

**DIRECT TESTIMONY OF ROBIN L. JACOBSON
ON BEHALF OF AMERITECH ILLINOIS**

ILLINOIS
COMMERCIAL COMMISSION
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1 **I. INTRODUCTION**

2
3 **Q. PLEASE STATE YOUR NAME AND OCCUPATION.**

4
5 A. I am Robin L. Jacobson, Area Manager-OSS Regulatory Support and Reporting for SBC
6 Communications, Inc. ("SBC"), supporting the Operations Support Systems ("OSS")
7 regulatory activities of Ameritech Illinois. My office is located at 200 Center Street
8 Promenade, Room 735, Anaheim, CA 92805.

9 **Q. WHAT ARE YOUR RESPONSIBILITIES AS AREA MANAGER-OSS**
10 **REGULATORY SUPPORT AND REPORTING?**

11 A. I am responsible for addressing regulatory matters related to SBC local telephone companies'
12 OSS used by Competitive Local Exchange Carriers ("CLECs").

13
14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 A. The purpose of my testimony is to illustrate how Ameritech Illinois has complied with its
16 legal and contractual obligations in providing CLECs with nondiscriminatory access to loop
17 qualification information, for use by CLECs for the pre-ordering, ordering and provisioning
18 of DSL services that use line shared local loops. In particular, I will address Issue 8.

19

1 **II. ISSUE 8**

2 **Q. SHOULD CLECS HAVE DIRECT, ELECTRONIC AND MANUAL ACCESS TO**
3 **AMERITECH ILLINOIS' OSS THAT CONTAIN LOOP MAKEUP INFORMATION,**
4 **INCLUDING DATABASES SUCH AS LFACS AND TIRKS?**

5 A. Under the Telecommunications Act of 1996, as interpreted by the Federal Communications
6 Commission ("FCC"), Ameritech Illinois has an obligation to provide CLECs with
7 nondiscriminatory access to its OSS. The FCC has stated that an incumbent local exchange
8 carrier ("ILEC") such as Ameritech Illinois must provide competing carriers access to OSS
9 functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing that
10 is equivalent to what the ILEC provides to itself, its customers or other carriers. Ameritech
11 Illinois has developed and continues to enhance CLEC access to pre-ordering functionality
12 through EDI consistent with FCC requirements.

13 **Q. WHAT RECENT ACTIONS HAS AMERITECH ILLINOIS TAKEN TO INSURE**
14 **CONTINUED COMPLIANCE WITH ITS OBLIGATION TO PROVIDE**
15 **NONDISCRIMINATORY ACCESS TO ITS OSS?**

16 A. On April 3, 2000, Ameritech Illinois deployed additional DSL loop qualification
17 functionality, as specified in the collaborative Advanced Service Plan of Record ("POR")
18 filed with the FCC April 3, 2000. In addition, the Advanced Services POR provides ordering
19 enhancements to be implement May 17, 2000.

20 **Q. RHYTHMS AND COVAD CLAIM THAT THEY WANT ACCESS TO BACK-**
21 **OFFICE SYSTEMS. IS THIS REASONABLE?**

22 A. No, Rhythms' position is not reasonable. Ameritech Illinois has an obligation to provide
23 CLECs with nondiscriminatory access to OSS functions. Ameritech Illinois has fulfilled this

III. C.C. Docket 00-0312 and 00-0313
Ameritech Illinois Ex. 3.0 (Jacobson)

1 obligation by designing, deploying and enhancing “gateways” for CLECs that provide a
2 single entry point for pre-ordering, ordering, maintenance and repair, and billing of local
3 services, including line shared loops. These gateways give the CLECs the ability to provide
4 local service to their end users using one interface per function. Using a single gateway, a
5 CLEC can access pre-ordering information, such as the Customer’s Service Record; obtain
6 a telephone number assignment; validate a service address or listing; and do other things.
7 If a CLEC were to access each back office system individually, the CLEC would receive
8 information in various, cryptic formats. The CLEC would also have to train employees to
9 interpret the pre-ordering information from each system, then create systems to translate that
10 data into the required Local Service Request format for ordering.

11
12 In the collaboratives for the Uniform and Enhanced OSS POR, CLECs have repeatedly
13 demanded that information obtained from pre-ordering be consistent with the required entries
14 in ordering. CLECs that attended the collaboratives developed the following language in the
15 POR to address this issue: “The data elements returned from a pre-order inquiry will be in
16 the same format with the same content, valid values, and data element characteristics as on
17 the LSR for ordering and that such synchronization will be maintained through the order and
18 pre-order process.” SBC has agreed to make this possible, pending investigation of
19 regional differences. This is one of the reasons that the industry has developed guidelines
20 for gateways, e.g., EDI for pre-ordering and EDI for ordering. Using these gateways is an

1 elegant way to transmit the information that CLECs seek.

