

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Rebuttal Testimony of Mark J. Cottrell
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 4.1

April 22, 2002

TABLE OF CONTENTS

I.	INTRODUCTION AND PURPOSE OF REBUTTAL TESTIMONY.....	1
II.	LINE LOSS NOTICES.....	2
	836 LINE LOSS NOTIFICATION PURPOSE.....	2
	AT&T's COMMENTS	2
	ICC STAFF COMMENTS	6
	WORLDCOM COMMENTS	8
	Z-TEL COMMENTS	10
	CURRENT OVERVIEW OF LINE LOSS NOTIFICATIONS.....	12
III.	AMERITECH PRE LSOG 4 RELEASE.....	14
IV.	LSOG 4 CHANGE MANAGEMENT.....	16
V.	OSS POR ENHANCEMENTS	20
V.	LSOG 4.....	21
	EDI CONNECTIVITY.....	21
	CORBA TESTING.....	23
	13-STATE CLEC PROFILE	24
	PARSED CSR.....	25
VII.	SERVICE ORDER COMPLETION ISSUES	25
VIII.	JOINT TEST ENVIRONEMENT.....	27
IX.	DIRECTORY LISTINGS	30
X.	LSOG 5.....	35
XI.	ENHANCED VERIGATE LEX GUI.....	38
XII.	FLOW-THROUGH	43
XIII.	ELECTRONIC BONDING TROUBLE ADMINISTRATION (“EBTA”).....	44

XIV.	900/976 BLOCKING FUNCTIONALITY	46
XV.	AT&T MICHIGAN MARKET ENTRY TEST	47
XVI.	CONCLUSION	49

1 **REBUTTAL TESTIMONY OF MARK J. COTTRELL**

2 **ON BEHALF OF AMERITECH ILLINOIS**

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

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

6 A. Mark J. Cottrell, 2000 Ameritech Center Drive, Room 4G50, Hoffman Estates, Illinois
7 60196.

8
9 **Q. Are you the same Mark J. Cottrell that submitted Direct Testimony on January 28,**
10 **2002?**

11 A. Yes, I am.

12
13 **Q. What is the purpose of your Rebuttal Testimony?**

14 A. The purpose of my Rebuttal Testimony is to respond to claims and proposals made by
15 other parties in this proceeding with regard to Ameritech Illinois' Operations Support
16 Systems ("OSS"). In my Rebuttal Testimony, I will provide correcting facts in response
17 to the Affidavits of AT&T witnesses Van De Water and Willard, and I will provide
18 additional information related to the issues raised by McLeodUSA witness Sprague, RCN
19 witness Valentine, Vertex witness Mintz, WorldCom witnesses Chapman and
20 Lichtenberg, Z-Tel witness Walters, and ICC Staff witness Weber.

21
22 **Q. Do you sponsor any schedules supporting your Rebuttal Testimony?**

23 A. Yes. I have included schedules MC-1 through MC-6.

24

25 **II. LINE LOSS NOTICES**

26

27 **Q. Please describe the 836 Line Loss notification process.**

28 A. The 836 line loss notification process is the Ameritech wholesale OSS process that is
29 used to inform CLECs – both resellers and users of the unbundled network element
30 platform (“UNE-P”) – when one of their customers disconnects service in favor of a
31 competitor.

32

33 836 LINE LOSS NOTIFICATION PURPOSE

34 **Q. Why was the 836 line loss notification process developed?**

35 A. The line loss notification process was developed to inform a Competitive Local Exchange Carrier
36 (“CLEC”) utilizing an Incumbent Local Exchange Carrier’s (“ILEC’s”) facilities to provide
37 service to its end users when that CLEC’s end user customer changes service providers.

38

39 **Q. Is the line loss notification process only required in situations where the losing CLEC serves
40 its customer using UNE-P or by reselling Ameritech Illinois’ services?**

41 A. Yes, the ILEC only notifies a CLEC of its competitive loss of an end user when a CLEC offers
42 service to its end user by solely utilizing the ILEC’s facilities, such as UNE-P or Resale of an
43 ILEC’s services. In these cases, the CLEC has no facilities to disconnect when an end user
44 decides to change service providers. Because the ILEC is involved in this migration process, it
45 informs the losing CLEC that a disconnect has occurred.

46

47 AT&T’S COMMENTS

48 **Q. Did Ameritech research the examples that AT&T references (Van De Water Test. , pp. 15-**
49 **17.) of the 143 instances where AT&T believed that Ameritech failed to notify line losses?**

50 A. Yes, Ameritech received AT&T's spreadsheet on February 12, 2002. Ameritech researched all
51 the examples and provided detailed information on March 8, 2002, and followed up with a
52 meeting and discussion of root cause analysis on March 21, 2002. It should be noted that out of
53 the 143 TNs, 117 (or 82%) of these were disconnected in 2001.¹

54

55 **Q. Is the decrease in missing loss notifications in January 2002 for AT&T indicative of overall**
56 **improvement with Ameritech's loss notification process in recent months?**

57 A. Yes, Ameritech has dedicated resources to correcting and improving the line loss notification
58 process. Ameritech has improved its loss notification process in recent months so that currently
59 over 90% of all line loss notifications are being sent correctly and in a timely manner (within 24
60 hours of completion).

61

62 **Q. How did you measure this performance level?**

63 A. As I describe below, as part of the cross-functional team efforts, daily reports are produced to
64 monitor progress. These reports include all line loss notifications that have been handled
65 correctly and also any potential line loss notification problems.

66

67 **Q. Has any additional organizational structure been put in place that is specifically focused on**
68 **resolving line loss notification issues?**

69 A. Yes, SBC has formed a cross-functional team with members from Industry Markets, Product
70 Management, Information Technology ("IT"), the LSC, and Account Management to review the

¹ Of the 143 TNs, 117 were disconnected in 2001, 7 TNs were disconnected in 2002 and the other disconnect dates were unknown or no line loss notification was required.

71 overall line loss notification process. The team's charge is to examine daily transactions, identify
72 error conditions, and correct those error conditions, where possible. Four sub-teams have been
73 formed as follows:

- 74 • Analysis,
- 75 • Re-flow,
- 76 • Resolution, and
- 77 • Oversight Teams.

78 Identified errors are categorized, and any new issues with the process are documented. Errors are
79 communicated to the Re-flow Team to be corrected, and the correct information is sent to the
80 CLECs via the normal channels. Errors are referred to the Resolution Team to determine and
81 coordinate implementation of corrections to prevent future occurrence. Reports are created and
82 reviewed daily on a sample basis. Any errors found are referred to the Resolution Team. The
83 results of this intensified scrutiny provide a safety net to capture incorrect 836 line loss
84 notifications, correct them, and redistribute them to the CLECs. The team's target is to get all
85 this done within a four-day timeframe following the effective date of the loss. This process is a
86 complicated one and, in order to be thorough, involves an extensive amount of time and
87 resources.

88

89 **Q. Has Ameritech attempted to communicate with CLECs and explain the reasons for failures**
90 **in its line loss notification process?**

91 A. Despite Mr. Van De Water's allegation (p. 18), Ameritech has provided frequent and
92 comprehensive updates to both CLECs and state Commissions and has attempted to keep all
93 parties informed on the status of line loss notifications.² In addition, CLECs are encouraged to
94 use the channels designed to promote communication between Ameritech and the CLEC

² Ameritech has committed to file regular status updates with the Commission in this docket.

95 community. These channels include regular contact with the Account Teams and requesting
96 status of topical issues (like the line loss notification process) in the regularly scheduled Change
97 Management and User forum meetings. Ameritech believes that cooperative business-to-business
98 discussions and resolutions regarding these types of complex operational issues is a better
99 approach to resolving technical issues. Mr. Van De Water even comments on the two-day
100 workshop on line loss notifications, which was hosted by Ameritech March 13-14, 2002, in
101 Hoffman Estates to acquaint CLECs and state Commissions not only with the various issues and
102 causes related to the line loss notification problems in the Ameritech region but also with the
103 resolutions that Ameritech has employed to correct these problems. A detailed list of line loss
104 notification issues was presented to all attendees at the March 13-14 workshop and is also
105 provided as Schedule MC-1 to my testimony. In addition, this list was distributed to all CLECs
106 (including those that did not attend the workshop) as part of an Accessible Letter (CLECAM02-
107 123, dated March 29, 2002).

108

109 **Q. Has Ameritech made any progress in eliminating some of the manual processing that led to**
110 **failures in its loss notification process?**

111 A. Yes, in fact, the manual processing for winbacks that is described in the example Mr. Van De
112 Water cites (p. 20 and attached as Exhibit MVW-01 to his testimony) will no longer be necessary
113 after the April 24, 2002 release. The process by which Ameritech retail operations manually
114 created a list of service orders to fax to the LSC and the LSC responsibility for inputting these
115 disconnected numbers into MOR/Tel will be discontinued after this release.³ This manual
116 processing on Ameritech's winbacks was possibly responsible for up to 133 of the 143 missing
117 line loss notifications (approximately 93%) noted on AT&T's spreadsheet.

³ This winback process is explained in Schedule MC-1, Item 2 c.

118

119 **Q. AT&T claims (Van De Water Test., p. 27) that Ameritech has not yet revealed a plan or**
120 **process in place for CLEC-to-CLEC migrations loss notification problems. Is this true?**

121 A. No, it is not. In fact Schedule MC-1 (Items 3a-c) indicates that retraining updates were covered
122 with service representatives. The retraining efforts are explained in more detail in the Rebuttal
123 Testimony of Justin Brown. In addition, for CLEC-to-CLEC migration to different products (as
124 explained in Item 3 d of schedule MC-1) a service order process change was implemented on
125 March 8, 2002. Finally, another system change has been identified and will be implemented on
126 May 3, 2002, which will resolve the partial migration issue discussed in Schedule MC-1 (Item 3
127 c).

