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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Application by SBC Communications Inc.,)
The Ohio Bell Telephone Company d/b/a)
Ameritech Ohio and Southwestern Bell) CC Docket No. _____
Communications Services, Inc. d/b/a Ameritech)
Long Distance for Provision of In-Region,)
InterLATA Services in Ohio)

**AFFIDAVIT OF JUSTIN W. BROWN
ON BEHALF OF AMERITECH**

STATE OF WISCONSIN)
)
COUNTY OF MILWAUKEE)

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I, Justin W. Brown, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

1. My name is Justin W. Brown. My business address is 790 North Milwaukee, Milwaukee, Wisconsin.
2. I am currently General Manager – Regulatory Support. In this position, I am responsible for monitoring Local Service Center (“LSC”) and Local Operations Center (“LOC”) performance and investigating complaints involving or impacting LSC or LOC operations. I coordinate changes within the LSC and LOC as necessary to comply with regulatory requirements. In addition, I provide requested information and testimony to regulatory bodies regarding LSC and LOC operations.
3. I am a graduate of the University of Oklahoma, with a degree in Computer Science and a minor in Mathematics. I began working for SBC in January 1997 in Little Rock, Arkansas, as a Manager in the Customer Operations group. During this time I provided support for Billing Systems and Credit and Collections. In April 1998, I accepted the position of Manager-LOC in Ft. Worth, Texas, where I served in many capacities including the Call Center, Coordinated Hot Cut Group for INP and LNP conversions, Maintenance group for Special Services, and the Analysis Group. In July 1999, I was promoted to the position of Area Manager-Local Operations Support in Dallas, Texas. In this capacity, I was primarily responsible for forecasting force requirements for the LOC and the two LSCs that were in operation at the time. In February 2000, I accepted the position of Area Manager-Regulatory Support in Dallas, Texas. During this assignment, I represented the Southwestern Bell Telephone Company (“SWBT”) LOC and LSC in the various 271 proceedings in the SWBT region (including Texas, Oklahoma, Kansas, Missouri and Arkansas) as well as other

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miscellaneous Workshops, Complaint hearings, Arbitrations, etc. I performed these duties until I was promoted to my current position in April 2001.

PURPOSE OF AFFIDAVIT

4. The purpose of my affidavit is to describe how Ameritech's LSC provides pre-ordering, ordering, and billing services to Competitive Local Exchange Carriers ("CLECs") for interconnection, resold services, and unbundled network elements ("UNEs"). I will describe the procedures that the LSC has developed, and the steps that it has taken, so that it receives and processes both electronic and manual CLEC service orders on a nondiscriminatory, timely and efficient basis. I will also describe how Ameritech has prepared itself to expand LSC operations as necessary to meet CLEC demand for service in Ameritech and throughout the five-state region (Illinois, Indiana, Michigan, Ohio and Wisconsin).
5. In addition, my affidavit will describe the operations of Ameritech's LOC, and will demonstrate how Ameritech is providing provisioning, maintenance and repair services to CLEC customers. As described in detail below, the LOC supports the day-to-day provisioning and maintenance activities for CLECs entering the local exchange market within the five-state territory served by Ameritech.¹ Once service requests are received and processed by the LSC, the LOC is responsible for the coordination of all maintenance and repair activities for the CLECs. The LOC is also responsible for some installation coordination activities. My affidavit, together with the affidavit of Mark Cottrell, demonstrates that The Ohio Bell Telephone Company d/b/a Ameritech Ohio or Ameritech²

¹ In Ameritech, the provisioning of High Capacity ("HICAP") circuits (i.e., DS1, DS3, etc.) is handled by the Ameritech Interexchange Control Center ("IECC") and is covered in the affidavit of Patrick Foster.

² "The Ohio Bell Telephone Company, an Ohio corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications Inc. Ohio Bell

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("Ameritech") has systems, processes and procedures in place that enable it to comply with its obligation under the Telecommunications Act of 1996 ("the Act") and the rules of the Federal Communications Commission ("FCC") to provide nondiscriminatory access to its Operational Support System ("OSS") functions in Ohio.

FOCUS AND GOALS OF THE LOCAL OPERATIONS DIVISION

6. The Ameritech Local Operations Division was created to support the preordering, ordering, billing, provisioning and maintenance activities of the wholesale telecom provider community. The Local Operations Division acts as the liaison organization for the wholesale providers as they meet the telecommunications needs of their end user customer base.
7. The Local Operations Division is comprised of two component organizations: the Local Service Center (LSC) and the Local Operations Center (LOC). The LSC supports the wholesale provider in the pre-ordering, ordering and billing functions required to provide end user services while the LOC supports the provisioning and maintenance functions for a portion of those same end user services.
8. Ameritech's LSC and LOC are organized with customer-focused processes in mind. Ameritech assigns a specific LSC work group to each wholesale product group (*i.e.* Unbundled Network Elements (UNE) and Resale) and a specific LOC work group to each primary function (*i.e.* provisioning and maintenance). This one-on-one contact gives the CLECs access to service representatives, manager(s) and an area manager to handle their service requests and any associated issues for pre-order, order, billing, provisioning and maintenance matters. Ameritech provides the CLEC with contact names and telephone numbers of the management team that is responsible for handling all requests and complaint resolutions for that particular CLEC. The

offers telecommunications services and operates under the names "Ameritech" and "Ameritech Ohio" pursuant to

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CLEC may, at any time, escalate problems or request service expedites to any LSC or LOC team member, up to and including the Vice President.

9. The wholesale local market is one that has seen explosive growth since the passage of the Act in February 1996. In fact, between the years 1998 through 2000 alone the Ameritech LSC processed nearly 2.5 million orders for competitive companies. Wholesale orders handled manually by Ameritech Service Representatives account for approximately 54% of Ameritech's wholesale order volume or 1.35 million of the 2.5 million orders mentioned above. Although order volumes have steadily increased, the increases were perhaps the most dramatic between 1999 and 2000. Order volumes between 1999 and 2000 grew by 81.7% from approximately 717,700 in 1999 to approximately 1,304,000 in 2000. Order volumes between 1998 and 1999 grew by approximately 59.4% from 450,406 to 717,743. Furthermore, the overall percentage growth for all three years equates to a 189.5% increase in order volumes between 1998 to 2000. Of the 2.5 million orders referenced above, more than 52% were processed in 2000. Despite substantial and increasing volume, the LSC handled all orders, including over 1.35 million manual orders, while continuously improving the quality of service to CLECs.
10. The LSC has established procedures to ensure that all CLECs receive non-discriminatory service that allows them to compete effectively in the local market regardless of whether they provide facilities-based or resold service, or whether they choose to place orders on an electronic or manual basis. The LSC's procedures and staffing are more than sufficient to accommodate CLEC growth both in the number of orders processed and in the number of CLECs utilizing its services.

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11. To support the ordering activity of the LSC, provisioning and maintenance activities also have accelerated. Between April 1999 and April 2001, the LOC successfully provisioned more than 971,800 circuits in the five-state Ameritech region. From April 1999 to April 2001, the LOC processed more than 1,053,200 maintenance reports for the five-state area. The LOC also coordinated the Local Number Portability (“LNP”) cut-over of more than 1,166,200 Ameritech subscriber lines to facilities-based CLECs from April 1999 to April 2001. The LOC has established procedures to ensure that CLECs receive maintenance and provisioning services on a non-discriminatory, timely and efficient basis. Following these procedures, the LOC has met the requirements of a steady increase in transaction volume.
12. Ameritech has assigned the highest priority to resolving customer problems and issues and has dedicated resources to handle these situations. Ameritech has set a goal of being easy to do business with and every operational decision centers around being accessible and flexible for the CLEC. The Local Operations Division has attempted to convey this flexibility to their customers by:
 - On-site visits to the CLEC premises, as needed, to help answer questions regarding order processing issues;
 - Sponsoring coordination calls with CLECs and Ameritech departments on major conversions and, on an as-needed basis, to resolve provisioning conflicts;
 - Encouraging open communications between CLEC and LSC/LOC management;
 - Establishing customer care and service management positions that serve as the internal points of contact responsible for coordinating major projects and contract implementation, thereby, ensuring that the LSC and LOC coordinate smoothly and efficiently with other Ameritech organizations;
 - Maintaining escalation procedures with the convenience of the CLECs as the primary goal;
 - Establishing a centralized group of employees to support the CLECs and our internal operations for Local Number Portability (LNP).
 - The LSC and LOC participate in the monthly Ameritech CLEC User Forum (CUF) and Change Management Process (CMP) meetings to cooperatively work with the CLEC community to resolve outstanding issues.

