

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Joint Submission of the Amended)
Plan of Record for Operations) **Docket No. 00-0592**
Support Systems (“OSS”))

**FINAL STATEMENT OF POSITION OF
McLEODUSA TELECOMMUNICATIONS SERVICES, INC.,
BIRCH TELECOM OF THE GREAT LAKES, INC.
AND
NEXTLINK ILLINOIS, INC. D/B/A XO ILLINOIS, INC.**

**William Haas
McLEODUSA INCORPORATED
McLEODUSA Technology Park
6400 C Street SW
P.O. Box 3177
Cedar Rapids, Iowa 52406-3177
(319) 790-7295**

**Rina Hartline
BIRCH TELECOM OF THE GREAT
LAKES, INC.
502 West 14th Street
Austin, TX 78701
(512) 236-1700**

**Carol Pomponio
NEXTLINK ILLINOIS, INC. D/B/A
XO ILLINOIS, INC.
810 Jorie Blvd.
Suite 200
Oak Brook, IL 60523
(630) 371-3357**

**Carrie J. Hightman
Latrice Kirkland
SCHIFF HARDIN & WAITE
6600 Sears Tower
Chicago, Illinois 60606
(312) 258-5657**

**Attorneys for
McLEODUSA TELECOMMUNICATIONS
SERVICES, INC.,
BIRCH TELECOM OF THE GREAT
LAKES, INC.
and
NEXTLINK ILLINOIS, INC. D/B/A
XO ILLINOIS, INC.**

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McLeodUSA Telecommunications Services, Inc. (“McLeodUSA”), Birch Telecom of the Great Lakes, Inc. (“Birch”) and NEXTLINK Illinois, Inc. d/b/a XO Illinois, Inc. (“XO”) (hereafter jointly referred to as “Joint Small CLECs”), by their attorneys, hereby file their Final Statement of Position Related to the Joint Submission for Arbitration Per Ameritech’s Amended Plan of Record for Operational Support Systems (“OSS”).¹

I. INTRODUCTION

The Commission’s order² approving the merger of SBC and Ameritech requires Ameritech to implement a comprehensive plan of record (“POR”) for improving the Operational Support Systems (“OSS”) systems and interfaces available to competitive local exchange carriers (“CLECs”) in Illinois. The purpose of this arbitration is to resolve the disputed issues related to SBC/Ameritech’s proposed POR.³

Joint Small CLECs intervened in this proceeding because, as providers of competitive local exchange services in Illinois, they are dependent upon SBC/Ameritech’s OSS to obtain access to SBC/Ameritech’s bottleneck facilities and services in order to serve their customers. As the Commission itself noted in the order approving the SBC/Ameritech merger, “perhaps few other elements of telecommunications provisioning are more critical to the flow of benefits from competition to consumers . . . OSS are critical to engendering

¹XO takes no position on Issue 73.

²Order, Docket 98-0555 (Sept. 23, 1999).

³As the Commission is well aware, SBC/Ameritech initially proposed a plan of record that was insufficient to meet the requirements of the merger order. Consequently, it was rejected by the Commission. This subject of this arbitration are terms and conditions contained in Ameritech’s revised Plan of Record, which was subsequently approved by the Commission.

competition in the local exchange marketplace and protecting the interests of Ameritech Illinois' customers." (Merger Order, p. 198)

Contrary to SBC/Ameritech's claims throughout this proceeding, it is intuitively obvious that the Commission's decision in this docket will have a profound impact on whether Joint Small CLECs will be able to effectively compete with SBC/Ameritech for local service in Illinois. Given their limited resources, Joint Small CLECs have addressed the particular issues that most significantly impact their ability to effectively compete in Illinois.⁴ For the reasons described below, Joint Small CLECs respectfully urge the Commission to adopt their recommendations and seize this opportunity to take a step forward in making Illinois a truly competitive market for local service.

The Commission must also recognize that many of the issues before it in this proceeding involve the timing of OSS enhancements. The resolution of those issues boils down to whether the Commission accepts SBC/Ameritech's oft repeated claim that it just cannot get the job done any sooner. (See e.g., Tr. 289-92) The Commission must question what can be accomplished in a given time frame and whether it makes sense to require more of SBC/Ameritech than SBC/Ameritech is willing to provide. The Commission must not simply accept SBC/Ameritech's claims, since the evidence shows that when SBC/Ameritech wants to get a job done it is able to do so.

⁴Joint Small CLECs' failure to address any disputed issue in this arbitration should not be deemed acquiescence in SBC/Ameritech's position thereon. Rather, Joint Small CLECs understand that other CLECs will be addressing other issues.

In reviewing the record and reaching a decision on these disputed issues, the Commission must not forget the reason why this proceeding is important to SBC/Ameritech. It is only if the Commission approves its POR that SBC/Ameritech has any chance to obtain the coveted 271 authority it so desperately desires. Yet, on the other hand, the Commission should also recognize that the CLECs have repeatedly identified these issues as their highest priority items for many months. SBC/Ameritech has nevertheless refused to modify its position on these issues and, on one significant issue, SBC/Ameritech has backslided.⁵ What this indicates is that decisive action is required by this Commission in order to resolve these issues in a manner that is conducive to competition.

Much has been stated recently about the decline in SBC/Ameritech's service and the impact of the SBC/Ameritech merger on end user customers and competitors alike. Questions have been raised as to whether the Commission erred in approving the merger. The only way to satisfactorily answer those questions and to find a resolution that is truly in the public interest is to adopt the position of the Joint Small CLECs on the issues addressed herein. Any other conclusion will appropriately lend further support to the conclusion that approval of the merger was erroneous. The Commission must require SBC/Ameritech to honor the commitments and promises it so freely offered in order to win approval of its merger, and should keep in mind the old adage: fool me once, shame on you, fool me twice, shame on me.

⁵On the day the Joint Petition for arbitration was filed, SBC/Ameritech modified its position and for the first time indicated that it would not make lite address validation available for any orders until three months later than the filed POR indicates, i.e., on March 1, 2001. See Disputed Issue 13, below.

This final statement is organized by disputed issue number. A brief statement of the issue and the competitive ramifications of rejection of the Joint Small CLECs' position are stated at the beginning of the discussion of each issue. The actual language Joint Small CLECs propose be included in SBC/Ameritech's POR is included in Appendix A to this final statement.

II. DISCUSSION OF DISPUTED ISSUES

Disputed Issue 1: Application Versioning

Statement of Issue: SBC/Ameritech has agreed to make application versioning, i.e., the process by which SBC/Ameritech supports multiple versions of a production application, available in March 2001. The CLECs want versioning made available prior to March 2001.

**Competitive
Ramifications:**

If versioning is not available, CLECs may not be able to implement changes to their systems and processes needed to accommodate new applications SBC/Ameritech chooses to implement. Versioning will allow CLECs to forgo the most recent release and continue with the current version if it meets the CLEC's specific needs, eliminating the need for the CLEC to commit precious resources to an upgrade which may not affect its business. Further, the three month interval at issue here is critical to CLECs, especially smaller CLECs, who must stay focused on their business plan in this fast-paced telecommunications market.

New versions of interfaces need to be implemented to bring SBC/Ameritech's system up to current industry standards. Versioning is the ability to keep two versions of a particular

software system – current and most recent past version – available at the same time.⁶ SBC/Ameritech has agreed to implement versioning, but not until March 2001. The only issue that the Commission must resolve related to application versioning is whether SBC/Ameritech should be required to implement versioning sooner than it proposes. The evidence supports the conclusion that versioning should be implemented as soon as possible, but no later than by the end of the year.

The need for versioning is a function of the multiple OSS changes SBC/Ameritech plans in Illinois, which in turn is a result of SBC/Ameritech's failure to keep up with industry standards. As the Commission is well aware, it conditioned approval of the SBC/Ameritech merger on the requirement that SBC/Ameritech implement industry-standard⁷ versions of its OSS interfaces. Industry standards are continually being updated through the release of new versions of these interfaces. However, SBC/Ameritech's systems have not been updated as required. For example, LSOG Version 3 was adopted by the industry in May 1998 and LSOG 4 became the industry standard in June 1999.⁸ In March 2001, SBC/Ameritech plans to

⁶Versioning could also require that the incumbent local exchange carrier make three versions of a release available. For example, if SBC/Ameritech were to release a "dot" for LSOG 4 (e.g., LSOG 4.1), it would continue to provide two versions of the current release (e.g., LSOG 4.0 and LSOG 4.1) and the most current version of the previous release (e.g., the most version of LSOG 3). (AT&T Initial Comments, AT&T Ex. , p. 46, fn. 28)

⁷Published industry standards are provided by the Alliance for Telecommunications Industry Solutions ("ATIS") and are known as the Local Service Ordering Guides ("LSOG") and the Electronic Local Mechanized Specifications ("ELMS"). (AT&T Initial Comments, AT&T Ex. 4, p. 45)

⁸LSOG 5 standards are scheduled to be issued in late October 2000.

upgrade its pre-ordering and ordering interface versions from LSOG 2 to LSOG 4. (AT&T Initial Comments, AT&T Ex. 4, p. 45)

CLECs learn of the changes required to their interfaces through participation in the Change Management Process and related forums. Necessary CLEC changes could include programming changes to the CLECs' systems, training of employees, and process and procedure changes. In addition, CLEC internal testing must be done in parallel with SBC/Ameritech's internal testing so that joint testing of the new SBC/Ameritech interface and the CLEC complement can be coordinated prior to implementation. However, a CLEC may not be able to complete the work at the exact time SBC/Ameritech implements a new version of a particular system. (AT&T Initial Comments, AT&T Ex. 4, pp. 45-46)

While the Commission might believe that OSS upgrades should be lauded by the CLECs, in fact they impose additional burdens since upgrades always require complementary CLEC changes. When SBC/Ameritech implements a new version or an upgrade of an existing interfaces, i.e., a release, significant changes may be required on the CLEC side of the interface. For example, if a change deviates the manner in which a CLEC is to complete certain types of orders sent to SBC/Ameritech, each CLEC using these order types must change its systems simultaneously with SBC/Ameritech's implementation of the change. If that is not done, order rejects or errors may occur. A change that is not fully implemented by the CLEC can disrupt the CLEC's ability to send orders and meet its customers' needs. (AT&T Initial Comments, AT&T Ex. 4, pp. 45-46)

It is abundantly clear -- and not in dispute in this proceeding -- that "flash cut" changes to interfaces by CLECs and SBC/Ameritech are not practical. For this reason,

SBC/Ameritech, like many incumbent local exchange carriers (“ILECs”)⁹, has agreed to implement “versioning,” which means that, when implementing a new software system, it will make the existing software system available to Illinois CLECs in addition to the new software system. This allows CLECs the flexibility to use the existing version to migrate to the new version when each has had time to upgrade its systems and train its employees on use of the new version. Versioning also allows CLECs time to wait until the particular interface version becomes more stable and reliable in the marketplace before utilizing it. Versioning provides CLECs the needed flexibility to implement a system in accordance with its own business needs, and only after it has conducted successful testing and training. (AT&T Initial Comments, AT&T Ex. 4, pp. 46-47)

The only issue in dispute related to versioning is the timing of its implementation. SBC/Ameritech has agreed to implement versioning of its pre-order and order interfaces beginning with the implementation of the March 2001 software installations. However, this proposal leaves a gap (from now until March 2001) when versioning will not be available to Illinois CLECs. During this period, SBC/Ameritech plans on issuing one pre-order and four order releases for its electronic interfaces. Without versioning, CLECs using these interfaces would be forced to implement these releases on a flash cut basis, even if they are unable to do so.

⁹Southwestern Bell Telephone (“SWBT”) and Pacific Bell, SBC/Ameritech’s affiliates, and Qwest, and Verizon make versioning available. (AT&T Initial Comments, AT&T Ex. 4, p. 47, fn. 30)

SBC/Ameritech claims that the delay will cause no harm to CLECs since the implementation of versioning will coincide with its implementation of LSOG 4 for ordering and pre-ordering interfaces, and that LSOG 4 is the only upcoming change before March 2001 that will have “coding” impacts on CLECs. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 12) These claims are misleading. First, while coding impacts are significant, there are other impacts that changes to systems can have on CLECs. (Tr. 391) Enhancements or other changes made by SBC/Ameritech could necessitate a change in CLEC processes or procedures, or additional CLEC employee training. (d.) Second, and significantly, SBC/Ameritech’s expert on this issue was unable to confirm that there are no other changes between now and March 2001 that would necessitate changes in CLEC processes and procedures. (Tr. 392) In fact, the evidence shows that there are. (See Cross Ex. 4)

Finally, SBC/Ameritech claims that it may not be able to implement LSOG 4 in March 2001 if required to implement versioning before then. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 12) It is for this Commission to decide to what extent SBC/Ameritech should commit resources to implementing the types of OSS changes contemplated by the merger order. The Commission must not accept SBC/Ameritech’s threat that it will simply be unable to make those changes if forced to do so on a timely basis.