128

129 ICC STAFF COMMENTS

130 **Q. Why doesn't Ameritech's retail operations use the loss notifiers , or 836 transactions as line**
131 **loss notifications (Weber Test. pp. 13-14)?**

132 A. The line loss notification as originally designed contained a field that could have identified the
133 winning carrier of the line. Because of this, Ameritech's retail business units were advised not to
134 use the 836 reports generated as part of the wholesale provisioning process to avoid any concerns
135 regarding the use of wholesale information by retail. In replacement of the line loss information
136 contained in the 836, Ameritech's retail business units were required to obtain their line loss data
137 from other databases within the company that were not specific to wholesale.

138

139 **Q. What line loss notice does Ameritech Illinois' retail operations receive?**

140 A. An 836 line loss notification is generated for Ameritech Illinois' retail line losses to competitors.
141 However, as explained above, those notifications are not currently used by Ameritech Illinois'
142 retail operations. Instead, a different process that did not include any carrier identification was

143 developed to extract line loss information for the retail operations. There are four steps in this
144 process:

- 145 1. When a disconnect order (or a change order with outward activity) for a retail account is
146 marked as completed in Ameritech Service Order Negotiation system (“ASON”), the
147 order information is passed to the Service Order Interface (“SOI”) system. At the end of
148 the processing day for SOI, the SOI system creates a file of all service orders processed
149 that day.
- 150 2. The next business day the Service Order Repository (“SOR”) system uses the SOI file to
151 begin processing all of the completed service orders. SOR processes throughout the day.
152 At the end of the SOR processing day, SOR creates a file of information that is sent to the
153 AIT Winback System.
- 154 3. The information on the file sent to the AIT Winback System contains all disconnect and
155 outward change activity for Ameritech retail accounts. The AIT Winback System
156 receives the file and loads the data by 10 a.m. Central time. The AIT Winback System
157 processes the data throughout the day until midnight. The AIT Winback System extracts
158 information from this file based on logic developed to segregate winback candidates
159 resulting from migrations from other disconnect scenarios.
- 160 4. This list is made available for use by the AIT Winback unit at the beginning of the next
161 business day – or the fourth business day after the order is completed in ASON.

162

163 **Q. Does the process used by Ameritech Illinois’ retail business units to obtain line loss**
164 **information result in Ameritech Illinois’ retail operations receiving superior or**
165 **discriminatory line loss information compared to what CLECs receive?**

166 **A.** No, the only line loss information that a CLEC or Ameritech Illinois’ retail operations need is the
167 identity of the line (telephone number or circuit ID) disconnected and the date of the
168 disconnection. Everything else, the CLECs and Ameritech Illinois retail can obtain from their
169 own databases. To that extent, Ameritech Illinois’ retail operations receive the same line loss
170 information as CLECs receive. With respect to timing, the line loss information is delivered to
171 Ameritech Illinois’ winback unit for use on the fourth business day after the disconnect order is
172 completed. Under the 836 line loss notification process, the CLEC should receive the line loss
173 notification on the second business day after the disconnect order is completed, or in many cases
174 sooner.

175

176 **Q Has Ameritech implemented the recommendations made by the ICC Staff (Weber Test., p.**
177 **20)?**

178 A. Yes. I provide herein that Ameritech has implemented or will implement recommendations (I)
179 through (VII) made by Ms. Weber in her Testimony. Recommendation VII is being addressed
180 under Docket 02-0160 and Recommendation (VIII) and (IX) is addressed in the Rebuttal
181 Testimony of Mr. James Ehr.

- 182 • Recommendation I – Ameritech will implement a fix on an expedited basis for the partial
183 migration issues on May 3, 2002. (See Schedule MC-1 (Item 3 c).
- 184 • Recommendation II – Ameritech has conducted retraining for its service representatives as
185 set out in the Rebuttal Testimony of Justin Brown.
- 186 • Recommendation III – Ameritech is continually evaluating whether other conditions exist
187 that may result in missing line loss notifications as part of its ongoing initiatives, specifically
188 the examination of daily transactions and analyzation of error conditions conducted by the
189 cross-functional team.
- 190 • Recommendation IV – Schedule MC-1 clearly states all issues uncovered for line loss
191 notifications. Furthermore, all CLECs have been informed via Ameritech’s distribution of its
192 March 29, 2002 Accessible Letter (CLECAM02-123).
- 193 • Recommendation V – Account managers have contacted and are continuing to work with
194 individual CLECs to identify and resolve any specific concerns. As part of the March 13-14
195 workshop, CLECs were requested to provide specific examples of problem areas and several
196 CLECs have done so.
- 197 • Recommendation VI – Ameritech has committed to keep all parties informed on the status of
198 the line loss notification process.
- 199 • Recommendation VII – Ameritech believes the current process is nondiscriminatory.
200 However, Ameritech Illinois has committed in the pending proceedings in CC Docket 02-
201 0160 to discontinue the current process used by it retail operations, so that it only receives
202 line loss information by the 836 line loss notice.

203 .

204

205 **WORLDCOM COMMENTS**

206 **Q. Will you comment generally on WorldCom’s comments related to line loss?**

207 A. WorldCom correctly notes that Ameritech has admitted it had a problem with its line loss
208 notification process (Chapman Test., p. 4). However, WorldCom has failed to mention that line
209 loss has been a weekly agenda item on Account Team calls with WorldCom since at least

210 October 3, 2001. In addition, line loss has been an agenda item on executive level quarterly calls
211 since October 8, 2001 as well as on the director level weekly calls since February 19, 2002. On
212 these calls, WorldCom and its Account Team are involved in an ongoing dialogue to update
213 status on line loss notifications. Ameritech is proactively tracking line loss notifications and is
214 current on the correction of errors. If any missing or incorrect line loss notifications are
215 identified, the Account Team coordinates the efforts to re-flow the loss notifiers to WorldCom.
216 WorldCom and its Account Team have been working on a business-to-business basis for several
217 months and the number of missing line loss notifications have declined. In addition, Ameritech
218 implemented a new release of its OSS interfaces on April 20, 2002 that decreases the number of
219 manual touch points in the line loss notification process and should decrease the daily error rates.

220

221 **Q. What is your response to WorldCom's allegation of receiving loss notifiers when there was**
222 **no line loss? (Chapman p. 18-21)**

223 A. As explained in Schedule MC-1 (Item 3 c) a CLEC will erroneously receive loss notifications on
224 all 10 lines in an account when only 3 of the lines migrate to another CLEC. This anomaly does
225 not affect service for the end user, but as WorldCom claims, the CLEC will receive line loss
226 notifiers on lines that are not actually lost. As set out above, a fix will be implemented to correct
227 this problem on May 3, 2002. However, until the fix is implemented, emails are being sent to the
228 CLECs to advise them of the accounts for which they received line loss notifications in error.
229 WorldCom was advised on March 25, 2002 that SBC is working on a "partial assume"
230 spreadsheet to identify TNs that WorldCom will need to reactivate in its systems.

231

232 **Q. What is your response to WorldCom's complaints regarding the timing and content of the**
233 **line loss recoveries? (Chapman p.13-18)**

234 A. WorldCom's complaints are virtually the same as those filed in its January 24, 2002 filing in
235 Michigan. Ameritech responded in detail to WorldCom's allegations in its February 8, 2002
236 filing. A summary of Ameritech's response is that WorldCom's data does not always agree with
237 Ameritech's back-up records relating to loss notifications sent. Ameritech's records indicate that
238 some of the reflows that WorldCom alleges were sent multiple times, were only sent once.
239 Furthermore, most of these complaints are related to missing line loss notifications for 2001 – and
240 may no longer be applicable, given the additional monitoring, analyzation, and validation directed
241 at line loss notifications by the cross-functional teams' activities. For the sake of completeness, I
242 am including in Schedule MC-2 all of the reports that have been filed with the Michigan Public
243 Service Commission.

244

245 Z-TEL COMMENTS

246 **Q. Mr. Walters (pg. 7) states in his testimony that in May 2001 Ameritech began sending Z-Tel**
247 **line loss notifications that contained empty data fields. Please comment.**

248 A. Mr. Walters' Testimony gives the mistaken impression that Ameritech Illinois was responsible
249 for this issue. After several days of investigation, Ameritech Illinois was able to prove that it was
250 not transmitting "empty" reports. In fact, Z-Tel's vendor (Launch Now) was sending the empty
251 reports. However, this was a very complex issue to troubleshoot and prove, and, at Z-Tel's
252 request, Ameritech continued to work with Z-Tel's vendor to pinpoint the cause of the empty
253 836s throughout this period until the problem was fixed. Until Z-Tel received loss notifications
254 containing proper information, Ameritech assumed responsibility – even though this was not an
255 Ameritech problem. This is the explanation for the lack of statements from Ameritech Illinois
256 during this timeframe. As validation, there are no more Z-Tel notations relating to 836s with
257 empty data once Z-Tel's vendor made the program changes. SBC Ameritech will continue to
258 work with Z-Tel to resolve any additional concerns they may have.

259

260 **Q. In his testimony filed March 20, Mr. Walters stated (p. 8) that for the period from March 1,**
261 **2002 through March 11, 2002, 42% of the line loss notifications provided to Z-Tel were**
262 **more than six days after the Z-Tel customer disconnected from Z-Tel. How do you respond**
263 **to that statement?**

264 A. Ameritech conducted an investigation of line loss notifications provided to Z-Tel from March 1 to
265 March 14, which concluded that line loss notifications fell into one of the following two
266 categories or scenarios:⁴

- 267 1. Line loss provided within 24 hours. More than 96% of Z-Tel's line loss notifications
268 were in this category during the investigation period. The timeframe was calculated
269 based on when the data was loaded in the CLEC's mailbox by Ameritech's VAN.
- 270 2. Line loss notifications in excess of 24 hours were provided in approximately 4% of the
271 cases. Ameritech's initial investigation determined that some of these were the "missing"
272 line loss notifications discovered as a result of the cross-functional team's analysis and
273 subsequently re-flowed. A continuing investigation is ongoing.

274

275 **Q. In his testimony filed March 20th, Z-Tel Vice President Ron A. Walters discusses a sample**
276 **audit Z-Tel conducted which indicated that Ameritech Illinois in many instances continued**
277 **to bill Z-Tel for wholesale services even after Z-Tel received a line loss notification. How do**
278 **you respond?**

279 A. In the March 13 and 14 Line Loss Notification Workshop, this issue was discussed and the
280 CLECs agreed to provide specific examples, if they had not already. Ameritech Illinois agreed to
281 investigate and track the steps of the billing and daily usage extract feed process to determine
282 why a line loss notification was triggered. The CLECs, including Z-Tel, agreed to provide these
283 examples to Ameritech by March 25th. In the interim, Ameritech Illinois is conducting its own

⁴ The possibility exists that a line loss notification was not sent out that was also not captured in the 106B, however, in Ameritech's sampling this situation has not occurred.

284 investigation into the current process for the criteria for sending the daily usage extract feeds and
285 the billing notices.

286

287 **Q. Has Ameritech Illinois made any adjustment to Z-Tel's bills to correct for these alleged**
288 **errors?**

289 A. Account Management has informed me that Z-Tel has not provided specific information to its
290 Account Team related to incorrect billing in association with line loss notifications. If specific
291 information is provided by any CLEC, Ameritech will investigate the examples provided by the
292 CLECs as described above and determine if there is any billing overcharging. In the event it is
293 determined that Ameritech erroneously charged the CLECs for lines that had been disconnected,
294 Ameritech will adjust the charges appropriately.

295

296 **Q. Mr. Walters (pg. 21) also requests that Ameritech Illinois be prohibited from conducting**
297 **any winback marketing until it fixes the line loss notification problems and Ameritech**
298 **Illinois retail and Z-Tel receive identical line loss notifications. How do you respond?**

299 A. Ameritech is already in compliance with the Commission's Order in ICC Docket No. 02-0160 on
300 Z-Tel's request for interim relief, and is delaying any winback initiatives for 17 days after the
301 disconnect (or outward activity) is placed in completion status. Ameritech has voluntarily
302 extended that relief to all CLECs in all 5 states in its region. Once the in-process changes have
303 been completed and Ameritech Illinois has sufficient experience to confirm that the line loss
304 issues have been resolved, Ameritech Illinois will request that the 17-day delay on winback
305 marketing be eliminated.

306

307 CURRENT OVERVIEW OF LINE LOSS NOTIFICATIONS

308 **Q. Have all of the process and system issues that affect the performance of the 836 line loss**
309 **process been identified?**

310 A. Yes, to the best of my knowledge.⁵ However, we are continuing to monitor so we can validate
311 that the line loss notification process is performing in the manner in which it was designed to
312 function.

313

314 **Q. How do you know that you have identified all the issues?**

315 A. Our daily monitoring has not identified any additional issues. Continued monitoring will ensure
316 that if an additional issue is identified, it will be addressed promptly.

317

318 **Q. Have all of the process and system issues been resolved?**

319 A. No, but they are under control. As discussed above, the reports developed and used by the cross
320 functional team provide a safety net to identify and correct errors made daily. A few additional
321 fixes are planned and the manual process of sending the service order numbers to the LSC from
322 the retail winback group will be completely mechanized for all versions (Issue 7, LSOR 4 and
323 LSOR 5) by April 24. The LSC service representative will no longer manually input the service
324 order numbers into MOR/TEL. This “fix” will improve timeliness by eliminating the need for the
325 use of the safety net reports in these scenarios. In addition, the May 3, 2002, fix for CLEC-to-
326 CLEC partial migrations will address concerns expressed by AT&T, WorldCom, and ICC Staff..

327

328 **Q. Do you have any further comments?**

⁵ It should be noted that factors not related to the line loss process can cause inaccurate or missing loss notifications – factors such as ensuring correct LSRs can also cause late or missing line loss notifications.

329 A. Yes, I do. I want to reiterate that Ameritech has always sought to be responsive to the needs of
330 the CLECs, working through the account teams and escalating issues that required a broader or
331 higher level of attention. Ameritech is working diligently to resolve all issues regarding line loss
332 notifications, and most have already been resolved. Ameritech takes its responsibility very
333 seriously and is committed to resolving all line loss issues on an expedited basis.

334

335 **III. AMERITECH PRE LSOG 4 RELEASE**

336

337 **Q. AT&T (Willard pg. 12) states that for two and one-half years prior to its merger**
338 **with SBC in October of 1999, and in fact until March 2001, Ameritech's OSS were**
339 **virtually frozen in time. Please comment.**

340 A. Although AT&T witness Willard suggests otherwise, Ameritech has engaged in a
341 program of regular enhancement of its OSS interfaces. Mr. Willard claims that
342 Ameritech's OSS were "frozen" in time. Of course, that is not the case as nothing in this
343 industry has stood still for the past six years. Instead, Ameritech's interfaces have been
344 constantly enhanced since their original implementation in 1996. Just a few examples of
345 these enhancements include: Direct TCP/IP Ordering (implemented 9/98), Customer
346 Service Record (CSR) Retrieval via TCNet (9/98), Combined Order for Unbundled Loop
347 with LNP (6/99), New Pre-order Transaction – Carrier Availability (9/99), UNE-P/CPO
348 Ordering (10/99), and New Pre-order Transactions – NC/NCI Validation, Connecting
349 Facility Assignment (CFA) Inquiry, Service Availability, and DSL Loop Qualification
350 (4/00).

351 AT&T's claim is based on its assertion that Ameritech did not implement a change tied,
352 by name, to a specific version of the Local Service Ordering Guide ("LSOG") between
353 1997 and March 2001, which is to say, it elevates form over substance. LSOG versions,
354 as defined by the Ordering and Billing Forum ("OBF"), each of the new versions include
355 a variety of changes to previous versions⁶. Through the LSOG guidelines, the OBF
356 provides a "language" to be used between telecommunications carriers when ordering
357 products and services from one another. The LSOG is a recommendation with much
358 flexibility and many options. Implementing companies must make choices regarding
359 which portions of the guideline apply to their systems and products, and must, in some
360 cases, choose between the options presented by the guidelines. Through Ameritech's
361 change management process, CLECs participate in this transformation of the OBF's
362 guidelines into an interface specification suitable for implementation.

363 Due to the time required to develop new LSOG versions and to the dynamic nature of the
364 competitive local service industry over the last six years, OBF guidelines have generally
365 lagged the business needs of the ILEC and the CLEC. There has always been a need for
366 ILECs and CLECs to exchange information in ways not included in OBF guidelines. As
367 a result, some ILECs constructed proprietary interfaces to provide for these information
368 exchanges, or chose to use manual methods for those functions and products not
369 supported by OBF guidelines.

⁶ The Ordering and Billing Forum ("OBF") is a subcommittee of the Alliance for Telecommunications Industry Standards, which is a North American standards body that is leading the development of telecommunications standards, operating procedures and guidelines through its sponsored committees and forums. Most ILECs, many CLECs, and many Interexchange Carriers ("IXCs") participate regularly in the OBF. The OBF provides guidance to the industry for the ordering and billing of both local and access services. One output of the OBF is guidelines for the ordering of local services in the form of the Local Service Ordering Guide ("LSOG"). While the OBF has been

370 Ameritech's strategy, beginning with the initial implementation of its pre-ordering and
371 ordering EDI interfaces, was to not constrain the products and functions supported on its
372 interfaces to only those for which an OBF guideline existed. In many cases, Ameritech
373 implemented support for ordering and pre-ordering functionality in a manner consistent
374 with the existing industry guidelines in advance of the actual issuance of a guideline by
375 OBF. As an example of the benefit of this practice, CLECs were able to order resale
376 DS1s electronically from Ameritech long before the OBF issued a guideline for DS1
377 ordering.

378 This willingness to implement functionality in advance of industry guidelines as
379 necessary, coupled with a program of regular enhancement, means that CLECs operating
380 in the Ameritech region have been provided EDI ordering and pre-ordering interfaces
381 with a very current level of functionality, counter to the characterization of AT&T's
382 witness Willard.

383

384 **IV. CHANGE MANAGEMENT PROCESS FOR LSOG 4 IMPLEMENTATION**

385

386 **Q. AT&T (Willard pg. 16) states that Ameritech's rollout of its LSOG 4 release**
387 **deviated greatly from the stated change management timeframes. Please comment.**

388 A. I disagree completely with Mr. Willard's assessment. During last year's OSS
389 collaborative discussions, the parties agreed upon a Chang Management Process
390 ("CMP") to be used for the FCC Uniform and Enhanced OSS Plan of Record releases.

issuing guidelines for access services since 1984, it has only more recently (four years ago) begun issuing ordering guidelines for local services.

391 This CMP included timelines to be followed in the implementation of the March 2001
392 release in Ameritech.

393

394 **Q. When was the 13-state CMP agreed to?**

395 In the summer of 2000, agreement was reached on a 13-state CMP, with exception of one
396 issue. With CLEC concurrence, Ameritech began implementing the added provisions
397 and associated timetables of the 13-State CMP for the March 2001 release. When final
398 agreement was reached in December 2000 on all issues of the 13-state CMP, and upon
399 the request of the CLECs, Ameritech agreed to a substitution of the CMP that had been
400 agreed upon for the March 2001 release with the just agreed upon 13-state agreement.