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LOC AND LSC ORGANIZATIONS

LSC

13. The LSC is part of Ameritech's Local Operations Division and provides CLECs with a single point of contact for the purpose of preordering, ordering and billing related to interconnection facilities, resold services, and UNEs.³ Ameritech created the LSC in order to replicate its retail business offices. Since its inception, the LSC has undergone many changes to better serve the local wholesale market. Indeed, the evolution of the LSC continues today and will continue into the future as CLEC needs change.
14. The LSC was initially established in 1993 for the purpose of serving wholesale customers, well before the Telecommunications Act of 1996 was passed. Then known as the Ameritech Information Industry Service Center (AIISC), the LSC was initially staffed with approximately 110 employees in a single location, Milwaukee, WI, and served the Competitive Access Providers (CAPs) and the Telemangement customers.⁴ In response to the growing CLEC service market under the Federal Telecommunications Act of 1996, Ameritech has added three additional LSC facilities. One is located in Indianapolis, IN, another is located in Southfield, MI and yet another is near Grand Rapids, MI.⁵ LSC expenditures for 1999 are reported here in a combined manner with those of the Ameritech LOC organization. Combined expenditures for the two groups were over \$70 million during 1999. Expenditures for the Ameritech LSC represent about 72% of the 1999 combined

³ This affidavit deals only with the five-state Ameritech region, which includes Ohio. SBC utilizes different personnel and facilities to serve its local markets in California, Nevada, Texas, Oklahoma, Arkansas, Missouri, Kansas and Connecticut (specifically, Pacific Bell, Nevada Bell, Southern New England Telephone, and Southwestern Bell territories).

⁴ Telemangement customers resold Centrex service, one of the first products offered for resale in Ameritech.

⁵ The center commonly referred to as the "Grand Rapids Center" is actually located outside of Grand Rapids in Wyoming, MI. This affidavit will refer to the center as being in Grand Rapids to avoid potential confusion by using the name Wyoming.

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expenditures, or more than \$50 million. LSC expenditures for the year 2000 also were over \$50 million.

15. By the end of June, 2001, the LSC employed 1,120 management and non-management employees with an annual average expenditure of more than \$50 million. LSC employees bear the same titles and perform the same functions as employees in Ameritech's retail business offices. These employees include 1 vice president, 3 general managers, 1 director, 20 area managers, 81 managers, 4 administrative assistants, 953 service representatives and 57 clerical employees. The area manager groups referenced above perform one of the following sets of job responsibilities:

- Oversee the pre-ordering, ordering and billing functions that support CLEC accounts and serve as Ameritech's liaison with all CLECs for service order processing. These area manager duties also include personnel administration, subordinate development, force management, assistance in negotiations with CLECs and implementation of CLEC resale and interconnection agreements.
- Handle specialized activities, namely billing, Interconnection Trunks and the Digital Subscriber Line ("DSL") Unit.
- Various support roles throughout the LSC organization.

16. Currently processing of CLEC orders is divided between the above mentioned facilities by the following product groups: Resale and UNE-P are handled within the Southfield and Grand Rapids LSCs while the remaining Unbundled products and Line Sharing products are handled within the Milwaukee and Indianapolis LSCs. Thus, while work groups specialize according to product type, they do not specialize by state. For example, a CLEC submitting Local Service Requests (LSRs) for the provisioning of resale services to their end users located in Ohio might also submit resale LSRs for end users located in Wisconsin. Both the Ohio and the Wisconsin requests would be processed by the same LSC work group. Indeed, the same LSC service representative(s), at the same LSC location, would provide any manual processing needed for both service requests. This one-on-one contact with the assigned work

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group gives the CLEC community access to service representatives, line manager(s) and an area manager to handle their service requests and any associated issues for pre-ordering, ordering and billing.

17. Within their respective product lines, the Ameritech LSC facilities act as back-ups for each other, sharing workload as necessary. Ameritech provides the CLECs with contact names and telephone numbers of the management team that is responsible for handling all requests and complaint resolutions for a given CLEC. However, the CLEC may, at any time, escalate problems or request service expedites to any LSC team member, up to and including the Vice President – Interconnection Services.

LOC

18. In 1995, Ameritech created the Customer Response Unit (CRU) to address Resale and other wholesale services maintenance issues and the Unbundling Center (NECC) to handle provisioning and maintenance for UNEs. In July 1999, these two groups were combined to form the LOC to serve as the single point of contact for CLECs in connection with the provisioning of unbundled elements. The LOC also handles the receipt of maintenance reports and maintenance work for all resold POTS services, DSL and line shared services and UNEs. The LOC was designed to replicate functions performed at the Customer Service Bureau and Maintenance Centers in Ameritech's retail operations.
19. The mission of the LOC is to ensure that CLECs receive high quality provisioning, maintenance, and repair services in parity with that provided by Ameritech's retail operations. In support of that objective, Ameritech has committed considerable financial and personnel resources. The LOC has one facility located in Milwaukee, Wisconsin, to support all CLECs in the Ameritech region. The Milwaukee LOC facility handles maintenance and

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repair for: a) all resold POTS services; b) DSL and line shared services; and c) UNEs; as well as all provisioning for non-hicap UNE loops, which includes DSL service, and LNP service. Ameritech budgeted more than \$24 million to support the LOC's operations in 2000. The LOC's budget for 2001 is projected to exceed \$28 million.

20. The job titles of LOC employees parallel those of employees in Ameritech's retail provisioning and maintenance centers. As of the end of June, 2001, the LOC workforce consisted of 561 management and non-management employees, including 1 general manager, 1 director, 3 area managers, 1 administrative assistant, 3 operation managers, 31 front-line managers, 7 service/network performance managers, 4 project managers, 2 center analysis managers, 194 maintenance technicians⁶ supporting the wholesale services listed above, 178 provisioning Plain Old Telephone Service ("POTS") technicians supporting UNE Loops and LNP, 131 technicians supporting DSL/Lineshare and 5 clerical support personnel. These employees support Ameritech's commitment to provide parity service to all CLECs doing business in Ameritech's five states.

21. The LOC general manager supports all aspects of the LOC operation including center operation, network performance, service management, project management and center analysis. Reporting to the general manager are the director LOC, area manager LOC Service/Network Performance, area manager LOC Project and area manager LOC Analysis. The director supports center operations and day-to-day CLEC issues, including escalations. The 3 area managers support analysis, process improvement, service management, network performance, and Automatic Call Distribution (ACD) and headcount evaluation. The 28

⁶ There are currently two titles that are referred to as technicians. They are Telecommunication Specialist ("TS") and

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front line managers within the LOC are specifically assigned to supervise the technicians.

The 7 service/network performance managers are assigned to individual CLECs and support the account teams and represent the LOC on weekly/monthly CLEC calls that may be scheduled with CLECs to address ongoing operational issues. In addition, the service/network performance managers work with internal Ameritech departments for process improvement initiatives. The 4 LOC project managers support the LOC by managing projects that help improve LOC efficiencies by, for instance, working on the mechanization of LOC process. The 2 center analysis managers support the LOC by providing data and reports to insure that the LOC is meeting its commitment to provide quality service to the CLEC community.

