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ILLINOIS COMMERCE COMMISSION

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CHIEF CLERK'S OFFICE

ILLINOIS BELL TELEPHONE )  
COMPANY )  
)  
)  
Petition for Waiver Pursuant )  
to Condition (30) of the )  
SBC/Ameritech Merger Order )

Docket No. 00-0238

PETITION FOR WAIVER

Illinois Bell Telephone Company ("Ameritech Illinois" or "the Company") hereby petitions for a waiver of condition (30) of the Commission's Order in the SBC/Ameritech Merger proceeding. Order in Docket 98-0555, adopted September 23, 1999. In support whereof, Ameritech Illinois states as follows:  
Infeasibility

1. In the SBC/Ameritech Merger Order, this Commission adopted certain requirements relative to performance measures, benchmarks and liquidated damages. The Commission's order required Ameritech Illinois to work with the Commission Staff and the CLECs in a collaborative process to implement the Texas performance measurements and standards/benchmarks. Merger Order, supra, p. 256. Following this process, Ameritech Illinois was required to file a report detailing the timeline for implementing each of the performance measures; if any of

these measures were deemed by Ameritech Illinois to be "infeasible", the Company is obligated to explain why in that report. Merger Order, supra, p. 257. The report has been duly filed. The Merger Order then provides that the Commission may grant waivers for infeasible measures. *Ibid.*<sup>1</sup>

2. There are six Texas measures which Ameritech Illinois has concluded are infeasible. The CLEC participants in the collaborative process have not disputed this assessment. These measures can be divided into two general categories: (1) measures for systems which Ameritech Illinois has not deployed; and (2) measures for products that Ameritech Illinois no longer offers. These two categories are discussed below:

a. Measures For Systems Which Ameritech Illinois Has Not Deployed: *SBC #3 EASE Average Response Time*

SBC's Texas measures contain an average response time for a system called the Easy Access Sales Environment ("EASE"). EASE is a proprietary system deployed by SEC, which supports ordering of POTS residence and business telephone service. SBC's retail service representatives and wholesale (resale) customers utilize this system.

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<sup>1</sup> It is not clear from the Merger Order whether the Commission expected to grant such waivers based solely on the report. To avoid procedural issues, Ameritech Illinois is filing this waiver request separately.

Ameritech Illinois has not deployed EASE and does not currently offer an EASE-like system, which provides direct access to ordering. It is therefore infeasible for Ameritech Illinois to provide SBC measure #3, "EASE Average Response Time". Ameritech Illinois' mechanized ordering functions are accomplished via the Electronic Data Interchange (EDI) interface, which has been operational since 1996. EDI functions are captured in other ordering measures within the SBC Texas performance measures. Should Ameritech Illinois deploy EASE or an EASE-like system coincident with complying with merger conditions relative to OSS, Ameritech Illinois would initiate work to implement an Average Response Time measurement.

- b. Measures For Products That Ameritech Illinois No Longer Offers: *Interim Number Portability SBC #87, 88, 89, 90, 116*

SBC's Texas measures contain five items which relate to interim number portability. These five measures are as follows:

- #87 Percentage Installation Completed Within "X" (3, 7, 10) Days - INP
- #88 Average INP Installation Interval
- #89 Percentage INP Only I-Reports Within 30 Days
- #90 Percent Missed Due Dates (INP Only)
- #116 Percentage of Missed Mechanized INP Conversions

Ameritech Illinois was among the national leaders in the deployment of Long Term Number Portability ("LNP"). Interim Number Portability ("INP"), utilized prior to the widespread availability of LNP in Illinois, was discontinued as a product

offering in Ameritech Illinois' territory effective June 13, 1999. In contrast, SBC continues to offer INP and, therefore, has several performance measures associated with processes supporting INP. LNP processes are reflected in eleven other performance measures within the Texas plan and these measures will be implemented in Illinois (i.e., measures #91 through #101).

3. Accordingly, Ameritech Illinois requests a waiver for these six performance measures. There was no disagreement among the parties to the collaborative that these six measures satisfied an "infeasibility" standard.

Parity vs. Benchmark

4. Although the Commission accepted the Joint Applicants' commitment to import to Illinois the "Texas plan" for 122 performance measures and incident-based liquidated damages provisions, it required certain additional showings. The Texas plan contains "parity" measures for the majority of the operations being measures -- i.e., the company's wholesale performance is compared to its own retail operations or the retail operations of an affiliate. Where retail analogs are not readily available, the Texas plan provides for "benchmarks" -- i.e., an objective measure is established for completion of the operation in terms of seconds, hours, or other appropriate

measure of timely performance. Of the 122 Texas performance measures, 62 are based on benchmarks.