2 **Q. HAS THE ISSUE OF PROVIDING LOOP QUALIFICATION INFORMATION BEEN**
3 **RAISED IN OTHER FORUMS AND PROCEEDINGS?**

4 A. Yes, and Ameritech Illinois has enhanced and plans to enhance its OSS accordingly. For the
5 pre-ordering and ordering of DSL, including loop qualification, the FCC and Illinois
6 Commerce Commission ("ICC") have promulgated the following orders and conditions: 1)
7 the SBC/Ameritech Merger Conditions issued on October 8, 1999, 2) the FCC Third Report
8 and Order and Fourth Notice of Proposed Rule Making in CC Docket No. 96-98 ("UNE
9 Remand Order"), 3) the FCC Fourth Report and Order in CC Docket No. 96-98 ("*Line*
10 *Sharing Order*"), and 4) ICC Merger Conditions and Illinois POR collaboratives. As part
11 of the SBC/Ameritech merger conditions and as stated above, SBC, including Ameritech
12 Illinois, and numerous interested CLECs, including Rhythms, collaborated to develop an
13 Advanced Services POR. In the collaboratives, CLECs and Ameritech Illinois set forth their
14 desired improvements to loop qualification and loop ordering. CLEC input has provided
15 insight into how best to enhance the DSL pre-ordering and ordering processes, including line
16 sharing. This collaborative process has resulted in the development of a Future Method of
17 Operation ("FMO") as documented in the Advanced Services POR.

18

19 Ameritech Illinois will also comply with the requirements set forth in the FCC's UNE
20 Remand Order relating to loop qualification, and has and will continue to comply with the
21 *Line Sharing Order*. In addition, Ameritech Illinois will host Illinois DSL, including line

1 sharing, collaboratives with interested CLECs per the ICC merger conditions.

2 **Q. WHAT LOOP MAKE-UP INFORMATION SHOULD BE PROVIDED BY**
3 **AMERITECH ILLINOIS' LOOP QUALIFICATION TOOL FOR LINE-SHARING**
4 **UNE ORDERS?**

5 A. The loop make-up information should be that which is required for DSL capable loops under
6 the parties' interconnection agreements. In addition, however, Ameritech Illinois has made
7 and will continue to make OSS improvements. As noted, Ameritech Illinois' OSS pre-
8 ordering system, EDI, was improved on April 3, 2000. Ameritech Illinois' OSS ordering
9 systems, EDI, was enhanced on May 17, 2000, as the CLECs know.

10

11 Ameritech Illinois has or will be providing the following OSS functionality for loop
12 qualification consistent with the POR:

- 13 • Loop length (includes both the feeder pair (F1) and the distribution pair to the
14 customer's terminal (F2))
- 15 • Loop length by segment
- 16 • Length by gauge
- 17 • 26 gauge equivalent loop length (calculated)
- 18 • Presence of load coils
- 19 • Quantity of load coils (if applicable)
- 20 • Presence of bridged taps
- 21 • Length of bridged taps (if applicable)
- 22 • Presence of pair gain/Digital Loop Carrier ("DLC")
- 23 • Qualification status of the loop based on specified Power Spectral Density mask
24 ("PSD"). If no PSD class is specified, the default PSD is class 5 (ADSL)

- 1 • Source of data – actual or designed

2 In addition, the following information will be returned when present in the “backend” system
3 of Ameritech Illinois:

- 4 • Location of load coils
5 • Presence of repeaters
6 • Location of repeaters
7 • Quantity of repeaters
8 • Type of plant (aerial or buried)
9 • Type of loop (copper or fiber)
10 • Portion of loop that is copper or fiber*
11 • Length of loop that is copper or fiber
12 • Availability of spare facilities*
13 • Location of bridged tap
14 • Quantity of bridged tap by occurrence
15 • Location of bridged tap by occurrence
16 • Quantity of range extenders
17 • Location of range extenders
18 • Number of gauge changes
19 • Location of pair gain devices
20 • Type of DLC
21 • Location of DLC
22 • Quantity of DLC

- 1 • Presence of DAML
- 2 • Presence of disturbers in same or adjacent binder groups
- 3 • Loop medium
- 4 • Whether the loop originates at a Remote Switching Unit (RSU)
- 5 • Location of RSU
- 6 • Type of Remote RSU
- 7 • Resistance zone

8 * To be provided in the July 22, 2000 release.

9
10 In addition, Ameritech Illinois has also committed to populating existing databases in all
11 operating regions on a going forward basis as individual manual requests for loop
12 qualification information are received and performed by Ameritech Illinois engineers.

13 In summary, the pre-ordering capabilities for DSL, including Line Sharing, will return all
14 loop qualification information that is available electronically when requested via Ameritech
15 Illinois' EDI electronic pre-ordering interface.

16 **Q. SHOULD AMERITECH ILLINOIS BE REQUIRED TO PROVIDE A WEB-BASED**
17 **GRAPHICAL USER INTERFACE ("GUI") UNTIL SUCH TIME AS AMERITECH**
18 **ILLINOIS PROVIDES AN ELECTRONIC INTERFACE TO PERFORM ALL PRE-**
19 **ORDERING FUNCTIONS, INCLUDING ACCESSING ALL INFORMATION IN**
20 **SYSTEMS AND DATABASES CONTAINING LOOP MAKE-UP INFORMATION?**

21 **A.** Although Ameritech Illinois does not currently provide a GUI, both the Advanced
22 Services Enhanced POR and the Uniform and Enhanced OSS POR document the addition
23 of GUIs to the Ameritech Illinois suite of OSS. Per the Advanced Services POR, in

1 September of 2000, Ameritech Illinois will make Loop Qualification available. In
2 addition, the Uniform and Enhanced POR timelines will make available to CLECs in
3 Ameritech Illinois region the enhanced web-based pre-ordering Verigate GUI in March
4 2001.