22. Initial training for LOC technicians is approximately five weeks long. Training consists of customer contact skills, provisioning and maintenance system operations, product/service information, *i.e.*, UNE Loops, LNP, DSL, Line Sharing etc., and provisioning/maintenance procedures and processes. The LOC UNE provisioning, DSL provisioning, and maintenance technicians directly interface with the CLEC to perform turn-up, testing and repair of UNEs, resale, DSL and Line Sharing. The LOC technicians must successfully complete training to qualify for these positions. The consistency of the OSS across the Ameritech five states allows these training courses to prepare the technicians to work provisioning orders or maintenance tickets for any given service, from any given CLEC, on any given day in any of the five states. The training includes the same curriculum as that of retail maintenance employees. Once this training is successfully completed, the employee is provided continued training designed to keep the technician current as products and technology change. Courses

Maintenance Administrator (“MA”). The TS title is grandfathered in the LOC.

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include DSL updates, new product offerings, enhancements to existing products, and diversity training. In addition, the technicians are required to become certified. Specifically, this certification requires that the technician successfully complete over 200 observations of a list of checklist items in the presence of an LOC manager.

LSC AND LOC AVAILABILITY

23. The LSC provides pre-ordering, ordering and billing services to CLECs Monday through Friday from 7:00 a.m. to 5:00 p.m. Central Time. The LOC maintenance group is staffed 24 hours a day, seven days a week. Ameritech provides the CLECs with a 24-hour toll free number to the LOC Call Center to report and status service issues. Ameritech also provides CLECs with an online Electronic Bonding Trouble Administration (EB/TA) tool which allows the CLEC to issue trouble reports electronically and view up-to-date status information on their EB/TA submitted trouble reports. CLECs are advised to contact the LOC for resolution of service problems occurring on or after the due date of the service request. The exception is billing issues, which are to be referred to the LSC or the account team when appropriate. The LOC provisioning groups are staffed Monday through Friday, at a minimum between 8:00 a.m. and 5:00 p.m. Central Time, adjusted for overtime as needed. CLECs throughout Ameritech's five-state region are provided the exact same toll free number and escalation lists to contact the LOC maintenance group for service problems. Additionally, CLECs throughout the Ameritech region are provided the exact same escalation lists for the LOC provisioning groups to escalate their provisioning needs.

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SCALABILITY

LSC

24. The LSC monitors CLEC order activity on a daily and weekly basis to determine trends and is prepared to respond to any increase in volume. Ameritech has created a force model to anticipate staffing needs based on historical trends, time and motion studies, internal forecasts and referencing benchmarks. The force model utilized by Ameritech is similar to the model used by SWBT and approved by the FCC for Texas, Kansas and Oklahoma. It is a region-wide model that utilizes Ohio data as well as data from all five Ameritech states to determine LSC force and staffing needs. Ameritech has increased the LSC's service representative force in 2000 through 2001 by nearly 59%, from 600 service representatives in January 2000 to 953 service representatives in June 2001.

LOC

25. The LOC is also committed to providing sufficient resources to meet the needs and demands of CLECs. LOC management personnel have created a force model to manage anticipated force requirements based on volumes and capacities. The force model utilized by Ameritech to meet the LOC staffing requirements is based on region-wide volumes, and uses Ohio data as well as data from all five states to determine the LOC force and staffing needs. Ameritech has increased the LOC's technical force in 2000 through 2001 by over 170%, from 186 technicians in January 2000 to 503 technicians in June 2001.

26. LOC historical data is used to project reports and new circuit volumes. Analysis has been performed that identifies the number of productive hours per day per employee based on standard productivity variables. Some of the basic data and assumptions that were used to develop the force model include: number of business days per month, total minutes per day

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per employee, productive minutes per day per employee, average handle time per report, average reports per day per employee, forecasted reports for LOC processed classes of service, forecasted lines, forecasted report rate, reports received manually, mechanized reports, forecasted new circuits provisioned for LOC handled classes of service and average circuits provisioned per employee per day for processed classes of service. Using this criteria, the force model enables Ameritech to trend volumes over a three-month, forward-looking period to determine if force requirements should be accelerated to meet demand. This, in turn, allows Ameritech to project the required capacity in sufficient time to meet actual demand.

27. The LOC continues to predict staffing needs according to the requirements projected by the capacity management tool. This manual scalability for LOC operations is key to its ability to handle both current and reasonably foreseeable transaction volumes for Ohio and the five-state region.

LSC ORDER PROCESSING

28. Ameritech's LSC is responsible for manual processing of CLEC service requests. Not all orders submitted by the CLEC must be processed manually. There are many orders that "flow through" to Ameritech's back end systems with no need for human intervention. The affidavit of Mark Cottrell describes electronic OSS, and flow-through, in more detail.
29. When a CLEC chooses to submit its Resale, LNP and UNE-P requests manually (*i.e.* by facsimile), the request is processed by the LSC through the appropriate systems. Similarly, when a CLEC submits its LSRs via one of Ameritech's electronic OSSs, for instance, Electronic Data Interchange (EDI), the LSC provides manual handling on those orders that

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are not designed to flow-through, or that otherwise require manual intervention before provisioning. The only difference between a manually-submitted LSR and an EDI-submitted LSR requiring manual intervention is the up front clerical input required when Ameritech receives a manually-submitted LSR. All subsequent, downstream processes are the same for both order types. Attachment A to my affidavit illustrates the workflow for LSC processing of LSRs sent both manually and electronically by the CLECs. This flow is the same for all LSRs sent to the Ameritech LSC, regardless of the state in which service is provided. As demonstrated in this attachment, the only difference in process for electronically submitted service requests requiring manual intervention is that the electronically processed requests automatically appear on the service representatives' work list without the intervention of the Ameritech LSC clerical force.

30. Mechanized service requests are received into a system called Mechanized Order Receipt (MOR). Those mechanized service requests that require manual handling are accessed by the LSC via the single system, Mechanized Order Receipt/Telemangement (MOR/Tel) regardless of whether the LSC service representatives receiving them are in Milwaukee, Indianapolis, Southfield or Grand Rapids. MOR/Tel is a Graphical User Interface (GUI) which allows the LSC to query, view and manipulate orders housed in MOR. For a more detailed description of the interaction between MOR and MOR/Tel, see the affidavit of Mark Cottrell. All orders received by the LSC are prioritized on a first in/first out basis. MOR/Tel is a workload management and order processing tool that is utilized by Ameritech LSC service representatives at all LSC locations. Service requests that require LSC intervention are distributed to a service representative whose responsibility it is to process that particular product type. The service representative assures that the request for service is properly entered into the back end systems

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using information provided by the CLEC on the LSR and that it is then released to be processed in Ameritech's downstream systems.

31. Attachments B through I of my affidavit are MOR/Tel "Screen prints," which reflect service requests requiring manual handling for one CLEC operating in Ohio. Attachment B is the MOR/Tel listing of service requests for this CLEC. Attachment B demonstrates that the service requests are received in the LSC and are then distributed to LSC service representatives without regard to the state in which the local service is to be provided. Notably, the service requests from each of these states are found in the workload distributed to a single service representative at the LSC. Service representatives reporting to the LSC, either in Milwaukee, Indianapolis, Southfield or Grand Rapids will receive their workload in exactly the same manner. Finally, all requests in Attachment B are the same, with the exception of specific ordering information within the fields of the service request that identify the end user's specific information, such as street address and area code. Attachments C through I are the screens that are required to create a Customer Service Request (CSR) based on the CLEC customer's service request.

32. The Ameritech LSC enters all manually received Resale, LNP and UNE-P service requests into the MOR/Tel system. The service representative then assures that service order(s) are properly entered into the same back end systems used by the Ameritech retail business office and sends the service orders downstream to the Ameritech provisioning systems. This may require further order processing by the LSC service representative directly into these legacy systems.