5. In the Merger Order, the Commission made clear that parity measures were preferred. The Commission stated that benchmarks were only to be used if no retail analogs existed and that the burden of proof remained on the Joint Applicants:

"Additionally, all performance measures must be based on comparison to performance that the Joint Applicants provide to their own operations and/or subsidiaries. The burden of proof shall remain on the Joint Applicants to demonstrate that no retail analogs exist and that benchmarks should be substituted." Merger Order, p. 221.

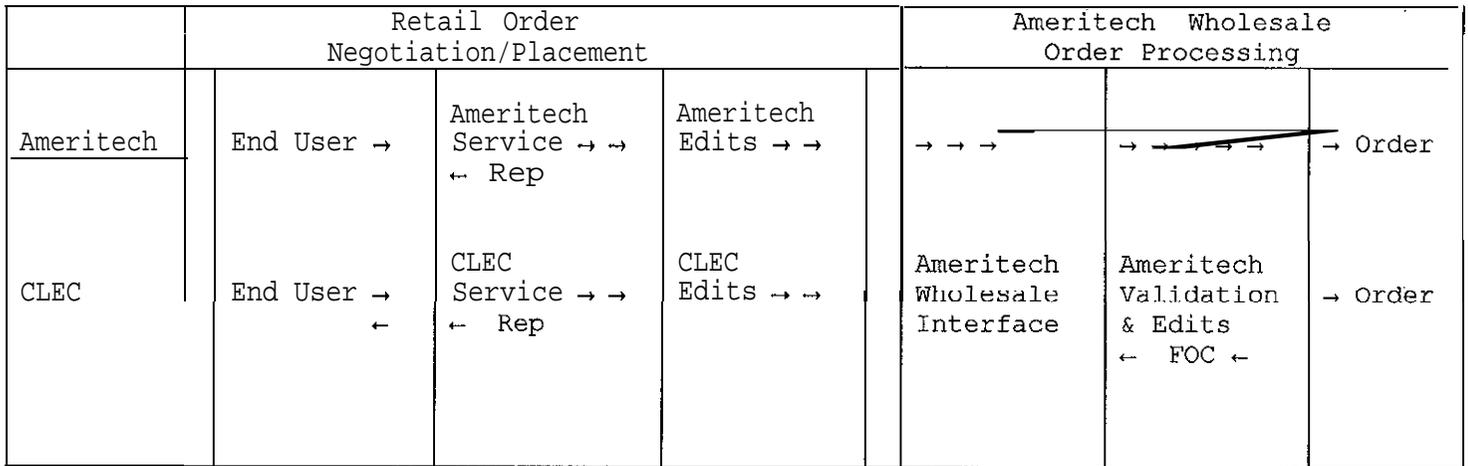
6. After an extensive review by the Company, Staff and the CLECs through the collaborative process, there was substantial agreement regarding the use of parity and benchmark standards. A retail analog was developed for 19 of the 62 Texas measures which were based on benchmarks. Thus, a parity standard will be implemented for those measures in Illinois. There was also agreement among the parties that 40 of the 62 Texas benchmark measures and parts of two others could be based on benchmarks, at least at the outset. Five of these 42 benchmark measures are interim in nature and will be revisited by the parties participating in the collaborative this June, to determine whether parity measures have become available. In addition, with respect to two of the interim benchmark measures, the

Company and the CLECs have agreed to change the benchmark to impose a more rigorous performance standard on Ameritech Illinois. Attachment A to this document lists all agreed-upon measures that will be subject to benchmarks and an explanation as to why a retail analog is not available.

7. Accordingly, there are only three benchmark measures on which the parties to the collaborative could not reach agreement. They all relate to Firm Order Confirmation ("FOC") response time. Ameritech Illinois' wholesale order interface ("EDI" for electronic orders) and wholesale service representatives (manual orders) check CLEC orders for format and content. The EDI interface translates the CLEC orders from a generic industry format to one that is understood by Ameritech Illinois' internal systems. CLEC orders which are improperly formatted, or which do not contain necessary data, are returned to the CLEC with a rejection notice. Orders that are correct and accurate are confirmed. The purpose of the Firm Order Confirmation ("FOC") measurements is to assess the amount of time it takes Ameritech Illinois to notify the CLEC that an order has been accepted as accurate and complete.

