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February 27, 2001

**Via E-Mail Followed By Hand Delivery**

Hearing Examiner Eve Moran  
Illinois Commerce Commission  
160 North LaSalle  
Chicago, Illinois 60601

Hearing Examiner Leslie D. Haynes  
Illinois Commerce Commission  
160 North LaSalle  
Chicago, Illinois 60601

Re: *Docket No. 00-0592*

Hearing Examiners Moran and Haynes:

Covad Communications Company (“Covad”) opposes the amended Plan of Record for Operational Support Systems (“OSS”) filed by Ameritech today in the above-captioned proceeding. Covad does not join in this filing because the amended Plan of Record fails to detail how Ameritech will implement the requirements of the Commission’s January 24, 2001 Order (“OSS Order”) regarding terminal makeup information (Issues 29/31).<sup>1</sup>

Condition 29 of the Illinois Merger Order requires Ameritech to prepare a Plan of Record that includes “an overall assessment of SBC’s and Ameritech’s existing OSS interfaces, business processes and rules, hardware and data capability, and security provisions, and differences, and the application-to-application interfaces and graphical user interfaces for OSS, as well as integrating their OSS processes.” (Order, Docket No. 98-0555 at 251). The Plan of Record must also identify OSS interfaces, enhancements, and business requirements resulting from Phase II of Condition 29. (Order, Docket No. 98-0555 at 251). As you know, Phase II was conducted in this docket. In the OSS Order, the Commission directed that a Plan of Record be filed that reflects the Commission’s findings. However, Ameritech’s amended Plan of Record fails to provide the required specifics regarding terminal makeup information.

In its amended Plan of Record, Ameritech simply states: “Ameritech Illinois will provide sufficient information on terminal make-up, i.e. information on the engineering

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<sup>1</sup> Covad also opposes Ameritech’s proposed Plan of Record language implementing Issue 13 (lite address validation) as it too narrowly interprets the Commission’s Order. Covad, along with Rhythms Links, Inc. and McLeodUSA Telecommunications Services, Inc, filed an Application for Rehearing on February 23, 2001 on this issue, and therefore will not address that matter herein.

capability of the system, in order for CLECs to determine the type of services they may offer to end customers.” This language fails to identify any of the OSS interfaces, enhancements, or business requirements required to provide CLECs with access to terminal makeup information, as required by the Commission’s OSS Order. In other words, Ameritech’s proposed Plan of Record fails to identify how Ameritech will actually implement the Commission’s OSS Order, and in what manner and through what interfaces Ameritech will provide CLECs with access to terminal makeup information by the Commission’s March 2001 deadline. Despite several attempts to reach resolution regarding this issue, Covad and Ameritech were unable to agree to the language that would implement the Commission’s order.

Covad strongly believes that the current version of the POR being proffered by Ameritech fails to meet the requirements of both Condition 29 and the OSS Order. Moreover, Covad strongly believes that the lack of detail on how Ameritech will comply with the requirements in the OSS Order concerning terminal makeup information will likely lead to additional litigation. To remedy this deficiency and avoid this result, Covad proposes that the following language be included in the amended Plan of Record:

Ameritech Illinois will provide a pre-ordering function through its EDI, CORBA, and GUI interfaces that will allow CLECs to inquire about the configuration of a particular remote terminal. Ameritech Illinois will accept the terminal address or CLLI code and respond with the information which will identify all the F1 loops, including dark fiber, connected to the remote terminal, and provide detailed information about the data services offered over those loops. The response will also include the make and model of the remote terminal as well as spare capacity information for data/voices service line cards.

Covad respectfully requests that the Commission require Ameritech to include the aforementioned language regarding terminal makeup information in the final Plan of Record. Absent specific language regarding interfaces, enhancements, and business requirements, Covad and other CLECs cannot be assured that Ameritech will implement

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the Commission's Order in a manner that will allow them to benefit from the enhanced OSS functionalities that the Commission ordered Ameritech to provide.

Very truly yours,

Felicia Franco-Feinberg

cc: Donna Caton  
Service List