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ORDER CONFIRMATION NOTICES

33. The Firm Order Confirmation (FOC) serves to notify the CLEC that its order has been entered into Ameritech's systems, either mechanically or manually. The FOC contains such information as the assigned telephone number, order number and service due date for each order. In the case of a manually submitted Resale, LNP or UNE-P order, the CLEC is notified via either EDI or facsimile depending upon the requirements of the CLEC. For electronically submitted orders that require manual handling, the LSC utilizes MOR/Tel to return the FOC to the CLEC over the same EDI interface on which the request was received.
34. Regardless of how the CLEC submits its orders, Ameritech assigns due dates for provisioning CLEC service order requests on a non-discriminatory basis by utilizing a first-come, first-served routine. Due date selection and provisioning flows (including such things as line number assignment, facility assignment, etc.) utilized by the LSC for CLEC service requests are the same as those utilized by Ameritech's retail service representatives for provisioning service to Ameritech's retail customers. Due dates for complex services are obtained based on the work involved, using either a predetermined interval or a mutually negotiated due date. Again, the same methods for due date assignment are utilized by Ameritech's retail operations. A due date is not affected by whether the request is made on behalf of an Ameritech retail customer or a CLEC customer. Resale change and conversion requests that require, "No field work" (*i.e.* dispatch of a technician to the customer's premise is not required such as a request to add call waiting to an existing line) and that are received prior to 3:00 p.m. Central Time are eligible for a same business day due date. Those orders received after 3:00 p.m. Central Time will be assigned a due date for the next business day. If fieldwork is required, the next available due date will be assigned. Both retail and local

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wholesale offices follow this due date procedure. These processes are carried out in the same way as the equivalent processes in SWBT. In both the Texas (¶ 195) and Kansas-Oklahoma orders (¶ 155), the FCC found these procedures provide “competing carriers with equivalent access to information on available service installation dates” in a manner that satisfies the requirements of the Act. The FCC found in its Kansas-Oklahoma Order ¶ 155, that “SWBT assigns due dates for service orders at the LSC and transmits the orders for provisioning to the LOC in a nondiscriminatory fashion. SWBT’s LSC uses the same due date selection and provisioning flows for competitor’s orders as SWBT’s retail service representatives use for provisioning service to SWBT’s retail customers.” While the Ameritech systems may differ in name, the same nondiscriminatory processes are in place within the Ameritech region.

35. Performance Measure (PM) 5 tracks Ameritech’s actual performance in providing timely FOCs on orders submitted electronically and manually. For additional information regarding PM 5 see the affidavit of Salvatore Fioretti.

REJECTS

36. The Ameritech LSC uses MOR/Tel to return all electronically submitted rejects throughout the five-state region, including Ohio. Utilization of this tool within the LSC allows for a speedy rejection of a service request back to the CLEC for comprehensive correction. Ameritech provides individual CLECs, upon request, with a monthly error-tracking report that can aid the CLEC in analyzing its own quality performance.⁷ The benefits of this team approach are:

- Reduction of multiple rejects and response time;
- Consistency in processing CLEC errors;
- Improved efficiency; and

⁷ See Accessible Letter CLECAM01-059 on the CLEC Website <<https://clec.sbc.com>>.

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- Implementation of consistent tracking among all CLECs.

37. PM 10.2, Percent Manual Rejects Received Electronically and Returned Within Five Hours, measures the percentage of LSRs that are sent electronically by the CLEC and are then rejected manually by the LSC and returned to the CLEC via MOR/Tel. P M 11.1 (Mean Time to Return Manual Rejects that are Received via an Electronic Interface) measures the average amount of time it takes to return a reject to the CLEC. These are described in more detail in the affidavit of Salvatore Fioretti.

870 TRANSACTIONS

38. Ameritech's process for returning 870 transactions, also referred to as jeopardy notifications, via either facsimile or EDI depending upon the requirements of the CLEC, provides efficient CLECs with a meaningful opportunity to compete.

39. As set out in the affidavit of Mark Cottrell, over three years ago Ameritech implemented a five-state process whereby a mechanical feed from the Ameritech downstream systems to MOR/Tel provides MOR/Tel notice of jeopardy situations that are then forwarded to the CLECs. In the case of jeopardy situations relating to "No facilities available," an additional notice is provided to CLECs using the Facilities Modification ("FMOD") process discussed later in this affidavit.

40. Implementing the process described above, Ameritech went beyond parity on jeopardy notification by implementing a process covering jeopardy situations that are not addressed in Ameritech's retail operations, such as "No access." Ameritech's retail customers only receive jeopardy notifications when there are no facilities available. Although Ameritech is

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not necessarily required to actively provide electronic jeopardy notices,⁸ all applicable Ordering and Billing Forum (“OBF”)-standard jeopardies can be mechanically returned via MOR/Tel to CLECs submitting orders either manually or via EDI. These jeopardy situations are handled via MOR/Tel in the same manner as the electronic reject notifications discussed above. Simply stated, once a jeopardy situation is detected, an electronic feed from one of the Ameritech downstream systems is sent to MOR/Tel which, in turn, produces an electronic notification returned to CLECs via facsimile or EDI.

POSTING

41. During the first quarter of 1999, the LSC created a specialized Error Corrections team that focuses solely on clearing errors on orders that have been completed but cannot post for proper billing. This team prioritizes its work by bill date and is committed to having all errors corrected prior to the date a bill would be rendered to the CLEC. The Error Corrections team service representatives check the work list that shows unposted service orders daily to ensure that all service orders are posting in a timely manner. Attachment J is an example of the work list used by the Error Corrections team.
42. The information obtained through this approach is trended and given to LSC area managers to highlight areas that require employee development or training. Attachment K is an example of the Coaching form used to provide timely feedback to a Service Representative regarding his or her order writing error. Attachment L is an example of the Error Corrections Referral form used to outline the action that is needed by the order originating Service Representative in order for his or her order to successfully pass through billing.

⁸ See New York Order, 15 FCC Rcd at 4051-052, ¶ 185.

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43. P M 17 reflects the percent of service orders completed within the billing cycle that post in the Ameritech Customer Information System (ACIS) or Carrier Access Billing System (CABS) within a 30 day billing cycle and is the PM used to monitor Ameritech's success in this area. The Ameritech business rules for PM 17 state that, "On time SOs [Service Orders] are SOs that reached 'Updated' (3U) status in 19 cycles or less. A SO that was updated in 20 cycles or more has missed at least one bill. Twenty cycles is approximately 30 calendar days. The start date is the date the SO is available for billing and the end date is the date (Update date) the SO reaches the 'Updated' status. This time span is measured in cycles. SOs are reported by the month of their update." The benchmark for PM 17 is parity with Ameritech retail. It should be mentioned that, during the months of April, May and June of 2001, Ameritech met the parity requirement for PM 17.

44. Ameritech continues to identify actions needed to improve manual processes. Once identified, many of these actions and improvements may have a direct impact on Ameritech's Billing Completeness performance. Root Cause analysis continues to be performed by Ameritech to identify and correct any deficiencies regarding posting errors that impact this measurement.

45. Recent changes and improvements implemented in Ameritech's LSC that impact billing completeness include allocating additional personnel to the Error Corrections team and increasing service representative knowledge and experience.

BILLING

46. The LSC is responsible for billing monies owed to Ameritech by its CLEC customers for services ordered. Interconnection agreements specifically address CLECs' financial responsibilities regarding bill payment to ensure continuous service. It is the responsibility

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of the CLEC to remit any monies due to Ameritech, as stipulated by its contract. Two centralized groups, one specializing in collections and another specializing in billing accuracy, were created by Ameritech to oversee these activities. The collections group is assigned to the Ameritech Industry Markets Finance organization while the Billing Accuracy team is assigned to the Ameritech LSC. These operations are similar to the billing and collection teams in Ameritech's retail offices. The LSC Billing Accuracy team serves as the single point of contact for CLECs on all billing issues and questions. This team answers billing questions, makes adjustments for incorrectly billed amounts and ensures parity among all CLECs. Currently 1 area manager, 2 managers and 24 service representatives are dedicated to billing activities.