The competitive ramifications of allowing the delay asked for by SBC/Ameritech are significant. If a CLEC is unable to use a new iteration of a particular system, it may be unable to market to new customers and equally unable to provide service changes to its existing customers. The CLECs’ ability to provide seamless service to customers would be jeopardized. In order ensure a smooth CLEC transition to these imminent releases, the

Commission should direct SBC/Ameritech to implement versioning as soon as possible, but by no later than the end of the year.

Disputed Issue 2: Joint Testing (Both Long Term and Interim)

Statement of Issue: SBC/Ameritech plans to change its joint testing in March 2001 in a manner consistent with joint testing in the SWBT and PacBell regions. The CLECs take the position that the current testing environment is wholly inadequate and the proposed future testing environment also will not be adequate since it will not mirror the production environment.

**Competitive
Ramifications: If the joint testing environment does not mirror the production environment, CLECs will not be able to determine whether the results of the tests will hold true in production.**

The issue of joint testing arises when an ILEC or CLEC implements a new OSS interface or application, including releases or versions. Similarly, a CLEC may choose to upgrade or change its side of an OSS interface, or its own process and procedures directed at utilizing those interfaces. In both instances it is essential that, before a CLEC can use the new release or upgrade, it must be able to conduct joint testing of the new to ensure that the change will not adversely affect its ordering and provisioning of local service.

SBC/Ameritech's current joint testing process is inadequate for a CLEC to test changes on a commercially viable basis. First, CLECs may now only test five orders a day. Second, the manual nature of the testing process causes a four-day turn-around in getting test

results.¹⁰ (AT&T Initial Comments, AT&T Ex. 4, pp. 60-61) This is hardly the type of robust testing necessary to evaluate systems and processes changes.

In addition, SBC/Ameritech's current joint testing process does not allow CLECs to test changes in the application-to-application interfaces in a test mode. This places actual CLEC orders at risk. SBC/Ameritech should provide an entirely separate computer system for CLECs to use for testing, and that system should be identical to the production system. This would provide CLECs the opportunity to test changes under a managed methodology and verify test results, while alleviating the risk to production processes. (AT&T Initial Comments, AT&T Ex. 4, pp. 61-62) The evidence establishes that, in order for joint testing to be meaningful, it must be conducted in an environment that is identical to the production environment. (Tr. 665)

SBC/Ameritech proposes to establish new joint testing processes for pre-ordering and ordering that will be available to CLECs in March 2001. Until that time, SBC/Ameritech will require CLECs to utilize the current inadequate testing procedures. The Commission must reject this proposal, given the problems identified above, since it would allow the existing procedures to remain in place until March 2001. In addition, the Commission should require that the testing process be modified to run off of a separate computer system that mirrors the production system. Until these modifications occur, CLECs are unable to conduct true tests of changes in the application-to-application interfaces and are at risk of discovering problems

¹⁰The five order per day order restriction applies to all order types. Such a restriction limits a CLEC's ability to test in a timely manner changes to its system that involve several different order types.

only at the production level, which jeopardizes CLECs service to customers. (AT&T Initial Comments, AT&T Ex. 4, p.62)

As to the planned changes, SBC/Ameritech's proposed testing process is not sufficient for several reasons. First, the POR fails to detail whether the future test process includes a computer-based testing system that is physically separate from its production interfaces. As explained above, this is an essential requirement of any testing process.

Second, SBC/Ameritech proposes to monitor test transactions for all CLECs regardless of whether the CLEC requests monitoring.¹¹ (AT&T Initial Comments, AT&T Ex. 4 p. 65) This proposal could adversely affect CLECs, especially if they do not desire to be involved in the testing. This is because, as part of the testing process, SBC/Ameritech stops the flow of the transaction, reviews it, and indicates which test transaction it is before allowing the order to continue through the normal flow. (Tr. 671) This type of review does not take place in the normal production environment. At the very least, the monitoring process slows the movement of test orders through SBC/Ameritech's systems, which necessarily impacts the interval within which SBC/Ameritech's systems provide CLECs a response to the pre-order or order transaction. In addition, monitoring test orders may detract from order flow through processing and diminish a CLEC's ability to test SBC/Ameritech's flow through performance. This would impact a CLEC's ability to conduct end-to-end testing, in which the test order is received, processed and confirmed electronically. Monitoring disrupts this

¹¹SBC/Ameritech proposes that no more than 10% of a CLECs test orders be sent during a window in which no monitoring will occur. (SBC/Ameritech Initial Comments, Amer. Ex. 4, p. 16) SBC/Ameritech, however, is unable to provide CLECs with specific information regarding the window, such as its length. (Tr. 675)

normal flow of a transaction and obscures the test results that CLECs are relying upon to implement changes to their application-to-application interfaces. (AT&T Initial Comments, AT&T Ex. 4 p. 66)

The SBC/Ameritech POR also fails to indicate whether the March 2001 joint testing process will be available in instances where a CLEC initiated changes on its side of the interface and seeks to test them, or whether those will only be available for testing new releases of SBC/Ameritech initiated changes. Both types of testing are necessary to support market entry. (AT&T Initial Comments, AT&T Ex. 4 pp. 63-64)

The joint testing proposal is also contradictory. Although the POR claims that SBC/Ameritech's testing environment will "mirror" production, this commitment is later contradicted by other portions of the POR. These later portions heavily caveat this commitment in a manner that would make the testing environment significantly *different* from production. SBC/Ameritech's joint testing proposal for pre-ordering must be revised to include commitments from SBC/Ameritech that it will utilize the interfaces and software systems that mirror production systems and that it will make available all pre-ordering functionality that is available to CLECs in production. While SBC/Ameritech witness Angela Cullen has testified that SBC/Ameritech will give CLECs access to all pre-ordering functions for a particular type of test, including the databases surrounding those functions, as well as software systems that mirror production systems, the POR lacks language memorializing such a commitment. (Tr. 689-92) The Commission should ensure that the POR includes these commitments. (AT&T Initial Comments, AT&T Ex. 4 pp. 66-67)

Staff shares the concerns raised by the Joint Small CLECs regarding SBC/Ameritech's current joint testing procedures. It is Staff's position that the current testing environment with its manual testing procedure is not conducive to reliable testing because it is difficult to determine whether the manual intervention in the testing process skews the validity of the test results. (Staff Initial Comments, Staff Ex. 2, p. 8) In addition, Staff believes that the entry of more CLECs into the marketplace raises additional concerns whether SBC/Ameritech's current testing environment can sustain a constant stream of CLEC requests for tests. Even assuming that SBC/Ameritech can allocate more personnel to the testing process, the current manual testing environment is still rather inefficient. According to Staff, the Commission, therefore, should direct SBC/Ameritech to inventory the current testing process, then upgrade it from the existing manual testing and verification to a more efficient computerized testing procedure which is likely to reduce the turn around of the test results. (Staff Initial Comments, Staff Ex. 2, p. 8)

Staff recommends that SBC/Ameritech make the following changes to the current joint testing process: (1) CLECs should be able to increase the number of test records they can send in a day to 15 from 5; (2) The turn around time for a response from SBC/Ameritech on whether the record passed should be reduced from 4 days to 1 day; (3) CLECs should have a minimum of 15 days and a maximum of 30 days prior to the scheduled release for testing any release planned prior to the March 2001 release, and; (4) Dedicated resources should be assigned to the CLECs during a given test period to assist them in the process (other than their SBC/Ameritech Account representative). (Staff Initial Comments, Staff Ex. 2, p. 8) Joint Small CLECs fully support Staff's proposal.

Joint Small CLECs support Staff's recommendation that any ambiguous language in the proposed testing process be more detailed and less ambiguous, in order to minimize disputes between the CLECs and SBC/Ameritech. Specifically, Staff recommends that all necessary amendment be made no later than December 15, 2000, or not more than thirty days after the order in this docket, whichever is sooner. Also, the time between when a test is initiated and concluded should be pre-determined. Staff further recommends that a 60-day test period for initial POR-related releases and a 30-day test period for other releases be accepted. Joint Small CLECs agree with Staff that the Commission should hold SBC/Ameritech to its promise that all tests meet the industry guidelines. Finally, Staff recommends that SBC/Ameritech be mandated to use computerized testing procedures and that SBC/Ameritech publicly demonstrate in a workshop forum the efficacy of the proposed testing process to the Commission and the CLECs. (Staff Initial Comments, Staff Ex. 2, pp. 10-11)

The Commission should adopt Staff's proposal.

Disputed Issue 4: Change Management Process – OIS Voting Process

Statement of Issue: The only remaining issue regarding SBC's Change Management Process is the Outstanding Issue Solution voting process. SBC/Ameritech inappropriately proposes to include a minimum requirement on the number of CLECs that may participate in an OIS vote on changes to SBC/Ameritech's OSS. That limitation should not be countenanced, and the voting process should be based instead on a simple majority vote of qualified CLECs who choose to participate in the OIS vote.

**Competitive
Ramifications:**

The practical effects of SBC/Ameritech's position will be to silence the CLECs who have grave concerns about the impact of a proposed change. SBC/Ameritech's position prevents concerned CLECs from being able to maintain the status quo if the proposed change is somehow problematic. The OIS voting process was conceptually developed as such a safeguard. The CLECs want to ensure that the OIS process gives participating CLECs a meaningful opportunity to affect the process.

As part of the Change Management Process, SBC/Ameritech and the CLECs have agreed on inclusion of an Outstanding Issue Solution ("OIS") voting process. The OIS voting process is available to CLECs to challenge an SBC/Ameritech proposed OSS change. The only issue in dispute is the number of CLECs that may participate in an OIS vote. For the reasons described herein, SBC/Ameritech's proposal will stifle the CLECs and ensure that SBC/Ameritech will infrequently, if ever, be prevented from implementing OSS changes it desires to make.

It is the Joint Small CLECs' understanding that SBC/Ameritech initially agreed that notification that a CLEC had requested an OIS would be sent by SBC/Ameritech to all CLECs and result in a conference call among interested parties, during which a majority vote of the qualified participants in that conference call would decide the outcome. It is further the Joint Small CLECs' understanding that SBC/Ameritech changed its position and now proposes that a quorum of qualified¹² CLECs should be required to participate in the OIS vote. If there

¹²Qualification for a vote depends upon the particular OSS transactions at issue. For example, a CLEC may qualify for an OIS on EDI-related changes by having tested the release, registered a change management point of contact, and engaged in at least 30 EDI transactions the prior month. (Tr. 43)

is no quorum, a vote cannot be taken and SBC/Ameritech may move forward with its implementation. The actual number of CLECs that would constitute this quorum, and their identities, will be known only to SBC/Ameritech. (AT&T Initial Comments, AT&T Ex. 4, p. 13) At the hearing, SBC/Ameritech explained that it has further revised its position and now proposes that either a quorum of qualified CLECs or eight CLECs participate in the vote, whichever is less. (Tr. 69-74, 85) However, the POR now before the Commission in this proceeding fails to reflect that position. (Tr. 69)

SBC/Ameritech acknowledges the importance of having a workable OIS voting process to deal with issues where negotiation does not result in resolution. (Tr. 84) While SBC/Ameritech takes the position that CLECs should have the opportunity to challenge any SBC/Ameritech system change that could adversely affect the CLECs if implemented, SBC/Ameritech's specific proposal ensures that will not be the case. Under SBC/Ameritech's proposal, only those CLECs that have engaged in a certain minimum number of transactions will be able to participate in an OIS vote. The purpose of this minimum is ostensibly to weed out those CLECs that are not affected by the proposed change. (Tr. 80) A quorum of qualified CLECS would then be necessary for the vote to be taken. For example, while there may be 300 certificated CLECs in Illinois (Tr. 111), only 30 may possibly have engaged in enough EDI transactions to be qualified to participate in a vote involving an EDI change.¹³ While the notice will go out to the CLECs, if a majority of those 30 CLECs does not participate

¹³However, the CLECs will not necessarily be informed of the identities of the qualified CLECs. (Tr. 61)

in the conference call, a vote cannot be taken. (Tr. 85) The result will be that the affected and interested CLECs will be unable to stop implementation of the OSS change.

There are numerous problems with SBC/Ameritech's proposal. First, it is highly unlikely that a quorum would ever be present. As the documents filed in this proceeding show, only nine carriers actively participated in the collaboratives leading up to this arbitration.¹⁴ SBC/Ameritech could not state whether that number would be sufficient to constitute a quorum to oppose an OSS change. (Tr. 48-50) Indeed, the Joint Small CLECs are unaware of any meeting taking place in Illinois over the last year that included a "majority" of the CLECs operating in the state. While SBC/Ameritech indicated that nearly forty carriers are using its EDI interface, only seven carriers actively participated in the thirteen-state change management discussions. Similarly, only a handful of CLECs participate in the SBC/Ameritech sponsored forums held over the past three years. (Tr. 109) What this demonstrates is that, even if all active Illinois CLECs participated in an OIS meeting, that would likely not be sufficient to constitute a quorum or for a vote to go forward. The result of SBC/Ameritech's proposal is that there would be no means by which a CLEC could stop implementation of an adverse OSS change.

