

State of California            )  
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 County of Santa Clara        )

**VERIFIED STATEMENT OF BOGDAN SZAFRANIEC**

1. My name is Bogdan Szafraniec, independent consultant for Covad Communications Company ("Covad"). In my role as consultant for Covad, I oversee CLEC to ILEC OSS gateway planning, development, and implementation. I also participate in OSS Change Management, review carrier merger conditions, participate in technical collaborative sessions, and define performance measurements for OSS Third Party Testing.
  
2. Prior to working for Covad, I was a systems architecture consultant for Ameritech from September 1996 through March 1999. At Ameritech, I oversaw the design of pre-ordering, ordering, and trouble administration gateway; developed business continuity plans; participated in OBF, TCIF, ECIC and T1 standard and guidelines for designed order status and jeopardy notification applications; managed software vendors and reviewed proposal for OSS solution; implemented OSS interface monitoring applications for performance reporting purposes; and devised strategy for selection of CORBA, EDI, and CMIP technologies. Prior to working for Ameritech, I was Director of Information Systems – AON Risk Corporation from February 1994-August 1996 where I was responsible for the automation of 13 remote offices; implementing of messaging gateway and LAN

deployment; designing internet connectivity and firewall security and contributing to development of AON corporate technology standards.

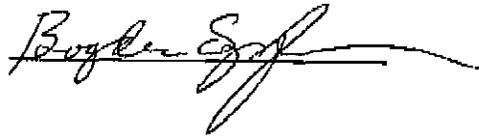
3. I submit this statement in support of Covad's Initial Verified Comments Related to the Joint Submission for Arbitration of the Amended Plan of Record for Ameritech's Operations Support Systems. Specifically, I will address the basis for Covad's request that the Commission order Ameritech to offer the following preordering and ordering functionalities: lite address validation for stand alone DSL capable loops and line shared loops; spare loop availability; loop reservation; and terminal configuration inquiry.
4. Currently, Covad must suffer through an address validation requirement that is cumbersome and difficult to use because it requires exact duplication of the address as it appears in Ameritech's records. This results in a "hit or miss" approach for Covad regarding loop qualification and ordering as Covad must determine whether Ameritech's database and records list an address as "Street" or "St." As a result, a substantial number of Covad's orders are rejected because the address listed on the order is invalid, even if the address is technically accurate. When that occurs, Covad must resubmit the order resulting in manual intervention which makes the preordering and ordering process prone to human error and delay. To address these issues, Covad requested through the collaborative process that it be allowed to qualify and order DSL and line shared loops using "lite address" validation, meaning that Covad would be able to qualify and submit orders using only the customer's telephone number rather than having to maneuver the cumbersome address validation process.

5. Moreover as a general matter, Ameritech's OSS do not allow CLECs such as Covad to perform functions in substantially the same time and manner as Ameritech does for itself. For example, Ameritech employees are able to view multiple available loops from a pool of spare facilities, while Covad employees are able to view only one of the available loops. Thus, the loop information currently obtainable from Ameritech is inadequate as it does not allow Covad to inform its customers of whether it can definitely offer DSL service and, if so, what type of DSL can be provided. Covad presently uses several DSL technologies to provide the customer with optimal speed and price options based on the capabilities of the underlying facility, (i.e., ADSL, HDSL, SDSL, and IDSL). It is essential, therefore, that Covad have efficient access to accurate electronic information about relevant operational parameters regarding Ameritech's constructed and maintained loop facilities. More simply stated, loop information helps Covad to sell the right DSL product to the right customer. Without this preordering information, Covad's customer has to tolerate inordinate delay and frustration in obtaining service from Covad.
5. Today, Covad cannot even guarantee a customer the lowest speed of DSL service that it offers because it does not know, ahead of time, whether a facility exists at all to serve a customer, whether Ameritech will provision a short copper loop (capable of supporting Covad's highest speed service), or a long copper loop, or a fiber DLC-fed loop (both of which allow Covad to provide a customer only its lowest speed service).

6. To address these issues, Covad has requested that it be granted the same access that Ameritech has to the spare loop availability, loop reservation, and terminal makeup information housed in Ameritech's OSS. If Covad had access to this information, it could ensure that it offered the best DSL service possible to the customer by obtaining and reserving the loop best able to support Covad's DSL service. In that way, Covad would be able to offer and provide the right DSL product to the right customer given the loop facilities available.
7. The information that Covad has requested from Ameritech already resides in Ameritech's OSS as well other incumbent carriers' OSS. In fact, both Bell Atlantic and BellSouth have offered CLECs the ability to view through their OSS several loops that would be available to serve a particular customer. I have personally attended collaboratives during 1999 on behalf of Covad in New York at which Bell Atlantic offered CLECs the ability to obtain loop makeup for 10 loops that serve a particular customer address. In addition, at collaboratives which I attended on behalf of Covad in Atlanta, Georgia in April 2000, where BellSouth offered CLECs in their region the ability to examine and qualify up to 4 loops that would be available to serve a particular customer, and then reserve a single loop for up to 3 days so that an order could be placed. These types of functions ensure that Covad will be able to determine what specific DSL service it can offer to a customer and then follow through and offer the promised service.
8. Ameritech uses the same functions as Covad has requested for its own internal purposes, but has refused to follow other ILECs such as BellSouth and Bell Atlantic in offering those functions to CLECs. Despite Covad's repeated

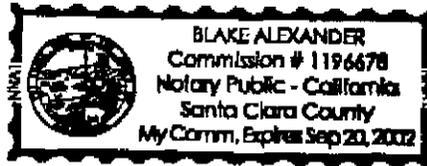
requests, Ameritech has refused to provide similar preordering functions to Covad and other CLECs in Illinois. Ameritech's refusal to recognize the needs of Covad and other CLECs for those functions - the same functions that Ameritech itself has and uses - can only be viewed as discriminatory.

FURTHER AFFIANT SAYETH NAUGHT



Subscribed and sworn to  
before me this 1<sup>st</sup> day of September  
2000.

  
Notary Public



My Commission Expires: 9/20/02