5
6 In the interim, Ameritech Illinois enhanced its existing EDI pre-ordering interfaces on April
7 3, 2000. These enhancements provide CLECs with an electronic interface to perform all pre-
8 ordering functions, including accessing all available Loop Make-up Information contained
9 in systems and databases.

10 **III. ADDITIONAL COMMENTS ON RHYTHMS' AND COVAD'S ARGUMENTS**

11 **Q PLEASE RESPOND TO RHYTHMS' REQUEST FOR INTEGRATED ORDERING**
12 **AND PRE-ORDERING FUNCTIONALITY OF PROVIDING LOOP MAKEUP**
13 **INFORMATION.**
14

15 This issue was raised in the Uniform and Enhanced OSS POR collaboratives and following
16 discussions, as previously stated in this testimony, CLECs and SBC agreed to add language
17 to meet the CLEC's need. This language is as follows:

18 **The data elements returned from a pre-order inquiry will be in the same format**
19 **with the same content, valid values, and data element characteristics as on the**
20 **LSR for ordering and that such synchronization will be maintained through the**
21 **order and pre-order process.**

22 SBC has agreed to make this possible, pending the investigation of regional differences. In

1 addition, a CLEC has the option of integrating its pre-ordering and ordering application-to-
2 application interface on its side. Ameritech Illinois provides the documentation on each
3 interface to assist a CLEC in this process.

4
5 **Q. RHYTHMS AND COVAD ARGUE THAT THEY ARE ENTITLED TO MORE**
6 **THAN JUST LOOP PROVISIONING INFORMATION THAT IS AT PARITY WITH**
7 **AMERITECH ILLINOIS' RETAIL ADSL OPERATIONS AND THAT THEY ARE**
8 **ENTITLED ACCESS TO THE SAME LOOP QUALIFICATION INFORMATION**
9 **UTILIZED BY AN ILEC'S RETAIL OPERATIONS OR SERVICE**
10 **REPRESENTATIVE. (Rhythms Ex. 2.0 at 12 (Baros)). HOW DO YOU RESPOND?**

11
12 **A.** Ameritech Illinois is providing CLECs the same loop qualification information that is being
13 provided to its retail operations. The latest enhancement to EDI on May 17, 2000 provided
14 this capability.

15 **Q. RHYTHMS AND COVAD ARGUE THAT AMERITECH ILLINOIS IS ONLY**
16 **PROVIDED FILTERED ACCESS TO THE DATA THAT THEY SEEK AND THAT**
17 **FILTERED ACCESS MAY BE DISCRIMINATORY. (Covad Ex. 1.0 at 21 (Moya)).**
18 **HOW DO YOU RESPOND?**

19
20 **A.** Rhythms and Covad are wrong. Ameritech Illinois is not providing filtered information.
21 The gateway merely converts data base information into a standard format. The information
22 provided to CLECs is the same as the information in Ameritech Illinois' data basis and is not
23 filtered in any way.

24 **Q. RHYTHMS AND COVAD ARGUE THAT AMERITECH ILLINOIS SHOULD**
25 **PROVIDE LOOP PROVISIONING INFORMATION BASED ON THE INDIVIDUAL**
26 **TELEPHONE NUMBER OR ADDRESS OF AN END-USER IN A PARTICULAR**
27 **WIRE CENTER OR NXX CODE. (Rhythms Ex. 2.0 at 21 (Baros)). HOW DO YOU**
28 **RESPOND?**

29
30 **A.** Ameritech Illinois does provide CLECs the capability to receive loop information for line

1 sharing based on an individual telephone number. This capability was part of the EDI
2 improvements which occurred on April 3, 2000.

3
4 **IV. CONCLUSION**

5
6 **Q. CAN YOU SUMMARIZE YOUR TESTIMONY?**

7 A. Yes. The same pre-ordering and ordering functionality applies whether the service in
8 question uses line sharing or not. Ameritech Illinois has an obligation to provide
9 nondiscriminatory access to OSS functionality and this includes access to loop make-up
10 information. It is not required or desirable that Ameritech Illinois give direct access to
11 Ameritech Illinois' back office systems in order for Ameritech Illinois to provide the same
12 level of information provided to itself, its customers or other carriers. These CLEC
13 interfaces consolidate the desired information in a single interface that is far superior
14 operationally to multiple interfaces. As an ILEC, Ameritech Illinois is not required to
15 develop new or improved databases for CLECs. At such time as Ameritech Illinois does
16 create a new or improved database, however, Ameritech Illinois is under an obligation to
17 make that same information available to CLECs. Ameritech Illinois will meet this
18 obligation.

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes.