

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Direct Testimony of Robben Kniffen-Rusu
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 8.0

January 28, 2002

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1 **DIRECT TESTIMONY OF ROBBEN KNIFFEN-RUSU**

2 **ON BEHALF OF AMERITECH ILLINOIS**

3
4 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

5 **Q. Please state your name and business address.**

6 A. My name is Robben Kniffen-Rusu. My business address is 100 East Big Beaver, Floor
7 13, Troy, Michigan 48083.

8
9 **Q. By whom are you employed and in what capacity?**

10 A. I am currently employed by Ameritech Advertising Services (“AAS”), the directory
11 publishing affiliate of Ameritech Illinois. My title is Director - CLEC Strategy.

12
13 **Q. What are your duties and responsibilities in that capacity?**

14 A. In the position of Director-CLEC Strategy, I am responsible for facilitating the
15 relationship between competing local exchange carriers (“CLECs”) and AAS. These
16 activities include negotiating listing and directory services agreements with CLECs on
17 behalf of AAS and directing the implementation of processes to support the terms of
18 these agreements. I also assist Ameritech Illinois in meeting its legal and regulatory
19 requirements relating to White Page directory operations.

20
21 **Q. How long have you served in that capacity?**

22 A. I began my current assignment as Director-CLEC Strategy for AAS in October 1999.

23

24 **Q. What is your telecommunications experience?**

25 A. I began my career with Ameritech in 1990. I have held various positions in the
26 information technology, legal, marketing and publishing departments. Most relevant to
27 this proceeding is the fact that I have been involved in supporting CLEC activity for five
28 years.

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

31 A. I have a Bachelor of Business Administration in Management and a Master of Business
32 Administration from Michigan State University in East Lansing, Michigan.

33
34 **Q. What is the purpose of your testimony?**

35 A. The purpose of my testimony is to demonstrate that Ameritech Illinois satisfies Section
36 271(c)(2)(B) of the Telecommunications Act of 1996, which requires Ameritech Illinois
37 to provide “[w]hite pages directory listings for customers of the other carrier’s telephone
38 exchange service.” A detailed discussion of the Company's compliance is contained in
39 my affidavit attached as Schedule RKR-1 to this testimony. I will also address certain
40 issues relating to my affidavit that arose during workshops held in this proceeding.

41 Specifically, I respond to requests for clarifications made by certain parties regarding
42 white page directory listings.

43

44 **II. ADDITIONAL ISSUES RAISED IN INDUSTRY WORKSHOPS**

45 **Q: During the industry workshops certain parties asked Ameritech Illinois to clarify**
46 **whether the Directory Assistance (“DA”) database is used to publish the WP**

47 **directory and to explain the role of ACES and TCListLink. In addition, these**
48 **parties were concerned that information provided to AAS (and present in**
49 **TCListLink) is sometimes not available from the DA database and that customer**
50 **information in TCListLink is sometimes different from information submitted via**
51 **ACES. Can you explain?**

52 A. The DA database is separate from the WP publishing database. As explained in the
53 attached 271 affidavit, the WP database updates Ameritech Illinois' DA database each
54 night and treats all listings in the same manner, regardless of the underlying local
55 exchange carrier. White Page directory listings for CLEC end users served via resale or
56 UNE-P reach the WP database in the same manner and within the same time frame as
57 White Page directory listings for Ameritech Illinois' retail end users. Like retail, resale
58 and UNE-P WP listings, the listings orders of switched-based CLECs, regardless of the
59 ordering method utilized by the CLEC, are updated into Ameritech's WP database each
60 night and the WP database subsequently updates the DA database. Although the DA and
61 WP databases are physically separate, processes are in place that successfully maintain
62 the consistency between the two databases.

