

**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 (8<sup>th</sup> 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 (9<sup>th</sup> Cir. 1999); MCI v. US West, 204 F.3d 1262

(9<sup>th</sup> Cir. 2000); Southwestern Bell Telephone v. Waller Creek Communications, 2000 WL 1091669 (5<sup>th</sup> 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 14<sup>th</sup> 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

By:



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**

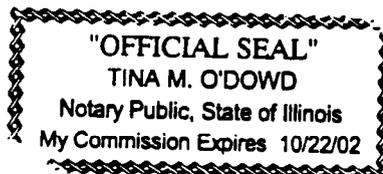
I, Carrie J. Hightman, being first duly sworn upon oath depose and say that I am an attorney for McLeodUSA Telecommunications Services, Inc., Birch Telecom of the Great Lakes, Inc. and NEXTLINK Illinois, Inc. d/b/a XO Illinois, Inc.; that I am authorized to make this Verification on their behalf; that 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.

  
\_\_\_\_\_



**APPENDIX A**  
**TO THE 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.**

## TABLE OF CONTENTS

Disputed Issue 1: Application Versioning .....	1
Disputed Issue 2: Joint Testing .....	1
Disputed Issue 4: Change Management Process - OIS Voting Process .....	4
Disputed Issue 6: Hours of System Availability .....	4
Disputed Issues 9, 16, 19, 20, 21, 24 and 40: Interface Development Rule - Detailed Specification Requirements .....	5
Disputed Issue 11: Retain Current Listings .....	6
Disputed Issue 13: Customer Service Record Address Validation .....	6
Disputed Issue 18: Flow Through .....	7
Disputed Issue 19: Ordering Graphical User Interface (GUI) .....	8
Disputed Issue 42: Unsolicited 865 Transactions .....	8
Disputed Issue 46: Hot Cuts: Coordinated Issues and Procedures .....	8
Disputed Issue 47: Hot Cuts: Desired Frame Due Time .....	9
Disputed Issue 62: Directory Listing Ordering and Inquiry .....	9
Disputed Issue 73: UNE-P: Ordering, Billing .....	9

Disputed Issue 1: Application Versioning, Section III.A of the Plan of Record

("POR") should be revised as follows:

#### Versioning

Versioning will be implemented by Ameritech Illinois coincident with the ordering release that is scheduled for implementation on September 25, 2000 and coincident with the pre-ordering release that is scheduled for implementation on December 9, 2000. These releases will co-exist with the production system interfaces now in use. Ameritech Illinois' implementation of the March 2001 pre-ordering and ordering interfaces will be the introduction of the LSOG 4-based pre-ordering and ordering interfaces and these will be versioned as the initial LSOG 4 interfaces. The LSOG 2-based interfaces will remain available to CLECs until the implementation of the uniform pre-ordering and ordering interfaces currently expected to be implemented in September, 2001 according to SBC's Uniform and Enhanced OSS Plan of Record. Versioning will be implemented by Ameritech Illinois coincident with the March 2001 ordering and pre-ordering releases. The March 2001 pre-ordering and ordering interfaces will co-exist with the production system interfaces beginning with the March 2001 implementation. Ameritech Illinois will support three versions of software at all times for its EDI Ordering and EDI/CORBA Pre-Ordering interfaces. The last dot release of the retired LSOG will be supported until the next LSOG is implemented. The other two versions supported will either be the latest two dot versions or in the case of initial implementation of an LSOG, the new LSOG and the next to last dot release of the retired LSOG. Sunset of the oldest LSOG will occur on the implementation date of the newest LSOG version. This versioning concept is further described in Attachment A (Interface Change Management Process - Versioning of Gateway Releases) to this POR.