Second, SBC/Ameritech's quorum proposal is based on the erroneous assumption that an affected CLEC will always be interested in the OSS change at issue. That is not necessarily the case. As even SBC/Ameritech's expert acknowledged, "the fact that a CLEC

¹⁴These carriers include AT&T, WorldCom, Sprint, McLeodUSA, Covad, North Point, CoreComm, 21st Century/RCN and Nextlink. (Tr. 48) As is also apparent by the filings and the transcript, Sprint did not file any substantive comments nor appear at the hearing.

may be affected by a change does not necessarily mean that the CLEC is interested in that particular issue.” (Tr. 80) However, SBC/Ameritech’s proposal would require CLECs who are not interested in the OSS change to participate in the vote in order to attain a quorum. (Tr. 80-81) SBC/Ameritech’s proposal would have the effect of preventing the vote from going forward.

Third, SBC/Ameritech’s proposal has an inappropriate and unfair result: it assumes non-participation in a vote is a default vote in favor of implementation of the change. The CLECs all agree -- and the Commission must find -- that if a CLEC wishes to abstain from involvement in a vote about a pending change, it should be able to “opt-out” of the debate completely and that doing so should not be considered acquiescence in the change. (AT&T Initial Comments, AT&T Ex. 4, pp. 14-15)

Fourth, while SBC/Ameritech has now added the minimum of eight qualified CLECs alternative, this aspect of its proposal is arbitrary and unsupported, and fails to rectify the other shortcomings of the proposal. Significantly, the witness proffered by SBC/Ameritech to support its proposal was not involved with the decision to add the eight CLEC minimum. Indeed, this expert had not participated in any of the Illinois collaboratives nor had she read the minutes of those meetings.¹⁵ (Tr. 40) Thus, she could not explain why “eight” was chosen as the minimum number. (Tr. 51-52) Moreover, she was forced to admit that there may be less than eight qualified CLECs participating in this arbitration. (Tr. 53) That admission alone should convince this Commission that the proposal is inherently flawed and designed to take

¹⁵Indeed, it was unclear from her testimony whether she actually had read the change management plan that is the subject of this proceeding. (See Tr. 40-41)

from the CLECs the very benefits that OIS is designed to provide. There can be no other conclusion than that the inclusion of an arbitrary minimum number of CLECs that would enable an OIS vote to go forward does not remedy the undeniable flaws in SBC/Ameritech's proposal.

Fifth, SBC/Ameritech's proposal does not achieve its intended objective. SBC/Ameritech claims that one of the purposes of its voting proposal is to ensure that small CLECs' interests are protected. (Tr. 55) Yet, not a single small CLEC has supported SBC/Ameritech's proposal or objected to the CLEC proposal in this proceeding. (Tr. 55) Indeed, the small CLECs signing this final statement oppose SBC/Ameritech's proposal. Moreover, the evidence makes clear that the small CLECs are worse off if SBC/Ameritech's proposal is adopted. As Rod Cox of McLeodUSA stated:

Q. [By Examiner Moran] I mean, what is the cost to vote?

A. It's probably not the issue of cost of vote. It's the issue of having a resource dedicated to that from a smaller CLEC they may not have that contact that's keeping up with every session that's going on. I mean, I'm just speaking for a smaller CLEC. We have people that attend. But it's more of the issue of the number of people who's available and will they want to show up or not. They just don't show up. In Illinois we have had -- I mean you're looking at the three companies or four that show up.

(Tr. 115-16)

SBC/Ameritech will likely argue that a single CLEC should not be able to prevent an OSS change from being made. This argument is specious. In the event a single CLEC objects to a change, all qualified CLECs would have the opportunity to vote on that change. If at least a majority of qualified participating CLECs are in favor of the change, the single

CLEC cannot prevent it from occurring. (Tr. 113-15) Thus, the problem SBC/Ameritech suggests cannot occur.

SBC/Ameritech will also likely argue that the OIS vote is not as significant as the CLECs contend because the Change Management Process allows all CLECs to participate in discussions regarding OSS changes. Contrary to SBC/Ameritech's claim, the Change Management Process is not a sufficient vehicle for CLECs to oppose OSS changes that could adversely affect their ability to provide service in Illinois, and Staff agrees. (Staff Initial Comments, Staff Ex. 2, p. 14) That is because problems resulting from a change may not be apparent until testing of the change is complete. Testing occurs after conclusion of the Change Management Process. Thus, while a CLEC may have been involved with discussions regarding a change in the Change Management Process and may not have expressed any objection to the planned change at that time, it may only become apparent after testing that the proposed change is somehow flawed. (Tr. 98-99, 102-05) The only opportunity the CLEC would then have to oppose the change -- once the CLEC becomes aware of the problem -- would be the OIS vote. (Id.) Thus, the ability to participate in an OIS vote is critical to every CLEC in Illinois and the Change Management Process is not an alternative to OIS voting.

The Commission must ensure that a clearly defined and fair change management process is implemented so that CLECs have the ability to register objections to the massive changes to Ameritech's OSS that have been proposed and are scheduled for implementation. Staff supports the Joint Small CLECs' position that the OIS vote should be democratic, without any voting minimum. As Staff stated: "a majority decision of the qualified CLECs who choose

to participate in such vote should be mandated rather than a quorum-oriented procedure.”
(Staff Initial Comments, Staff Ex. 2, p. 14) The Commission should approve this previously
agreed upon voting process as the permanent Illinois change management process.

Disputed Issue 6: Hours of System Availability

Statement of Issue: Hours of system availability are those hours that Ameritech can guarantee OSS will be in operation and available for use by the CLECs. The CLECs take the position that there is a substantial gap between the available hours of the pre-ordering and ordering systems. CLECs need uniformity in the hours of operation among the pre-ordering and ordering systems because the pre-ordering functions support ordering capability.

**Competitive
Ramifications:**

A truly competitive market will allow CLECs to make the decision when to serve their customers, regardless of how SBC/Ameritech decides to serve its retail customers. It is imperative that CLECs have the ability to place and process customer orders in a timely manner. Ameritech’s current pre-ordering system availability hours prevent CLECs from performing necessary functions to process customer orders, which directly and negatively impacts a CLEC’s ability to provide service to their customers in a timely, reliable and efficient manner. The current hours of availability force CLECs to mimic Ameritech’s inefficient practice of not processing pre-orders, and consequently orders, on Sunday.

Currently, SBC/Ameritech does not offer synchronized hours of pre-order and order availability. The hours of availability for the interface that allows CLECs to access pre-order functionality are: Monday through Friday, 6:00 a.m. to 10:00 p.m.; and Saturday, 7:00 a.m. to 10:00 p.m. The pre-ordering interface is not available to CLECs on Sunday. (Tr. 206) The

hours of availability for the interface that allows CLECs to access ordering functionality are Monday through Sunday, 6:00 a.m. to 1:00 a.m. (WorldCom Initial Comments, WorldCom Ex. 1, Attachment A) Thus, there is a substantial gap between the availability of the pre-ordering and ordering systems. In addition, SBC/Ameritech offers limited availability for trouble administration, maintenance and repair. The hours of availability for the Electronic Bonding Trouble Administration system (“EBTA”), which provides access to maintenance and repair functions, are twenty-four hours a day, seven days a week, except from 12:00 a.m. to 4:00 a.m. on Sundays and 10:30 p.m. to 11:30 p.m. Monday through Friday. There is also a down window between 12:00 a.m. and 2:30 a.m. for mechanized loop testing. (Tr. 219)

CLECs require uniformity in the hours of operation of the pre-ordering and ordering systems because the pre-ordering functions support ordering capability. Without pre-ordering functionality, CLECs are unable to cure rejected orders based on incorrect address validations. CLECs are also unable to reserve telephone numbers and due dates without access to pre-ordering functionality. (Tr. 204) Thus, the restricted availability of the pre-ordering interface directly impacts a CLEC’s ability to provide service to customers in a timely, reliable and efficient manner. (WorldCom Initial Comments, WorldCom Ex. 1, p. 7) In addition, CLECs require greater access to report repair and maintenance problems. For example, CLECs need to be able to submit a trouble ticket in the middle of the night if that is when a problem occurs. (Tr. 219)

Other ILECs have successfully demonstrated that an around-the-clock system of OSS availability is possible. Verizon and BellSouth have OSS availability hours on Saturday and Sunday. Verizon’s down time for maintenance and repair is preset. BellSouth’s Network

Reliability Center is manned 24 hours a day, seven days a week. SWBT, Ameritech's affiliate, also offers pre-order hours on Sunday. (Staff Initial Comments, Staff Ex. 2, p. 18) These facts demonstrate that SBC/Ameritech should be able to offer greater hours of availability.

SBC/Ameritech claims that its back-end systems that support pre-ordering, ordering, maintenance and repair for both wholesale and retail service were not designed and built to provide continuous availability. (Amer. Initial Comments, Amer. Ex. 15, p. 26) This claim is nothing more than an admission that SBC/Ameritech's back-end systems are outdated. SBC/Ameritech expert Ms. Cullen agreed that most businesses are moving towards providing service accessible on an electronic basis twenty-four hours a day, seven days a week. (Tr. 231) SBC/Ameritech is obviously out of step with current industry trends. Indeed, Verizon will be providing Illinois CLECs access to its pre-order, order and trouble administration/maintenance and repair systems twenty-four hours a day, seven days a week, with one or two hours of maintenance down-time per system per month. (WorldCom Initial Comments, WorldCom Ex. 1, p. 6) SBC/Ameritech should no longer be allowed to operate in a pre-21st century manner when doing so adversely affects competition.

Since this arbitration began, SBC/Ameritech has decided to open a pre-ordering maintenance window on Sundays. (Tr. 214-15) This decision, however, has not been formally announced nor has SBC/Ameritech provided any details regarding the proposed pre-ordering maintenance window. Indeed, it has not yet stated when it will produce such information. (Tr. 215-16) Apparently, SBC/Ameritech is in the process of investigating how to implement this change, but this investigation is not expected to be complete for another six to eight weeks.

(Tr. 223) In effect, SBC/Ameritech has not offered any concrete solution to the concerns raised by CLECs.

The Commission should order SBC/Ameritech to provide extended hours of operation for its pre-ordering and ordering systems . Specifically, the Commission should order SBC/Ameritech to provide access to pre-order and maintenance and repair systems twenty-four hours a day, seven days a week, allowing for two hours a month during off-hours for maintenance down-time for each system.

**Disputed Issues 9, 16,
19, 20, 21, 24 and 40:**

Interface Development Rule – Detailed Specification Requirements

Statement of Issue:

SBC/Ameritech has failed to provide the specific business rules and specifications necessary to evaluate its proposed improvements to its OSS, which is the crux of what was required for this Phase II. Without this information, CLECS do not know whether SBC/Ameritech is implementing the system functionality prescribed by industry standards. SBC/Ameritech must be required to provide specific information regarding the interfaces, and CLECs should have the right to arbitrate remaining disputed issues related to those details.

**Competitive
Ramifications:**

SBC/Ameritech has failed to provide the specifications needed by the CLECs to effectively evaluate its proposed OSS improvements. Such specifications should have been provided during the OSS collaboratives, which would have allowed a robust discussion of the proposals. By failing to make the specifications available, SBC/Ameritech has foreclosed this opportunity. It is imperative that the CLECs have a meaningful opportunity to address their concerns. Without the ability to timely and effectively challenge the specifics of SBC/Ameritech's OSS

improvements, the protections afforded CLECs by Condition 29 of the Commission's merger order would be lost and CLECs would be unable to obtain a timely resolution of any disputed issues.

Paragraph 29 of the Commission's merger conditions requires SBC/Ameritech to implement enhancements to its OSS "as defined, adopted, and periodically updated by industry standard setting bodies for OSS that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combinations of UNEs." Order, p.259, Docket 98-0555. These enhancements were to be designed and implemented in three phases. In Phase I, SBC/Ameritech submitted its POR, which was initially rejected by the Commission.¹⁶ In Phase II, SBC/Ameritech was to work collaboratively with the Staff and CLECs to obtain written agreement on OSS interfaces, enhancements and business requirements identified in the POR. Those issues that could not be resolved are to be resolved in this arbitration. At the conclusion of Phase II, implementation, or Phase III, is to begin. (AT&T Initial Comments, AT&T Ex. 4, pp. 15-16)

The merger order required SBC/Ameritech to work with CLECs in the Phase II collaborative to "obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the POR." SBC/Ameritech has not done so. SBC/Ameritech has not provided the business rules and specification level detail necessary for the CLECs to

¹⁶It is significant to note that when SBC/Ameritech first presented its POR to the Commission, numerous CLECs objected to it as fundamentally lacking in the specificity needed for a full evaluation. The Commission agreed and rejected the POR on the basis that it was appallingly vague. (Cross Ex. 3) Although the revised POR was ultimately approved by the Commission, it still lacks the needed specifics to fully evaluate and understand SBC/Ameritech's plans. (AT&T Initial Comments, AT&T Ex. 4, pp. 15-21)

understand SBC/Ameritech's OSS plans, and thereby come to "agreement" on interfaces, enhancements and business requirements.