63

64 **Q. Is the DA database used to publish the white pages directory?**

65 A. No.

66

67 **Q. What is "ACES"?**

68 A. Some CLECs have chosen to implement a PC-based software package offered by AAS.

69 This software, called Ameritech Customer Entry System or "ACES", is designed to be a

70 manual data entry system, *not a listing database*, which can be used as an alternative to
71 faxing handwritten listing updates prior to the CLEC's implementation of one of the
72 available electronic interfaces. The ACES PC software offered by AAS is not meant to
73 be a full electronic operations support system. Although the software has won national
74 industry awards for innovation, it is intended to be a transitional alternative a CLEC can
75 choose to use until it is prepared to implement either or both of Ameritech Illinois's
76 electronic interfaces -- LSR Exchange ("LEX") or Electronic Data Interchange ("EDI") --
77 or the Publisher's EDI interface, which uses the Directory Service Request ("DSR")
78 format based on industry standards promulgated by the Ordering and Billing Forum
79 ("OBF").

80

81 **Q. What is "TCListLink"?**

82 A. TCListLink is a password-protected website, provided by AAS, with an easy-to-use
83 graphical user interface that, among other functions, allows CLECs to review and verify
84 their end-user's WP listing data. Other than the temporary exceptions outlined below,
85 TCListLink effectively reflects the end-user's DA listing data as well. TCListLink is the
86 same listing verification tool that AAS provides to Ameritech Illinois' retail operations.

87

88 **Q. Under what circumstances might a CLEC listing appear in TCListLink but be**
89 **unavailable from DA?**

90 A. Although I am not directly responsible for the DA database or associated services, I do
91 have an understanding about the relationship between the DA and WP databases and can
92 provide the following information. There are two rare, but possible, situations where a

93 timing issue could cause a temporary discrepancy between DA and TCListLink, and a
94 third possible situation where the end-user may be using a different DA provider with
95 different processes and update schedules. First, as stated above, all listing updates are
96 passed each night from the WP database to the DA database. During 2001, the DA
97 nightly batch listing update process was successfully completed in one night 97.7% of the
98 time in Illinois. The remaining 2.3% of the time, as a result of various technical issues,
99 there was a one-day delay and the listing update batch process for DA completed on the
100 second night. In the meantime, the nightly batch listing update process for the
101 TCListLink website could have completed successfully in the first night, causing a
102 temporary discrepancy between the two databases. Second, the individual listing updates
103 passed via nightly batch process are successfully applied to the DA database without
104 manual intervention an extremely high percentage of the time. For example, from
105 November 30, 2001 to January 18, 2002, 100% of the listing updates applied successfully
106 to the to the DA database without manual intervention. On the rare occasion that manual
107 intervention is required on an individual listing update, the DA listing update is
108 completed within one day. In these rare occasions, it is possible that an individual listing
109 update could have updated successfully in TCListLink but required manual intervention
110 in DA, again causing a temporary discrepancy between the two databases. Third, it is
111 possible that an end-user could access a non-Ameritech DA provider, so the listing would
112 appear in AAS's TCListLink database but may not be in the DA database of the non-
113 Ameritech DA provider. Ameritech Illinois provides these other DA providers with
114 access to the same daily listing updates, but does not control the timeliness or accuracy of
115 their application of the updates.

116

117 **Q. Does AAS make available to CLECs an expedited trouble resolution process for**
118 **listings transmitted via ACES to AAS' and then forwarded to Ameritech Illinois'**
119 **DA?**

120 A. Yes. AAS instructs CLECs to submit a Listing Trouble Report ("LTR") to AAS if they
121 find inaccurate or unavailable listing data from Ameritech Illinois' DA service two (2)
122 business days after submission of the listing order. This LTR process allows the listing to
123 be promptly corrected and forwarded to the DA database. If the problem remains after
124 the LTR update is forwarded to DA, the CLEC can escalate the LTR to a DA CLEC
125 Specialist for resolution directly in the DA database.

126

127 **Q. Does a comparable process apply for listings transmitted via ACES that appear on**
128 **TCListLink?**

129 A. Yes. There is a notice posted directly on the TCListLink website listing inquiry screen
130 that states "The listing information on TC Listing Link is current as of three (3) business
131 days after Ameritech advertising services' receipt of a correct listing order." AAS
132 instructs CLECs to submit a LTR to AAS if they find inaccurate listing data on the
133 TCListLink website following the three day update timeframe. If the problem remains
134 after the LTR update is forwarded to TCListLink, the CLEC can escalate the LTR to an
135 AAS CLEC Specialist for resolution.

136

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

138 A. Yes.