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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)
Communications Services, Inc. d/b/a)
Ameritech Long Distance for Provision of)
In-Region InterLATA Services in Ohio)

CC Docket No. _____

STATE OF INDIANA)
)
COUNTY OF MARION)

**AFFIDAVIT OF PATRICK A. HARRISON
ON BEHALF OF AMERITECH**

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9-1-1/E9-1-1**

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I, Patrick A. Harrison, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Patrick A. Harrison. My business address is 220 N. Meridian Street, Room 1620 Indianapolis, and Indiana 46204. I am Associate Director-9-1-1 Database and Technology for Business Communications Services (“BCS”), which is a business unit of SBC Communications. I am responsible for the overall management of Ameritech’s E-9-1-1 Database, which is comprised of approximately 29 million records, including Ohio records. I have additional responsibilities for new product implementation and information technology associated with updates to the E-9-1-1 Database. My responsibilities include file management for updates to the E-9-1-1 database from both Ameritech and other service providers, management of access to the E-9-1-1 database and vendor management of Ameritech’s third party provider.

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

2. I have had overall management responsibility of Ameritech’s E-9-1-1 Database from May 1995 to the present. I have continually implemented process improvements to the timeliness, accuracy and integrity of the database. Additionally, I have a very diverse background with respect to 9-1-1 and all facets of 9-1-1 operations, including network architecture, selective calling routing and customer premise equipment. Outside of the 9-1-1 arena at Ameritech, my prior experiences and responsibilities include network technical support for first office applications of new features and functionality for digital switching and maintenance engineering for hardware and software modifications of digital switching and data communication applications. I have also been a marketing representative for digital switching services, data communications and special applications, a supervisor for network

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switching responsible for seven Central Offices and supervisor of a network switching control center responsible for surveillance and analysis of digital switching technology.

3. I attended University of New Mexico, Albuquerque New Mexico where I studied psychology. I have attended several continuing education courses receiving certification in Project Management, Data Communication and Digital Switching.

PURPOSE OF AFFIDAVIT AND EXECUTIVE SUMMARY

4. The purpose of my affidavit is to demonstrate how Ameritech Ohio¹ provides nondiscriminatory access to 9-1-1 and E9-1-1 Services as required by checklist item (vii)(I). 47 U.S.C. § 271(c)(2)(B)(vii)(I). In the *Michigan 271 Order* ¶ 256², the FCC found that “section 271 requires a BOC to provide competitors access to its 9-1-1 and E9-1-1 services in the same manner that a BOC obtains such access.” The FCC elaborated that a BOC “must maintain the 9-1-1 database entries for competing LECs with the same accuracy and reliability that it maintains the database entries for its own customers.” *Id.* This duty includes, among other things, populating the E9-1-1 database with competitors’ end user data and performing error correction for competitors on a nondiscriminatory basis. BOCs must ensure that resellers are able to provide 9-1-1 service to their customers in the same manner as the BOCs. And for facilities-based carriers, the BOC must provide “unbundled access to [its] 9-1-1 database and 9-1-1 interconnection, including the provision of dedicated trunks

¹ 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 Telephone Company offers telecommunications services and operates under the names “Ameritech” and “Ameritech Ohio” pursuant to trade name registrations with the state of Ohio.

² *In the matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in Michigan*, FCC 97-298, Released August 19, 1997 in CC Docket No. 97-137.

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from the requesting carrier's switching facilities to the 9-1-1 control office at parity with what [the BOC] provides to itself."