Without a complete set of business rules, process flows and specifications for SBC/Ameritech's planned enhancements, the CLECs and the Commission are unable to determine what the proposed interfaces, enhancements and business requirements actually include. CLECs require this level of information to build their systems and to operate on their side of the interfaces.¹⁷ (AT&T Comments, AT&T Ex. 4, pp.16-17) SBC/Ameritech's testimony confirms this point. SBC/Ameritech witness Mr. Gilles testified that a CLEC would not know whether SBC/Ameritech is following industry standards and guidelines until SBC/Ameritech releases its specifications for the March 2001 releases, which is scheduled to occur on October 13, 2000. (Tr. 129, 142) Indeed, Mr. Gilles was unable to commit that the business rules and specifications will comply with industry standards. (Tr. 141-42) In the absence of specification-level detail, and given Mr. Gilles' testimony, CLECs are in no position to accept the POR, much less to design and build pre-ordering and ordering systems of their own. CLECs are left without the information necessary to determine whether SBC/Ameritech plans to provide system functionality that complies with industry standards.

Moreover, SBC/Ameritech has provided vague and sometimes contradictory explanations in regard to the level of commitments that it has included in the POR. For example, with regard to its plans to improve its flow through capabilities, SBC/Ameritech has

¹⁷Any deviation from specifications or business rules can result in a reject or other failure of the transaction. Thus, in order to build its systems, to operate on its side of the interface, a CLEC must have this level of information. (AT&T Initial Comments, AT&T Ex. 4, pp.16-17)

only stated that it intends to “improve” flow through for certain order types. It has provided no detail as to what these “improvements” will include. See Issue 18, below. Similarly, Mr. Gilles testified that SBC/Ameritech intends to change the format of the CSR, but could not describe in detail the specifications of this change. (Tr. 150) Finally, although SBC/Ameritech originally agreed to make relaxed validation available by December 2000, it has now pushed that date back to March 2001. See Issue 13, below. This inattention to detail or consistent revision in plans seriously impacts the usefulness of the POR.

The crux of this issue is how open issues regarding specifications and business rules related to the proposed enhancements will be resolved if Phase II ends and Phase III begins. SBC/Ameritech has requested that the CLECs sign off on the POR even though it does not provide the specifications and business rules needed to evaluate the proposed improvements, and leave the resolution of disputed issues arising from yet unknown specifications for interface changes to the Change Management Process. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 35) This result is unacceptable to the Joint Small CLECs for two reasons.

First, it does not provide the same timely and effective relief as that afforded by the merger conditions. Under Condition 29 of the merger order, CLECs have a right to arbitrate before the Commission any OSS system changes on the grounds that they do not conform to the industry standard as well as the right to arbitrate whether SBC/Ameritech’s implementation is compliant. Order, pp. 260-261, Docket 98-0555. Adoption of SBC/Ameritech’s proposal would essentially prevent the Commission from addressing questions regarding specifications and business rules until after they are implemented, even if the CLECs know

there are problems with the business rules once they are released.¹⁸ (Tr. 130-32) Second, the CMP does not provide for resolution of issues arising from underlying business rules that are governed by specifications. (Tr. 182-83) Neither does it provide for CLEC proposed changes to OSS. (Tr. 154)

The CLECs' proposal overcomes these problems and offers a reasonable procedure. Under the proposal, once SBC/Ameritech presents the specifications and business rules for its systems enhancements, it should simultaneously provide a document that maps those specifications to the relevant industry standards.¹⁹ Thereafter, SBC/Ameritech and the CLECs would proceed to expedited collaborative discussions. Any remaining disputes would be subject to arbitration under the arbitration procedures set forth in Condition 29 with respect to Phase III.²⁰ (AT&T Initial Comments, AT&T Ex. 4, p. 19)

Staff supports the CLECs' position that, had SBC/Ameritech been forthcoming regarding detailed specifications and business rules for OSS during the collaborative

¹⁸The business rules for the March 2001 releases will be available in October. (Tr. 129) Thus, if SBC/Ameritech's position were adopted, the CLECs would have to wait from October until March to file for relief from the Commission. (Tr. 129-32)

¹⁹The CLEC proposal includes a document in which the detailed data elements for each of the forms, each of the inquiry responses and each of the inquiry components of both pre-order and order would be mapped to show its relationship as defined by SBC/Ameritech to the standard as published by the Ordering and Billing Forum and would also relate that data element to its particular place in the form in which it is being used. (Tr. 171-72)

²⁰Condition 29 provides in relevant part that: "If one or more CLECs contend that SBC/Ameritech has not developed and deployed the system interfaces, enhancements, and business requirements consistent with the written agreements contained in Phase II, or has not complied with the Commission's decision received in Phase II, the may file a complaint with the Commission which shall arbitrate the issues consistent with the procedures identified in Phase II except that this arbitration shall be concluded within two months."

process, the CLECs would have had the right to arbitrate any such matters. Staff notes that SBC/Ameritech did not do so despite the Chairman's admonition in his February 17th letter (Cross Ex. 3), and despite the matter having been raised during the collaborative process. Staff characterizes SBC/Ameritech's position as an effort to foreclose the CLECs' right to arbitrate. (Staff Initial Comments, Staff Ex. 2, p. 25)

According to Staff, Condition 29 specifically affords the CLECs the remedy of arbitration. Arbitration is the Illinois-sanctioned remedy, which the Illinois Commission has deemed the proper way to resolve OSS interface disputes. SBC/Ameritech's attempt to foreclose, by its own failures and omissions, the CLECs' right to arbitrate in favor of a Texas remedy it appears to prefer, should be rejected by the Commission. Since the CLECs have been denied the opportunity to arbitrate these issues in Phase II, they should be permitted to arbitrate them in Phase III. For all these reasons, Staff recommends that the Commission should adopt the CLEC proposed Interface Development Rule. (Staff Initial Comments, Staff Ex. 2, pp. 25-26)

Accordingly, the Commission should adopt the CLEC and Staff proposal and make clear that once SBC/Ameritech releases its initial specifications for the March 2001 releases, the CLECs may initiate a Phase II arbitration if they believe those specifications conflict with the commitments SBC/Ameritech has made in the revised POR or the applicable industry standards. While the CLECs are willing in effect to put the specified issues on hold pending publication of the specifications, they are not willing to concede that SBC/Ameritech's POR is adequate on these issues.

Disputed Issue 11: Retain Current Listings

Statement of Issue: SBC/Ameritech has agreed to provide a process to retain the current listing for UNE orders other than partial migrations. The CLECs require a similar process for partial migrations.

Competitive Ramifications: Requests for partial migrations require a CLEC to place an additional order with SBC/Ameritech's advertising affiliate, which processes the orders manually. Such a process delays the CLEC's ability to respond to its customers and increases the likelihood of human error.

A partial migration occurs when a customer migrates only a portion of the lines on its account to another carrier, as opposed to a full migration, which entails a conversion of the customer's entire account (all telephone numbers). (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 63) In the event of a partial migration, the CLEC must place a second order with Ameritech's publishing affiliate, Ameritech Advertising, Inc., in order to retain the current directory listing for the migrated lines. While these types of matters can be completed without customer input, under SBC/Ameritech's process, partial migration is subject to manual intervention and does not flow through. (CoreComm Initial Comments, CoreComm Ex. 2, p. 17; Tr. 1022-23) Thus, additional delays are incurred and there is a greater risk of error.

CLECs require the ability to retain current listings on partial migrations without having to place a second call to Ameritech Advertising, Inc. for several reasons. First, the current process of separately placing directory listings with Ameritech's publishing affiliate injects needless complexity to the process of provisioning partial migration orders. More importantly, the process injects the additional potential for human error and omission. Placing directory

listing orders for partial migration through EDI would eliminate these concerns. (CoreComm Initial Comments, CoreComm Ex. 2, p. 18)

SBC/Ameritech claims that it cannot support retention of current listings for partial migrations because to do so would break up the account relationship between a primary listing and the additional listings associated with the primary listing. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 64) This explanation does not make sense in those instances when the CLEC customer does not want the listing changed for the migrated lines. (See Tr. 1027-32) In any event, SBC/Ameritech's explanation does not excuse its unwillingness to enhance its OSS in a way that benefits competitors.

The Commission must order SBC/Ameritech to support retention of directory listings for partial migrations without the need for additional calls and manual intervention.

Disputed Issue 13:	Customer Service Record Address Validation (Lite Edit)
Statement of Issue:	When a CLEC order is received by SBC/Ameritech, validation rules are applied to the address fields on the order. Orders are often rejected if the address is not identical to the corresponding address in SBC/Ameritech's data base. SBC/Ameritech currently proposes to relax the address validation rules for resale, UNE-P, loops with number portability and line sharing, by March 2001. CLECs would like the functionality implemented earlier than March 2001, and for all orders.
Competitive Ramifications:	SBC/Ameritech's address validation procedure is onerous and causes rejects for minor address differences. The rejection notice also does not

include a listing of the error. CLECs must guess the correct address abbreviation and try again. This hit-or-miss system is inefficient and unacceptable. The sooner relaxed validation is implemented, the sooner unnecessary order rejects will be reduced, and CLEC end use customers will receive service on a more timely basis.

Both SBC/Ameritech and the CLECs agree that SBC/Ameritech's OSS validation process should be relaxed such that an address need not be provided for CLEC orders. However, SBC/Ameritech's proposal to relax the order validation process does not apply to all orders and is being implemented too late. The Commission should require SBC/Ameritech to expand the orders to which relaxed validation applies and require relaxed validation to be implemented by no later than the end of 2000.

A. Introduction

The evidence establishes that the most frequent reason that SBC/Ameritech rejects CLEC orders is because the street address provided by the CLEC does not match the street address against which SBC/Ameritech validates the order. Indeed, industry-wide, approximately 35% of all orders reject for this reason.²¹ If the street address provided by a CLEC does not match the street address against which SBC/Ameritech validates an order either in form (e.g., the spacing of the street address) or in content (e.g., "St." versus "Str."), the order will reject. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) This occurs even if the address is technically correct. (Covad Initial Comments, Covad Ex. 2, p. 3)

²¹This information became available in the FCC's SWBT Texas 271 investigation. (AT&T Initial Comments, AT&T Ex. 4, p. 25)

In the pre-ordering process, SBC/Ameritech provides CLECs access to the customer service record (“CSR”) database, which includes information regarding the customer (e.g., directory listings, street address, telephone number, features and services ordered by the customer). CLECs use the information in the CSR to populate the fields of the order that must be provided to SBC/Ameritech. In addition, SBC/Ameritech provides CLECs access to the Ameritech Street Address Guide (“SAG”) database. The SAG includes valid street addresses in the Ameritech region. The address information contained in these two databases does not always match in format and content. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) For example, the actual addresses or abbreviations used may differ. Thus, one may include “Str.” while the other includes “St.” as the address for a particular location. Obviously, both forms are technically correct, but only one will pass SBC/Ameritech’s address validation process as it currently works.

In addition, the SAG address information is provided in a “fielded” format, while the CSR is not. When information is provided in a “fielded” format, each piece of information (the number, the street name, etc.) is provided in a specific place or “field” on the form. Because the SAG information is provided in discrete fields, it is provided in a format that can be cut and pasted by the CLEC into an order in the format required by SBC/Ameritech. Because the address information in the CSR is provided in a non-fielded manner, it may not be properly “spaced” or provided in the format required by SBC/Ameritech’s ordering systems. If the CLEC were to copy the CSR address information into an order it could be rejected. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

When CLECs send an order to SBC/Ameritech, SBC/Ameritech requires that CLECs provide the street address of the end-user.²² Depending on the type of order, SBC/Ameritech validates the order through either the CSR or the SAG. SBC/Ameritech's systems compare the telephone number and address on the order to the telephone number and address in the customer service record. The address check assures that the order is posted to the correct customer record. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

When a reject occurs, the CLEC must attempt to discern which portion of the address did not match the customer record address. Once it makes that determination, it must manually resubmit the order. There is no guarantee that the resubmitted order will not be rejected. This is because SBC/Ameritech does not inform the CLEC as to the correction that needs to be made; it merely informs the CLEC which field has an erroneous entry. (Tr. 735-37) Manual re-submission of orders also introduces many additional steps that must be performed by the CLEC and, with each step, the CLEC must guess how the address is stored in SBC/Ameritech's SAG, creating an additional opportunity for error (and additional rejections) to occur. Each additional submission requires the use of additional CLEC resources and results in additional delay in the date on which the CLEC's customer receives service. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29; Covad Initial Comments, Covad Ex. 2, p. 4)

²²This is consistent with the OBF industry ordering guidelines. (Tr. 784) However, it should be noted that while the guidelines require inclusion of an address on an order, other ILECs do not so require. In addition, relaxed validation could be implemented in a manner that addresses are required but their validation does not impact order rejection.

