

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Direct Testimony of Jan D. Rogers
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 9.0

January 28, 2002

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20 **Q. How long have you served in that capacity and what is your telecommunications**
21 **experience?**

22 A. I began my career with Southwestern Bell in 1987. I have held various positions in
23 Corporate Communications, Advertising, Benefits Administration, and Industry Markets
24 organizations. From August 1996 to May 1999, I was responsible for resale
25 implementation, Competitive Local Exchange Carrier (“CLEC”) education, and Operator
26 Services interconnection agreement language and negotiation support in Southwestern
27 Bell’s Local Interconnection and Resale organization. I began my current assignment as
28 Director-Regulatory for SBC’s Operator Services staff in June 1999.

29
30 **Q. What is your educational background?**

31 A. I attended the University of Oklahoma in Norman, Oklahoma, where I earned a Bachelor
32 of Arts degree in Journalism in May 1975. I completed a Masters degree in Business
33 Administration at Washington University in St. Louis, Missouri in August 1998. While
34 working for the Company, I have attended a number of seminars and other training
35 sponsored by the Company, and other industry organizations on various management
36 subjects.

37
38 **Q. What is the purpose of your testimony?**

39 A. The purpose of my testimony is to demonstrate that Ameritech Illinois is in compliance
40 with the requirements to provide nondiscriminatory access to directory assistance
41 services to allow the other carrier’s customers to obtain telephone numbers, operator call
42 completion services as required by sections 251(b)(3) and 271(c)(2)(B)(vii)(II) and (III)

43 of the Federal Telecommunications Act of 1996 (“Act”). A detailed discussion of the
44 Company's compliance is contained in my affidavit, attached as Schedule JDR-1 to my
45 testimony. I will also address certain issues relating to my affidavit which arose during
46 industry workshops held in this proceeding.

47

48 **II. BRANDING OF OPERATOR AND DIRECTORY ASSISTANCE SERVICES**

49 **Q. During industry workshops in this proceeding certain parties complained that it**
50 **takes five business days from the time a customer has migrated its service to a**
51 **CLEC before the customer’s OS/DA service is properly branded in the CLEC’s**
52 **name. As an initial matter can you explain what is branding for Operator and**
53 **Directory Assistance services?**

54 A. As explained in more detail in paragraph 25 of my initial affidavit attached as Schedule
55 JDR-1, Ameritech Illinois provides the capability to brand CLEC subscribers’ OS/DA
56 calls in the CLEC’s name, before the call is answered by an operator, when the CLEC
57 chooses Ameritech Illinois to provide those wholesale services. Thus, when a CLEC
58 subscriber dials “zero” for operator services or “411” for directory assistance, the caller
59 will hear the name of his or her local exchange carrier, if the CLEC has subscribed to
60 Ameritech Illinois’ wholesale branding service. This branding capability is identical to
61 branding Ameritech Illinois provides to itself for its retail subscribers.

62

63 **Q: Can you explain how Ameritech Illinois brands OS/DA calls in the name of a CLEC,**
64 **even though Ameritech Illinois’ own operators handle the call?**

65 A. As I detailed in paragraph 25 of my initial affidavit attached as Schedule JDR-1,
66 Ameritech Illinois offers to brand CLEC subscribers' OS and DA calls with the name of
67 their local exchange provider. The ability to brand CLEC subscribers' calls with CLEC-
68 specific names is provided both to switch-based carriers as well as resale and UNE-based
69 CLECs using Ameritech Illinois' unbundled local switching. Ameritech Illinois brands
70 CLEC subscribers' calls with CLEC-specific information, in the same manner that it
71 brands its own subscribers' calls. Ameritech Illinois uses the same 271-compliant
72 process used by Southwestern Bell Telephone ("SWBT") and approved by the FCC in
73 271 proceedings for Texas, Kansas, Oklahoma, Missouri and Arkansas. As noted in my
74 affidavit, when a switch-based CLEC selects Ameritech Illinois to provide wholesale OS
75 and/or DA services on the CLEC's behalf, calls initiated by the CLEC's subscriber are
76 routed to Ameritech Illinois' operator platform via dedicated trunks. Branding of OS and
77 DA calls coming to Ameritech Illinois' operator switch via dedicated trunks has long
78 been available.