401 However, all parties were careful to note that the substitution of change management
402 plans would not modify the existing notification and implementation schedules to ensure
403 that the March release would be deployed on schedule.

404 Through the period between the summer of 2000, when agreement was reached on the
405 POR CMP, and the March 2001 release, although there was uncertainty about the
406 adoption of the 13-state CMP due to disagreement only on the quorum requirement for
407 OIS voting, the actual change management process and its associated timetables for
408 change management deliverables were never in disagreement. In implementing the
409 March 2001 release, Ameritech did not miss any of these agreed upon change
410 management notification dates, contrary to what AT&T witness Willard states.

411

412 **Q. Were the final LSOG 4 requirements delivered on time?**

413 A. Yes. The final requirements were issued November 22, 2000, well within the 110 to 130
414 day calendar day window required by the 13-state CMP. The final requirements
415 walkthrough took place November 30 and December 1. Though, several changes were
416 made to the March 24 release requirements after the final requirements were released,
417 these changes were a result of additional collaborative walkthrough sessions which were
418 held at the request of the CLECs.

419

420 **Q. AT&T (Willard pg. 20) states that CLECs continued to receive clarifying**
421 **information and additional requirements for LSOG 4 after the final requirements**
422 **were issued. Please comment.**

423 A. Following each of the collaborative walkthrough sessions that were held at the request of
424 the CLECs, Ameritech distributed, via accessible letter, the updates to the requirements
425 based on CLEC input. The CLECs were given information in a manner that provided
426 them with the specifications, and would allow them the time to make changes,

427 enhancements and upgrades to their systems to accommodate the upcoming March 2001
428 release, either through attendance at collaborative walkthrough sessions and/or by receipt
429 of the accessible letter update information to the final requirements. All changes to the
430 requirements were discussed at length and in ample time for AT&T (and any other
431 CLEC) to ready its systems. In addition, all Change Management notifications were
432 issued on time in advance of the March 24, 2001 release per the CMP, and CLECs were
433 provided the required comment periods. Notification milestones are outlined below⁷:

- 434 ■ *The Release Notification allows for a 7-day CLEC comment period and therefore must be*
435 *issued at least 7 days prior to Initial Requirements.*
 - 436 ■ Accessible Letter CLECAM00-050, dated 9/29/00, provided the Release
437 Notification and the 7-day CLEC comment period.
438
- 439 ■ *Initial Requirements allow for a 21-day comment period and therefore must be issued at least*
440 *21 days prior to Final Requirements. A CLEC walk-through is held during the 21-day*
441 *comment period, generally between day 14 and day 19.*
 - 442 ■ Accessible Letters CLECAM00-052 and 053, dated 10/13, provided the Initial
443 Requirements for the Pre-Ordering and Ordering Releases, respectively. A 21-day
444 CLEC comment period was provided (CLEC comments were due 11/3/00).
 - 445 ■ The Initial Requirements walk-through was originally scheduled for October 25th but
446 was re-scheduled for November 13th. Ameritech extended the CLEC comment period
447 to November 16th, to accommodate the rescheduled walk-through.
448
- 449 ■ *Final Requirements are issued 110 days prior to implementation. Walk-throughs are held if*
450 *significant changes have occurred since the publication of the Initial Requirements.*
 - 451 ■ Accessible Letters CLECAM00-067 and 068, dated 11/22/00, provided the Final
452 Requirements for the Pre-Ordering and Ordering Releases respectively. These letters
453 were published 122 days prior to release implementation (12 days ahead of schedule).
454 As required by CMP, another walk-through was held to discuss changes from the
455 Initial Requirements. Due to the size of the release, this walk-through was scheduled
456 for 2 days (11/30 and 12/1).
 - 457 ■ Updates to the Final Requirements resulting from CLEC input at the walk-throughs
458 were issued on 12/15 (CLECAM00-074 and 075 for Ordering and Pre-Ordering
459 respectively). An additional walk-through was scheduled for January 3rd at CLEC
460 request.
 - 461 ■ Accessible Letters CLECAM01-007 and 008, dated 1/22/01, provided the updates
462 resulting from the January 3rd walk-through.

⁷ All Ameritech Accessible Letters may be found at CLEC Online at < <https://clec.sbc.com/acclatters/home.cfm>>.

- 463 ▪ Accessible Letter CLECAMS01-012, dated 2/6/01, provided additional Pre-Ordering
464 updates.
465 ▪ Accessible Letter CLECAMS01-035, dated 3/13/01, provided Pre-Ordering
466 clarifications.

467

468 **Q. Did AT&T express any confusion as to which change management process or**
469 **timetable Ameritech was following throughout the March 2001 release process?**

470 A. No it did not. Throughout the March 2001 release process, Ameritech adhered to the
471 precepts and timelines agreed to in the CMP, as well as to the notification requirements
472 of the “Plan of Record” CMP that was used on an interim basis pending completion of
473 the CMP negotiations. Additionally, a 60-day test window was provided to the CLECs
474 per the requirements of the 13-state CMP and the Plan of Record CMP.

475

476 **Q. Does the CMP have a provision that enables the CLECs to call for a vote and**
477 **prevent the release from proceeding?**

478 A. Yes it does. If any CLEC, including AT&T, had a significant concern with either the
479 finalization of release requirements or the implementation of the release, they could have
480 requested a vote, as provided by the CMP, on whether the release should proceed. No
481 CLEC did so.

482

483 **V. IMPLEMENTATION OF ENHANCEMENTS SET FORTH IN PLAN OF**
484 **RECORD**

485

486 **Q. AT&T (Willard pg. 14) questions whether Ameritech has implemented the OSS**
487 **enhancements that were agreed to in the Illinois Plan of Record (POR). Please**
488 **comment.**

489 A. Contrary to AT&T's comments, the ordering and pre-ordering enhancements identified
490 during the Illinois-sponsored OSS collaborative meetings during 2000 have been
491 implemented. As described in my January 28th affidavit, most were implemented prior
492 to or as part of the March 2001 LSOG 4 release. The June 2001 release included an
493 additional item, the enhancement that enabled CLECs to order directory listings through
494 the interface used for ordering service. None of the CLEC-requested OSS POR
495 enhancements await the implementation of the LSOG 5 release in April 2002. That
496 release will be used to bring an *additional degree of uniformity to the interfaces of the*
497 *multiple regional companies within SBC*, and to implement the next version (LSOG 5) in
498 the continual progression of OBF guideline versions. However, the currently
499 implemented interface version (LSOG 4) includes all the functionality that the CLECs
500 and Ameritech jointly reported to the ICC would be implemented by this time and that
501 was identified for inclusion in the OSS test.

502

503 **V. LSOG 4 IMPLEMENTATION**

504

505 EDI CONNECTIVITY

506 **Q. AT&T states (Willard pg. 28) that it took approximately six months to establish**
507 **connectivity with Ameritech's LSOG 4 EDI interface. Please comment.**

508 A. Mr. Willard is correct it did take approximately six months for AT&T to establish
509 Ameritech Remote Access Facility (“ARAF”) connectivity. However, Mr. Willard
510 attempts to place blame on Ameritech’s account management personnel and asserts that
511 they did not seem to understand how to implement SBC’s Uniform Connectivity
512 Requirements. Mr. Willard further claims that, the process itself was fraught with errors
513 and delays caused by Ameritech’s lack of internal processes for establishing connectivity
514 (Willard pg. 28). The fact of the matter, however, is that AT&T has wrongly blamed
515 Ameritech for the delays AT&T experienced in establishing connectivity with Ameritech.
516 Both the time period claimed and the issues that arose were mostly due to AT&T not
517 following Ameritech’s documented CLEC OSS Interconnection Procedures, as
518 announced and included in Accessible Letter CLECAM00-056, dated October 24, 2000.
519 The CLEC OSS Interconnection Procedures document lists the requirements to be met by
520 the CLEC before connectivity can be established.

521

522 **Q. Did Ameritech inform the CLECs of the type of equipment that is compatible with**
523 **Ameritech’s equipment?**

524 A. Yes. Appendix 1 of the CLEC OSS Interconnection Procedures document clearly states
525 that the CLEC must provide equipment compatible with Ameritech equipment, and
526 includes the equipment manufacturer and model numbers. In addition, The CLEC OSS
527 Interconnection Procedures document also itemizes the respective responsibilities of the
528 CLEC and Ameritech. Included in this list is an item describing CLEC responsibility to
529 arrange for the ordering, shipping, and delivery of the circuit equipment necessary for the
530 connection. Installation at the Ameritech site is Ameritech’s responsibility.

531

532 **Q. So, AT&T was responsible for ordering the equipment and having it delivered to**
533 **Ameritech's site?**

534 A. That is correct. The equipment that AT&T ordered was received at the Ameritech site on
535 February 12, and that Ameritech's installation efforts covered just 15 days of the six
536 months cited by Mr. Willard. In addition, Ameritech's installation work might have
537 progressed quicker but for a delay that occurred due to AT&T providing private IP
538 addresses rather than the required public IP addresses. This requirement is documented
539 on the New Circuit Request Form that AT&T completed when requesting the circuit
540 connection to Ameritech. The New Circuit Request Form is included as schedule MC-3
541 to my Testimony. Clearly, AT&T bears most, if not all of the responsibility for any delay
542 in implementing its connection to Ameritech's ARAF.