Relaxed or “lite” validation would allow CLEC orders to be verified based on the customer’s telephone number, and not its address, because the address entry becomes optional.²³ (Tr. 766-67) This form of validation avoids the many pitfalls inherent in the current validation process -- which stem from the fact that there are numerous ways to properly state a valid address -- and results in fewer CLEC orders being rejected. Because it only requires that ten numbers be input, the likelihood of errors in the order decreases substantially, which results in fewer rejected orders. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

During the collaborative process, SBC/Ameritech committed to offer CLECs “lite” address validation on migration orders for resale, UNE-P and loops with number portability. SBC/Ameritech refused, however, to allow CLECs to submit orders for unbundled loops and line shared loops using “lite” address validation. However, during the pendency of this proceeding, SBC/Ameritech modified its position to allow lite validation for line sharing orders. (Tr. 725-728; Covad Initial Comments, Covad Ex. 2, p. 4) Why orders for unbundled loops continue to be left off the list that qualify for “lite” address validation is unclear. Orders for unbundled new loops flow through the same OSS gateways and backend systems as orders for line shared loops.

B. Scope of Orders to Which Relaxed Validation Would Apply

SBC/Ameritech has only offered “lite” validation for certain CLEC orders and has not yet provided to CLECs the business rules or detailed specifications of its proposal. (Tr. 750)

²³SBC/Ameritech has not yet provided the specifics as to its current relaxed validation proposal, and could not indicate whether an address could be provided with the order, the validation of which would not cause order rejection. (Tr. 724-25, 749-51)

Specifically, SBC/Ameritech has now committed to offer “lite” validation for orders that migrate an existing SBC/Ameritech customer to a CLEC using resale, combinations of UNEs, unbundled loop/number portability and line sharing. Significantly, the proposal excludes all orders for new unbundled loops. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29) SBC/Ameritech claims that it is offering “lite” validation for only “migration” orders or changes to an existing service, but not for “new service.” (Tr. 711) However, SBC/Ameritech is offering “lite” validation for line sharing and it considers line sharing a new service. (Tr. 725) Thus, SBC/Ameritech’s proposal is internally inconsistent. Thus, SBC/Ameritech’s proposal is internally inconsistent. There is no basis for this artificial distinction between migration of service and new service. Moreover, SBC/Ameritech’s change of position establishes that “lite” address validation could easily be applied to orders for new service.

The deficiency of SBC/Ameritech’s proposal is best illustrated by an example. If an SBC/Ameritech customer with a single line decides to add a CLEC DSL loop to connect to the Internet, the CLEC order would continue to have to meet the overly rigorous address validation process for the order to not be rejected. However, if that same customer were to have two SBC/Ameritech lines and then cancel one and replace it with a CLEC DSL loop, that order would be deemed a migration, and lite validation would apply.²⁴ In both cases,

²⁴This situation is similar to line sharing, where the customer obtains voice service from SBC/Ameritech, but data service over the high frequency portion of the loop from a CLEC. In such a case, SBC/Ameritech is willing to allow lite validation on the basis that the line sharing service “rides the existing line” so there is no “potential confusion about where the service would be provided.” (Tr. 728-29) There simply is no practical or relevant difference between the line sharing scenario and the provision of a new loop where the customer continues to obtain phone service from SBC/Ameritech.

SBC/Ameritech had accurate address and telephone number information about the end use customer in its OSS systems. (Tr. 717-23) The lite validation process should be applicable to both these scenarios.

It is more reasonable to validate based on the customer's phone number than its address since there is only one way to state a phone number, but multiple ways to state an address. In other words, there can only be ten digits to a phone number. (Tr. 702) On the other hand, there are multiple ways to specify any particular address, all of which would be technically correct for all purposes other than validation on SBC/Ameritech's databases. (Tr. 705-06) SBC/Ameritech should have no opposition to use of the customer's phone number for order validation purposes, since the phone number is used by SBC/Ameritech for retail purposes. For example, if a retail customer calls SBC/Ameritech to order additional service, SBC/Ameritech identifies the customer by its telephone number. (Tr. 707)

SBC/Ameritech will likely argue that lite validation is not as pressing a change as it once was because of the improvements made to SBC/Ameritech's address validation transaction to include validation through the living unit database during the pre-ordering process. However, the record indicates that while improvements have been made in the pre-ordering process, it nevertheless remains a possibility that the address will be rejected in the ordering process due to the translations needed to fill in the address fields in the ordering form. (Tr. 740-41)

SBC/Ameritech is not the only ILEC to be faced with address validation problems. Its Texas ILEC affiliate, SWBT, determined to implement a relaxed form of validation as part of its 271 approval process. The evidence shows that once relaxed validation was implemented,

WorldCom's rejection rate dropped from an outrageously high 50% to less than 20%. (Tr. 761-65) While SBC/Ameritech attempted to distinguish the situation in Texas from the present situation in Illinois, its expert reluctantly admitted that there is probably some correlation between WorldCom's reject rate decreasing and lite validation being introduced. (Tr. 765)

The Commission must also recognize that SBC/Ameritech's inadequate proposal fails to eliminate the root cause of the problem: the conflict between the databases from which CLECs retrieve customer addresses. Other ILECs have addressed this same problem. For example, Verizon deployed an upgraded system including a full synchronization of street address records and customer service records. The synchronization of the two data bases was engineered using the hypothesis that the CSR was more likely to be incorrect than the SAG, since the customer service records were, in many cases, established prior to the ILEC's decision in the early 1980s to begin to verify orders for new service locations against the SAG. Discrepancies between CSRs and SAG entries were resolved by replacing the CSR address with the SAG address applying a one-time scrub of the databases. This process can and should be done by SBC/Ameritech. (AT&T Initial Comments, AT&T Ex. 4, pp. 25-29)

C. Timing of Implementation of Relaxed Validation

The POR which is the subject of this proceeding currently reflects that SBC/Ameritech has offered to implement a limited form of "lite" validation by December 2000. (Jt. Pet., Ex. 2, p. 11) In its initial comments, and again at the hearing, SBC/Ameritech informed the parties that it no longer is willing to implement lite validation by December 2000. (See Tr. 768-69)

A December 2000 implementation date is not soon enough. The newly delayed date of March 2001 is even more unacceptable.

SBC/Ameritech agreed to implement lite validation in December 2000.²⁵ In the eleventh hour, SBC/Ameritech changed its mind and slipped the date back by three months. (Tr. 768-69) It is not clear what prompted SBC/Ameritech to conclude at the last minute that it could no longer do what it had committed to the CLECs and Staff that it would do (see Tr. 768), but any reason it may now offer will be disingenuous at best. SBC/Ameritech could implement this change by the end of the year, if it were required to do so. The evidence shows that its affiliate, SWBT, implemented lite validation in Texas within 30 days. Its decision to do so was based on its desire to obtain 271 authority. (Tr. 771-72) While SBC/Ameritech is not seeking such authority here, and therefore has no real incentive to implement this change quickly, the Commission should nevertheless hold SBC/Ameritech's feet to the fire and require it to implement this necessary OSS change by no later than the end of the year.

Importantly, the evidence is clear that approximately 35% to 40% of orders are rejected based on faulty addresses. (AT&T Initial Comments, AT&T Ex. 4, p. 25; see e.g. Tr. 788-90, 792-95) This is clearly a significant problem. The evidence further demonstrates that relaxed validation will significantly improve the problem. (Covad Initial Comments, Covad Ex. 2, p. 4; Tr. 800) The sooner it is implemented, the better for competition. As Rhythms' expert Brian Baltz testified:

²⁵In fact, SBC/Ameritech originally proposed a September 2000 implementation date. During the collaborative process, that date was moved back to December 2000. (Tr. 778-79)

[B]y pushing that release out, we are not engaging in light validation. That means that we are going to experience a reject rate of 35 to 40 percent for an additional 90 days. That means that we are not going to be able to offer service to our end users in a reasonable cycle time. So it's critical that validation is released as quickly as possible. . . . You always have the ability to correct the rejects, but the goal would be to eliminate the reject and allow that order to flow correctly the first time through.

(Tr. 798-99) While the CLECs do not believe December 2000 is soon enough, it is exceedingly better than the new implementation date of March 2001 now proffered by SBC/Ameritech.

D. Conclusion

In order to ensure that CLEC orders are not being inappropriately rejected, *i.e.*, rejected when the correct phone number is provided, the Commission should require SBC/Ameritech to offer "lite" validation for all order types by no later than the end of the year. In the long term, the Commission should require SBC/Ameritech to eliminate the cause of this problem by synchronizing the data included in the SAG and CSR.

Disputed Issue 18: Flow Through

Statement of Issue: Flow through refers to CLEC orders that are processed through SBC/Ameritech's ordering interface into ACIS (the SBC/Ameritech service order system) without manual intervention. SBC/Ameritech plans to increase the flow through capabilities of its OSS over the next twelve months, although it has provided no specifics. The CLECs propose that SBC/Ameritech remove all exceptions to flow through by 50% within the next twelve months.

Competitive

Ramifications: **Flow through is imperative to the efficient processing of commercial volumes of orders. If orders do not flow through, manual intervention occurs, which results in delay in provisioning service to end use customers and greater likelihood of errors. Additionally, certain types of orders, including unbundled loops, are not “eligible for flow through. All CLEC orders, regardless of service platform, should flow through. SBC/Ameritech should not be allowed to favor one service platform over another. CLEC orders should be processed at parity with SBC/Ameritech orders; there should be few if any exceptions to flow through.**

Flow through refers to SBC/Ameritech’s processing of a CLEC order electronically, without any manual intervention. (Tr. 432) Not all CLEC orders are processed entirely electronically. SBC/Ameritech is proposing to increase flow through of CLEC orders over the next twelve months. The Joint Small CLECs desire greater flow through of CLEC orders than SBC/Ameritech is willing to offer on a more expedited time frame. Specifically, the Joint Small CLECs propose that SBC/Ameritech remove all exceptions to flow through by 50% within the next twelve months.

A. Introduction

Flow through occurs when the CLEC EDI order enters SBC/Ameritech’s gateway, and stays in electronic form until it reaches the service order processor and generates a service order. (Tr. 543) Not all CLEC orders flow through SBC/Ameritech’s legacy systems to the same extent that SBC/Ameritech’s retail orders do. Rather, some orders drop out of the electronic process for varying degrees of manual intervention.²⁶ Those types of orders that

²⁶Manual intervention in the ordering process brings into play myriad of potential errors that can be caused through human error. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

fall out of the flow through process are referred to as “exceptions” to flow through. (Tr. 437)

The extent to which orders are processed electronically is a product of decisions made by SBC/Ameritech. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

The FCC stressed the importance of flow through to competition and the perils of manual intervention when it last evaluated SBC/Ameritech's OSS. In finding that SBC/Ameritech's OSS did not meet the requirements of Section 271, the FCC stated as follows:

We find that Ameritech's reliance on manual processing is substantial and appears to cause a significant deterioration in Ameritech's performance as orders increase. Given that the problems currently faced by Ameritech generally have arisen from a limited number of orders for simple POTS service, we are concerned that the problems Ameritech is experiencing will multiply, as more competing carriers enter the marketplace and increase both the total number of orders and the number of orders involving complex services.

