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 the federal Telecommunications Act of 1996.	)))))	Case No. U-12320

AFFIDAVIT OF YOUNG NOBLE
REGARDING
CERTAIN DSL ISSUES

I, Young Noble, 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:

I am a Manager, Level II, of Local Network Planning and Services Delivery at WorldCom. I have held this position for a year, and have been with the company (and its predecessors) for 6 years. My present responsibilities include managing project managers for daily activities & tasks, develop project implementation strategy and analyze project readiness, and to oversee tasks relate to numerous projects, including HDSL Process/System Requirements Development & Pre-production testing and DSL LEC LSR requirements.

The purpose of this affidavit is to show some of the difficulties WorldCom is having with Ameritech which are preventing WorldCom from provisioning digital subscriber loop ("DSL") services to its own customers. This affidavit is not intended to describe all of the problems WorldCom is experiencing. Instead, it highlights some recent problems which are indicative of the obstacles and challenges we are facing in attempting to begin ordering DSL-capable loops in the Ameritech region.

One of the initial steps in determining how WorldCom can provision DSL services to its customers in Michigan is to obtain documentation from Ameritech showing the ordering requirements which WorldCom is to follow when ordering DSL-compatible loops. To meet this objective, people in my group including Sigrid Heuser and Richard Weedon have conducted conference calls with Ameritech and have submitted sample LSR order forms for Ameritech's critique and corrections. WorldCom refers to this as 'Clean Order Testing'. This Clean Order Testing effort is to be performed in advance of submitting orders, so as to minimize Ameritech order rejects and to

maximize on-time service delivery to WorldCom customers. The Clean Order Testing took place in October 2000 and resulted in a "Job Aid" document which WorldCom prepared based on the experience in the Clean Order Testing which Ameritech reviewed and approved. The Clean Order Testing allowed WorldCom to successfully send a test order.

In June 2001, Ameritech unilaterally and without notice to its business contacts at WorldCom changed its business practices. This change in business practices rendered the Job Aid developed in October 2000 inaccurate. The misleading information provided in June 2000 and relied upon by WorldCom has now delayed WorldCom's ability to begin submitting "live customer" orders. This means that the "clean" test order which was sent in October 2000 would now be rejected by Ameritech.

For example, during the Clean Order Testing conducted in October 2000, Ameritech stated that WorldCom would not be expected to specify the specification (SPEC) code on the loop orders for the loops which we wanted conditioned and therefor would not have to access Ameritech's loop make-up database to obtain the SPEC code. During June 2001, while attempting to order a 4-wire HDSL-compatible loop, Ameritech indicated that WorldCom is expected to select one of SPEC codes and include the specific SPEC code on the local service request ("LSR") order form, in order to ensure the loop is DSL-compatible upon loop delivery. Each SPEC code specifies whether and what type of loop conditioning (i.e., removal of load coils, repeaters, and/or bridge taps) is requested based upon Verigate loop make-up information.

Ameritech, as is true for many incumbent local exchange companies ("ILECs"), offers a web-based "CLEC Handbook." Ameritech's CLEC Handbook can be found by

accessing http://clec.sbc.com/, clicking on "CLEC Handbook", and selecting the appropriate state (from SBC's list of 13 states). Ameritech's CLEC Handbook contains inaccurate, conflicting and missing information. Examples of inaccurate and missing information were provided to Ameritech during a June 14, 2001 conference call. In response to WorldCom's request that Ameritech correct the inaccuracies in its CLEC Handbook, Ameritech provided an on June 21, 2001 which stated: "We will take that into consideration." A subsequent attempt by WorldCom to obtain an Ameritech commitment to correct its web information has been met with no response.

An example of the misinformation contained in the CLEC Handbook is that CLECs are frequently prompted to use an Access Service Request ("ASR") order form. However, during the June 14, 2001 conference call with WorldCom, Ameritech representative Milly Plavsic (Ameritech's Local Service Center Support for Methods & Procedures) stated that WorldCom should only submit DSL and PSD (Power Spectral Density) orders via a LSR (Local Service Request), and not an ASR. As many in the industry are aware, LSRs and ASRs are vastly different ordering forms which are based on entirely on different systems.