8. No retail analog exists for a FOC. The following diagram depicts the differences between the process in place for

Ameritech Illinois' retail and wholesale order operations:



9. As this diagram demonstrates, there is a fundamental difference between retail and wholesale service order processing. Although the retail order negotiation/placement process with the customer is similar for both Ameritech Illinois and CLECs, the processing flow which occurs after the CLEC completes its customer contact and internal system edits is unique to the wholesale process. The Ameritech Illinois retail system edits ensure that the Ameritech Illinois order is formatted properly and is complete; the order cannot be processed if it is not. Therefore, the Ameritech Illinois retail service representative requires no separate notification that the order can be processed and does not receive one. In contrast, the CLEC retail edit system is entirely separate from Ameritech Illinois' and the CLEC order must be sent to Ameritech

Illinois through an interface (EDI). At that point, Ameritech Illinois' wholesale systems review the CLEC order to ensure that it is formatted properly and is complete. Since this wholesale edit check is required, a confirmation back to the CLEC that its order "passed" or did not "pass" (i.e., a "FOC") is required. Since there is no retail analog to the FOC, a benchmark is appropriate.

10. The practice of comparing FOC performance to benchmarks is widely accepted. As part of the SBC/Ameritech merger conditions, the FCC approved benchmark FOC measures as part of its carrier-to-carrier performance plan. Ameritech/SBC Merger Order, CC Docket 98-141, released October 8, 1999, Attachment A-5a, (OSS Measurement 1). The FCC's Bell Atlantic 271 Order upheld the New York Commission's conclusion that "there are no retail analogues" for order confirmations, and found that benchmarks "established in a collaborative proceeding" provided a sufficient basis for assessing performance. Bell Atlantic 271 Order, CC Docket 99-295, released December 22, 1999, ¶160 n. 490.

11. Accordingly, use of a benchmark in Illinois is reasonable and appropriate and should be approved by the Commission.

In view of the foregoing, Ameritech Illinois requests that its Petition for Waiver be granted.

Respectfully submitted,

AMERITECH ILLINOIS

By: Theresa P Larkin  
Theresa P. Larkin  
Vice President,  
Regulatory Affairs

## ATTACHMENT A

<u>SBC#</u>	<u>Measure Name</u>	<u>Discussion</u>
1	Average Response Time for OSS Pre-Order Interfaces	The average response time for <b>Pre-order</b> transactions is similar to Ameritech's retail response time. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has <b>direct</b> access to the systems. The response time standards established in the Texas business rules are not dissimilar than those associated with Bell Atlantic's standard of parity plus 4 seconds, with some bettering those standards. Four of the six disaggregations in this measure offer benchmarks of six or less seconds. <b>CLECs agreed to a benchmark as the standard for this measure.</b> This measure is required by the FCC merger agreement.
2	Percent Responses Received within "x"seconds-OSS Interfaces	The "percent within" measurement requires a different, somewhat longer standard than the average response time measurement, however four of the six disaggregations are for 95% responses in less than sixteen seconds, while another is 95% in less than 25 seconds. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has <b>direct</b> access to the systems. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
4	OSS Interface Availability	This measurement represents, in some cases, both the back end legacy systems and the interface itself, while the retail environment does not deal with the CLEC interface. Therefore there is not a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b> This measure is required by the FCC merger agreement.
7	Percent Mechanized Completions Returned Within one hour of Completion in ACIS	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's <b>finding</b> that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. <b>CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be re-evaluated in June.</b>
7.1	Percent Mechanized Completions Returned Within one Day of Work Completion	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's <b>finding</b> that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. <b>CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be w-evaluated in June.</b>

## ATTACHMENT A

<u>SBC#</u>	<u>FCC#</u>	<u>Measure Name</u>	<u>Discussion</u>
8		Average Time to <b>Return</b> Mechanized Completions	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail <b>analogue.</b> " Bell Atlantic 271 Order, 186 n.591. <b>CLECs proposed and Ameritech accepted a change in the benchmark from 97% to, 99% on an interim basis (until June) as a compromise. This measure is a diagnostic measure and will be re-evaluated with 7 and 7.1 in June.</b>
9		Percent Rejects	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. <b>Ameritech</b> Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of <b>error</b> , rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
10		Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in <b>MorTel</b>	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. <b>Edits</b> in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
10.1		Percent Mechanized Rejects Returned within <b>1</b> Hour of Receipt of Reject in of LSR from CLEC	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>