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, CC Docket No. 97-137, ¶ 173 (rel. Aug. 19, 1997). Since the date of the FCC's order, SBC/Ameritech has made no known improvement in its flow through capabilities for unbundled elements. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

The FCC's concerns were well founded. AT&T's experience entering the New York market confirmed that an inordinate amount of manual processing cannot sustain a commercially viable offering in the marketplace. Less than a year after the UNE-P became available in New York, Bell Atlantic was processing over 400,000 orders per month. When the ILEC must process over 20,000 orders per day, manual intervention required to fill even

a small percentage of orders will be catastrophic. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

B. SBC/Ameritech's Proposal to Eliminate Flow Through Exceptions is Insufficient

In the past, SBC/Ameritech refused to provide CLECs a list of exceptions to flow through. During the collaboratives, SBC/Ameritech identified the order types that flow through its systems and the exceptions that would cause those order types to not flow through. It became apparent at the hearing that the information is not accurate. (See Cross Ex. 16; Tr. 447-50, 453-55) Indeed, SBC/Ameritech's expert Mr. Gilles conceded that "[w]e're still in the process of identifying what all the exceptions are." (Tr. 456) What appears certain from the information provided by SBC/Ameritech is that the exceptions to flow through are the rule. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

Not only has insufficient information been provided regarding the flow through situation, SBC/Ameritech has offered few plans to improve its flow through capabilities. The evidence makes clear that SBC/Ameritech has no plans to improve its flow through capabilities for any type of unbundled element orders, including loop and number portability orders. Instead, SBC/Ameritech has indicated that it will only "improve" flow through for DSL, some resale orders and for its UNE-P offering (which is not yet available in Illinois). (Cross Exs. 16 and 18; Tr. 435-39) Moreover, those plans do not include resale of Centrex, which is a key entry platform for McLeodUSA.²⁷ (Tr. 470) Thus, it is apparent that the planned improvements will

²⁷SBC/Ameritech expert Gilles testified that there are likely exceptions associated with ordering Centrex resale. (Tr. 467) He could not state for certain whether all Centrex resale orders fall out to manual. (Tr. 468)

have little affect on the entry platforms presently being used by Illinois CLECs. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25)

More importantly, SBC/Ameritech has provided no explanation of what it means when its states that it will “improve” flow through for these limited product types. Without such specifics, the Commission cannot be assured that the planned changes will “improve” SBC/Ameritech’s flow-through capabilities in a manner that will noticeably impact the processing of CLEC orders, and thereby ease market entry. (AT&T Initial Comments, AT&T Ex. 4, pp. 21-25) Anything short of that result is unacceptable.

Exacerbating the problem are the performance measures that are used by the FCC, this Commission and the CLECs to measure SBC/Ameritech’s performance in ordering, pre-ordering, billing, provisioning, maintenance and miscellaneous administrative areas. (Tr. 1199) SBC/Ameritech currently measures its flow through performance by including only eligible orders. (Tr. 457-59) That means that it excludes those orders that are not designed to flow through. (Tr. 1200) This can be compared to a measure of total flow through that looks at all orders, not just those designed to flow through. (Tr. 1203-04) While SBC/Ameritech is planning to implement such a measure this month, it is not clear how accurate the measure will be if the list of exceptions is not complete. (Tr. 1204)

In conclusion, SBC/Ameritech’s flow through capabilities are far below that required to sustain a competitive market. SBC/Ameritech must be required to enhance the rate of flow through for CLEC orders to the level of its retail flow through so that parity exists. To accomplish this goal, SBC/Ameritech should publish the flow through types and the flow through exception lists monthly and identify which exceptions will be removed in the next

software release. The Commission should require SBC/Ameritech to remove flow through exceptions by at least 50% within the next twelve months.

SBC/Ameritech should further be required to measure the flow through rate for all CLEC orders received so that this aggregate result can be compared to the flow through rates for flow through eligible orders. SBC/Ameritech should disaggregate this data by product type so that the CLECs, SBC/Ameritech, and the Commission can more easily identify the areas where flow through improvement is necessary.

Disputed Issue 19: Ordering Graphical User Interface (GUI)

Statement of Issue: SBC/Ameritech proposes to implement pre-ordering and ordering GUIs by March 2001. The CLECs request an earlier implementation date, and that both read-only direct access and gateway access to loop provisioning information be provided.

**Competitive
Ramifications: GUIs provide CLECs with an easy and efficient method to carry out pre-order and order activities, as well as a back-up method of ordering when EDI systems go down. Thus, timely implementation of pre-ordering and ordering GUIs is critical to the development of competition in Illinois.**

Ameritech plans to provide pre-ordering (Verigate) and ordering (LEX) GUIs in March 2001.²⁸ The CLECs have requested that these GUIs be implemented prior to March 2001. Rather than do so, SBC/Ameritech has offered to implement an interim ordering GUI in October 2000. The Commission must conclude that SBC/Ameritech's interim solution is

²⁸Verigate and LEX are systems that have been in use in other SBC states for some time.

inadequate, and that permanent pre-ordering and ordering GUIs must be implemented by December 2000.

The Commission must reject Ameritech's proposal to delay implementation of pre-ordering and ordering GUIs until March 2001 for several reasons. First, and most significantly, early implementation of pre-ordering and ordering GUIs is critical to the timely development of competition for residential and small business customers. These GUIs will provide CLECs with an easy and efficient method to carry out pre-ordering and ordering activities. For CLECs using EDI, these GUIs will also provide a back-up method of ordering when EDI systems go down. The GUIs will also allow CLECs to supplement pre-ordering and ordering activities from many locations that may not have EDI capability. On the other hand, delayed implementation means uncertainty and delayed business planning, which hinders CLECs and provides SBC/Ameritech an unjustified competitive advantage. (WorldCom Initial Comments, WorldCom Ex. 1, p. 11)

In those states where these GUIs are available (Texas, New York and Pennsylvania), there is more competition for local and residential customers than there is in Illinois. Just as GUIs have assisted in bringing competition to local markets in other states, they can do so in Illinois if they are implemented in a timely manner. (WorldCom Initial Comments, WorldCom Ex. 1, p.11) Indeed, in the Covad/Rhythms/Ameritech line sharing arbitration, the Commission recently ordered Ameritech to make available in Illinois pre-ordering and ordering GUIs by December 2, 2000. Order, Dockets 00-0312/00-0313, p. 43 (Aug. 17, 2000). While that

determination is now being reheard,²⁹ the Commission must take this opportunity to make clear the benefits of timely implementation of ordering and pre-ordering GUIs for all Illinois CLECs.

Second, since SBC makes the same systems available in Texas, requiring it to do so in Illinois would be consistent with the requirement in the Commission's merger condition 27(A) in the Commission's merger order, as well as the interconnection condition in the FCC's Merger Order. Timely implementation of these GUIs would also be consistent with SBC/Ameritech's stated intent to deploy a 13-state wide OSS.

The Commission should reject Ameritech's claim that its interim solution is satisfactory. Ameritech's interim solution is insufficient since it applies only to the ordering GUI and does not extend to pre-order functionalities. In addition, CLECs would have to contract with a third party vendor to implement the proposed interim ordering GUI, and would have to stick to forecasts of usage of the GUI or pay an additional fee. (Tr. 293-294)

As a related matter, the CLECs also seek access to "all information in its records, databases or back-end systems that may be used in provisioning xDSL services on line shared loops" and "both read-only direct access, and gateway access to loop provisioning information," as SBC/Ameritech was required to provide in the Rhythms/Covad arbitration. See Order, Dockets. 00-0312/00-0313, p. 43 (Aug. 17, 2000). The prohibition on discrimination requires that Ameritech provide all CLECs (not just Rhythms and Covad) the

²⁹Commission Notice of Action, Dockets 00-0312/00-0313, Oct. 4, 2000.

same interconnection arrangements on the same terms and conditions. See 47 U.S.C. §§ 251(c)(2)(C), 251(c)(2)(D), 251(c)(3) and 252(i).

In sum, the Commission should conclude that the POR must be modified to require implementation of the pre-ordering and ordering GUIs by December 2, 2000, with the same functionality that SBC currently provides in Texas. The POR should also be revised to make clear that SBC/Ameritech will provide CLECs will both read-only direct access and gateway access to loop provisioning information.

Disputed Issue 42: Unsolicited 865 Transactions

Statement of Issue: Unsolicited 865 transactions are sent to CLECs by SBC/Ameritech to communicate a change of information on the original firm order confirmation or to signal a change of status on the order. The field level details in the 865 transactions do not mirror the field level details of the version of the purchase order that is the subject of the 865 transaction. CLECs believe they should.

Competitive Ramifications: When SBC/Ameritech sends a CLEC an unsolicited 865 transaction that does not contain the same field level details of the particular version of a purchase order to which it applies, the CLEC must spend additional time and resources to manually match the unsolicited 865 transaction to the version of the purchase order at issue. Performing these additional tasks is an inefficient use of CLEC resources and impacts a CLEC's ability to service its customers in a timely and efficient manner.

SBC/Ameritech's systems and processes generate electronic notices referred to as "Unsolicited 865 Transactions." These notices are sent after SBC/Ameritech has already

provided the CLEC a Firm Order Confirmation (“FOC”), which includes a scheduled provisioning date, and alters a previously confirmed CLEC order for resale and unbundled elements. (Tr. 918-19) A single FOC can generate multiple 865 transactions. (Tr. 916) SBC/Ameritech uses these update notices to correct or change confirmed due dates, order numbers, telephone numbers, or other miscellaneous information. (Tr. 915) They are “unsolicited” because they are not sent as a result of a CLEC initiated activity, but rather are used to notify the CLEC of a change SBC/Ameritech is making to an already confirmed order. 865 Transactions are unique to SBC/Ameritech.

Unsolicited 865 transactions are not uncommon. What’s worse, they are costly for a CLEC to process because they do not match the particular version number of a purchase order submitted by the CLEC. The 865 notices cannot be processed by CLEC electronic systems, but instead must be processed manually because the 865 transaction does not include the particular version or supplement of an order for the CLEC to successfully match-up a notice to the related CLEC order. (Tr. 968) Thus, the CLEC must manually review each 865 notice and attempt to match it to the proper order. Matching is critical so that the CLEC can identify the appropriate order and determine the nature of the change made by SBC/Ameritech.³⁰ Unless the CLEC representative can match the 865 to the proper order, the advice to the CLEC’s end user may be incorrect or misleading. (AT&T Initial Comments, AT&T Ex. 4, pp. 30-31)

³⁰The 865 transactions reason codes include: Change of Due Date; Change a Service Order Entry; Add a Service Order Entry; or Cancel a Customer Order. (AT&T Initial Comments, AT&T Ex. 4, p.30)

Since most 865 notices involve customer impacting issues, if a CLEC is unable to track the notice to an order, the customer's service -- and thus the CLEC's reputation -- is put at risk. If a CLEC is unable to trace the notice to the order, it cannot inform its customer of this change in a timely fashion. Thus, a customer's service or due date may change, but the CLEC cannot notify the customer of this critical information. Even though the CLEC may not be at fault, the customer is likely to blame the CLEC for any delay or confusion that could have been avoided were the 865 notice to be timely matched up to the order. (AT&T Initial Comments, AT&T Ex. 4, p. 31)

In its initial comments, SBC/Ameritech stated that in December 2000 it will include the version number of the most recent supplement processed for a given order in the information provided as part of the transaction header. (SBC/Ameritech Initial Comments, Amer. Ex. 15, pp. 53-53) However, when questioned about this new enhancement at the hearing, SBC/Ameritech witness Mr. Gilles indicated that the 865 transaction will only contain the most recent version number, not necessarily the version number of the purchase order that is the subject of the 865 transaction. (Tr. 976-77) Thus, this "enhancement" will not necessarily enable CLECs to associate an unsolicited 865 notice with an order. Accordingly, SBC/Ameritech's proposal is insufficient.

The Commission should order SBC/Ameritech to re-engineer its processes to ensure that the 865 transactions include data sufficient for a CLEC to easily associate the notice to the order.

Disputed Issue 46: Hot Cuts Coordinated Issues and Procedures

Statement of Issue: The process to be followed when an existing SBC/Ameritech customer is switching service to a CLEC involves two separate changes that must be made almost at the same time by the CLEC and SBC/Ameritech to ensure that the customer does not lose service. Coordinated cuts are scheduled the day of the cut over via a phone call between the two parties involved. As an outgrowth of the Wisconsin OSS collaborative, CLECs and SBC/Ameritech have been working on the processes and procedures for hot cuts since early June. Some Illinois CLECs interested in providing input to the hot cut process have participated in these Wisconsin sub-team meetings. There are still process and procedure disputes between the parties despite the work of the sub-team.

Competitive Ramifications: If a fail safe hot cut procedure is not implemented, CLEC customers may experience a total loss of service or be unable to receive incoming calls, thereby resulting in irreparable damage to a CLEC's reputation.

The vast majority of "facilities-based" local service offered today by CLECs in Illinois involves leasing an unbundled UNE loop from SBC/Ameritech and combining that UNE loop with transport and switching facilities provided by a CLEC. In order for a CLEC to provision service using a UNE loop and its own facilities, ILEC technicians must physically disconnect the UNE loop from the ILEC switch and reconnect the loop to the CLEC's facilities. The process of physically disconnecting and reconnecting the UNE loop has become known as a "hot cut." Since the hot-cut process includes the physical disconnection of the customer's loop, the customer will be without service for some period of time.