5. As I demonstrate below, Ameritech Ohio satisfies this requirement by providing CLEC's with access to 9-1-1 and E9-1-1 at parity with Ameritech Ohio for the same access. Specifically, Ameritech Ohio makes available non-discriminatory access to its 9-1-1 databases to both facilities (switch) based and non-switch based carriers³ and non-discriminatory connectivity to its 9-1-1 control office⁴ in its interconnection agreement, Appendix 9-1-1.⁵ . Based on CLECs' particular needs, switch-based CLECs may choose to interconnect via CLEC owned facilities, third-party leased facilities, or Ameritech Ohio leased facilities. All CLECs have available to them multiple options for submitting and updating their end user data in Ameritech Ohio's 9-1-1 database. Likewise, all updates to the 9-1-1 database (both Ameritech Ohio's and CLECs') are processed on a non-discriminatory basis, with the same edits applied to all records presented to the database. The number of 9-1-1 interconnection trunks currently in place and the number of CLEC end user records currently in the 9-1-1 database can be found in the affidavit of Ms. Deborah Heritage (specifically, Attachments A and F of her affidavit).
6. In providing this access to the CLECs through various optional network and database arrangements, Ameritech Ohio:

³ Non-switch based carriers are those who utilize Ameritech's switching functionality to provide dialtone to their end users. This includes resellers and CLECs who subscribe to the Unbundled Network Element Platform (UNE-P), which is a combination of an unbundled loop and unbundled local switching with shared transport.

⁴ The 9-1-1 Control office is also referred to as the 9-1-1 Router or 9-1-1 Tandem. Its function is to switch the 9-1-1 call from the incoming trunks from the serving end offices to the outgoing trunks to the Public Safety Answering Points (PSAPs).

⁵ Carriers with approved interconnection agreements containing the Appendix 9-1-1 include: Bullseye Telecommunications, Level 3, and a number of Others as listed in Attachment A to the affidavit of Mr. Scott Alexander. For brevity in the remainder of my affidavit, I will refer to the Bullseye Telecom Agreement only, (hereinafter "Bullseye").

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- Dedicates personnel to facilitate CLEC interconnection, including the testing and turn-up of 9-1-1 trunking at the 9-1-1 Tandem.
- Provides CLECs with access to the Ameritech Ohio 9-1-1 database to electronically maintain end user records, allowing the carriers to choose from optional data exchange formats with multiple transmissions each day. Additionally, Ameritech Ohio has implemented tools to assist each CLEC in maintaining the accuracy and completeness of its end user data: TCView and TCEnter. The former allows the CLEC real-time access to the database to check an end user record or to check an address for validity in the MSAG (“Master Street Address Guide”). The latter is a downloadable data input system that provides for dial-up transmission of the entered data; a tool for those CLEC without other file transfer capability.
- Provides (upon request) CLECs with monthly updates of the Master Street Address Guide (MSAG), the industry standard for address validation. (Bullseye, Appendix 9-1-1, Sec. 3.4.5.)
- Provides the CLEC OnLine <<http://clec.sbc.com>> website with very comprehensive product information on 9-1-1 service. Ameritech Ohio has also taken an educational approach to designing the web-site. CLECs can utilize the 9-1-1 section of this website as self-paced 9-1-1 training, as well as utilizing it as a reference guide.
- Provides Local Number Portability (LNP) error reports electronically to facilitate CLEC resolution of LNP-related 9-1-1 error records, to ensure that the end user 9-1-1 records are accurately reflected in the 9-1-1 Database.

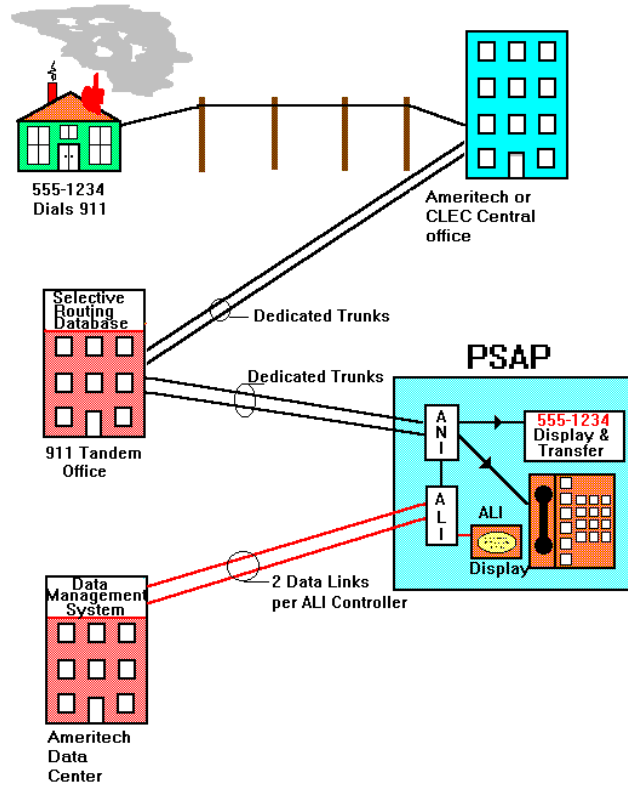
BACKGROUND: WHAT IS E9-1-1 SERVICE? HOW DOES IT WORK?

