

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

**AFFIDAVIT OF JOANN BALDWIN**

1. My name is Joann Baldwin. My business address is 800 Jorie Boulevard, First Floor, Oak Brook, IL 60523. I am employed by XO Communications, Inc. ("XO") as a Project Coordinator. During my employment with XO, I have had significant experience in submitting XO's directory listings additions and changes to Ameritech.

2. I have been employed by XO since April 1999. I also have 8 ½ years work experience with Ameritech and one year with MCI.

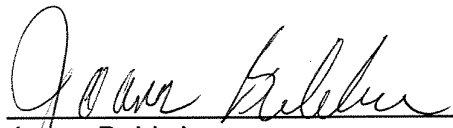
3. In order to transmit a new listing to Ameritech or to revise a current listing, XO uses a software application supplied by Ameritech called Ameritech Customer Entry System ("ACES").

4. Once XO transmits a new listing or a revision to a current listing, Ameritech provides XO with confirmation that it is in receipt of XO's request. Ameritech sends confirmation for many of XO's requests even though it does not input those requests. This happens with 30% of XO's request for directory listing additions or revisions. Thus, XO believes additions or revisions have been made which were never made.


5. In maintaining customer listings, Ameritech utilizes TCLISTLINK. When XO wishes to review a record to ensure its accuracy XO accesses Ameritech's

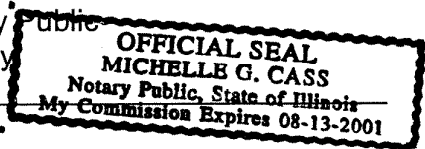
TCLISTLINK database. When an error is discovered in a customer's record, XO contacts Ameritech and XO is often told by Ameritech that the record within the TCLISTLINK database which Ameritech has retrieved is different from the record currently being viewed by XO. Thus, XO is not being allowed to view the same or most current records within this database. This impacts the ability of XO to ensure its end-user customers receive accurate listing in Ameritech's white pages.

6. At least three times per week, XO, while it is using ACES, receives "run time errors" which are sent when XO attempts to enter an additional listing. In order to continue to enter new listings, the XO representative must shut his/her computer and restart the computer prior to entering new records. When XO brings this problem with Ameritech's software to Ameritech's attention, Ameritech provides XO with another ACES application for XO to download. These new downloads do not solve the problem.

  
Joann Baldwin

Signed and sworn before me  
This 21<sup>st</sup> day of June, 2001

  
\_\_\_\_\_, Notary Public  
\_\_\_\_\_, County  
My Commission Expires: \_\_\_\_\_



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**AFFIDAVIT OF MICHAEL C. BATTS**

1. My name is Michael C. Batts. My business address is 21555 Melrose Avenue, Suite 18, Southfield, MI, 48075. I am employed by XO Michigan, Inc. ("XO") as Switch Manager. My job responsibilities include maintenance and support of XO's switch as well as testing and installation of new and existing customers.

2. I have been employed by XO since June 1999. Prior to my XO employment, I was employed by LDMI as Lead Switch Technician for one year. I also spent 5 ½ years with National Communications Services as a Switch Technician supporting companies such as U.S. West and Sprint.

3. During the conversion of Ameritech customers' service to XO's service, Ameritech's Local Operations Center ("LOC") communicates to XO's conversion coordinators that it has completed its work. XO then ports the telephone numbers associated with the order and test the lines.

4. A few days after the conversion is complete, XO sometimes receives reports from its customers that they are failing to receive some of their incoming calls. XO's customers are aware of this problem because their customers are notifying them that they are getting a "ring no answer" when they attempt to place a call.

5. Upon investigation, XO discovers that Ameritech did not remove the translations from its switch meaning that any Ameritech customer that originates from the Ameritech switch where the XO customer's number resided prior to the conversion will receive a "ring no answer" when attempting to contact the XO customer. The reason for this failure is because Ameritech's switch "thinks" that this number resides in the same switch where the call originated, and therefore, the calls terminates to a "ring no-answer" to Ameritech's frame. There is no way for XO to test for this circumstance because in order for the problem to surface, the calls must be placed from a number which resides in Ameritech's switch.