543

544 CORBA TESTING

545 **Q. AT&T states (Willard pg. 30) that on the day that CORBA testing was scheduled to**
546 **begin, Ameritech informed them that they would have to switch their connectivity**
547 **point and conduct testing of Ameritech's pre-ordering CORBA interface through**
548 **the SWBT connectivity point in St. Louis. As a result they were forced to recode**
549 **their firewall and reload their system to point to a set of SWBT internet protocol**
550 **addresses. Please comment.**

551 A. What AT&T portrays as occurring on one day is actually a chain of events that occurred
552 over several days. After AT&T was physically connected to the ARAF for EDI testing,

553 AT&T informed Ameritech that it wanted to pursue testing SBC/Ameritech's CORBA
554 interface. Ameritech provided AT&T with the network connectivity information for the
555 CORBA interface. Since the CORBA servers were physically located in Dallas, AT&T
556 wanted to send its traffic through the LRAF, which is also located in Dallas. However,
557 Ameritech region specific traffic must flow through the ARAF. Since AT&T was one of
558 the first CLEC's to test in the CORBA environment, Ameritech engineers explored
559 AT&T's request. A proxy IP was established in front of the CORBA servers.
560 Unfortunately, this did not work and AT&T ultimately had to connect to the ARAF in the
561 Ameritech region, even though the CORBA servers are located in Dallas.

562

563 13-STATE CLEC PROFILE

564 **Q. AT&T claims (Willard pg. 31) that Ameritech did not provide business rules for**
565 **completing the 13-state CLEC profile form. Please comment.**

566 A. At the time that AT&T was to begin testing in Ameritech's LSOG 4 Joint Test
567 Environment ("JTE") business rules had not yet been completed describing how to
568 completely fill out the 13-state CLEC profile document. In effort to get AT&T started on
569 its test, Ameritech identified the specific information that would be applicable to
570 establishing AT&T in Ameritech's test environment, and requested that AT&T provide
571 just that information, with the understanding that the form would be updated once the
572 business rules were completed. Once the business rules were completed, Ameritech
573 worked closely with AT&T to ensure its questions were answered in completing the
574 document.

575

576 PARSED CSR

577 **Q. AT&T (Willard pg. 38) claims that Ameritech is not providing a customer's**
578 **“hunting” information in a parsed CSR format, as required by the LSOG 4**
579 **requirements. Please comment.**

580 A. Ameritech is aware of this issue and has corrected the problem in the next scheduled
581 release of its graphical User Interface (“GUI”), which is due to be implemented in the
582 Ameritech region during April 2002.

583

584 **VII. SERVICE ORDER COMPLETION ISSUES**

585

586 **Q. Please describe the purpose of a SOC.**

587 A. As I described in my affidavit, a Service Order Completion (“SOC”) is a notice
588 Ameritech Illinois sends to inform a CLEC that the work for its service order has been
589 physically completed. Once the work to provision the order has been physically
590 completed, the order is placed in “completion” status within Ameritech Illinois’s systems
591 and Ameritech Illinois mechanically sends an SOC to the appropriate CLEC. If no
592 fieldwork, such as an outside dispatch or central office work, was required to provision
593 the order, an SOC is sent automatically. If manual fieldwork was required, such as
594 translation work, the technician who performed the work, and the Service Order
595 Completion Center, initiates the SOC once the fieldwork has been completed.

596

597 **Q. WorldCom (Lichtenberg pg. 18-21) asserts that it has received SOC notices prior to**
598 **all the translation work has been completed. Please address this issue.**

599 A. On rare occasions, it is possible that a CLEC could get an SOC prior to all of the work
600 being physically completed for a service order. This happens when a technician, who
601 believes that the fieldwork has been completed, initiates an SOC to the CLEC and
602 Ameritech Illinois later determines that the fieldwork was completed incorrectly.
603 However, this is a rare exception caused by human error and not a defect in the system.

604

605 **Q. WorldCom (Lichtenberg pgs. 5-10) also claims that Ameritech is having difficulty**
606 **sending Service Order Completions (the so-called “missing notifiers” issue) that**
607 **affect WorldCom’s ability to operate. Please respond.**

608 A. Before responding to the individual elements of this issue, it is important to place it into
609 the proper context. What Ms. Lichtenberg attempts to portray, as a single issue of
610 “missing notifiers” was in reality a handful of related issues of lesser magnitude that have
611 been corrected by Ameritech. Although she strains to draw some comparison to the
612 “New York meltdown” (Lichtenberg pg. 3), there is no evidence that Ameritech has any
613 kind of system problem that is similar in cause to the problems experienced in New York
614 shortly after their 271 approval. Ameritech has taken the problems reported by
615 WorldCom seriously, and has implemented program fixes for those parts that can be
616 attributed to system problems. In fact, Ms. Lichtenberg (pg. 11) notes Ameritech’s
617 performance has improved significantly. Ameritech is not aware of any existing system
618 issue that would cause a “missing” SOC. However, if the CLEC is aware of a potential
619 system issue that would cause a missing SOC they should notify their account manager

620 so that Ameritech can investigate the issue. In addition, Ameritech has improved its
621 procedures in the Local Service Center, as noted in the Affidavit of Mr. Justin Brown.
622 Ms. Lichtenberg (pg. 10) further claims that WorldCom typically is missing 200 SOC's on
623 a daily bases. However, Ameritech's numbers do not agree with Ms. Lichtenberg's
624 numbers. Ameritech reviewed all of the missing SOC's that were reporting during March
625 2002 by WorldCom. As you can see from the attached document, Schedule MC-4,
626 Ameritech's numbers are considerably less than what Ms. Lichtenberg is reporting. To
627 put the issue in perspective, the number of WorldCom's missing notifiers must be judged
628 relative to the number of total orders submitted by WorldCom. See schedule MC-5 for
629 WorldCom's February 2002 order volume. When these numbers are compared, it is clear
630 that missing SOC's reported by WorldCom to Ameritech affected less than two tenths of
631 one percent of WorldCom's orders. This hardly amounts to a system meltdown.
632 Nevertheless, this is a situation that WorldCom's Ameritech account management team
633 continues to pursue diligently with the support of the necessary functional organizations.
634 Finally, the true nature of this situation will be readily apparent to the Commission when
635 presented with the final report of the OSS evaluation and with performance measure
636 results.

637

638 **VIII. JOINT TEST ENVIRONEMENT**

639

640 **Q. AT&T (Willard pg. 44) states that Ameritech's joint test environment lack's**
641 **adequate resources and that it does not mirror Ameritech's actual production**
642 **environment. Please respond.**

643 A. Although each of these issues will be evaluated by KPMG, I will provide a response to
644 each. First, the 13-state Change Management Process requires that Ameritech make a
645 new software release available to the CLEC for testing 67 days prior to its release into
646 production. At that time, the test environment is “production +1”, meaning that the
647 version that is currently being tested is newer than the version that is in production. From
648 a logical view, if the Joint Test Environment (“JTE”) always mirrored production, the
649 CLEC would never be able to test a new software version prior to its release into
650 production.

651 AT&T is correct that, as a general rule, Ameritech does limit the number of orders that
652 are reviewed to five per day. But AT&T’s claims, however, that this is a major
653 restriction and that it results from too few resources committed to this activity, are simply
654 incorrect. As you can see from the attached document (schedule MC-6) that summarizes
655 AT&T’s test activity with Ameritech, from October 16, 2001 through February 28, 2002,
656 on several of the days AT&T submitted more than the five test orders with Ameritech,
657 and Ameritech willingly reviewed the orders with AT&T. However, it also very clear
658 from the attached document that AT&T did not take full advantage of the test resources
659 Ameritech made available: On more than half the days that AT&T submitted test orders
660 they submitted four or fewer orders.

661 Ameritech also dedicates more than ample resources to the testing environment. Daily
662 status calls are held between Ameritech and the CLEC to review each of the test orders in
663 detail. In addition, all CLECs are provided an opportunity to review more test cases, if
664 the need arises, particularly as they approach the target production date. These test

665 procedures are also published in the 13 State Joint CLEC Test Plan, which can be found
666 on the CLEC Online website.

667

668 **Q. AT&T (Willard pg. 46) claims that Ameritech’s joint testing environment rejected**
669 **“860” (order supplement) transactions that it had sent to correct a rejected “850”**
670 **(order). Please respond.**

671 A. I believe AT&T’s comment is unfounded. Ameritech systems do not allow a CLEC to
672 send an 860 (order supplement) to correct an order that has been rejected. The CLEC
673 would be required to correct the order and resubmit an 850 to Ameritech. As I’ve stated
674 in my previous testimony, an order supplement (860) is sent to Ameritech by the CLEC
675 when the CLEC wishes to provide additional information for an order (850) that has
676 already been received and accepted by Ameritech. It is not used to correct a rejected
677 order.

678

679 **Q. AT&T (Willard pg. 46) states in another circumstance, when AT&T conducted joint**
680 **testing in February 2002, Ameritech asked AT&T to change the manner in which it**
681 **populated a certain field on Local Service Requests even though this new instruction**
682 **conflicted with the production environment and Ameritech’s published Local**
683 **Service Ordering Requirements. Please comment.**

684 A. Ameritech cannot substantiate AT&T’s claim. The field that Mr. Willard references is the
685 BCH01 field on an 860 (order supplement). The correct values for this field can be found
686 in the LSOR. The LSOR provides the OBF values to enter on a paper LSR form. The
687 EDI Support Website also provides a conversion table for OBF to X12 values, in which

688 the BCH01 is included. These values have also been published in LSOR since November
689 2000. Both the LSOR and the field values are the same for this field in both the JTE and
690 production environments for EDI.