47. This team is also responsible for resolving any billing disputes that arise. Some common types of disputed charges can result if a service representative does not: waive installation charges; provide correct tax information, which results in an under or over billing of the account; or correctly apply repair charges. The billing group shares this information within the LSC to provide feedback to each order-provisioning unit. This process helps identify additional training requirements and contributes to individual performance evaluations. Additional disputed charges can also be caused by the CLEC, and include such common mistakes as incorrect telephone numbers and duplicate orders. In short, the LSC billing group resolves billing disputes with CLECs and takes action to investigate and adjust incorrect amounts or to explain why the amounts are correct.

PROCESS IMPROVEMENTS AND ENHANCEMENTS

48. Process improvements and enhancements have been implemented by the LSC and LOC as a result of numerous collaboratives between Ameritech and CLECs in Ohio and in other Ameritech states as discussed in the affidavit of Daniel R. McKenzie. As a result of those

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successful collaborative discussions, the following OSS enhancements and process improvements have been incorporated and implemented by the LSC.⁹

865 VERSIONING

49. Ameritech deployed 865 versioning in its March 24, 2001 release, which is discussed in detail in the affidavit of Mark Cottrell. Prior to the March release, in an effort to reduce the number of unsolicited 865 notifications and improve the effectiveness of the 865 notification process, an interim manual process was developed and implemented by the LSC. This process ensured that, prior to issuing an 865, the LSC service representative would verify that the most recent revision of the LSR was being reviewed for accuracy. Prior to this change, there were occasions when a service representative might process an LSR and send an 865 when, in fact, a subsequent version of the LSR had already been submitted by the CLEC. However, with the enhancements included in the release, there is no need for the LSC to follow this interim process. This is due to the fact that the enhancements allow the full refresh of supplemental orders so that there are never multiple versions of the same CLEC request in the system. Other enhancements included the implementation of the Provider Initiated Transaction notification, and the inclusions of the Purchase Order Number (PON) and the Version of the most currently processed LSR.

SUB-LOOP ORDERING

50. Ameritech also implemented an electronic interface for ordering sub-loops in its December 2000 OSS enhancements. While sub-loops have not yet become a prominent product in Ameritech, the LSC is ready to handle these orders when the CLECs begin issuing them.

⁹ See generally Third Joint Progress Report Regarding the Resolution of Certain OSS, Process, Product and Performance Measurement Issues, Case No. 00-942-TP-COI (Jan. 16, 2001).

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ABBREVIATED ADDRESS VALIDATION

51. The Abbreviated Address Validation was also implemented in the March 2001 release. This enhancement reduced the number of LSR rejects associated with discrepancies between the address on the LSC and that recorded in the various systems used by Ameritech. While the system release affected the rejects sent automatically by the system, the LSC also coordinated changes in their processes and procedures with this release so that manual reject notifications would not be sent to the CLECs in the circumstances addressed by the electronic enhancement.

FACILITY MODIFICATION PROCESS (“FMOD”)

52. Another process improvement that resulted from the collaborative discussions mentioned above is Ameritech’s agreement to revise its Facility Modification (FMOD) process. This issue was raised in the Joint CLEC Petition for Resolution of Unresolved OSS Issues filed in Case No. 00-942-TP-COI on October 25, 2000, and all parties reached agreement on a resolution as described in the Third Joint Progress Report filed in that case on January 16, 2001. The agreed-to process, as described in Accessible Letter CLECAM00-153, which can be found on the CLEC Online web site at <<https://clec.sbc.com>>, is designed to provide notification and ongoing status to the CLEC in the event that an order is in jeopardy of being delayed due to facility shortage. The LSC plays a vital role in this process, serving as the point of contact for the CLEC and providing internal departments a single point of contact with the CLEC.

53. In order to fulfill this role, the LSC has created a special team and has dedicated resources to this process. Once a facility issue is recognized by a provisioning organization, notification is sent to the LSC from which the LSC advises the CLEC of a potential delay in meeting the

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original due date. The FMOD process requires that this notification be provided to the CLEC within 24 hours of the FOC. Additional information is to be provided to the CLEC within 72 hours on what type of complex modification will be required, an estimated completion date for the work, whether any charges may be applicable or if the requested service is in a new area where no telecommunications system currently exists.

54. Upon acceptance by the CLEC, the service order is revised to indicate the new due date and is scheduled accordingly for completion. Additional notification may also include a Facility Update Notification, or “good news” notice, that facilities have become available and the original due date will be met. Throughout the facility modification and notification process, the LSC monitors the status of the orders to ensure continued communications with the CLEC. For examples of the forms utilized for communications with the CLECs during the FMOD process, see Attachment M. The provisioning processes associated with the FMOD process is discussed in the affidavit of Bill Deere.

55. The LSC is committed to continuing the improvement of communications with CLECs to insure accurate and timely information is made available to the CLECs in order to allow them to effectively manage end-user expectations.

ADDITIONAL INTERCONNECTION SERVICES OFFERINGS

56. The LSC offers consultations and conferences to customers on Ameritech and CLEC premises. Topics include workflow processes, contact lists and escalation processes and address any unique request the individual customer may present. These meetings are conducted as Ameritech begins processing orders as well as any time the CLEC requests.

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Several customers have requested and received ongoing conference calls to discuss operational practices and individual service issues.

57. Ameritech strives to establish a good working relationship with all CLECs. This is done, in part, by training CLECs to utilize Ameritech's offerings properly. Ameritech offers CLECs education in two formats: workshops and OSS classes. All CLEC classes are instructor-led, in-class sessions. This enables the instructor to ensure a quality learning experience and achieve a certain level of understanding for each student rather than rely on self-instructional tools. Ameritech offers a variety of workshops on how to do business with our company. Workshops cover operational information that is required for both manual and electronic order processing. Workshops regarding product and operational issues are covered in detail in the affidavit Mary Pat Regan. Those classes offered for OSSs are discussed in the affidavit of Mark Cottrell.

58. At the CLECs' request the, aforementioned, workshops are followed by CLEC-specific operational meetings within the LSC. These operational meetings outline standard practices and procedures and discuss any request or requests made by the individual CLEC. This gives the CLEC the opportunity to discuss any specific need that may exist in its business, which would require either a modification to standard procedures or the development of a new Ameritech practice. Once specific practices are established and agreements and contracts are signed and approved, the CLEC and Ameritech can begin doing business. No matter how large and well funded a CLEC may be, starting a new enterprise is never easy, and Ameritech recognizes this. Although training and handbooks are provided, the LSC is ready to help with such tasks as how to get an order issued, how to order directories and what procedures to follow if special attention is needed for a service request. If problems occur in meeting

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CLECs' expectations, the LSC works cooperatively with the CLEC to resolve them.

Additionally, each CLEC is assigned an Ameritech Service Manager who works with the CLEC as a liaison within Ameritech's internal departments should any operational problems arise.

LOC PROVISIONING AND MAINTENANCE

PROVISIONING

59. There are two workgroups within the LOC that handle provisioning. They are the POTs UNE Loop group and the DSL group. The POTs group handles POTs UNE Loops and LNP. The DSL group handles DSL and ISDN BRI. The two groups provide provisioning and turn-up on all new services for all five Ameritech states, as well as coordination between Ameritech Network personnel and the CLEC. There are currently 309 technicians who perform provisioning functions in the LOC.