A coordinated hot cut refers to the synchronization of two separate processes, provisioning a UNE loop via a hot cut and the porting of its associated telephone number. The later process involves forwarding software changes to the Number Portability Administration Center (“NPAC”)³¹ to permit the appropriate routing of calls using the customer’s existing telephone number. A failure in the coordinated hot cut process results in increased service disruption to the customer transferring its service to the CLEC. Significant progress has been made in the negotiation of hot cut coordination processes since this issue was first identified in the Wisconsin OSS collaborative in July. At the time initial comments were filed in Illinois, the outstanding issue involved SBC/Ameritech’s unwillingness to undertake testing of the network connections before the due date.

In initial comments, CLECs rightfully maintained that delaying testing until the due date would not give them sufficient time to correct problems encountered before the due date. CLECs sought to have Ameritech perform both an automatic number identification (“ANI”) test to verify the number assigned by the CLEC and a dial tone test at least 48 hours before the due date. Advantages of pre-testing include permitting the CLEC to correct any problems with its network facilities without missing the due date, or if the problem is unresolved, enabling CLECs to provide advance notice to its customer that service would not be converted as scheduled. (AT&T Initial Comments, AT&T Ex. 4, p. 36) Ameritech’s original position was that it would not agree to perform a pre-test unless all CLECs were ready and able to complete their provisioning work two days in advance of the due date.

³¹NPAC number portability databases are used to coordinate and disseminate routing information needed for porting telephone numbers from supplier to supplier.

During cross examination, Ameritech acknowledged it had agreed during the prior day's collaborative session that it would perform an ANI test for a CLEC in advance of the due date when it was requested in addition to the testing that took place on the actual due date. (Tr. 628-29) SBC/Ameritech witness Navickas explained that a dial tone ANI test determines both the presence of dial tone on the facilities and confirms, using the automatic number identification, that the number provisioned or translated on the facilities is indeed the correct number. (Tr. 627) However, SBC/Ameritech witness Navickas stated that SBC/Ameritech planned to charge CLECs on a time and labor basis to perform the ANI test prior to the due date. The Commission should reject SBC/Ameritech's attempt to assess a separate charge for the pre-test.

Common sense dictates that the pre-due date ANI test should be part of the standard procedure for which no separate charge is required. Ms. Navickas agreed that Ameritech technicians are already required to perform wiring office testing in the central office at the same time it could perform the ANI test. (Tr. 630) In addition, Ms. Navickas testified that the ANI test takes very little time to complete by itself. Given the ease with which the ANI test could be performed with the other required testing 48 hours in advance of the due date, routinely performing the ANI test 48 hours in advance of the due date is the most sensible solution.

SBC/Ameritech's unwillingness to commit to making the pre-test part of the standard procedure is purportedly based on the fact that one or two CLECs originally stated they would not be ready to test dial tone on their switch 48 hours in advance of the due date. Aside from

the fact that SBC/Ameritech's concern appears to be based on outdated information,³² SBC/Ameritech's position unfairly penalizes the vast majority of CLECs for no good reason. Certainly, SBC/Ameritech is not harmed if it performs the ANI test even if a CLEC is not ready 48 hours in advance of the due date to test dial tone. The only party harmed is the CLEC. In such situations, performing the ANI test as part of the standard pre-due date testing would at least confirm whether or not there are network problems on the SBC/Ameritech side of the network regardless of the readiness of the CLEC. (AT&T Initial Comments, AT&T Ex. 4, pp. 38-39) Thus, even in instances where the CLEC is not ready, there is still a benefit to performing the ANI test 48 hours in advance of the due date.

If because a CLEC is not prepared 48 hours in advance of the due date it seeks a second ANI test, then SBC/Ameritech would be warranted in charging for that non-standard pre-test. However, the Commission should require SBC/Ameritech to implement the ANI test as part of its routine pre-testing without additional charge to CLECs. The benefits are undisputed and will significantly enhance the seamless conversion of a customer's service to a facilities-based CLEC using UNE loops.

Disputed Issue: 47 Hot Cuts: Desired Frame Due Time

Statement of Issue: The process to be followed when an existing SBC/Ameritech customer is switching service to a CLEC involves two separate changes that must be made almost at the same time by the CLEC and SBC/Ameritech to ensure that the customer does not lose service. The

³²AT&T witness Finney testified that every Illinois CLEC he was aware of had committed to have dial tone present 48 hours before the due date. (Tr. 656)

requested cut over time that is negotiated ahead of time between the CLEC and SBC/Ameritech is referred to as the “Frame Due Time.” The process surrounding the frame due time functionality has not been finalized. The item is in dispute until agreement can be reached on the detailed process to support desired frame due time and coordinated hot cut functionality.

Competitive

Ramifications:

If a fail safe frame due time hot cut procedure is not implemented, CLEC customers may experience a total loss of service or be unable to receive incoming calls, thereby resulting in irreparable damage to a CLEC’s reputation.

The requested cut-over time that is negotiated between the CLEC and SBC/Ameritech is referred to as the “Desired Frame Due Time” hot cut (“DFDT hot cut”). A DFDT hot cut requires both the CLEC and SBC/Ameritech to do the necessary work at pre-arranged times. In a frame due time cut, no communications between the companies is required at the time of the loop cut-over because the time of the cut-over is designated in the ordering process. The CLEC provides an order to SBC/Ameritech with the requested frame due time, and SBC/Ameritech returns a FOC to the CLEC. The FOC indicates that the order was received by SBC/Ameritech, that it is valid, and should provide the due date for the completion of the order. If the CLEC indicated a frame due time in its order, SBC/Ameritech would provide a frame due time in the FOC.

At the time initial comments were filed, SBC/Ameritech did not allow CLECs to request or negotiate a frame due time. In addition, SBC/Ameritech did not have a functioning electronic OSS to support loop provisioning through frame due times despite the fact that its

sister affiliates do offer that functionality. Before the hearing, SBC/Ameritech and the CLECs reached agreement on a written FDT hot cut process. Many CLECs accepted the new written process as adequate and agreed the issue is resolved. The Joint Small CLECs agree the written process appears workable, but until that process is actually implemented and tested, the Commission should render a decision on this key issue. Thus, the Joint Small CLECs are unwilling to remove the FDT hot cut issue from the disputed issue list.

Because this issue is part and parcel of the general hot cut issue, there appears to be some confusion as to when and if the DFDT hot cut process has been implemented. Ms. Navickas testified the hot cut process was implemented on September 11, 2000. (Tr. 640) Ms. Navickas agreed that weekly collaborative calls were continuing to determine if further improvements or modifications to the process are necessary. (Tr. 644)

In fact, the process Ms. Navickas was referencing is the manual hot cut process. To date, the FDT hot cut process involving OSS systems has not been implemented. (Tr. 619) In other words, the DFDT hot cut process today is nothing more than a written document outlining the process. Indeed, McLeodUSA witness Cox testified that the process itself is not fully defined. (Tr. 650) Until the DFDT hot cut process is fully defined, implemented and tweaked in a manner similar to that being undertaken on the manual hot process, the Joint Small CLECs believe the Commission must explicitly require SBC/Ameritech to continue working with the CLECs until, as Ms. Navickas testified, all parties seem to be satisfied that the process is working. (Tr. 619)

Finally, SBC/Ameritech suggests that CLECs should pay for this activity when it is implemented. The Joint Small CLECs believe such charges are inappropriate until the DFDT hot cut process is fully defined, tested and implemented. (Tr. 650)

Disputed Issue 62: Directory Listing Ordering and Inquiry

Statement of Issue: **There are three issues in dispute: (1) SBC/Ameritech has committed to support the ordering of directory listings over a single interface for all orders, except partial migrations, in September 2001. CLECs would like directory listing orders to be supported over a single interface by March 2001; (2) SBC/Ameritech plans to implement a process that will enable CLECs to acquire directory listing information for resale and UNE-P customers via the application-to-application interface and the GUI in March 2001. Directory listing information for UNE-loop customers will have to be obtained from SBC/Ameritech's affiliate, Ameritech Advertising, Inc. CLECs would like to make directory listing inquiries for all service platforms via the application-to-application interface and the GUI by March 2001, and; (3) SBC/Ameritech has stated that yellow page headings will only be available via its affiliate, Ameritech Advertising, Inc., regardless of how the order is originally placed. CLECs want yellow page headings to be available in the directory service listing incorporated within the SBC/Ameritech customer service record, not separately via SBC/Ameritech's affiliate.**

**Competitive
Ramifications:** **Under SBC/Ameritech's proposal, CLECs must perform additional work to access directory listings and yellow page headings for certain services. SBC/Ameritech's retail operations do not have to perform additional work for the same information. Thus, CLECs are placed at a competitive disadvantage by having to use their time and resources to perform additional tasks that SBC/Ameritech does not have to perform.**

A. Introduction

The process that CLECs currently use to place directory listing orders and to make directory assistance inquiries is inefficient and should be modified. CLECs need to be able to provide their new customers with directory listings and be able to make directory listing inquiries to assist customers with questions about the listings that were placed. Currently, a CLEC is able to place a directory listing order concurrently with a telephone service order through SBC/Ameritech's OSS interface only when the customer is provided competitive service via resale or UNE-P. However, if a CLEC places a directory listing for a UNE loop or a loop with local number portability ("LNP"), the CLEC must place its directory listing order through a separate interface that connects to SBC/Ameritech's advertising affiliate, Ameritech Advertising, Inc. (AT&T Initial Comments, AT&T Ex. 4, p. 49; Tr. 1042) In addition, Ameritech has designed the customer service record information that is provided to CLECs to exclude information about the sections of the yellow pages where business end user listings are located. (AT&T Initial Comments, AT&T Ex. 4, p. 51)

B. Ordering of Directory Listings Over a Single Interface

According to SBC/Ameritech, because a different external database is used for directory listings published for UNE loop customers, a new functionality would have to be created to link the external database to SBC/Ameritech's CSR database for CLECs to be able to place directory listing orders directly through SBC/Ameritech. SBC/Ameritech has agreed to implement the necessary functionality to enable CLECs to order listings for UNE loops and loops with LNP on an integrated basis through SBC/Ameritech's OSS interface,

but proposes to make this new functionality available in September 2001. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 61; Tr. 1044-45)

SBC/Ameritech should be ordered to provide the integration of loop and directory listing orders by March 2001, six months sooner than currently planned, for several reasons. First, a March 2001 delivery date would be consistent with SBC/Ameritech's plans to implement a process to integrate directory listing inquiries for UNE loop services. If SBC/Ameritech implements by March 2001 the needed functionality to bridge the gap between its databases and Ameritech Advertising Inc.'s databases for purposes of UNE loop directory listing inquiries, it should be able to do the same for UNE-loop directory listing orders.

Second, the non-discrimination requirements of the Public Utilities Act and the Telecommunications Act of 1996 require that SBC/Ameritech perform the same functions for all service platforms. Its current practice blatantly discriminates against the unbundled loop platform. While SBC/Ameritech claims that the reason for the disparate treatment of CLECs requesting loops and LNP is that SBC/Ameritech does not provide the telephone number for these services (Tr. 1054-55), that explanation does not justify its discriminatory practice.

C. Access to Directory Listing Information for UNE Loop Customers

Once a CLEC has retained a new customer with a listing, the CLEC needs to access SBC/Ameritech's listing databases for inquiry purposes. Access to those databases is referred to as "directory listings inquiries." Currently, for customers served via unbundled loops, CLECs access this information via a separate EDI interface with Ameritech Advertising, Inc. SBC/Ameritech intends to implement a process that will enable CLECs to

acquire listing information via both the SBC/Ameritech application-to-application interface and the GUI in March 2001, at which point CLECs would be able to obtain some directory listing information directly from SBC/Ameritech. (AT&T Initial Comments, AT&T Ex. 4, p. 50)

SBC/Ameritech's proposal is inadequate because it will not provide CLECs access to all listings. Rather, it will only make available those listings that relate to resale and UNE-P customers. Other listings would be blocked from CLECs. CLECs that need access to these listings would be required to separately process their inquiries as they do now, through SBC/Ameritech's affiliate, Ameritech Advertising, Inc. (AT&T Initial Comments, AT&T Ex. 4, p. 50) Thus, the proposal must be rejected and SBC/Ameritech should be required to design its directory listing inquiry system to function over an SBC/Ameritech provided interface for all orders, including UNE loops.