7. Before demonstrating in detail how Ameritech Ohio complies with the requirements of competitive checklist (vii)(I), it may be helpful to provide a brief overview of E9-1-1 service and a description of how it works in Ohio. 9-1-1 service is provided to private and public safety agencies and enables a caller to reach a Public Safety Answer Point (PSAP) by dialing the digits 9-1-1. When first introduced, 9-1-1 service could only deliver the 9-1-1 calls originated from a particular end office to one Public Safety Answering Point (PSAP); this was known as Basic 9-1-1 service. Enhanced 9-1-1 service (E9-1-1) employs the use of a switch so that a 9-1-1 call can be routed to a particular PSAP, as designated by the public safety agency, based on the caller’s phone number. Further, it is the public safety agency

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that determines how calls should be routed and what features will be used; for example, whether or not the PSAPs will receive both the Automatic Number Identification (ANI or telephone number) and Automatic Location Identification (ALI or name and address) with the 9-1-1 call.

8. The Enhanced 9-1-1 (E9-1-1) system is very complex. The elements included in the system (which are at the PSAP premises) are the ANI Control Equipment, ALI multiplexer or MUX, and other station equipment. Other elements of the E9-1-1 System are the Selective Routing Control Office, TSS (Transaction Services System), and the SR/ALI databases which provide routing, name, address and phone number information. A diagram depicting E9-1-1 System Components is contained in my Attachment A.
9. As my Attachment A shows at the top left-hand corner, the E9-1-1 call begins when an end user dials 9-1-1. The call is first handled by the end user's serving central office, which is delineated as "END OFC" on the diagram. The END OFC (central office) then sends the call to the 9-1-1 control office, shown as CONTROL OFFICE on the diagram. The END OFC could depict an Ameritech Ohio end office, an independent telephone company's end office, or a competitive local exchange carrier's (CLEC's) end office. The Control Office (or router) queries the Selective Routing Database (shown as SR/ALI database) to determine which PSAP the call should be directed to. The Selective Routing Database looks at the end-user's telephone number (the ANI) and determines which PSAP receives the call based upon that number. A more simplistic diagram is shown below:



10. Customer data for 9-1-1 service is stored in multiple databases that work together to provide E9-1-1 service. The “9-1-1 database” contains the necessary information associated with each end user to process E9-1-1 calls (i.e., telephone number, name, address, class of service) and actually consists of two separate databases that are integral to the operation of the E9-1-1 Services: the Transaction Services System (TSS, also known as the Database Management System – DBMS or DMS) and the Selective Routing/Automatic Location Identification (SR/ALI) database.⁶ The end user data is created and updated by each telephone service provider, including Ameritech Ohio, CLECs, and other local exchange carriers, such as independent companies (or ICOs).

⁶ On my Attachment A, there are two SR/ALIs shown because there are two separate systems serving the state. While the PSAPs are distributed across the two systems for local balance, they are duplicative of each other and serve as a “hot” back-up for each other.