6. Here is an example of the types of problems Ameritech still cause XO. During a recent conversion of an Ameritech customer to XO service, XO received confirmation from Ameritech's Local Operations Center ("LOC") that it had completed all of its necessary work. XO then proceeded to port the numbers to its switch. Everything appeared to work for this customer. About two days later, the customer informed XO that it was not receiving all of its calls. After looking at the originating NPA\_NXXs, XO determined that all of the calls that were not being received originated from the same Ameritech switch where the customer's number previously resided. XO then called Ameritech, and Ameritech verified that that translations were still on the line. XO then contacted the LOC where a representative informed XO that he could not remove the translations without an order from XO. XO provided the LOC with the order number, and the LOC indicated that the order had been cancelled. XO checked with its own internal provisioning department who then contacted Ameritech's business office to determine the cause of the cancellation. Ameritech informed XO that the order was

cancelled by Ameritech in error. Even though Ameritech caused this significant problem, XO still had to issue a new order to have the translations removed so XO's customer could receive all of its calls. Ameritech removed the translations the following day.

7. In these cases the impact to XO and its customers are great. The customers do not understand that Ameritech was the cause of the problem especially since the customers never experienced such a problem as an Ameritech customer.

  
Michael C. Batts

Signed and sworn before me  
This 26<sup>th</sup> day of JUNE, 2001

\_\_\_\_\_, Notary Public  
\_\_\_\_\_, County,  
My Commission Expires: \_\_\_\_\_



ARTHUR S. GRESSER  
NOTARY PUBLIC-WAYNE COUNTY, MI  
MY COMMISSION EXPIRES 01-10-02

STATE OF MICHIGAN

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**AFFIDAVIT OF LORIE R. HANKINS**

1. My name is Lorie R. Hankins. My business address is 21555 Melrose Avenue, Suite 18, Southfield, MI, 48075. I am employed by XO Michigan, Inc. ("XO") as the Repair Coordinator. My job responsibilities include monitoring trouble tickets for the Michigan market and coordinating all areas of the repair process including preliminary testing of circuits and referring trouble tickets to Ameritech's Local Operations Center or High Capacity Center. I also dispatch technicians, schedule vendor meets, and work closely with XO's Switch and Transport Technicians to resolve customer issues.

2. I have been employed by XO since December 1999. Prior to my XO employment, I spent two years with LDMI in customer care and sales support positions.

3. I initiate trouble tickets with Ameritech both verbally and through an electronically bonded system known as EB/TA, which is Ameritech's electronically bonded trouble ticket system.

4. While EB/TA should have reduced my need for direct contact with Ameritech, it has not. In fact, I still have to contact the Local Operations Center directly to get an update on a particular trouble ticket even though Ameritech should be sending electronic updates on each of the tickets.

5. Ameritech's representatives at its LOC are inadequately trained which makes them unable to understand the remarks that Ameritech's own technicians provide to them regarding the nature and resolution of a particular trouble ticket. Since I communicate with Ameritech's LOC, it is impossible for me to convey information regarding a trouble ticket to XO's customers. Given the little information that I receive from Ameritech's LOC after the resolution of a trouble ticket, I am unable to maintain adequate records in the event of repeat trouble. Other than contacting the LOC, there is no other method for me to find out what actually happened during a dispatch, what technician they sent out on a job, let alone find out what the technician did to resolve the problem.

6. Ameritech's responsiveness to trouble tickets is also inadequately reported because Ameritech is poorly organized to timely respond to repair requests. Ameritech is only meeting its commitment times for XO trouble tickets 60% of the time.

7. For a no dial tone report relative to an unbundled network element ("UNE") loop, Ameritech's commitment time to repair is no less than 24 hours. In many cases, the issue is not resolved until 48 hours.

8. If a trouble ticket is cable related, Ameritech rarely has spare cable, forcing the customer to wait (up to )72 hours for resolution.