691

692 **IX. DIRECTORY LISTINGS**

693

694 **Q. AT&T (Willard pg. 49) asserts that Ameritech has not met its commitment to**
695 **provide an EDI ordering interface that CLECs could use to process both directory**
696 **listings and Local Service orders. Please comment.**

697 A. That is patently wrong. The capabilities provided by Ameritech to CLECs for the
698 ordering and maintenance of directory listings, already in full compliance with applicable
699 regulation, have been further enhanced through the integration of the Ameritech
700 Advertising Services (“AAS”)-provided EDI interface into the Ameritech OSS EDI
701 ordering interface, as described in my Affidavit. In addition, an enhancement was
702 implemented in June 2001 in complete fulfillment of the directory listings ordering
703 commitment made by Ameritech during ICC-sponsored OSS collaboratives. With this
704 enhancement, switch-based CLECs are able to access through Ameritech’s EDI ordering
705 interface all the same directory listings ordering functionality previously available only
706 through AAS’s EDI interface.

707

708 **Q. AT&T (Willard pg. 51) also claims that the directory ordering process discriminates**
709 **against facilities-based CLECs. Please comment.**

710 A. All directory listings received by Ameritech ultimately reach AAS for processing and
711 inclusion in the Directory Assistance and directory publishing databases. This is true for
712 all CLEC listings, whether from a switch-based provider or from a UNE-P or resale
713 provider, as well as for the listings of all Ameritech retail customers.

714 Also, although Mr. Willard (pg. 51) states otherwise, all directory listing orders received
715 by Ameritech from CLECs via its OSS EDI ordering interface are edited before being
716 sent to AAS. Just as Ameritech retail service representatives receive feedback from their
717 order entry system regarding errors in the directory listing information, CLECs are
718 provided the information necessary to edit their orders and detect errors before sending
719 their orders to Ameritech. Should they choose not to do so, though, most errors will be
720 detected by Ameritech's ordering interface system and an error message (reject) will be
721 returned to the CLEC. This is true for switch-based orders as well as for other CLEC
722 orders.

723 Mr. Willard fails to make an important distinction in his discussion of directory listings
724 ordering. When a facilities-based CLEC places an order for directory listings, it may do
725 so in two circumstances. If the CLEC is ordering a directory listing at the same time it is
726 ordering an unbundled loop, as is commonly done to serve a customer with CLEC-
727 provided switching, it is first edited for errors and if none are detected the directory
728 listing portion of that order is held by Ameritech until the network portion of the order is
729 completed (the unbundled loop is installed). The directory listing is then forwarded to
730 AAS. This process is very similar to the process that is followed by Ameritech for CLEC
731 UNE-P and resale orders, and for its own retail service orders.

732 If a facilities-based CLEC is only ordering a directory listing, *i.e.*, is not ordering any
733 network product or service from Ameritech, since there is no need to wait for completion
734 of the network-related work, that order is forwarded to AAS after being edited, and then
735 processed immediately. Since these orders are essentially completed as soon as received,
736 if a CLEC decides later to change or correct information sent on such an order, another
737 order must be sent. This is true for any correction of any type of order received by
738 Ameritech where the CLEC wishes to make a change after the order is completed.
739 However, a CLEC is able to supplement an order that is not yet completed. This includes
740 the directory listings portion of a combined order for an unbundled loop and directory
741 listings.

742 Once AAS receives an order, there is a limited possibility that an error will be
743 encountered that prevents the completion of processing. This is true of Ameritech retail
744 orders, CLEC UNE-P and resale orders, as well as facilities-based CLEC orders. The
745 nature of the error encountered may require a CLEC contact for resolution. This is no
746 different than other steps in the provisioning or completion of an order from a CLEC –
747 sometimes it is necessary to contact the ordering party (the CLEC in the case of a
748 wholesale order and the retail customer in the case of an Ameritech retail order) in order
749 to resolve an issue with an order to insure that it is processed correctly.

750 Although Mr. Willard attempts to characterize the contacts as particularly burdensome to
751 the facilities-based CLEC, some facts are helpful in understanding the actual impact. Mr.
752 Willard (pg. 52) refers to “faxes, phone calls, and emails”. AAS posts to a Web site for
753 AT&T, and all facilities-based providers, three reports daily. One is a Notification of
754 Loss Report, which lets the CLEC know that another CLEC has taken “ownership” of a

755 listing that previously was “owned” by the CLEC receiving the loss report, presumably in
756 connection with a change of providers by the end customer. The other two reports are
757 daily summaries of the orders received by AAS, one of manually received orders and one
758 for electronically received orders. Phone calls made by AAS to CLECs in conjunction
759 with received orders are normally in response to CLEC-to-AAS calls. Finally, faxed
760 inquiries, are used by AAS to notify CLECs of errors or questions about their listing
761 orders, and are sent to AT&T on less than 1% of their facilities-based orders.

762

763 **Q. AT&T (Willard pg. 53) contends that Ameritech’s directory listings inquiry**
764 **capability is discriminatory. Please comment.**

765 A. This is no more true than Mr. Willard’s similar claim regarding Ameritech’s directory
766 listings ordering capability.

767 Ameritech’s pre-ordering interface directory listings inquiry provides information from
768 Ameritech’s customer service database. The only directory listings information
769 contained in that database is that retained from orders for directory listings provided by
770 Ameritech in conjunction with a TN-based service offered by Ameritech. For example,
771 the unbundled local switching product includes a directory listing provided by Ameritech.
772 Since this product and listing are ordered from Ameritech (although the listing is
773 obtained from AAS), the customer service record includes the listing information and it is
774 available to the CLEC through Ameritech’s pre-ordering interface.

775 Directory listings provided to the facilities-based CLEC are not part of any product
776 ordered from Ameritech. Instead they are separately ordered from and provided by AAS.

777 Consequently, the listing information resides only in the databases of AAS and not in
778 Ameritech's customer service record database.

779 AAS provides access for CLECs to the listings included in its database through a GUI
780 listing inquiry interface, described in the Affidavit of Robben Kniffen-Rusu. As a
781 deregulated provider of publishing services, AAS must provide a means of access to its
782 directory listing information appropriate for its customers who may or may not also
783 purchase network services from Ameritech. If a CLEC chooses, it may use this GUI
784 listing inquiry interface to access all its listings, both for customers served from its
785 switches as well as those served using Ameritech switch-based services, thereby giving
786 its service representatives a single interface for accessing its directory listings.

787 Ameritech and AAS have agreed to integrate some of the directory listings inquiry
788 functionality provided by AAS's GUI listing inquiry interface into Ameritech's pre-
789 ordering interface. That release is scheduled for implementation in November 2002. As
790 an added convenience to CLECs who obtain network services from Ameritech and also
791 choose to obtain listing services from AAS, these CLECs will be able to use Ameritech's
792 pre-ordering interface to access their facilities-based listings. This enhancement was
793 negotiated by Ameritech with CLECs during last year's OSS collaboratives, and was
794 expressly excluded from third-party OSS testing by all parties. In other words, while this
795 demonstrates Ameritech's on-going commitment to providing CLECs excellent access to
796 OSS and willingness to work with CLECs to address their needs, this additional
797 functionality is in no way a requirement for anything in the context of Ameritech Illinois'
798 section 271 application.

799

800 **X. LSOG 5**

801

802 **Q. Is Ameritech's implementation of LSOG 5 relevant to Ameritech's checklist**
803 **compliance?**

804 A. No it is not. Ameritech's implementation of the LSOG 5 release, or even LSOG 4, is not
805 a requirement of 271 checklist compliance given that the FCC has approved applications
806 from ILECs in seven states (New York, Texas, Kansas, Oklahoma, Massachusetts,
807 Connecticut, Pennsylvania), even though none of those ILECs had implemented LSOG 5.
808 In fact, the FCC approved Bell Atlantic's application for New York at a time when it was
809 operating under LSOG 3 standards, and approved SBC's applications for Texas, Kansas
810 and Oklahoma when SWBT's OSS were also provided under LSOG 3 standards. More
811 recently, the FCC approved Verizon's Section 271 application for Pennsylvania where
812 LSOG 2 was the interface tested (over the complaints of AT&T that the audit should
813 have tested LSOG 4). Pennsylvania 271 Order, ¶ 50 & n. 199.

814 Despite the amount of discussion devoted to the issue by Mr. Willard (pg. 20 – 26), the
815 April 2002 LSOG 5 release is not germane to the consideration of Ameritech's checklist
816 compliance. Almost all of the systems and interfaces presently being tested, including the
817 LSOG 4 EDI/CORBA pre-order and EDI order interfaces, will be unaffected by the April
818 2002 release. Ameritech will support LSOG 4 until LSOG 6 is implemented. LSOG 6
819 was issued by OBF in November 2001, however, has not yet been scheduled for
820 implementation by Ameritech, but would likely not be implemented before early in 2003.
821 Regardless, the April LSOG 5 implementation is simply an instance of an ongoing

822 program of system enhancements that has existed and will continue into the foreseeable
823 future.

824

825 **Q. AT&T (Willard pg. 11) claims that Ameritech's LSOG 5 release will add MOG and**
826 **LASR and that these two additions will have a huge impact on Ameritech's OSS.**

827 **Please comment.**

828 A. AT&T's assessment of the changes that are being made to Ameritech's systems is
829 incorrect. Ameritech is not implementing Mechanized Order Generator ("MOG"), which
830 is currently being used by Southwestern Bell. And although Ameritech will implement
831 Local Access Service Request ("LASR") to replace some of the up-front edits currently
832 being done by Mechanized Order Receipt ("MOR"), Ameritech will continue to use the
833 same MOR system to generate its mechanized orders for LSOG 5 just as it does for
834 LSOG 4. As I stated above, LSOG 4 will remain in production after LSOG 5 is
835 implemented, because Ameritech Illinois uses "versioning" to support more than one
836 version of the interface software. LSOG 4 will only be retired once LSOG 6 is
837 implemented.