D. Availability of Yellow Page Headings

Yellow page sections and headings are provided on CLEC orders to instruct the directory publisher regarding the placement of the listing. SBC/Ameritech's CSR, which is used by CLECs to place orders, does not contain the yellow page heading and section information. Thus, if an end user requests confirmation of the heading and section order entries once the order is completed by SBC/Ameritech, the CLEC must send a separate query to the SBC/Ameritech directory subsidiary to resolve the end user's questions or to add or change the sections and headings. (AT&T Initial Comments, AT&T Ex. 4, p. 51)

For its own business end users, SBC/Ameritech makes a request for a yellow page heading listing directly to AAS on behalf of the end user. SBC/Ameritech also performs this function for CLEC resale orders. (Tr. 1051) SBC/Ameritech does not perform this function

for CLECs ordering loops or LNP, in which case the CLEC must contact Ameritech Advertising, Inc. directly for a yellow page heading. (Tr. 1051-52) This requirement for a separate inquiry by CLECs is not only discriminatory, but it results in additional time and expense. (AT&T Initial Comments, AT&T Ex. 4, p. 51)

The Commission should order SBC/Ameritech to standardize the use of information regarding yellow page headings and section information. SBC/Ameritech must modify its customer service record so that CLECs and SBC/Ameritech have equivalent information about business end user listings. SBC/Ameritech's design for the separate directory listing query (due in March 2001) should also be modified to provide the same information on business end user listings.

Disputed Issue 73: UNE-P: Ordering, Billing

Statement of Issue: **There are two issues in dispute. First, it is unclear whether SBC/Ameritech will allow CLECs to purchase the unbundled network element platform (UNE-P) for the purpose of serving new customers, and customers seeking additional lines and second lines. CLECs take the position that Ameritech is obligated to provide UNE-P for new lines, second and additional lines. Second, SBC/Ameritech has indicated that it will support the Carrier Access Billing System (CABS) for UNE-P by October 2001. CLECs want CABS implemented by December 2000.**

Competitive Ramifications: **Allowing SBC/Ameritech to refuse to provide the UNE Platform to CLECs precludes CLECs from offering competitive services to the residential and small business market. Further, CABS produces auditable bills that can be disputed by the billed party. Delaying the**

implementation of CABS for UNE-P places CLECs at risk of being overcharged by SBC/Ameritech.

A. Availability of the UNE Platform

The CLECs seek a resolution in this proceeding of the terms and conditions under which SBC/Ameritech will offer the UNE Platform (“UNE-P”). SBC/Ameritech offers numerous reasons why that determination should not be made in this case. Its position is just another effort at delaying provision of this important combination.

As the Commission is well aware, SBC/Ameritech has steadfastly refused to make the UNE Platform available in Illinois, notwithstanding repeated mandates from this Commission that it do so. The Commission first ordered Ameritech to provide the UNE platform in 1996 in Docket 95-0458. Ameritech did not implement what the Commission ordered. The Commission then ordered the provision of shared transport, an integral component of the UNE Platform, as a condition of approval of the SBC/Ameritech merger. SBC/Ameritech still has not offered the platform. SBC/Ameritech currently restricts the UNE Platform to customers with connected UNE loop, switching and transport. Staff concluded that SBC/Ameritech is encouraging CLECs not to order UNE-P. Its efforts have been successful. Not a single UNE-P order has been placed and no process exists for UNE-P ordering. (Staff Initial Comments, Staff Ex. 2, pp. 47-49)

The UNE Platform will enable CLECs to serve new customers and second lines. This market has seen significant growth since 1996, which continues today. (WorldCom Initial Comments, WorldCom Ex. 1, pp. 20-21) Delaying implementation of OSS for the UNE platform would further hamper the CLECs’ efforts to serve this market. Without working EDI

systems, mass marketing of the platform will be impossible because orders could not be processed in a timely manner. (ICC Staff Initial Comments, Staff Ex. 2, pp. 47-48) Furthermore, the availability of UNE-P would enable CLECs to better serve their customers, who currently face service issues with SBC/Ameritech. UNE-P does not require hot cuts or technician dispatches and, therefore, problems associated with these issues are avoided. These facts make clear that SBC/Ameritech has a strong incentive to deny access to UNE-P. In order to prevent this from occurring, the Commission should require SBC/Ameritech to offer the UNE Platform for new and additional lines. This will ensure that the UNE Platform is available and that pre-order, order and maintenance and repair OSS can be enhanced appropriately to accommodate unrestricted UNE Platform.

SBC/Ameritech has provided several arguments in support of its position that it need not offer UNE Platform to new customers or additional lines. First, it contends that UNE-P should not be considered in this arbitration proceeding. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 66) That position must be rejected. The Commission's order approving Ameritech's Plan of Record specifically noted that the collaborative was not to be limited to the issues contained in the approved POR. Order, p. 6, Docket 00-0271 (April 5, 2000). Thus, the availability of the UNE-P offering is within the scope of this OSS proceeding.

Next, SBC/Ameritech contends that Iowa Utilities Board v. FCC, 2000 WL 979117 (8th Cir. July 18, 2000) ("IUB II"), establishes that the unbundling requirements of the Federal Telecommunications Act do not require ILECs to combine network elements for requesting carriers where such elements are not already combined. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 67) SBC/Ameritech's position is erroneous. The U.S. Court of Appeals in

the Ninth and Fifth Circuits have upheld state commission orders requiring ILECs to combine separate network elements not ordinarily combined in the ILEC's network. US West v. MFS, 193 F.3d 1112 (9th Cir. 1999); MCI v. US West, 204 F.3d 1262 (9th Cir. 2000); Southwestern Bell Telephone v. Waller Creek Communications, 2000 WL 1091669 (5th Cir. 2000) ("Waller Creek"). Each of these decisions was issued after the vacatur of the FCC rules that had required ILECs to combine separate elements not ordinarily combined.

Indeed, Waller Creek was issued after Iowa Utilities II. Waller Creek makes clear that Iowa Utilities II has no bearing on the authority of commissions outside of the Eighth Circuit to order ILECs to combine network elements not currently combined in ILEC networks. In rejecting the notion that such a requirement would somehow violate the 1996 Act, the court made clear that it was concluding that combinations were not required, not that they are prohibited. Waller Creek, 2000 WL 1091669, at *7. Indeed, nothing in the 1996 Act or the FCC's rules prohibits new combinations of UNEs.

State law provides this Commission ample authority to require the provision of new non-competitive services, such as the UNE Platform. 220 ILCS 5/13-505.5. Since SBC/Ameritech has not shown that it is technically or economically impractical to offer this service, the Commission was well within its authority mandating that it be offered. Since the requirement to combine network elements not already ordinarily combined in its network is not inconsistent with the 1996 Act, it is clear that this Commission has full authority to again require SBC/Ameritech to offer the UNE Platform.

A Commission determination that the UNE platform should be available to new customers and for second or additional lines would also be consistent with SBC/Ameritech's

own interpretation of its Combined Platform (“CPO”) tariff. SBC/Ameritech’s TCNet website, which is used to provide information to CLECs on how to order unbundled elements and services, as well as how to interface with SBC/Ameritech’s OSS, includes an ordering guide entitled “Combined Platform Offering, Illinois Tariff Offering.” (WorldCom Ex. 1, Schedule 1.01P) This document was issued in conjunction with the CPO tariff and makes clear that the UNE Platform may be used to serve new lines, and additional or second lines. (WorldCom Initial Comment, WorldCom Ex. 1, pp. 15-16) SBC/Ameritech’s argument that it is not obligated to provide combinations of UNEs for new customers, and additional or second lines is contrary to its own description of its tariff. (WorldCom Initial Comments, WorldCom Ex. 1, p. 16)

For all these reasons, the Commission should reject SBC/Ameritech’s continued efforts to delay provision of the UNE Platform by not offering it to new customers or for additional lines.

B. Carrier Access Billing System for UNEs and UNE Combinations

SBC/Ameritech’s Carrier Access Billing System (“CABS”) must be enhanced to support billing for all UNEs, combinations of UNEs and interconnection arrangements. SBC/Ameritech claims that it will support this request by October 2001. (Tr. 301-03) That is not soon enough. SBC/Ameritech should be required to implement CABS billing by December 2000.

The importance of CABS billing is due in large part to the fact that it is an Industry Standard format for billing that has been in use for years. (WorldCom Initial Comments, WorldCom Ex. 1, p. 23) SBC/Ameritech currently has no billing delivery method in place for

the UNE Platform and uses a non-standard format for shared transport and unbundled local switching (components of the UNE Platform). The non-standard format used for shared transport and switching is the Ameritech Customer Information System ("ACIS"). (Tr. 331)

Until the UNE Platform is billed in CABS billing format, CLECs will not be able to audit their bills. (WorldCom Initial Comments, WorldCom Ex. 1, p. 24; Tr. 356-65) If CLECs are unable to audit their bills for combinations of UNEs, they are in essence forced to pay bills without knowing whether they are accurate. WorldCom witness Mr. Hurter testified that WorldCom currently receives unauditible bills for products that are not billed in the CABS billing format. (Tr. 377) Further, it has been WorldCom's experience that billing discrepancies and inaccuracies occur on a regular basis and can add up to substantial amounts of money. (Tr. 377-82) Without CABS billing, CLECs are forced to simply trust SBC/Ameritech. That is not a reasonable requirement to compete in the Illinois market.

SWBT and PacBell, SBC/Ameritech's affiliates, provide CABS billing for UNEs, combinations of UNEs (including the UNE Platform) and interconnection arrangements in Texas and California, respectively. (WorldCom Initial Comments, WorldCom Ex. 1, p. 25) PacBell is converting to the SWBT version of CABS in December 2000. (SBC/Ameritech Initial Comments, Amer. Ex. 15, p. 69) Given that SBC affiliates currently provide billing for UNEs, combinations of UNEs and interconnection arrangements in the industry standard CABS format, so too should SBC/Ameritech. (WorldCom Initial Comments, WorldCom Ex. 1, p. 28)

SBC/Ameritech should implement CABS billing by December 2000. Such an implementation is preferable since it is before large scale commercial entry will have occurred

and at the start of OSS testing. There is no technical reason why SBC/Ameritech cannot implement CABS billing by December 2000, the date when its affiliate PacBell is doing so. The only reason it provides for not being able to do so is that PacBell began its efforts to convert to CABS over three years ago. (Ameritech Initial Comments, Amer. Ex. 15, p. 69) However, that does not explain why SBC/Ameritech delayed working towards implementation of this industry standard for shared transport when it was implemented in September 1999. (Tr. 375-376) SBC/Ameritech's recalcitrance regarding implementation of the UNE Platform should not now excuse it from timely implementation.

For all of the foregoing reasons, Joint Small CLECs request that the Commission order SBC/Ameritech to implement CABS billing in Illinois for all UNEs, combinations of UNEs (including the UNE Platform) and all interconnection arrangements by December 2000.

III. CONCLUSION

For the reasons set forth herein, McLeodUSA Telecommunications Services, Inc., Birch Telecom, Inc. and Nextlink Illinois, Inc. d/b/a XO Illinois, Inc. respectfully request that the Commission require SBC/Ameritech to revise its proposed Plan of Record consistent with the positions stated herein.

Dated: October 13, 2000

Respectfully submitted,

**McLEODUSA TELECOMMUNICATIONS
SERVICES, INC.,
BIRCH TELECOM, INC.
and
NEXTLINK ILLINOIS, INC. D/B/A
XO ILLINOIS, INC.**

William Haas
McLEODUSA INCORPORATED
McLEODUSA Technology Park
6400 C Street SW
P.O. Box 3177
Cedar Rapids, Iowa 52406-3177
(319) 790-7295

Rina Hartline
BIRCH TELECOM, INC.
502 West 14th Street
Austin, TX 78701
(512) 236-1700

Carol Pomponio
NEXTLINK ILLINOIS, INC. D/B/A
XO ILLINOIS, INC.
810 Jorie Blvd.
Suite 200

By: _____

Oak Brook, IL 60523
(630) 371-3357

Carrie J. Hightman
Latrice Kirkland
SCHIFF HARDIN & WAITE
6600 Sears Tower
Chicago, Illinois 60606
(312) 258-5657

Attorneys for

**McLEODUSA TELECOMMUNICATIONS
SERVICES, INC.,
BIRCH TELECOM, INC.
and
NEXTLINK ILLINOIS, INC. D/B/A
XO ILLINOIS, INC.**

STATE OF ILLINOIS)
)
COUNTY OF COOK)

VERIFICATION

I, Carrie J. Hightman, being first duly sworn upon oath depose and say that I am an attorney for McLeodUSA Telecommunications Services, Inc., Birch Telecom of the Great Lakes, Inc. and NEXTLINK Illinois, Inc. d/b/a XO Illinois, Inc.; that I am authorized to make this Verification on their behalf; that I have read the above and foregoing Final Statement of Position of McLeodUSA Telecommunications Services, Inc., Birch Telecom of the Great Lakes, Inc. and NEXTLINK Illinois, Inc. d/b/a XO Illinois, Inc. by me subscribed and know the contents thereof; and that said contents are true and correct to the best of my knowledge, information and belief.

Carrie J. Hightman

Attorney for
McLeodUSA Telecommunications Services,
Inc.,
Birch Telecom of the Great Lakes, Inc.
and
NEXTLINK Illinois, Inc. d/b/a XO Illinois, Inc.

Subscribed and Sworn
to before me this
13th day of October 2000.

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