9. I also work with Ameritech's High Capacity ("Hi-Cap") Center East to open trouble tickets for T-1 or higher circuits. Ameritech's repair commitment time for these services is four hours although Ameritech is only meeting this four-hour commitment 10% of the time. As a result of missing its four-hour commitment, I am forced to call every hour to escalate. Ameritech begins responding after I have reached the third or

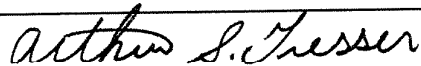
fourth level of the escalation process. I never receive call backs after escalating to the first or second levels.

10. Ameritech also closes many of the trouble tickets that I open citing "no trouble found." However, the customers report that, miraculously, service has been restored or the problem has disappeared after Ameritech has made a site visit. This occurs with 40% of the trouble tickets that XO opens with Ameritech. Other times, Ameritech closes the trouble ticket citing "no trouble found" and the customer reports that the trouble still exists. When this happens, XO must open yet another trouble ticket for the same problem with Ameritech and begin the 24 hour waiting process all over again.

  
Lorie R. Hankins

Signed and sworn before me  
This 26<sup>th</sup> day of June, 2001

\_\_\_\_\_, Notary Public  
\_\_\_\_\_, County,  
My Commission Expires: \_\_\_\_\_



ARTHUR S. GRESSER  
NOTARY PUBLIC-WAYNE COUNTY, MI  
MY COMMISSION EXPIRES 01-10-02

an XO customer is served by virtual collocation, and that XO customer experiences a service outage, XO cannot even begin repairs until two hours have passed.


4. This unequal access for XO is blatantly discriminatory and harms XO in the competitive marketplace.

5. Another significant problem relates to Ameritech's "unilateral testing." When XO has trouble with a DS-1 or DS-3 circuit, XO contacts Ameritech to arrange a "test assist" which means that Ameritech will test the circuit jointly with XO. When XO calls Ameritech requesting a test assist, Ameritech simply takes XO's request and indicates that it will call XO back to arrange the test assist. However, rather than coordinating the test assist with XO, Ameritech begins the test utilizing its automated test equipment **which causes the customer to lose service**. Ameritech then contacts XO after hours and indicates that it did not detect any trouble with the circuit. As a result of Ameritech engaging in this unilateral testing, Ameritech closes out the XO trouble ticket prior to XO testing the circuit, thus XO must contact Ameritech once again to open a new trouble ticket and start the process over. In most of these cases, the XO customer still has trouble with the circuit, and Ameritech's action simply cause additional delays for XO's customer's in getting its circuit repaired. Ameritech engages in unilateral testing about 90% of the time.


6. Still another problem relates to Ameritech's installation of high capacity circuits. During the installation process of a high capacity circuit for XO, Ameritech uses a negative response approach with respect to closing its installation orders meaning that if it does not receive an indication to the contrary, it will proceed with closing the order. For example, Ameritech will contact XO after hours or on voice mail to say that

Ameritech will close the order by the end of the business day if it does not receive a callback from XO. If Ameritech calls after hours, inadvertently dials the wrong number and therefore leaves the message with an incorrect XO contact, or should Ameritech fail to leave a message for anyone, then XO does not have the opportunity to report any trouble that exists with the new circuit prior to Ameritech closing out the order. When this occurs and the new circuit has a problem, XO must then open a trouble ticket with Ameritech because Ameritech views the order as completed. Once XO opens the trouble ticket, Ameritech has committed to closing the ticket in 24 hours which does not usually happen (see Affidavit of Lorie R. Hankins) meaning that in the first few days after the installation, an XO customer could be out of service because Ameritech did not wait for XO's to test the circuit and affirmatively ask Ameritech to close the conversion.

7. When escalating an order or a trouble ticket with Ameritech's High Capacity Center, XO does not receive any returned calls from Ameritech's supervisors (level one through four which is the highest level to which I can escalate). If XO has an order that has not been completed by Ameritech, I call for first level escalation. Ameritech's technician will hand the request to his/her supervisor. I will call the next day for status although Ameritech has none to report. I repeat this process though the fourth escalation level to no avail as XO still does not receive any status from Ameritech.