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11. The TSS contains the MSAG (Master Street Address Guide) and a working copy of the end user records. The MSAG contains street information with address ranges and the routing information for the responding Public Safety Agencies. In other words, the street address ranges are mapped to the responding PSAPs as identified by the county 9-1-1 coordinator(s) via the use of Emergency Service Numbers (ESNs), which define the responding agencies for law enforcement, fire and emergency medical services. This information is provided to Ameritech Ohio by the entity 9-1-1 coordinator(s) and is directly input to this database based on the information received. Responsibility for the accuracy of the MSAG lies with the county 9-1-1 coordinator(s).

12. The MSAG portion of the TSS database is used to validate a service update record, which includes the customer name, address, and telephone number, obtained from Ameritech Ohio or another carrier, such as a CLEC, via file transfer (or other method). As the record is passed to the TSS, an inquiry is made to validate the address against the MSAG. If the inquiry shows that the record matches a valid address within the MSAG, then a record is produced to be input into the SR/ALI database. This record, which contains the updated end user information, will also have routing information added to it. A file containing these records is prepared to update the SR/ALI database. If the record does not contain a valid address, then an entry to the error file is made; there is an error file produced for each file of 9-1-1 database updates submitted. This edit check is important as it ensures that the address passed is a valid address as recognized by the County or municipality. If the address is not recognized by the county, then the system does not know how to assign the routing for that call; i.e., the call cannot get to the proper PSAP as defined by the county. Errors may also be sent to PSAPs or counties for resolution as needed.

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13. In addition to the MSAG validation discussed above, the TSS performs a number of other edit checks on the end user record updates presented to help ensure that the databases remain accurate and complete. These include checking if the type of update submitted (insert, delete, change) is consistent with what is in the database. That is, if the update type is an insert, there should not be an existing record in the database. The TSS also does edit checks on pilot/ member relationships. A pilot number is the main number of a Centrex or PBX system; member numbers are the other telephone numbers associated with the Centrex or PBX system. An example edit is that a pilot number must be in the database before members can be added.
14. The TSS is maintained for the Ameritech region as a whole. The TSS produces the SR/ALI databases used by the 9-1-1 routers for the routing of 9-1-1 calls and used by the PSAPs to obtain the ALI associated with the phone number of the 9-1-1 call.
- The Selective Routing (SR) portion contains a record for each active telephone number in service for an end user served by an Ameritech Ohio 9-1-1 control office. Using criteria specified by the 9-1-1 customer in the MSAG, the TSS assigns the ESN and creates/updates the SR database stored either in one of the 9-1-1 control offices, or in the separate processor also used for storing the Automatic Location Identification (ALI) records. TSS correlates the SR database files to assure each 9-1-1 control office switch contains all of the telephone numbers working in the exchanges connected to that 9-1-1 control office. In the case of a 5ESS switch, selective routing is control by mated pair of SR/ALI systems. In the case of a DMS100 switch, selective routing is provided by the 9-1-1 control office.
 - The Automatic Location Identification (ALI) portion contains a record for each active telephone number in service. TSS creates each ALI record by combining information from two sources. Specific information about each end user customer that is downloaded and maintained by each telephone service provider in the SR/ALI system and information from MSAG that is maintained by the 9-1-1-service customer.

CHECKLIST ITEM (vii)(I): ACCESS TO 9-1-1/E9-1-1

15. Ameritech Ohio provides CLECs the means to provide their customers access to the 9-1-1 service selected by the local municipalities in a manner identical to the 9-1-1 service supplied to Ameritech Ohio's own customers. CLECs may provide 9-1-1 access service directly to the local municipalities, or may interconnect with Ameritech Ohio's existing service arrangement at the request of the governmental body, as shown below.

16. Ameritech Ohio provides and maintains equipment at the E9-1-1 Control Office and the Database Management System as necessary to provide E9-1-1 services for the requesting local E9-1-1 customer. (Bullseye, Appendix 9-1-1, Sec. 3) This includes some or all of the following, as needed:

- Transporting the E9-1-1 calls from the CLEC's point of interconnection to the Control Office of the E9-1-1 system⁷;
- Switching the E9-1-1 calls through the Control Office to the appropriate Public Safety Answering Point as delineated by the MSAG produced by the county and maintained by Ameritech Ohio ;
- Storing the names, addresses and associated telephone numbers of the CLEC's customers in electronic databases for the E9-1-1 TSS or Database Management System; and
- Transmitting the information associated with the CLEC's customers to the Public Safety Answering Point upon the customer calling 9-1-1.