HOT CUTS

60. Currently, in accordance with Checklist item 4 in the Act, Ameritech offers facilities-based CLECs a choice between two different methods for the provisioning of unbundled loops with LNP: the coordinated hot cut ("CHC") process and the non-coordinated hot cut process. These methods are used by CLECs to convert an active Ameritech customer to service provided by the CLEC. The cutover of the active loop within the Central Office (CO) from the Ameritech switch to the CLEC switch allows the CLEC to provide the dial tone to the end-user over the same copper wire used by Ameritech. The CHC process utilized by Ameritech is a result of intensive collaborative sessions facilitated by Ameritech throughout most of 2000. The processes described in this document are processes that were jointly developed and agreed upon with the CLEC community.

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61. CHC orders are manually handled in the Ameritech LOC, and require coordination and communication between Ameritech and the CLEC during the cutover of the end user.¹⁰ As discussed above, the CLEC first places its order directly for UNEs through one of the electronic interfaces described in the affidavit of Mark Cottrell. On orders requiring CHC, a CLEC provides the desired cut time on the submitted LSR via the Desired Frame Due Time (DFDT) field. Ameritech validates that CO personnel are available for the desired cut time. The service representative either confirms that the requested time is available or provides confirmation as to what time slot the cut is scheduled for. This feature allows a CLEC to schedule its technicians as required. Once the LSC has scheduled the CHC, Ameritech's back-office systems (those systems not directly accessed by LSC service representatives, but accessed by systems used by those service representatives) produce a work order that is transmitted electronically to the LOC.
62. The LOC provisioning technician screens the order on DD-2 (Due Date minus 2) or upon receipt. For non-coordinated cuts the technician will send a cut ticket to the CO indicating that a non-coordinated cut is scheduled for the given due date. The screening process eliminates potential roadblocks and provides CLECs advance notification of conversion issues, *e.g.* IDLC notification provided DD-2. As early as DD-2, CLECs submit a "Cut Sheet" confirming the orders to be coordinated cut for a particular due date and time. Cut Sheets are submitted by the CLECs either via email or fax. Ameritech returns the cut sheets with the appropriate notations, *e.g.* ready for cut, Non-CHC, etc.

¹⁰ Requests for the migration of more than 24 UNE loops at a single end user address or requests for a migration to be worked with a Desired Frame Due Time ("DFDT") outside normal installation business hours must be ordered as a project and coordinated with the LOC.

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63. Upon receipt of the cut sheet, the LOC technician will send a cut ticket to the CO indicating the time of the cut. This notification to the CO confirms that they are ready to work the order at the appropriate time. On the due date, the CHC process begins when the CLEC contacts the LOC during the agreed upon conversion window. The LOC then contacts the Ameritech CO technician to begin changing the wiring from the Ameritech switch to the CLEC switch. The CO technician performs validations that the correct dial tone is programmed on the CLEC's switch and that the correct loop facilities are being reused. If all validations provide the required/accurate information, the CO technician proceeds with the cut. If the validations identify problems, the cut does not proceed.
64. The CO technician notifies the LOC when wiring changes are completed or if problems are found. The LOC then informs the CLEC that the wire transfer is complete or that problems were uncovered. If the cut was successful, the CLEC activates the port of the telephone number. If problems were found, the CLEC is informed of the no cut condition. To allow the CLEC to resolve their provisioning problems, Ameritech maintains the CO technician on site for 30 minutes, allowing the CLEC the opportunity to correct its problems and maintain its due date. In addition, Ameritech will hold service orders open for 2 hours after the cutover allowing CLECs time for acceptance testing. Ameritech has agreed to take the trouble calls in the Provisioning/Coordination Center as opposed to the Maintenance Center.
65. For cuts that experience difficulties, Ameritech developed the "Throwback Process" allowing customer restoral of service in an expedited fashion using a specially developed "LOA Restoral Form." This process allows the CLECs to reestablish an Ameritech retail account rather than requiring customers to contact Ameritech retail centers. Once the issues have

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been resolved, the cut can be rescheduled. Additional information on the throwback process can be obtained through the CLEC Online web site at <<https://clec.sbc.com>>.

66. In addition to the standard Dial Tone/Automatic Number Identification (DT/ANI) validations performed at time of cut, Ameritech also offers CLECs an optional DT/ANI validation prior to the due date for a nominal charge. As reported in the Fourth Joint Progress Report Regarding the Resolution of Certain Unbundled Loop Provisioning Issues filed March 13, 2001 in Case No. 00-942-TP-COI, Ameritech now offers a mechanized DD-2 DT/ANI validation for CLECs who routinely complete translation work by 8 a.m. DD-2. A “Friendly User Trial” of the DD-2 DT/ANI mechanized process began on June 1, 2001. Subsequently, full deployment of the process occurred on August 1, 2001 as noted in Accessible letter CLECAM01-184 available on the CLEC Online web site at <<https://clec.sbc.com>>.

67. By contrast, non-coordinated orders do not require inter-company communication at the time of the cutover; rather Ameritech will work the order any time between 8 A.M. and 5 P.M. Central Time and notify the CLEC once the order is completed.

68. Depending on the type of service being delivered to the CLEC, the methods for closing out an order vary slightly. The LOC technician will close Coordinated Hot Cut (“CHC”) orders upon acceptance from the CLEC or 2 hours after notification is given to the CLEC, indicating that Ameritech has completed the required tasks and/or the circuit meets Ameritech’s turn-up parameters. The LOC technician will close Non-CHC orders after notification is given to the CLEC that Ameritech has completed the required tasks and/or the circuit meets Ameritech’s turn-up parameters. CLECs may freely choose between CHC and

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non-coordinated conversions, selecting the cutover method that best fits their resources and their priorities.

69. As reported in the Fourth Joint Progress Report filed March 13, 2001 in Case No. 00-942-TP-COI, Ameritech now offers a process known as Frame Due Time (“FDT”) conversions which are yet another alternative for converting customers from Ameritech’s service to a CLEC’s service. FDT allows a CLEC to schedule a non-coordinated conversion of an unbundled loop with LNP at a specific date and time. This process does not require manual intervention by either the CLEC or Ameritech to proceed with the conversion at the requested date and time. After collaboration between Ameritech and the CLECs, it was agreed that the FDT process would be scheduled for implementation on June 18, 2001, after completion of the “Friendly User Trial.” Implementation of the FDT process did, indeed, occur on June 18, 2001 as noted in Accessible letter CLECAM01-155 available on the CLEC Online web site at <<https://clec.sbc.com> >.

70. In support of the FDT process Ameritech has developed a link, within the CLEC Online web site at <<https://clec.sbc.com> >, that allows the CLEC to access information concerning the status of their FDT orders. After 6 PM on DD-2, a CLEC may view whether a submitted FDT order has been screened by the LOC technician. These orders will be noted as “confirmed.” In addition, the LSC will work proactively with the FDT orders that do not have confirmation to resolve any provisioning issues that may impede the due date. If an FDT order is noted as “confirmed,” this designates that the LOC technician has issued a ticket to the CO scheduling the cut for the confirmed date and time. In addition, Ameritech will offer DT/ANI verification two days prior to the due date (“DD-2”) for those CLECs who routinely complete their translation provisioning by 8:00 a.m. on DD-2. This customized

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service is being offered at no charge to the CLECs. If, however, a CLEC requests that Ameritech perform a subsequent DD-2 DT/ANI test, Ameritech will perform the requested test at a charge to the CLEC. This process has also been collaborated and agreed upon by participating CLECs in the Ameritech region. Following a "Friendly User Trial," this process is scheduled to be implemented August 1, 2001.