  
Phillip Routhier

Signed and sworn before me  
This 26<sup>th</sup> day of June, 2001

, Notary Public

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**AFFIDAVIT OF DENNIS WALL**

1. My name is Dennis Wall. My business address is 800 Jorie Boulevard, First Floor, Oak Brook, IL 60523. I am employed by XO Communications, Inc. ("XO") as Director of Service Delivery. My job responsibilities include managing the ordering and provisioning functions for Illinois, Michigan, Ohio, Wisconsin, and Indiana.

2. I have been employed by XO for three months. I also have 23 years of work experience with MCI, including 18 years in Network Operations and 5 years in Carrier Relations.

3. When XO submits an order to Ameritech, Ameritech returns a firm order commitment ("FOC") with 48 hours to let XO know when Ameritech's facilities will be ready for XO's use. Between the date that XO receives the FOC and the actual delivery date, Ameritech will often inform XO that the order will be delayed because Ameritech does not have facilities available to provision the service. XO calls this a "soft FOC" because Ameritech schedules the initial FOC without checking to see that facilities actually exist to complete the order. Ameritech issues soft FOCs on 50% of XO's orders.

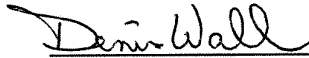
4. Ameritech's practice of issuing soft FOCs cause significant problems for XO and XO's customers. Once XO receives the initial FOC date, it contacts its

customer to begin the conversion process which is a complex process that involves the porting of the customer's numbers and physical loop to XO. XO must work with not only Ameritech, but also with the customer and the customer's vendor(s). Any change to that initial FOC creates numerous problems for XO, its end-user customers, and the customer's vendor(s).

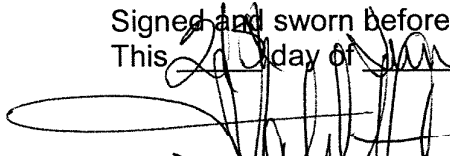
5. Typically Ameritech will issue to XO a subsequent FOC or a " re-FOC" just prior to the customer's conversion, if not on the actual date of the originally scheduled conversion. Thus, in many cases, XO and the customer are waiting to perform the actual physical conversion when Ameritech notifies XO that it has changed the conversion date. Often this new conversion date is weeks or months later causing considerable problems for XO and the end-user. Ameritech meets its re-FOCs for new conversion dates for only 60% of its orders.

6. Further, XO does not receive the support that it needs from Ameritech's Service Account Team. Ameritech's Service Managers are very quick to turn issues over to the Hi-Cap Center Management Team rather than attempt to resolve the problems themselves. The Hi-Cap Management Team has proven that they cannot and will not respond to XO's calls for status or for escalation of pending or past due orders. Within the last two weeks, Ameritech has provided XO with a new, dedicated Service Manager for the Ameritech states. However, this new Service Manager still pushes issues back to XO to resolve with the Hi-Cap and other service centers. Currently, XO is escalating this issue to the Service Manager's superiors to ensure that XO receives the support from the account team to which it is entitled. To date, XO has not resolved this issue with Ameritech.

7. In April, Ameritech reorganized its High Capacity Centers. Instead of being regional, the centers are now organized by CLEC meaning that certain CLECs are served by the Hi-Cap Center West and certain CLECs are served by the Hi-Cap Center East. The transition to this new organizational structure is a complete failure. The biggest failure is the complete lack of response from the center. For example, today, when XO calls into the center to check the status of an order, the hold time is at least 45 minutes with most hold times lasting more than one hour in duration. Also, when XO calls the center to escalate facility orders, it never receives a return call from the management team. These problems impact the center up to the fifth escalation level within Ameritech's organization.

  
Dennis Wall

Signed and sworn before me  
This 20 day of June, 2001

  
\_\_\_\_\_, Notary Public  
\_\_\_\_\_, County  
My Commission Expires: \_\_\_\_\_