838

839 **Q. AT&T witness Willard states that Ameritech's LSOG 5 release has been delayed**
840 **until April 2002. Please comment.**

841 A. Yes, this is correct. On February 19, 2002 SBC/Ameritech invoked the emergency
842 provisions of its 13 state Change Management Process and notified the Change
843 Management Points of Contact (CLEC contacts) of an emergency conference call to

844 discuss the status of the release. Over the next few days, SBC hosted two calls. On the
845 calls, SBC described the situation and indicated that, while it could move forward, it did
846 not recommend doing so because it feared a negative impact on CLEC operations. At
847 that time, SBC proposed alternative release dates. The CLECs did not express a
848 consistent opinion regarding the alternative dates; some (including WorldCom, AT&T,
849 and Birch) supported SBC's proposed dates, while others sought additional time beyond
850 SBC's proposed date. The parties eventually reached concurrence on SBC's proposed
851 date. In addition, SBC agreed to delay the retirement of other interfaces. Ultimately, the
852 FCC granted a 32-day extension to the target date for completion of the Uniform and
853 Enhanced OSS POR. Again, however, whether LSOG 5 is implemented in February or
854 April 2002 is irrelevant to the section 271 application.

855

856 **Q. AT&T (Willard pg. 21) asserts that SBC/Ameritech has had to make many**
857 **corrections to its LSOG 5 documentation. Please comment.**

858 A. The POR that will be implemented shortly is the result of a long but fruitful negotiation
859 process between SBC and the CLEC community. However the POR has required
860 software, hardware and other changes to a large set of systems. The changes that
861 SBC/Ameritech has made affected all aspects of systems design and development work,
862 from process flows to data requirements to implementation walkthroughs. Any change to
863 the EDI interface or LSR requirements, for example, can have a ripple effect through
864 multiple systems, affecting each of them and their business rules. Thus, in order to
865 maintain synchronization between systems, each change must be reviewed from the
866 perspective of each system. Consequently, SBC/Ameritech and its CLEC partners

867 extended the POR walkthroughs several months beyond schedule (ending in November
868 2001 instead of June 2001).

869 During the walkthroughs, SBC/Ameritech made many changes to its POR
870 documentation. Contrary to Mr. Willard's comments, the documentation changes were
871 either made at the CLECs' requests or with their concurrence. For example,
872 SBC/Ameritech agreed, at the request of the CLECS, to make data characteristic changes
873 to the LSR field, RPON/NOR ("Related Purchase Order Number / Number Of
874 Requests"), changing the number of occurrences of the RPON/NOR field from 20 to 99.
875 In turn, this impacted the LASR database and ultimately the EDI mapping and interface
876 specifications. In addition, most changes to the LSR business rules also impact
877 SBC/Ameritech flow through capabilities thus requiring further changes to downstream
878 processes and their supporting documentation. These documentation changes are thus,
879 contrary to AT&T's spin on the matter, evidence of Ameritech's dedication to the
880 process, concern with accuracy, and readiness to accommodate CLECs.

881

882 **XI. ENHANCED VERIGATE AND LEX GUI5**

883

884 **Q. McLeodUSA (Sprague pg. 2) claims that when McLeodUSA pulls a Customer**
885 **Service Inquiry ("CSI") from Verigate for a Centrex customer, the Service Listing**
886 **Address obtained is the "switch address" not the "Customer's Service Listing**
887 **Address," and that McLeodUSA cannot process Centrex orders via the toolbar.**
888 **Please comment.**

889 A. As I stated in my January Testimony, Ameritech does support address validation for
890 Centrex when using the Address Validation option of Enhanced Verigate. However, it is
891 now clear from Ms. Sprague's Testimony that McLeodUSA is not using the Address
892 Validation option of Enhanced Verigate, but is instead using the Customer Service
893 Inquiry option. When using this option, McLeodUSA is correct that Enhanced Verigate
894 will return the switch address instead of the customer service listing address. This issue,
895 however, will be resolved with the implementation of the next release of the GUI, which
896 will be released during April 2002. At that time, McLeodUSA will no longer need to pull
897 the customer service listing address from TCNET, since they will be able to retrieve it
898 from Enhanced Verigate.

899

900 **Q. AT&T witness Van De Water has noted that AT&T has encountered problems with**
901 **Ameritech's Graphical User Interfaces (GUIs) and argues that the GUI is slow and**
902 **unstable. Please comment.**

903 A. Although AT&T did experience slow response times in using the Web LEX application,
904 that problem was in fact caused by AT&T and not Ameritech's GUIs. Specifically,
905 AT&T made an inappropriate routing choice in connecting its users to Ameritech's OSS.
906 AT&T had connected its users through the SWBT region access point the LRAF rather
907 than the Ameritech region access point. The SBC CLEC OSS Interconnection document
908 clearly states that the LRAF cannot be used for accessing Ameritech interfaces until after
909 implementation of the uniform interface in the SWBT region. Once AT&T corrected the
910 connectivity problem it had caused, AT&T informed Ameritech that the problem was
911 resolved.

912

913 **Q. AT&T (Van De Water pg. 6) notes five problems that it has encountered when using**
914 **the GUI. Please comment.**

915 A. As described in my January affidavit, Ameritech deployed new Graphical User Interface
916 (GUI) pre-ordering and ordering applications, Enhanced Verigate and Enhanced LEX
917 respectively, as part of the March 2001 release. Although Ameritech performs many
918 quality assurance steps as part of its development process, CLEC users of these new
919 applications have encountered a limited number of problems. Ameritech has worked to
920 resolve these problems expeditiously, and continues to perform additional user testing as
921 a quality control measure. Additionally, the third-party OSS test will provide further
922 validation of the quality of the Enhanced Verigate and Enhanced LEX applications.

923 Ameritech quickly resolved all of the five issues cited by AT&T (Van De Water pg. 6) in
924 October 2001. The fifth issue that AT&T cited is not a system problem at all, but is a
925 business process issue. Presently, AT&T cannot migrate lines that would break up a hunt
926 group. Ameritech initially advised AT&T that the end customer must break up the hunt
927 group with Ameritech Retail before an order will be accepted from AT&T to migrate
928 these lines. To further address the issue, however, Ameritech implemented a change to its
929 business process in October 2001 to manually work these orders through the LSC.

930 Ameritech will be handling these orders electronically with the next release of its GUI
931 that is scheduled for April 2002.

932

933 **Q. AT&T (Van De Water pg. 7) claims that even though the GUI is an electronic**
934 **interface, the “back office” behind the interface continue to be largely manual.**
935 **Please respond.**

936 A. Contrary to AT&T’s claims, the majority of Ameritech’s processes are mechanized.
937 Ameritech has made it very clear which orders, if correctly submitted to Ameritech will
938 flow-through Ameritech’s systems without any manual intervention. Ameritech has
939 shared with the CLEC’s and the ICC the “Flow-through and Exceptions” document that
940 clearly states which orders will flow-through Ameritech’s systems. A current copy of
941 “Flow-through and Exceptions” document can be found on the Ameritech CLEC web site
942 at <https://clec.sbc.com/cmp/cmp.cfm>. In addition, Ameritech is working with CLECs on
943 a 24-month flow through initiative to improve its flow through capabilities based on
944 direct input from CLECs, which AT&T is an active participant.

945

946 **Q. Vertex (Mintz pg. 3) contends that the Enhanced Verigate and Web-LEX systems**
947 **are not integrated or tied together. Please comment.**

948 A. The Enhanced Verigate and LEX GUIs are integrated and do use the same databases.
949 However, based on the example presented in Ms. Mintz’s Testimony (pg. 3) Vertex
950 might not understand the timing of Ameritech’s database updates. Ms. Mintz notes that
951 even though Vertex has received a Service Order Completion (“SOC”) notice from
952 Ameritech, Enhanced Verigate will indicate that the customer is still an Ameritech
953 customer, and that information may not be updated for a couple days. This situation can
954 occur, as I explain, in the following scenario.

955 Once the SOC has been sent to the CLEC, Ameritech Customer Information System
956 (“ACIS”) or Carrier Access Billing System (“CABS”) will attempt to post the order for
957 billing the CLEC. If the order is successfully posted for billing, the Customer Service
958 Record (“CSR”) is updated to reflect the change in carrier. This update to the CSR
959 normally occurs on the day after the billing update. If the order contains errors that
960 prevent posting, however, the Local Service Center (“LSC”) will make the necessary
961 corrections to the service order and will redistribute the order. This error correction
962 process is described in the affidavit of Justin Brown. The order will then be sent to ACIS
963 or CABS that evening for another attempt at posting. As a result, it is possible for the
964 CLEC to have received an SOC and query a CSR that has not been updated. Once the
965 LSC has corrected the error and the order has posted to billing, the CSR will be updated.

966

967 **Q. Although the Enhanced Web LEX GUI does support the ordering of unbundled**
968 **local transport DS1 & DS3, Vertex (Mintz pg. 5) states that it does not have the**
969 **required fields to designate whether the DS1 facility should be channelized or not-**
970 **channelized and that this limits its ability to rout the DS1 circuit unswitched from**
971 **one location to a terminating location. Please comment.**

972 A. Vertex has clarified that it is not necessarily limiting itself to “unbundled transport” DS1
973 and DS3. However, Vertex can order a DS1 or DS3 unbundled loop on an LSR via the
974 Web-Lex application. Those orders, however, are not designed to flow-through. To
975 order a DS1 or DS3 unbundled loop, the CLEC must use the correct SPEC Code,
976 Network Channel (NC) code, and Network Channel Interface (NCI)/Secondary NCI
977 coding. These codes are available in the Local Service Ordering Requirements (LSOR).