⁷ The CLEC is responsible for transporting the E9-1-1 calls from its switch to its point of interconnection. (Bullseye, Appendix 9-1-1, Section 4.1.1;)

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17. The trunking arrangements from each end office (or serving switch) to the E9-1-1 control offices are the same for Ameritech Ohio, CLECs, and other local exchange providers.
18. Dedicated 9-1-1 implementation managers are used to facilitate CLEC interconnection with Ameritech Ohio 's 9-1-1 service. Further, these 9-1-1 implementation managers are assigned to facilitate the testing and turn-up of a CLEC's 9-1-1 trunk at the 9-1-1 tandem. Ameritech Ohio assists the CLEC in determining the minimum number of trunks necessary, makes arrangements for ordering those trunks (if the CLEC chooses to purchase trunks from Ameritech Ohio) and for timely delivery, and jointly tests those trunks with the CLEC. CLECs may also choose to self-provision their trunks or to purchase them from a third party. The CLEC is responsible for providing accurate forecasts to determine the number of trunks and cooperatively testing the trunks, which includes provision of test data for the E9-1-1 database. After trunk installation is complete, continuity testing is conducted jointly by Ameritech Ohio and the CLEC on the trunks to determine if they are functioning properly. Then call-through testing is performed to the PSAPs involved or to an appropriate test PSAP for the CLEC's service area. Call-through testing involves making test 9-1-1 calls, and thus tests the CLEC's switch routing, the trunking arrangements, the 9-1-1 control office, and the 9-1-1 database, as all components are used to complete the test call. This latter test involves not only the joint effort of Ameritech Ohio and the CLEC, but also the affected PSAP(s) where appropriate. Test data for the 9-1-1 database is required so that complete call-through testing can be performed; that is, to test the proper routing of the calls and the ALI display. Both parties are also responsible for monitoring the trunks and promptly reporting any failures as prescribed in applicable agreements or by law. This is the same testing that

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Ameritech Ohio performs when it installs new 9-1-1 trunks from its end offices to its 9-1-1 control offices. (*See*, Bullseye, Appendix 9-1-1, Sections 3.3.4, 4.2.10, and 4.3.6)

19. In addition, Ameritech Ohio provides and maintains sufficient dedicated E9-1-1 circuits according to provisions and specifications of the E9-1-1 customer (the Governmental Entity). (Bullseye, Appendix 9-1-1, Sec. 3.3.1.) Ameritech Ohio also provides CLECs a description of the geographic area as defined by the MSAG and PSAPs served by each E9-1-1 Control Office. (Bullseye, Appendix 9-1-1, Sec. 3.3.3) Since 9-1-1 call traffic is often quite peaked, the most important factor in determining the number of trunks required from a central office to a 9-1-1 control office is the number of calls originated and blocked. This data for proper sizing of 9-1-1 trunk groups can only be collected in the originating central office switch. Therefore, the CLEC must collect the traffic data and determine the proper number of trunks for 9-1-1 service on behalf of its own customers. (Bullseye, Appendix 9-1-1, Sec. 4.2.9;) This is the same data that Ameritech Ohio monitors on its own trunks from its end offices to the 9-1-1 control offices.

20. Ameritech Ohio recognizes the authority of the governmental E9-1-1 customer to establish service specifications and grant final approval of service configurations offered by Ameritech Ohio and the CLECs. (Bullseye, Appendix 9-1-1, Sec. 7.2.)