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<u>SBC#</u>	<u>FCC#</u>	<u>Measure Name</u>	<u>Discussion</u>
10.2		Percent Mechanized Rejects Received Electronically and Returned within 5 hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the “carrier to carrier” relationship. Ameritech also cited the FCC’s finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
10.3		Percent Manual Rejects Received Manually and Returned Within 5 Hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the “carrier to carrier” relationship. Ameritech also cited the FCC’s finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
11		Mean Time To Return Mechanized Rejects	There is no retail <b>analog</b> for a rejection notice since. no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the “carrier to carrier” relationship. Ameritech also cited the FCC’s finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
11.1		Mean Time To Return Manual Rejects that are Received Electronically via LEX or EDI	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. <b>Ameritech</b> Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative <b>from</b> inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the “carrier to carrier” relationship. Ameritech also cited the FCC’s finding in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>

## ATTACHMENT A

<b>SBC#</b>	<b>FCC#</b>	<b><u>Measure Name</u></b>	<b><u>Discussion</u></b>
11.2		Mean Time to Return Manual Rejects that are Received through the Manual Process	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in <b>that</b> process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the “carrier to carrier” relationship. Ameritech also cited <b>the FCC’s finding</b> in Bell Atlantic, which stated that there are no retail analogs for this function. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
15		Percent of Accurate and Complete Formatted Mechanized Bills	There is no retail analog to this function as Ameritech sends very few mechanized bills to its customers in <b>the</b> retail environment. This is a primarily a function which occurs as part of <b>the</b> carrier to carrier relationship. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
16		Percent of Usage Records Transmitted Correctly	There are significant differences in the way usage is treated in the retail vs. wholesale environment. Retail Usage is held until the <b>end-</b> user bill is generated, on a monthly basis. Wholesale usage is “transmitted” to the CLEC on a daily basis. Therefore there is no retail analog for this <b>measure.</b> <b>CLECs agreed to a benchmark as the standard for this measure.</b>
19		Daily Usage Feed Timeliness	There are significant differences in the way usage is treated in the retail vs. wholesale environment. Retail Usage is held until the end-user bill is generated. Wholesale usage is “transmitted” to the CLEC on a daily basis. CLEC usage is also aggregated from <b>the thirteen Ameritech</b> billing centers and sent to the CLECs as one file each day, which does not happen in the retail environment. Therefore there is no retail analog for this <b>measure.</b> <b>CLECs agreed to a benchmark as the standard for this measure.</b>
20		Unbillable Usage	<b>Unbillable</b> usage, by its nature is usage where the party who generated the usage is unknown. This usage may have been generated by either a wholesale or a retail customer, but the owner is indistinguishable and thus <b>the</b> usage will go <b>unbilled.</b> <b>This</b> is a diagnostic measure <b>in</b> Texas business rules. <b>CLECs agreed to leave this a diagnostic measure and not to set a benchmark as the standard for this measure.</b>

## ATTACHMENT A

<b>SBC#</b>	<b>FCC#</b>	<b><u>Measure Name</u></b>	<b><u>Discussion</u></b>
71		Common Transport Trunk Blockage	Common transport <b>trunks</b> do not differentiate between Ameritech traffic and Wholesale <b>traffic</b> , and transport all traffic in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
72		Distribution of Common Transport Trunk Groups > 2%	Common transport <b>trunks</b> do not differentiate between Ameritech traffic and Wholesale traffic, and transport all <b>traffic</b> in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
79		Directory Assistance Grade of Service	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail <b>traffic</b> when answering calls. <b>CLECs agreed to a benchmark as the standard for this measure.</b> CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
80		Directory Assistance Average Speed of Answer	Operator <b>Services/Directory</b> Assistance (OS/DA) measurements do not distinguish retail <b>from</b> wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. <b>CLECs agreed to a benchmark as the standard for this measure.</b> CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
81		Operator Services Grade of Service	Operator <b>Services/Directory</b> Assistance ( <b>OS/DA</b> ) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. <b>CLECs agreed to a benchmark as the standard for this measure.</b> CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting

## ATTACHMENT A

<u>SEC#</u>	<u>FCC#</u>	<u>Measure Name</u>	<u>Discussion</u>
82		Operator Services Speed of Answer	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale <b>from</b> retail traffic when answering calls. CLECs <b>agreed to a benchmark as the standard for this measure</b> . CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
83		Percent Calls Abandoned	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs <b>agreed to a benchmark as the standard for this measure</b> . CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
84		Percent Calls Deflected	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. CLECs <b>agreed to a benchmark as the standard for this measure</b> . CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
85		Average Work Time	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail <b>traffic</b> when answering calls. CLECs <b>agreed to a benchmark as the standard for this measure</b> . CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
86		Non-Call Busy Work Volumes	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale <b>traffic</b> . They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail <b>traffic</b> when answering calls. CLECs agreed to a <b>benchmark as the standard for this measure</b> . CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting

## ATTACHMENT A

<u>SBC#</u>	<u>FCC#</u>	<u>Measure Name</u>	<u>Description</u>
91		Percentage of LNP Only Due Dates within Industry Guidelines	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
92		Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the Second 9-Hour(T2) Timer	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
93		Percentage of Customer Account Restructured Prior to LNP Due Data	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
95		Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
96	16	Percentage <b>Pre-Mature</b> Disconnects (Coordinated Cutovers)	Since the LNP process does not occur in the retail environment, <b>CLECs agreed to a benchmark as the standard for this measure.</b>
97		Percentage of Time Ameritech Applies the IO-digit Trigger Prior to the LNP Order Due Date	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
100		Average Time of Out of Service for LNP Conversions	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
101		Percent Out of Service < 60 Minutes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. <b>CLECs agreed to a benchmark as the standard for this measure.</b>
110		Percentage of Updates Completed into the DA Database within 72 Hours for Facilities Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. <b>CLECs agreed to a benchmark as a standard for Manual D/A database updates.</b>
111		Average Update Interval for DA Database for Facility Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. <b>CLECs agreed to a benchmark as a standard for Manual D/A database updates.</b>

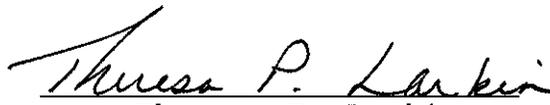
## ATTACHMENT A

<u>EBC#</u>	<u>C #</u>	<u>Measure Name</u>	<u>Discussion</u>
112		<b>Percentage of DA Database Accuracy for Manual Updates</b>	CLECs agree that no manual DA database updates occur in Ameritech retail, and therefore CLECs agreed to a benchmark as the standard for this measure.
114		<b>Percentage of Premature Disconnects (coordinated cutovers)</b>	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June. NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.
115		<b>Percentage of Ameritech Caused Delayed Coordinated Cutovers</b>	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June. NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.

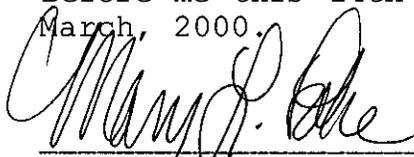
STATE OF ILLINOIS                    )  
  )  
COUNTY OF COOK                    )        SS

VERIFICATION

I, Theresa P. Larkin, on oath state that I am employed by Ameritech Illinois as the Vice President, Regulatory Affairs, that I have read the foregoing Petition For Waiver, and that the information contained therein is true and correct to the best of my knowledge and belief.

  
Theresa P. Larkin

Subscribed and Sworn to  
Before me this 24th day of  
March, 2000.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

ILLINOIS BELL TELEPHONE )  
COMPANY )  
 ) Docket No. \_\_\_\_\_  
Petition for Waiver Pursuant )  
to Condition (30) of the )  
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NOTICE OF PETITION

Pursuant to 83 Ill. Administrative Code §200.150(f), Illinois Bell Telephone Company ("Ameritech Illinois") provides the following notice regarding its Petition:

1. Legal Authority and Jurisdiction Under Which the Hearing is to Be Held: The Commission's legal authority and jurisdiction over this Petition derives from its Order in Docket 98-0555.
2. Statute or Rule Involved: No statute or rule is involved.
3. Plain and Concise Statement of the Matter Asserted:  
Ameritech Illinois is filing this Petition For Waiver of Condition (30) pursuant to the Commission's Order in Docket 98-0555.
4. Hearing Time and Location: \_\_\_\_\_

Respectfully submitted,

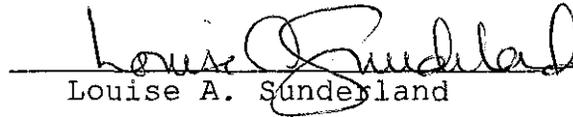
AMERITECH ILLINOIS

By: Louise A. Sunderland  
One of its Attorneys

Louise A. Sunderland  
Ameritech Illinois  
225 West Randolph Street, 27C  
Chicago, Illinois 60606  
(312) 727-6705

CERTIFICATE OF SERVICE

I, Louise A. Sunderland, an attorney, certify that Petition for Waiver of Ameritech Illinois was hand delivered to Ms. Donna Caton this 24th day of March, 2000.

  
Louise A. Sunderland