978 Examples for ordering these types of loops can also be found in the CLEC Handbook.

979 Channelized services are not offered on the unbundled DS1 or DS3 loops.

980

981 **XII. FLOW-THROUGH**

982

983 **Q. Please briefly describe Ameritech Illinois's continuing collaborative efforts to**
984 **improve flow through of CLEC Orders.**

985 A. As described above and reported to the ICC in an OSS Status Report of March 2002,
986 Ameritech has engaged in a cooperative effort with CLECs to prioritize and plan flow
987 through enhancements for the next twenty-four months. In that process, the scheduling
988 of these enhancements is reviewed regularly for adjustment in case CLEC business
989 priorities change. Ameritech is working with all CLECs on cooperatively planning future
990 flow through enhancements as part of its OSS change management meetings, which is the
991 proper venue for WorldCom to address this issue. In fact, based on these change
992 management discussions, Ameritech recently worked with requesting CLECs to modify
993 the twenty-four month flow through enhancement plan. As a result, an enhancement
994 requested by WorldCom to flow through UNE-P migration orders of accounts which
995 have retail call packs has been scheduled for August 2002.

996

997 **Q. WorldCom (Lichtenberg pg. 12) states that when Ameritech calculates its flow-**
998 **through percentage, it excludes orders that are covered by "contracts." Please**
999 **comment.**

1000 A. Ms. Lichtenberg refers to orders whose accounts have contracts such as intraLATA toll
1001 plans. As stated by Ms. Lichtenberg, documentation supplied by eritech does point out
1002 that orders on accounts with contracts will not flow through. Such orders, which may
1003 request early termination of an intraLATA toll contract, require manual handling to
1004 determine the amount of the termination charge or even if a termination charge should be
1005 made. These orders are reported as having not flowed through in Ameritech's diagnostic
1006 performance measure on total flow through, PM 13.1. Therefore, there is nothing
1007 misleading or "fatally flawed" about Ameritech's flow through reporting.

1008 This particular flow through exception applies in limited circumstances. For example,
1009 conversion order activity of Unbundled Network Element – Platform ("UNE-P") POTS
1010 where a contract exists requires manual intervention. This type of order activity, is not
1011 designed to flow-through, and therefore, is reported under Performance Measurement
1012 ("PM") 13.1, which measures flow-through performance of all electronically received
1013 orders, whether they are designed to flow-through or not. In cases where contract order
1014 activity is designed to flow-through, such as Resale POTS orders to add, assume or
1015 remove contracted intraLATA toll calling plans, then the results of that order activity
1016 performance is counted in both PM 13 and 13.1. Insufficient information was provided
1017 by Ms. Lichtenberg to understand how applicable her study of "about 62 orders" really is
1018 to the body of residential customers in Illinois.

1019

1020 **XIII. ELECTRONIC BONDING TROUBLE ADMINISTRATION ("EBTA")**

1021

1022 **Q. WorldCom (Lichtenberg pg. 28) claims that WorldCom is frequently unable to run**
1023 **a Mechanized Loop Test (“MLT”) on a customer’s line. Please comment.**

1024 A. MLT is a product of Tollgrade Technologies and is the most common software product
1025 used throughout the telecommunication industry to perform a test on a line. MLT is used
1026 by CLEC’s as well as Ameritech’s own retail organization to perform the tests. Although,
1027 it is unlikely, it is possible that when a user submits an MLT on a line there could be
1028 contention for testing resources in the switch that would prevent the MLT from
1029 completing. In these few cases, the user should resubmit the MLT. It should also be
1030 noted that KPMG during the November and December of 2001 conducted a volume test
1031 of the EBTA system. KPMG submitted trouble tickets on test circuits that simulated 250
1032 percent of December 2002 forecasted trouble ticket volume. During the volume test
1033 KPMG submitted hundreds of successful MLT transactions. Thus, independent tests cast
1034 doubt on WorldCom’s claims, especially the claim that there is a system problem.

1035

1036 **Q. Ms. Lichtenberg notes that when WorldCom reports trouble through the Local**
1037 **Operation Center (“LOC”) it receives a faster commitment date to repair out of**
1038 **service issues than when they report trouble VIA Electronic Bonding and Trouble**
1039 **Administration (“EBTA”). Please comment.**

1040 A. As Ms. Lichtenberg notes, EBTA does have the capability to retrieve an earlier
1041 commitment date if the CLEC is unhappy with the date that EBTA initially returns. The
1042 EBTA “escalation” button will return a date similar to the date that WorldCom was given
1043 when they called the Local Operations Center (“LOC”). In essence, when WorldCom
1044 called the LOC to get a commitment date they were escalating the issue to bypass the

1045 system. In either case, the dates that were provided to WorldCom through EBTA or the
1046 LOC are the same dates that are provided to Ameritech's own Retail organization.

1047

1048 **Q. Ms. Lichtenberg states that the trouble codes entered into EBTA change when**
1049 **entered into Ameritech's downstream systems. Please comment.**

1050 A. The trouble codes used by the EBTA system were not established by Ameritech as Ms.
1051 Lichtenberg claims, but are in fact standard codes that were established by the American
1052 National Standard Institute ("ANSI") in its T1.227/T1.228 standards. These are national
1053 standard codes used throughout the telecommunication industry. They are translated to
1054 codes that are used within Ameritech's downstream systems. WorldCom should not be
1055 affected by this process. However, if WorldCom does notice different trouble code on the
1056 trouble ticket than the one that they entered they should report this to the Ameritech
1057 Information Services Call Center. Ameritech encourages WorldCom and all CLECs to
1058 enter additional information in the "Additional trouble Info" field to eliminate any
1059 ambiguity in resolving their customer's cases of trouble. Ameritech's technicians are
1060 trained to read the additional information in the "Additional Trouble Info" field to resolve
1061 the customer's trouble.

1062

1063 **XIV. 900/976 BLOCKING FUNCTIONALITY**

1064

1065 **Q. Z-Tel (Walters pg. 13) asserts that Ameritech's OSS blocking function does not**
1066 **work. Please respond.**

1067 A. Ameritech is not aware of any OSS interface issues that would prevent a CLEC from
1068 accurately creating an order with 900/976 blocking. If the CLEC enters the correct
1069 Universal Service Ordering Codes (“USOC”) RTV1N and RTV2N on its order the OSS
1070 interface will accurately build the order and if the order is flow through eligible will
1071 complete the order. Please see the affidavit of Justin Brown for orders that require
1072 manual handling.

1073

1074 **XV. AT&T MICHIGAN MARKET ENTRY TEST**

1075

1076 **Q. AT&T (Willard pg. 39-43) makes several comments related to its Michigan market**
1077 **entry test. Please respond.**

1078 A. On March 11, 2002, AT&T filed comments on its Market Entry Trial. My response to
1079 this portion of Mr. Willard’s testimony is the same response provided to the same
1080 submission in Michigan. That is, to the extent AT&T offers its “test” as a means of
1081 notifying Ameritech Illinois of AT&T’s business and operational concerns, we welcome
1082 it. Ameritech has already worked with AT&T to address a number of issues raised by
1083 AT&T’s market entry, a fact AT&T acknowledges in its comments. And Ameritech
1084 remains committed to working with AT&T (and other CLECs) in the future to address
1085 legitimate issues as they may arise regarding our OSS performance.

1086 But while the “test” may be useful as a platform for business-to-business discussion, it is
1087 not, as AT&T concedes, a replacement for the Commission’s third-party OSS test, nor
1088 does it merit any meaningful weight in these proceedings. Calling it a “test” gives it
1089 undue credibility and undermines the integrity of the official OSS test and the actual

1090 commercial performance results required by this Commission. The Commission and the
1091 industry spent substantial time and effort forging the Master Test Plan, including
1092 addressing suggested changes to the Master Test Plan made by AT&T. KPMG has spent
1093 thousands of hours evaluating everything AT&T allegedly evaluated, and much, much
1094 more. There is simply no rational reason to give AT&T's unsupervised, piece-meal
1095 assessment any weight, given the fact that the Commission will have KPMG's full-scale
1096 independent evaluation, and commercial performance results before it in Phase II of this
1097 proceeding..

1098 Moreover, to treat AT&T's "test" in any manner similar to KPMG's test wastes finite
1099 resources. With KPMG's report just months away, Ameritech cannot afford to reallocate
1100 its valuable assets and personnel to respond point-by-point to AT&T's "test." Those
1101 resources are deeply entrenched in the real test, and moving them will simply delay the
1102 final report. Let the official test and actual commercial results speak for themselves. If
1103 AT&T has legitimate concerns, as it professes, then it can raise its concerns in Phase II of
1104 this proceeding after KPMG report is released. AT&T's "test" comments are simply
1105 premature and should not, indeed, cannot, delay completing the Commission's third party
1106 OSS test.

1107

1108 **Q. Are AT&T's market actions consistent with the allegations contained in its so-called**
1109 **"test?"**

1110 No, AT&T's commercial actions, rather than its regulatory strategy, speak for itself and
1111 prove the high quality of SBC's OSS performance. For example, when AT&T
1112 announced on June 11, 2001 that it had plans to enter Michigan's local phone market,

1113 AT&T said it could not provide an actual entry date until it first evaluated “the quality of
1114 Ameritech’s back-office systems.” Apparently, AT&T is pleased with Ameritech’s OSS
1115 performance because on February 13, 2002, AT&T announced it was entering the local
1116 market in Michigan. In less than 8 weeks, AT&T signed up 50,000 new Michigan
1117 customers. On April 22, 2002, AT&T announced that is in planning to enter the Illinois
1118 residential local services market starting in June. If Ameritech’s OSS performance really
1119 had the flaws AT&T’s regulatory arm suggests, it is hard to believe that AT&T’s
1120 commercial operations would be taking these steps and having such success.

1121

1122 **XVI. CONCLUSION**

1123

1124 **Q. Does this conclude your Rebuttal Testimony?**

1125 **A. Yes.**