71. PM 114, 114.1, 115, 115.1 and 115.2 were specifically established to measure Ameritech's performance on performing CHCs. PM 114 measures the, "Percentage of Premature Disconnects" during a coordinated hot cut. Under PM 114, a premature disconnect occurs when Ameritech begins the conversion process more than 10 minutes prior to the agreed-upon start time. The agreed to Ameritech business rules define PM 114 as the, "Percentage of coordinated cutovers where Ameritech prematurely disconnects the customer 10 minutes or more prior to the scheduled conversion. Attachment N to this affidavit depicts Ameritech's Ohio performance for PM 114 for the months of April 2001 through June 2001.

72. PM 114.1 is the, "CHC LNP with Loop Provisioning Interval." This PM measures the, "The percent of CHC LNP with Loop Lines completed by Ameritech within the established provisioning intervals." Furthermore, the agreed to Ameritech business rules for PM 114.1 note that, "The start time is at the direction of the CLEC and based on a negotiated and scheduled time for coordinated hot cut orders (CHC). For CHC orders, the clock starts when the CLEC calls the Ameritech LOC to start the conversion, and ends when the Ameritech technician completes the cross connect to the CLEC facilities and has called the CLEC to notify that the cut-over has been completed. This measurement only includes Coordinated Hot Cuts with 1-24 loops. A conversion with 25 or more lines (including multiple orders totaling 25 or more lines to the same customer premise on the same due date) is considered a

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project and is negotiated with the CLEC at the time of conversion.” Attachment N to this affidavit depicts Ameritech’s Ohio performance for PM 114.1 for the months of April 2001 through June 2001.

73. PM 115 is the, “Percentage of Ameritech Caused Delayed Coordinated Cutovers.” PM 115 is defined in the agreed to Ameritech business rules as, “Percentage of Ameritech caused late coordinated cutovers in excess of ‘x’ (30, 60 and 120) minutes.” Additionally, the agreed to Ameritech business rules state that, “A coordinated cutover is delayed if Ameritech is not ready within ‘x’ (30, 60, and 120) minutes after the scheduled cut time.” Attachment N to this affidavit depicts Ameritech’s Ohio performance for PM 115 for the months of April 2001 through June 2001.

74. PM 115.1 is the, “Percent Provisioning Trouble Reports (PTR)” which measures outages at the time of conversion. As defined in the agreed to Ameritech business rules, PM 115.1, “Measures the percent of CHC circuits for which the CLEC submits a trouble report on the day of conversion.” The business rules also state that PM 115.1 reflects, “The percent of CHC circuits for which the CLEC submits a trouble report on the day of conversion, or before noon on the next business day.” Attachment N to this affidavit depicts Ameritech’s Ohio performance for PM 115.1 for the months of April 2001 through June 2001.

75. Finally, PM 115.2, “Mean Time To Restore – Provisioning Trouble Report (PTR)” measures the, “Average duration of the outage from the receipt of the PTR to the time it is cleared.” The agreed to Ameritech business rules further define the time frames for PM 115.2 as well. “The start time is when the (trouble) report is received. The stop time is when the (trouble)

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report is cleared.” Attachment N to this affidavit depicts Ameritech’s Ohio performance for PM 115.2 for the months of April 2001 through June 2001.

NUMBER PORTABILITY

76. Number Portability is addressed in checklist item 11 of § 271 of the 1996 Act. Ameritech has devoted the resources necessary to ensure that number portability is provided to CLECs “with as little impairment of functioning, quality, reliability, and convenience as possible” in compliance with Section 271(c)(2)(B)(xi). This is discussed in detail in the affidavit of Jeff Mondon.
77. In April of 2000, Ameritech deployed 10 digit triggers for LNP conversions. Ten digit trigger allows the CLEC to send an activate message to NPAC without coordinating the order with Ameritech. Once the CLEC sends its activate message, the appropriate databases are updated and calls are then routed to the CLEC’s switch for termination at the end user’s location.
78. Extensive training is provided to all personnel involved with LNP. Ameritech’s initial training provides formal class instruction on the LNP conversion process and trouble resolution procedures. In addition, if methods change, documentation is distributed to ensure all involved Ameritech organizations receive any method corrections as quickly as possible.
79. Coordination and communication measures are continually improving in an effort to ensure that LNP orders are worked in a manner that is transparent to the end user. PM 91 measures the, “Percent of LNP Only Due Dates Within Industry Guidelines” and PM 96, “Percent Pre-

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mature Disconnects for LNP Orders” measures LNP stand-alone performance as it relates to the LOC.

DSL

80. DSL provisioning in the LOC follows many of the same processes as the provisioning processes described above. The orders are screened prior to the due date for accuracy and assigned to a technician who is responsible for ensuring the completion of the provisioning on the due date.
81. In addition to this provisioning process, as a result of discussion with the CLECs, Ameritech issued an Accessible Letter dated May 23, 2000, CLECAM00-042, offering Acceptance Testing on xDSL loops. This Accessible Letter can be found on the CLEC Online website <<https://clec.sbc.com>>. Between the months of May 2000 and July 2000, the process was initiated in each of the five Ameritech states.
82. Acceptance Testing allows the CLECs to verify that the xDSL loop has continuity. To order Acceptance Testing, the CLEC must request it on the LSR in the REMARKS section along with a contact name and number of the CLEC employee with whom the Acceptance Test will be performed.
83. Acceptance Testing occurs upon the delivery of the xDSL loop. At that time, the Ameritech field technician will call the LOC, and the LOC tester will call the contact number provided by the CLEC to initiate the Acceptance Test. For the test, the Ameritech field technician will provide a solid short across the tip and ring of the circuit and then open the loop circuit.

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84. If the loop passes the “Proof of Continuity” parameters, as defined in the Accessible Letter, the CLEC will provide Ameritech with a confirmation number and Ameritech will complete the order. The CLEC will be billed for the Acceptance Test as specified in the Accessible Letter.

85. If the Acceptance Test fails loop Continuity Test parameters, as defined in the Accessible Letter, the LOC technician will take any or all reasonable steps to immediately resolve the problem with the CLEC on the line including, but not limited to, calling the CO to perform work or troubleshooting for physical faults.¹¹ If the problem cannot be resolved in an expedient manner, the technician will release the CLEC representative and perform the work necessary to correct the situation. Once the loop is correctly provisioned, Ameritech will contact the CLEC representative to repeat the Acceptance Test. When the aforementioned test parameters are met, the CLEC will provide Ameritech with a confirmation number and Ameritech will complete the order.

MAINTENANCE AND REPAIR

86. The LOC handles all CLEC repair and maintenance requests, and provides CLECs with the status of maintenance reports on demand. The LOC maintains a toll free access line 24 hours per day, seven days a week, that allows CLECs to call in trouble reports and receive status updates at any time. As noted above, Ameritech has provided the CLECs with the EB/TA giving them the ability to issue trouble reports and check for status electronically, at any time of day, seven days a week.

¹¹ If CLEC xDSL service does not function as desired, yet test parameters are met, Ameritech will close the order.

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87. The LOC maintenance technicians are responsible for answering calls from the toll free number provided to CLECs in Ameritech's five states, including Ohio, for reporting maintenance and repair needs for Resale, UNE-P, UNE, LNP, DSL, ISDN/BRI, and line sharing. Once a trouble is reported to a LOC maintenance technician, the technician assists in isolating the trouble. For example, the technician may coordinate with the CO technician to prove continuity on a copper facility to the Main Distribution Frame ("MDF"). Next, the LOC maintenance technician may coordinate with the CO technician and the CLEC to verify continuity through the collocation block to the CLEC. If no trouble is found in the CO, then the technician may coordinate with Network field technicians to perform further testing from the demarcation point to the CLEC. If the trouble is determined to be within the Ameritech network, the Network field technicians will repair the trouble and do further testing with the LOC and the CLEC ensuring that the trouble is resolved. In addition to providing testing and coordination with the CLEC and Network personnel for certain services, other maintenance technician responsibilities include coordinating vendor meets, escalating expired timers, documenting test results, documenting all internal and external contacts, performing escalations requested by the CLEC, and providing status updates to the CLEC.