Disputed Issue 2: Joint Testing, Section III.A of the POR should be revised as follows:

#### CLEC Joint Testing

By December 1, 2000 Ameritech Illinois will establish a testing environment for existing releases of its interfaces that will mirror the production environment, including interfaces, systems, databases and tables through creation of the service order. The test environment will be physically separate from the production environment. This will be termed the Current Release Testing environment. As new releases of its systems are implemented, the Current Release Testing environment will be refreshed to reflect the newly implemented systems and the removal of systems that are retired. Testing procedures for the Current Release Testing environment will enable CLECs to schedule testing during the business day where testing

time and testing resources will be managed by Ameritech so that CLECs can fairly share the Current Release Testing environment. Ameritech will maintain test accounts, test databases, and test transactions that CLECs can utilize to test transactions within the Current Release Testing environment.

Available for the March 2001 releases, Ameritech Illinois will establish provide for an Ameritech Illinois-CLEC Joint Testing environment process for the ordering application to application interface and the ordering GUI that employs a stable test environment, which mirrors the production environment through creation of the service order. This test environment would be termed the New Release Testing environment. This environment will be physically separate from the production environment. The New Release Testing environment test system will utilize a duplicated copy of the production systems in an environment that is simultaneously updated to incorporate production table changes. ~~The test environment will support the multiple versions that exist or, for release testing the multiple versions planned:~~ The New Release Testing environment will migrate into mirror the production environment upon completion of testing new releases of SBC systems per the CMP. until just prior to the commencement of CLEC testing for a release, at which time the environment will be updated to introduce the code for the new release to be tested. Test cases will be monitored while being processed when requested by the CLEC according to its Joint Release Test Plan in order to provide CLEC prompt feedback on test results. ~~Ameritech Illinois will make a limited window available for automatic processing of test orders. As a guideline, for release testing, this window will account for no more than 10% of the total test window and may be increased, decreased and set through the CMP.~~

For each new release testing period, Ameritech Illinois and each participating CLEC will negotiate a documented, customized test plan. Ameritech Illinois will provide a Joint Release Test Plan template that may be used in the development of the customized test plan. Each testing party will meet with Ameritech Illinois and agree on its own set of test scenarios that will be included in the test, applicable entrance and exit criteria, and a test schedule. Regression testing will be supported in limited scenarios as agreed in the documented test plan. A limited number of test accounts, test databases, and test transactions will be made available for during CLEC testing. Ameritech Illinois will provide the necessary number of test accounts, test databases, and test transactions for CLEC use in joint testing. In order to ensure that there is an adequate number of test accounts, and that these test accounts, test databases, and test transactions meet CLEC scenario requirements, CLECs must provide to Ameritech Illinois, at least two weeks prior to the commencement of the scheduled test period, their test account, test database, and test transaction needs for that specific test period. Ameritech Illinois will make testing available in accordance with the

timeframes specified in the CMP. The available testing timeframe shall be no less than thirty calendar days. Testing must be scheduled to end at least seven (7) calendar days prior to the scheduled implementation date, unless otherwise agreed between Ameritech Illinois and the CLEC.

A New Release Testing environment testing system for the Pre-ordering application to application interfaces also will be made available for testing the March 2001 release. This environment will be physically separate from the production environment. The New Release Testing environment will utilize a duplicated copy of the production systems. These systems will allow for testing of each pre-order function in a manner that utilizes production data, databases in read-only mode as necessary and tables. Standard test cases will be provided for each function. Test cases will be monitored while being processed when requested by the CLEC according to its Joint Release Test Plan in order to provide CLEC prompt feedback on the results of the test. For New release testing, Ameritech Illinois will provide a Joint Pre-Order Test Plan template that may be used in the development of a customized test plan. Each testing party will meet with Ameritech Illinois and agree on its own set of test scenarios that will be included in the test, applicable entrance and exit criteria, and a test schedule. Regression testing will be supported in limited scenarios as agreed upon in the documented test plan. Ameritech Illinois will provide the necessary number of test accounts, test databases, and test transactions for CLEC use in joint testing.