79
80 Q. **Is branding of OS/DA services also available on CLECs' resale and UNE-P OS/DA**
81 **calls coming to Ameritech Illinois over shared trunks?**

82 A. Yes. In 2000,² Ameritech Illinois deployed the capability to provide CLEC-specific
83 branding of OS and DA calls for CLECs that compete by reselling Ameritech Illinois'
84 service, or by obtaining access to Ameritech Illinois' unbundled network elements. OS
85 and DA calls from resale and UNE-based CLECs' subscribers arrive at Ameritech
86 Illinois' operator platform from Ameritech Illinois' end office (dial tone) switches via
87 shared trunks, just as Ameritech Illinois' retail subscribers calls are routed. Ameritech
88 Illinois deployed technology that would allow the operator platform to determine which
89 local exchange carrier served a specific subscriber when an OS or DA call arrived at the
90 Ameritech Illinois operator switch from a shared trunk.

91

92 **Q. How do you respond to comments that it takes five business days from the time a**
93 **customer has migrated its service to the CLEC before the customer's OS/DA service**
94 **is branded in the new local exchange carrier's name?**

² Accessible Letter CLECAM00-074, issued August 1, 2000, details the capability that Ameritech Illinois developed and deployed to brand a CLEC's OS/DA calls that come to Ameritech Illinois's platform over shared trunks (i.e. calls that originate on Ameritech Illinois's end office switches and are routed to Ameritech Illinois's operator platform on the same trunks as calls from Ameritech Illinois's retail customers).

95 A. The concern about a possible five-day interval to change branding is based on old
96 information and is no longer relevant. In the fourth quarter 2001, Ameritech Illinois
97 further refined its OS/DA branding capability to utilize information in the Line
98 Information Database (“LIDB”) to trigger OS/DA branding. Ameritech Illinois utilizes
99 LIDB’s Originating Line Number Screening (“OLNS”) capability to determine which
100 local exchange carrier serves the caller -- a change that is transparent to CLECs as well as
101 Ameritech Illinois’ subscribers. Ameritech Illinois is utilizing OLNS to obtain carrier-
102 specific designation for OS/DA calls from Ameritech Illinois and CLEC subscribers
103 whose calls are routed from Ameritech Illinois’s end office switches to Ameritech
104 Illinois’s operator platform.³ Whatever the interval between migration and changes in
105 carrier-specific branding, however, the CLEC concerns are of no competitive
106 significance. OS/DA branding changes triggered by a subscriber’s migration from one
107 local exchange carrier to another are the same for Ameritech Illinois subscribers and
108 CLEC subscribers.

109
110 **Q. Is this OS/DA branding process any different from when a subscriber migrates local**
111 **exchange service from a CLEC to Ameritech Illinois?**

³ Prior to the recent refinement of the OS/DA branding process, the possible interval to change branding was up to five days using a table populated with per-subscriber-line carrier information. However, the interval generally was much shorter. Since the table update was downstream from the migration process, there was a period of time before a subscriber’s carrier OS and DA branding was changed to its new local service provider. This was as true for Ameritech to CLEC migrations as it was for CLEC to Ameritech migrations. Now Ameritech’s operator platform obtains carrier-specific information from the LIDB database to trigger OS/DA branding. LIDB is updated more quickly than the table initially utilized to trigger OS/DA branding.