21. Ameritech Ohio provides all necessary street address information for the exchanges or communities where the CLECs operate, in order to allow the CLECs to create the necessary customer files for E9-1-1 Automatic Location Identification. That is, Ameritech Ohio provides CLECs copies of the MSAG so that the CLEC may pre-validate their end user record updates before submitting them to the Gateway for processing by the TSS. (Bullseye,

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Appendix 9-2-2, Sec. 3.4.5) Ameritech Ohio also provides the CLECs with all necessary documentation for the operation of the local E9-1-1 system and the methods of electronic transfer and maintenance of its end user records. (Bullseye, Appendix 9-1-1, Sec. 3.4)

22. Ameritech Ohio considers the MSAG to be the 9-1-1 service customer's database and Ameritech Ohio to be the custodian of that database. Ameritech Ohio's use of the MSAG is limited to purposes associated with provisioning 9-1-1 service. Ameritech Ohio's 9-1-1 interconnection methods and procedures include a means of providing each CLEC with a mechanized copy of the MSAG for the geographic areas the CLEC serves, as discussed above. This makes the administration of MSAG more efficient for the 9-1-1 customer and the CLEC and reduces the potential for error by maintaining one mechanized MSAG under the control of the 9-1-1 customer and utilized by all service providers who interconnect with the E9-1-1 systems provided by Ameritech Ohio. A CLEC may also view a copy of the MSAG electronically via a product called TCView, which is discussed below

23. As part of the collaborative discussions last year, and as documented in the Third Joint Progress Report filed in Case No. 00-942-TP-COI, the parties recognized that there are differences between the MSAG and the Street Address Guide (SAG), a separate database used in Ameritech Ohio's ordering processes for validating addresses on Customer Service Records (CSRs)⁸. The differences between these two databases are due to their different focuses and purposes, and the fact that the MSAG is maintained, but not controlled, by Ameritech Ohio. Accordingly, both Ameritech Ohio and the CLECs experience problems when an address validates pursuant to the SAG for ordering purposes, but does not pass the

⁸ *Third Joint Progress Report Regarding the Resolution of Certain OSS, Process Product and Performance Issue. PUCO Case. No. 00-942-TP-COI, January 16, 2001, Section III, pp. 30-31.*

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MSAG edit when the E9-1-1 update record is processed by the TSS. It was agreed that this issue could be resolved if only one database could be used to determine a valid address for both service order and E9-1-1 purposes, but that such an objective was beyond the scope of the collaborative participants. As a result, Ameritech Ohio has agreed to notify CLECs through the CLEC User Forum of any new processes or updates to the E9-1-1 database. Ameritech Ohio is responsible for maintaining both the TSS and SR/ALI databases where requested by the 9-1-1 customer (i.e., the local government agency) to do so. In addition to receiving updates from its billing and order entry systems, Ameritech Ohio relies upon continuing input from other telephone companies and the E9-1-1 districts (i.e., the municipalities/PSAPs) to keep the database up to date. Therefore, while Ameritech Ohio is responsible for performing the maintenance functions of the E9-1-1 databases, the responsibility for providing timely, accurate and complete data updates to the database also lie with the counties/municipalities/PSAPs and all telephone service providers. (Bullseye, Appendix 9-1-1, Sec. 3.4.1; also sections 4.3.1 and 4.3.4).

24. The SR/ALI database is produced for the sole and specific purpose of 9-1-1 service and is created using proprietary information about end users of the telephone service providers. The ALI portion merely accommodates the display of that information at the PSAP for each 9-1-1 call, on a per-call basis. (Bullseye, Appendix 9-1-1, Sec. 2.2).

25. Ameritech Ohio assures the confidentiality of proprietary information about a CLEC's customers when these records are in Ameritech Ohio's E9-1-1 computer systems by strictly limiting the number of people who have access to this information. The only Ameritech Ohio employees who interact with the TSS are those who specifically support 9-1-1 services and those employees of Intrado, formally SCC Communications Corporation (SCC),

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Ameritech Ohio's 9-1-1 Database Services Provider. In addition, all employees of Intrado who have access to information in Ameritech Ohio's 9-1-1 database systems are required to sign non-disclosure agreements to ensure the confidentiality of all customer information. No other employees have access to the dedicated computer system where MSAG and SR/ALI databases are stored. (Bullseye, General Terms and Conditions, Section 20)

26. Detection and correction of CLEC customer data errors in the Ameritech Ohio 9-1-1 computer system is performed by Ameritech Ohio and Intrado in the same manner, and by the same employees as for Ameritech Ohio's customers.
27. Each switch-based service provider electronically uploads and maintains the information associated with its end users. When files containing the CLEC's customer records are uploaded, the TSS processes the file and the CLEC receives a statistical report confirming the number of records processed without error and an error file with any records that failed the system edits. The error file provides codes explaining the reason each record failed to process. The CLEC is responsible for correcting the record and resubmitting it to the TSS. (Bullseye, Appendix 9-1-1, Sections 3.4.4 and 4.3.4)
28. Ameritech Ohio accepts multiple data exchange formats for the CLEC's 9-1-1 update records. These include: Electronic Commerce Network (ECN), Information Exchange Facility (IXF), TC Entry and a third party database management vendor of choice. Further, the physical data records may be transmitted in the following standard formats: AT&T 232, NENA 1 and NENA 2. (Bullseye, Appendix 9-1-1, Section 3.4.3) Further, CLECs may transmit their data files, which would contain record updates for multiple end users, up to four times per day.

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29. All record update files (Ameritech Ohio's, CLECs', or other local exchange carriers') are all transmitted to the Ameritech Ohio Gateway. Once at the Gateway, the files are processed (as described above) in approximately a "first-in, first-out" methodology. That is, when the TSS queries the Gateway to process pending record update files, it processes all those waiting there in alphabetical order. The TSS system scans the gateway every 15 minutes for update files and processes those files, in alphabetical order, as the system is available for updates. Thus, the record update files are processed in approximately FIFO method.
30. Ameritech Ohio provides the switch-based CLECs that submit data to Ameritech Ohio's 9-1-1 database, upon request, an electronic compare file that contains the subscriber information stored in the Ameritech Ohio 9-1-1 database for its end user customers. CLECs may request that electronic compare files be provided for all of their customers in the state (sorted by NPA), or by specific NPA, once per quarter. At the CLEC's option, Ameritech Ohio provides the electronic compare file on diskette, or by e-mail to the CLEC. The compare file is created in accordance with NENA standards on data exchange. Ameritech Ohio processes requests for electronic compare files within 14 days of receipt of a CLEC's request. CLECs review the electronic compare file(s) for accuracy, and submit any necessary corrections to Ameritech Ohio via the normal record update process. Ameritech Ohio will negotiate terms and conditions with respect to the frequency or as defined in their interconnection agreement. The process for providing compare files was recently updated by Ameritech Ohio. Subject to CLEC feedback, this process will be finalized and then posted on the <<http://clec.sbc.com>> web site.
31. Error reports specific to Local Number Portability (LNP) are provided to CLECs to facilitate CLEC resolution of LNP-related 9-1-1 error records. These reports are a valuable tool

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because, when “porting” telephone numbers, CLECs must work with other CLECs and Ameritech Ohio to ensure that the end user 9-1-1 records are accurately reflected in the Ameritech Ohio 9-1-1 Database. There is a window of time during which a 9-1-1 end user record is “unlocked” so that the provider associated with that end user may be changed. This ensures the end user record remains in the database, but that the proper provider will be reflected.⁹ These reports are provided to the CLECs electronically. The error type and record that was sent for inclusions in the database are both contained in the report.