An example of missing information from the CLEC handbook is that the PSD includes a category "3b" PSD, but the definition of 3b does not describe how Ameritech would support this type of PSD category. Ameritech has informed us that we need to use category 3b to 4-wire HDSL capable loops. Yet, there is not documentation showing that we should use this category, nor any description of how Ameritech would support this. This missing information is preventing us from ordering 4-wire HDSL capable loops.

Ameritech stated during the June 14, 2001 conference call that WorldCom is permitted to order xDSL loops and PSD (Power Spectral Density) mask types, and took the action item to define the differences between DSL and PSD, from technical, operational and process standpoints. Kevin Sievert of WorldCom offered Peggy Herzog of Ameritech the name of the SBC SME who has represented SBC at DSL forums/meetings: Gene Edmunds. On June 21, 2001, Peggy Herzog/SBC Account Manager e-mailed a status update on Ameritech's action items, but did not provide any clarity, stating: "There isn't a difference between DSL & PSD's...." On June 25th WorldCom requested that Ameritech provide the ANSI (American National Standards Institute, an organization which sets national standards) document references for each of the following Ameritech NC/NCI (Network Channel/ Network Channel Interface) codes which Ameritech provides for their DSL and PSD-compatible loop ordering:

LX-- 04QB5.003

LX-- 02QB9.005

LX-- 02QB5.001

LX-- 04QB5.00H

LX-- 02QB9.00A

We are still awaiting a response. It is critical that Ameritech correlate their NC/NCI codes to the industry standards as set by ANSI so that we can order the proper type of loop for the customer specific applications.

Kevin Sievert indicated that ANSI document T1417-2001 includes PSD categories such as 1, 2, 3, etc. and not 1a, 1b, 3a, and 3b which Ameritech employs. Ameritech has not provided any comment to this discrepancy to the industry standard,

neither during the conference call nor subsequently. Ameritech's failure to do so means that we do not know how Ameritech provisioning differs from industry standards and as a consequence the Ameritech product is not properly defined. This leaves us in the dark on what to order from Ameritech to serve our customers.

WorldCom's DSL initiatives include providing Integrated DSL service or IDSL service for customers who are served by loops up to 50kft. WorldCom was told by Ameritech that (in an e-mail from Peggy Herzong) that: "Customer can order as long of a loop or short of a loop as they desire. However, conditioning charges will change depending on loop length." Ameritech stated on a June 14, 2001 conference call with WorldCom that SPEC codes to remove lad coils, repeaters and bridge taps (UALRLT, UALRLX, UALRRX, UALRTR, and UALRTX) are to be used for loops over 12kft to 17.5kft. There are currently no SPEC codes for loops over 17.5kft. Ameritech has indicated to WorldCom only that IDSL will have its own SPEC codes in the future. However, when asked for a timeframe, or whether WorldCom would receive an "accessible letter" of notification of the additional SPEC codes, Ameritech participants said they were unaware of when this information would be made available. Thus, as it currently stands, WorldCom's IDSL initiatives are being blocked because of Ameritech's failure to implement a system for ordering loops that are longer than 17.5kft and require conditioning.

In an effort to gather information to assist in the development of its DSL initiatives, WorldCom on June 14, 2001 requested the following information from Ameritech: What general design rules does Ameritech use for copper networks with loops: a) 12kft and less; and b) 18kft and less, including the wire guage corresponding to

what kilofeet parameters? Peggy Herzog/SBC Account Manager responded via a June 21, 2001 email: "SBC does not give out information on the design of their network. We design our network to support voice traffic according to the ANSI Standards." No specific reference was provided. This is an example of Ameritech just not providing basic information.

As a result of the above, WorldCom's ability to enter the DSL market in Michigan in a competitive way is being severely hampered by Ameritech's inconsistent, changing and undocumented business rules and explanations, and by Ameritech's unwillingness to disclose information essential for competitive entry.

FURTHER AFFIANT SAYETH NOT

Young Noble

Subscribed to and sworn to before me this

28 day of June, 2001

Notary Public

My Commission expires 12-31-05.