88. The LOC currently employs 194 maintenance technicians. These technicians input all manually submitted trouble reports for the products listed above into the Ameritech systems, either the Loop Maintenance Operating System ("LMOS") or Work Force Administration Center ("WFA/C"). Both systems are discussed in the affidavit of Mark Cottrell. This creates an electronic trouble ticket to be accessed by various Ameritech personnel, including

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maintenance technicians and Network field technicians. This is the same process and system used by Ameritech retail.

ADDITIONAL SUPPORT GROUPS

89. As part of the LOC's technical support efforts, a group of Service/Network Performance Managers is dedicated to assist CLECs with their provisioning and maintenance activities. The Service/Network Performance Managers: interact as needed directly with their CLEC customers; attend CLEC meetings; assist the Account Team in identifying and resolving provisioning and maintenance issues; act as a liaison between the CLEC and the Ameritech Network organization; and proactively initiate process improvement teams. The Service/Network Performance Management team also provides representation at the monthly CLEC User Forum meetings.

ADDITIONAL LOC SERVICE OFFERINGS

90. In order to foster a positive and cooperative working environment, Ameritech invites CLECs to attend individual orientation sessions at the LOC. These sessions include a presentation to define what the CLEC can expect from the LOC, and to educate the CLEC on internal workflows and processes. The CLEC has an opportunity to meet LOC personnel as well as see the tools the technicians use to provide provisioning and maintenance functions. To accommodate CLECs' individual capabilities, LOC Service/Network Performance Managers have traveled to CLEC locations to present the LOC orientation package to interested CLEC members and discussed these issues on conference calls. The presentation package includes a contact/escalation list and details on the overall functionality of the LOC. Since the LOC was established, LOC Service Managers have conducted these presentations for various CLECs, either at the Milwaukee LOC site, remotely at CLEC locations, or on conference

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calls with the CLEC and the Ameritech Account teams to begin each partnership on a positive note.

ESCALATION AND COMPLAINTS

91. A well-documented escalation process is available to CLECs and can be found in the CLEC Handbook. Escalation requests for CLECs' end user POTS service are processed using the same procedures and times as requests for escalation of retail POTS customers. Escalations for special services (*i.e.*, Voice Grade Private Line, Digital Data Services, etc.) are processed in the same manner as escalations are processed in retail.
92. For example, as soon as the LOC technician is made aware of a service outage that impacts a CLEC's overall network or CLEC provided essential lines, (those designated important to a community, *e.g.* fire department, police, hospitals, etc.), the CLEC is advised that the service condition will immediately be escalated. The LOC technician will handle the CLEC's problem by immediately calling the appropriate department within Network to get the service restored or activated. At the CLEC's discretion, the CLEC may choose to escalate the problem by following the escalation procedure as outlined on CLEC Online at <https://clec.sbc.com>.
93. The LSC not only has well documented escalation procedures that appear on the CLEC Online web site at <<https://clec.sbc.com>>, but has also created a Customer Care team that is the CLEC community's primary contact with regard to LSC escalations. The procedures listed on the site can be used for informal complaints regarding service order processing issues and allow the CLEC community access to all Customer Care managers up to and including the Vice President of LSC/LOC operations. When an informal complaint is

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received by a Customer Care group service representative, he or she attempts to resolve the CLEC's issue in a timely manner. If the Customer Care service representative is unable to resolve the issue within two hours, the CLEC contacts the Customer Care service representative's manager. If the Customer Care manager is unable to resolve the issue within two hours, the CLEC contacts the Customer Care area manager and so on up to and including the Vice President of LSC/LOC Operations.

94. A formal complaint process is also in place from an Ameritech corporate perspective. While CLECs are encouraged to take advantage of the Customer Care team and their expertise, the CLEC always has the option of initiating an official complaint via the Executive Appeals group. The Executive Appeals group will document, track and review the complaint and follow up with all responsible Ameritech organizations to assure resolution for the customer. Regardless of whether the complaint is initiated by a retail or a wholesale customer, the Executive Appeals group is responsible for resolving any and all official complaints made regarding Ameritech service.

95. Ameritech reports more than 160 performance measurements negotiated to evaluate the effectiveness of the pre-ordering, ordering, provisioning, maintenance and billing services performed by Ameritech personnel. The LSC and LOC organizations are directly responsible for assuring that Ameritech is in compliance with many of these measures. A listing of all performance measurements that monitor Ameritech's performance can be found in the affidavit of Salvatore Fioretti.

96. In conjunction with the CLEC community, Ameritech has also developed and implemented a CLEC User Forum (CUF). These meetings began in Ameritech's five-state region (including

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Ohio) in April 2000 and are ongoing on a monthly basis. The CUF meets to discuss issues that participants deem critical to business requirements and offers an arena for open discussion on operational issues and processes. The issues addressed by this forum are those which impact the daily business practices of CLECs. The intent of all participants and the Forum as a whole is to work cooperatively through a defined problem resolution process.

97. The LSC and LOC have dedicated three managers to participate in the CLEC User Forum as Subject Matter Experts (“SMEs”). These individuals also participate in the appropriate ordering/provisioning subcommittees to investigate and evaluate LSC and LOC processes, including jeopardies, in an effort to establish process improvements.

LOCAL OPERATIONS COMMITMENT

98. Ameritech has committed substantial resources to assist its CLEC customers’ entry into the local marketplace. The services provided and efforts expended demonstrate Ameritech’s dedication to this growing market. All Local Operations entities will continue to concentrate on customer service and satisfaction. The steady improvements discussed above will continue these organizations’ focus on providing efficient problem resolution and improved responsiveness, and will insure that issues, if they arise, are addressed by the Ameritech work group that can eliminate the problem. The mission of Local Operations is to create the highest level of customer care in the industry.

99. In an effort to improve order processing and reduce orders in error status, frequent meetings and conference calls are held with CLECs and, in some cases, communication occurs on a weekly basis. Local Operations meetings are scheduled for any CLEC who expresses a desire to meet on site with the LSC or LOC. These proactive meetings are another tool that

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improves communication, resolves issues and demonstrates Ameritech's interest in customer satisfaction. The LSC and LOC are focused on quality and demonstrate this commitment with knowledgeable and experienced managers, extensive training and development for service representatives and technicians, and accurate service order, provisioning and maintenance performance. Process improvements are evaluated internally and in partnership with CLECs.

100. Customer service is the hallmark of Local Operations. The division was created solely to serve CLECs in the local marketplace, and it will remain dedicated to providing service to CLECs. In fact, management and non-management alike have their compensation based on customer service excellence. Non-management appraisals are impacted by customer comments, complaints and compliments. Management compensation is tied directly to performance for this market, with the focus of these channels directed to supporting the CLEC customer. This fact demonstrates that Ameritech is sincere about insuring that the level of service being provided to CLECs remains at the highest possible level.

CONCLUSION

101. From its original formation in 1993, to the industry evolution brought on by the 1996 Telecommunications Act, to the realities of today's competitive communications market place, Ameritech's Local Operations organization has been and continues to be a stalwart proponent of all competitive providers within the Ameritech region. Indeed, Ameritech was the first regional operating company to recognize the need for just such a wholesale operation and responded to the requirements of the competitive marketplace with an entire organization dedicated to the success of the wholesale customer. That foresight and dedication continues today as evidenced by the unprecedented growth experienced by both the LSC and LOC

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organizations mentioned above. Both the LSC and the LOC are in place in order to meet and exceed the wholesale customers' expectations and continue to improve relationships, processes and the services that are critical to a CLEC's operations.

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This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

102. Executed on _____, 2001.

Justin W. Brown
General Manager–Regulatory Support

STATE OF WISCONSIN)
COUNTY OF MILWAUKEE)

Subscribed and sworn to before me this _____ day of _____, 2001.

Notary Public