and to constantly push Ameritech to make appropriate changes.

10

11

**CNAM DOWNLOADS**

12           On March 7, 2001, in Case No. U-12540, the Michigan PSC ordered Ameritech to  
13 provide CNAM downloads. To date, Ameritech has made no effort to comply with this order.  
14 Instead it has filed for rehearing on this issue. My understanding is that the order is in effect and  
15 that merely filing for rehearing does not stay the order.

16           As set forth in the hearing and briefs in that case, obtaining the CNAM downloads is very  
17 important to WorldCom. The issue should not be re-litigated here. Instead, Ameritech should  
18 comply with the Michigan PSC’s order in this regard and start to take active steps to comply  
19 with the requirement to provide the CNAM download to WorldCom.

20

21

22

23

JUNE 29, 2001

**CNAM UPDATES FOR PORTED NUMBERS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

Another CNAM problem happens in certain circumstances after customers switch to WorldCom from Ameritech for local service and their numbers are ported to WorldCom. In some cases, the data Ameritech has for the ported number is just plain wrong.

An example will help explain the problem. There is a specific case in Illinois of a travel agency who is now a WorldCom local customer who previously was an Ameritech local customer. When this travel agency made telephone calls placed to Ameritech local customers and the Ameritech local customer had caller ID with name, the travel agency was being identified as a funeral home. This occurred because Ameritech failed to update its CNAM database which is the source of the name displayed in the caller ID with name unit. Even though this example is from Illinois, the systems and processes from Ameritech are the same for this issue between Illinois and Michigan and therefore this Illinois experience is relevant to this Michigan filing.

This incorrect display on the caller ID with name obviously has a detrimental effect on WorldCom customers which should not be a price to pay for going with a competitor. The cause of this wrong information being displayed is the failure of Ameritech to update its CNAM information for customers who obtain local service from a CLEC.

This issue has been escalated between the companies as set forth in the emails in Attachment "A". As set forth in these emails, while Ameritech will correct the wrong information as each wrong piece of data is noticed, there is no present timetable for a permanent solution so as to prevent wrong information from being displayed.

It should also be noted that while Ameritech is taking steps to correct this problem, the only way the problem can be identified, without preemptive action on Ameritech's part., is when

**AFFIDAVIT OF MICHAEL LEHMKUHL**

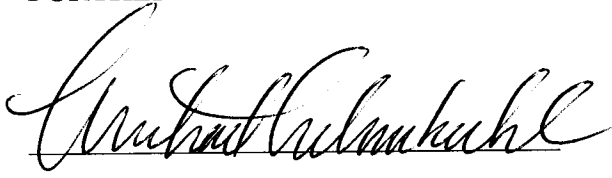
**JUNE 29, 2001**

1 a third party notifies the WorldCom customer that the caller ID with name is displaying the  
2 wrong name, and if the WorldCom customer then notifies WorldCom. Obviously, there can be  
3 long delays in any third party notifying the WorldCom customer about the problem. It is  
4 unknown to me what would happen if the Ameritech customer would contact Ameritech  
5 customer service. Also, it is highly likely that the Ameritech customer will simply do nothing but  
6 to think that the WorldCom local customer is not competent and is unable to accurately provide  
7 its name to “the telephone company.”

1 FURTHER AFFIANT SAYETH NOT

2

3



4 Michael J. Lehmkuhl

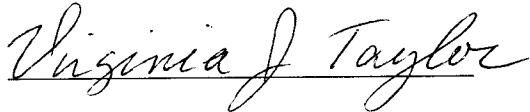
5

6 Subscribed to and sworn to before me this

7 25<sup>th</sup> day of June, 2001

8

9



10 Notary Public

Virginia J. Taylor  
NOTARY PUBLIC  
Commonwealth of Virginia  
My Commission Expires 4/30/05

JUNE 29, 2001

APPENDIX "A"

-----Original Message-----

From: MOORE, DONNA R. (AIT) [<mailto:dm1254@sbc.com>]  
Sent: Friday, June 08, 2001 1:10 PM  
To: 'trINETte.milroe@wcom.com'  
Cc: EWING, KATHLEEN (AIT); SMITH, JOSHUA (SWBT)  
Subject: RE: CNAM Data in Ameritech

Trinette

In response to your request, when a # is ported from Ameritech, the number is not being deleted from the Ameritech database, therefore when the database is queried it comes up with the Ameritech customer not the WorldCom customer.

Our System Support Staff is working on a project with Illuminet to delete the files from the AIT database. This will clean up the existing database, so the query will then go to the correct database to query.

Until the problem is fixed WorldCom should continue to call the LOC with any individual CNAM troubles. Ameritech has an ongoing effort to resolve this issue. However at this time we do not have a timetable for completion.

If you have any additional questions, please give me a call on (734) 266-6396.

Donna

> -----Original Message-----

> From: Trinette Milroe [<mailto:trINETte.milroe@wcom.com>]  
> Sent: Monday, May 21, 2001 10:40 AM  
> To: EWING, KATHLEEN (AIT)  
> Cc: MOORE, DONNA R. (AIT); [Diana.Davis@wcom.com](mailto:Diana.Davis@wcom.com)  
> Subject: FW: CNAM Data in Ameritech  
> Importance: High  
>  
> Kate and Donna,  
>  
> WCOM would like to get a current status or update on the customer  
> complaints below. Can you provide some information on why the CNAM  
> display is showing incorrect information for the three customers?  
>  
>  
> Thanks,  
> Trinette Milroe

JUNE 29, 2001

> WorldCom Carrier Management  
> 312-470-4993  
>  
>  
> -----Original Message-----  
> From: Trinette Milroe [<mailto:trinette.milroe@wcom.com>]  
> Sent: Tuesday, May 15, 2001 9:31 AM  
> To: dm1254@sbc.com  
> Cc: Kathleen.Ewing@msg.Ameritech.com  
> Subject: CNAM Data in Ameritech  
> Importance: High  
>  
> Donna and Kate,  
>  
> I need your assistance, WCOM is now experiencing problems again with  
> another customer receiving incorrect or bad CNAM display. Along with DER  
> Travel and Allegiance, Household International is also showing bad CNAM  
> display. The number is correct and the number is displayed correctly, but  
> Ameritech database is incorrect and WCOM wants to know why Ameritech  
> database is reflecting a different name for this customer as well as DER  
> Travel and Allegiance? Below is the information for Household  
> International.  
>  
> Number: [redacted] (this is a PRI BTN displayed on outbound)  
> Correct Name:  
> Name Displayed:  
>  
> WCOM would like to know why [redacted] displays, instead of [redacted], on outbound calls  
> from [redacted].  
>  
> WCOM would also like a progress report for [redacted], and  
> [redacted]  
> outbound calls also returning incorrect CNAM display in Ameritech region.  
>  
> Thanks,  
> Trinette Milroe  
> Worldcom  
> Carrier Management  
> 312-470-4993 (office)  
>  
>