32. Ameritech Ohio provides two additional products to CLECs to assist them in maintaining their end users’ records in the 9-1-1 database: TCView and TCEntry. Both of these products were developed in response to the *Michigan 271 Order*.
33. TCView enables a CLEC access to the Ameritech Ohio 9-1-1 database to view its end user 9-1-1 end user (or ALI) records. In addition, TCView enables CLECs to check addresses for MSAG validity. This product was first trialed with CLECs in 1998 and fully implemented in July 1999.
34. TCEntry, a downloadable electronic data input system, enables a CLEC to input its end user data into an update record file that can be transmitted via dial-up modem to the Ameritech Ohio Gateway for updates to the Ameritech Ohio 9-1-1 database. The software, when coupled with the MSAG data provided on CD-ROM, will also do a pre-validation of the end user record against the MSAG; the same main edit check that the TSS performs when processing the update record. Although the CLEC is not required to develop electronic data

⁹ In contrast, the only other method would call for the deletion of the end user record by the old provider with the insertion by the new provider. As this could have lead to the end user having no information in the 9-1-1 database, these alternative procedures are used. This is a recommended standard of the National Emergency Number Association (NENA).

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exchanges, electronic methods provide the best data accuracy, which is critical for 9-1-1 service, as it avoids the manual re-entry of faxed information. TCEnter provides a CLEC with the means to do an electronic update, while only requiring the CLEC to have only very basic personal computer capabilities: computer with Windows '95, CD-ROM drive, modem, and dial-up capability.

35. Non-switch-based providers, which includes resellers and CLECs using UNE-P, are able to provide 9-1-1 service to their end user customers in the same manner as Ameritech Ohio does for its customers. (Bullseye: Appendix Resale, Section 4.1) End user records for these types of providers are included in the files Ameritech Ohio uploads to the TSS for its own retail end users. This is possible because the telephone service for the CLECs' end users served via resale or UNE-P is initiated by the same service order entry system used to set up service for Ameritech Ohio end users. As noted above, it is the CLEC's responsibility to ensure that the proper 9-1-1 data is provided to Ameritech Ohio for inclusion in the 9-1-1 database. (See also Bullseye, Appendix Resale, Section 4.1) The E9-1-1 TSS makes no distinction between Ameritech Ohio's end users and the resale or UNE-P served end-users when processing the file, as the records are commingled together in the same update file that comes from Ameritech Ohio.

36. If Ameritech Ohio's error file contains a resale or UNE-P served end user record that failed edits, Ameritech Ohio employees in the appropriate Business Unit correct common errors that can be resolved by issuing a service order. MSAG discrepancies that may require a modification to the MSAG would be referred to the appropriate county for resolution. If, however, resolving the error requires contacting the end user, the error is referred to the CLEC for handling.

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37. Another process employed by Ameritech Ohio to ensure the accuracy and completeness of the 9-1-1 database is the 9-1-1 ANI/ALI Inquiries. When a PSAP takes a call from an end user and perceives that there is incorrect data in the 9-1-1 database – whether based on the routing performed (the call went to the wrong PSAP) or the name and address data shown for the caller, the PSAP completes an 9-1-1 ANI/ALI Inquiry detailing the perceived problem and submits it to Ameritech Ohio for investigation and correction. Upon investigation of the issue, if Ameritech Ohio determines it needs information from a CLEC to resolve an issue with its end user, the Inquiry will be forwarded to the CLEC within one business day of receipt from the PSAP. This provides the CLEC with the same opportunity to address the accuracy and completeness of its 9-1-1 data as Ameritech Ohio has. If the CLEC discovers a correction must be made to its 9-1-1 data, it submits an update record via the normal process.

38. The following Performance Measures for 9-1-1 are discussed in further detail in the affidavit of Mr. Salvatore Fioretti:

- Average Time to Clear Errors. (OH 102)
- Percent Accuracy for 911 Database Updates. (OH 103)
- Average Time Required to Update 911 Database. (OH 104)
- Average Time to Unlock the 911 record. (OH 104.1)

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CONCLUSION

39. As shown above, Ameritech Ohio provides nondiscriminatory access to 911 and E911 Services, consistent with the requirements of 47 U.S.C. § 271(c)(2)(B)(vii)(I).

40. This concludes my affidavit.

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

Executed on _____, 2001.

Patrick A. Harrison
Director 9-1-1, Database and Technology

STATE OF INDIANA
COUNTY OF MARION

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

Notary Public