112 A. No, the process is the same, implemented in the same timeframe. With information from
113 LIDB that is specific to which local exchange carrier serves the calling telephone line,
114 Ameritech Illinois' operator switch "plays" the CLEC-specific or Ameritech Illinois
115 brand.⁴ Thus, subscribers of resale and UNE-based CLECs' local exchange service, as
116 well as Ameritech Illinois' retail subscribers, can hear their carrier-specific brands after
117 dialing "zero" for operator services or "411" for directory assistance. Ameritech Illinois
118 uses the same 271-compliant process used by SWBT for its CLEC customers. As in
119 SWBT states, the OS/DA branding process in Ameritech Illinois is dependent upon
120 completion and posting of service orders to migrate local exchange service from one
121 provider to another. After the service order migration information flows through
122 Ameritech Illinois' operations support systems and is completed and posted, the new
123 carrier information flows down to LIDB. The process is the same whether a subscriber
124 migrates from Ameritech Illinois to a CLEC's local exchange service or from a CLEC to
125 Ameritech Illinois' local exchange service. The most important point is that all callers to
126 Ameritech Illinois' operator platform are treated the same, regardless of the subscriber's
127 local exchange carrier. Subsequent to service order completion and posting, any
128 branding change interval resulting from migration of a subscriber from Ameritech
129 Illinois' local exchange service to a CLEC's resold or UNE-based local exchange service
130 is the same as when a CLEC subscriber migrates to Ameritech Illinois' local exchange

⁴ A CLEC's brand is "played" when the CLEC has subscribed to Ameritech Illinois' OS/DA wholesale branding offer.

131 service.⁵ Branding of OS and DA calls handled by Ameritech Illinois is provided on a
132 nondiscriminatory parity basis.

133

134 **III. CLEC VERIFICATION CAPABILITIES FOR LISTINGS USED IN**
135 **AMERITECH'S DIRECTORY ASSISTANCE DA DATABASE.**

136

137 **Q. Another issue that came up at the industry workshop was whether Ameritech**
138 **Illinois provides CLECs the capability to verify the presence and accuracy of their**
139 **subscribers' directory listings. Is there such a process?**

140 A. Yes. Ameritech Illinois provides CLECs the capability to verify their listings used in
141 Ameritech Illinois' DA database. Both Ameritech Illinois' subscriber listings and CLEC
142 subscriber listings in Ameritech Illinois' DA database flow from the White Page ("WP")
143 database. As detailed in the testimony of Robben Kniffen-Rusu, Ameritech Illinois
144 CLECs have the capability to verify the presence and accuracy of their respective
145 subscribers' listings in the WP database, which then flow to Ameritech Illinois' DA
146 database. To the extent that a CLEC chooses to use the listing verification tools available
147 to it, the CLEC has the capability to verify the presence and accuracy of its subscribers'
148 listings, both in the WP database and in the downstream DA database.

149

150 **Q. Has the capability to verify CLEC directory listings been approved elsewhere?**

⁵ A CLEC might inaccurately argue that customer confusion results during any interval between carrier-to-carrier migration and changes in branding. However, most subscribers rarely use Operator or Directory Assistance services on a daily basis, so it would be unreasonable to conclude that customer confusion results during a short migration interval.

151 A. Yes. The ability to verify listings in the WP database, which “feeds” the DA database,
152 was approved by the FCC in SWBT’s section 271 proceedings for Texas, Oklahoma,
153 Kansas, Arkansas and Missouri. Ameritech Illinois provides CLECs a listing verification
154 process that is also 271-compliant.

155

156 **IV. CONCLUSION**

157 **Q. Does Ameritech Illinois fulfill its obligations under sections 251(b)(3) and**
158 **271(c)(2)(B)(vii)(II) and (III) of the Act?**

159 A. Yes. Ameritech Illinois provides CLECs nondiscriminatory access to its OS and DA
160 services and includes CLECs’ listings in its DA database on the same basis it does for
161 Ameritech Illinois’ retail subscribers.

162

163 **Q. Does this conclude your direct testimony?**

164 A. Yes.