In order to ensure that there is an adequate number of test accounts, test databases, and test transactions, and that these test accounts, test databases, and test transactions meet CLEC scenario requirements, CLECs must provide to Ameritech Illinois, at least two weeks prior to the commencement of the scheduled test period, their test account, test database, and test transaction needs for that specific test period. Test cases may be reused from release to release. No "clean-up" or "resetting" of accounts is necessary. However, it will be necessary for CLECs to return TNs requested during test, in order not to deplete the pool of available TNs for use by all CLECs. Ameritech Illinois will make testing available in accordance with the timeframes specified in the CMP. The available testing timeframe shall be no less than thirty calendar days. Testing must be scheduled to end at least seven (7) calendar days prior to the scheduled implementation date, unless otherwise agreed by Ameritech Illinois and the CLEC. ~~The test environment will also be available for CLEC turn-up testing and for other CLEC testing between releases. This testing is to be negotiated between Ameritech Illinois and the CLEC that wishes to test. A generic test plan template is available.~~

Disputed Issue 4: Change Management Process - OIS Voting Process, Section 7.5.1 of Attachment A of the POR should be deleted and replaced with the following language:

7.5.1 Voting Requirements

A majority vote is required to change a release requirement, delay implementation of an EDI release, back out a release, or delay retirement of an interface. Any Qualified CLEC (defined above) participating on the OIS call may vote. SBC shall send notice of the OIS call to all registered CMPOCs in advance.

Disputed Issue 6: Hours of System Availability, Section III.H of the POR should be revised as follows:

With the introduction of the application to application and GUI ordering interfaces in March 2001, Ameritech Illinois will expand the hours when an LSR sent to Ameritech Illinois will be held for processing. This ordering interface will be available from seven days a week. If back-end systems are not available during any of this period, LSRs will be held and then processed when the back-end systems become available. These extended hours will provide CLECs with a common window for submitting LSRs from at least local time.

Interface availability for Pre-Ordering, Ordering, as well as Maintenance and Repair will be as follows:

Preorder

	<u>Monday - Friday</u>	<u>Saturday</u>	<u>Sunday</u>
Ameritech (CT)	<u>24 x 7</u>	<u>24 x 7</u>	<u>24 x 7</u>

Ordering

	<u>Monday - Friday</u>	<u>Saturday</u>	<u>Sunday</u>
Ameritech (CT)	<u>24 x 7</u>	<u>24 x 7</u>	<u>24 x 7</u>

Maintenance and repair

	<u>Monday - Friday</u>	<u>Saturday</u>	<u>Sunday</u>
Ameritech (CT)	<u>24 x 7</u>	<u>24 x 7</u>	<u>24 x 7</u>

Disputed Issues 9, 16, 19, 20, 21, 24 and 40: Interface Development Rule - Detailed Specification Requirements, Section III.A of the POR should be revised by adding the following language:

Ameritech Interface Development Rule

Simultaneously with its publication of interface specifications for the releases referenced in the revised Future Method of Operations agreed to in Phase 2 of the Illinois OSS Collaborative (Condition 29) SBC/Ameritech, as set forth below, will document its pre-ordering, ordering, and provisioning interface specifications consistent with the format and terminology used by the Telecommunications Industry Forum (TCIF) of the Alliance for Telecommunications Industry Standards (ATIS), using the industry conventions of inquiry/response and forms. SBC/Ameritech will also provide a mapping document that relates each data element defined in its interface requirements and business rules to its electronic interface specification for EDI and CORBA.

In its design of interfaces, interface specifications and documentation that are to be implemented in response to the following Designated Issues identified in the Condition 29 Collaboratives, SBC/Ameritech will establish data elements required in the pre-ordering, ordering, and provisioning interfaces to be consistent with data element names, format and structure as those are defined in the most currently adopted ATIS Local Service Ordering Guideline and EDI LSOG Mechanization Specification (hereinafter the "Initial Release Requirements"). CLECs and SBC/Ameritech will collaboratively review the Initial Release Requirements immediately upon release. Final Release Requirements will reflect the mutually agreed to requirements resulting from those collaborative sessions. The collaborative efforts will conclude upon the issuance of Final Release Requirements for each interface release. The parties acknowledge that CLECs may have disputes with the ways in which SBC/Ameritech has designed and developed its implementation of the resolutions to the issues and may not be able to resolve those disputes in collaboration with SBC/Ameritech.

Once the CLECs and SBC/Ameritech have concluded their collaborative review of the specifications and documentation released by SBC/Ameritech as Initial Release Requirements, the CLECs and Ameritech agree that one or more CLECs may petition the Illinois Commerce Commission for arbitration of any outstanding issues relating to the manner in which the Initial Release Requirements define SBC/Ameritech's implementation of the revised POR, consistent with the provisions, including the

complaint/arbitration provision, in Condition 29 for Phase 3. Condition 29 of the OSS Conditions provides 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 agreement obtained in Phase 2, or has not complied with the Commission's decision received in Phase 2, they may file a complaint with the Commission which shall arbitrate the issue(s) consistent with the procedures identified in Phase 2 except that this arbitration shall be concluded within 2 months."

The OSS enhancements that are the subject of Condition 29 must be designed, developed, implemented and tested to demonstrate that they effectively contribute to establishing a competitive framework for local services in Illinois. As such, the issues resolved in the collaborative, and any arbitrated for resolution in Phase 2 or Phase 3, are subject to third party testing according to Condition 29. Third party testing of the enhancements will not be completed until a report has been issued by the third party tester which satisfactorily identifies the deficiencies of any tested enhancements and recommends a practical method and timetable for correcting such deficiencies.

Data elements in the SBC/Ameritech specification will support ordering and provisioning for all products and services that SBC/Ameritech offers in its wholesale tariffs or under any other arrangements it makes with state and federal regulators.

Disputed Issue 11: Retain Current Listings, the following language under Section

III.C of the POR should remain as is, and read as follows:

Ameritech Illinois will implement a process to allow CLECs the option to retain current listings on all orders, by March 2001.

Disputed Issue 13: Customer Service Record Address Validation, the fourth paragraph of Section III.C of the POR should be revised as follows:

Ameritech Illinois will do an abbreviated TN/address validation on all conversion retail, resale, CPO, and loop with portability orders, line sharing and all other order types, including standalone DSL Loops, that include a telephone number of an existing Ameritech service. This will be implemented by December 2000 using business rules that are collaboratively developed in the Change Management Process.

Disputed Issue 13: Customer Service Record Address Validation, the following should be added after the fourth paragraph of Section III.C of the POR:

By March, 2001, Ameritech Illinois will develop and implement a process for synchronizing its Customer Service Record addresses to conform with the valid street addresses as reflected in its Street Address Guide. This process will also be designed to maintain synchronicity between the Customer Service Record address and Street Address Guide records.

Disputed Issue 18: Flow Through, Section III.C of the POR should be revised by adding the following language:

Flow Through

Flow through of orders received over the application-to-application interface occurs when those orders are processed through the Ameritech interface and OSS and result in the generation of service orders in the service order processor, all without manual processing. Ameritech Illinois will publish its list of service types and orders types that are designed to flow through its systems, and identify exceptions to those that cause the orders to require manual processing, for review in each Change Management Process meeting. The first publication of this list occurred in August, 2000.

By March, 2001, Ameritech will reduce by fifty percent the exceptions as of August, 2000 that cause manual processing where those orders would otherwise be eligible to flow through. In each subsequent six month period, Ameritech will increase the types of orders that flow through by no less than 50% and will reduce by 50% the exceptions that remain for otherwise flow through eligible orders. Ameritech will publish its flow through results monthly according to two (2) measures and make those results available in each Change Management Process meeting. Individual CLEC results are to be kept confidential between Ameritech and the individual CLEC.

Measurement A. Percent of electronically received orders that flow through which are designed to flow through.

Disaggregations: product; state, individual CLEC and CLEC aggregate.  
Retail analogs: Orders entered into the service order processor that do not fall out for manual processing or error correction.

Disaggregations: POTS; Special Services; Affiliates

Measurement B. Percent of electronically received orders that flow through.

Disaggregations: product; state, individual CLEC and CLEC aggregate.

Retail analogs: Orders entered into the service order processor that do not fall out for manual processing or error correction  
Disaggregations: POTS; Special Services; Affiliates

Disputed Issue 19: Ordering Graphical User Interface (GUI), Section III.K of the POR should be revised as follows:

**Ordering Graphical User Interface (GUI)**

1. Release Announcement 10/2000
2. Implementation 12/2000

Disputed Issue 42: Unsolicited 865 Transactions, Section III.C of the POR should be revised as follows:

It is anticipated that there will always be reasons for an unsolicited message to be sent. The appropriate data will be included i.e., ~~PON~~, that will allow the CLEC to associate the response to the appropriate request.

Disputed Issue 46: Hot Cuts: Coordinated Issues and Procedures, Section III.D should be added to the POR and should read as follows:

Hot Cuts

SBC/Ameritech shall provide a hot cut process consistent with the process outlined in its July 18, 2000 document with the following exceptions:

SBC/Ameritech shall perform pre-cutover test procedures forty-eight (48) hours prior to the scheduled cut time. These procedures shall be designed to identify potential problems with a hot cut and allow sufficient time for Ameritech and/or the involved CLEC to resolve the problem in a timely manner or reschedule the order.

- SBC/Ameritech shall lay in jumpers between the connecting facility assignment (CFA) appearance on the IDF/MDF and the MDF appearance of the cable pair assigned to the unbundled loop order at least 48 hours prior to the due date. Once the jumpers are laid in, Ameritech will perform an ANI test using the telephone number assigned by the CLEC. This test shall be conducted in a manner which verifies the number assigned by the CLEC and uses the laid in

jumpers between the cable pair's MDF appearance and the CFA to ensure connectivity.

- Within one hour of completion of such testing, SBC/Ameritech shall immediately identify and correct any deficiencies found in their equipment and facilities, and notify the involved CLEC of any CFA, dial tone or switch translation problems identified in the CLEC's network.
- SBC/Ameritech will provide 3-day provisioning intervals consistent with that of its sister company SWBT.

Disputed Issue 47: Hot Cuts: Desired Frame Due Time, Section III.D of the POR should be revised to include the following language:

By December 1, 2000, SBC/Ameritech shall implement the system, operations, process, and procedure changes that enable CLECs to specify a frame due time in their order.

Disputed Issue 62: Directory Listing Ordering and Inquiry, Section III.C of the POR should be revised as follows:

As part of the SBC Uniform and Enhanced OSS plan, the capability to order directory listings integrated into the current EDI/LSR loop ordering processes will be provided not later than March 2001.

Disputed Issue 73: UNE-P: Ordering, Billing, Section V, Glossary, should be revised as follows:

CPO Combined Platform Offering - An Ameritech unbundled Network element platform (loop with port) offering. This offering applies to existing as well as new customers, and to customers requesting second or additional lines.

Disputed Issue 73: UNE-P Ordering, Billing, Section III.F should be revised as follows:

Where necessary to be consistent with the most current version of industry standards and guidelines, Ameritech Illinois will update these billing interfaces. Ameritech will implement the Carrier Access Billing System

(CABS) billing format to support billing for all UNEs, combinations of UNEs and interconnection arrangements by December 2000.

Disputed Issue 73: UNE-P Ordering, Billing. Section III.K Billing should be revised by adding the following language:

**CABS Enhancement**

- Implementation 12/2000