

1 **DIRECT TESTIMONY OF MICHAEL REITH**

2

3 **Q. COULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 **A.** My Name is Michael Reith. I am the Director Industry Policy of Z-Tel
5 Communications. My business address is 601 S. Harbour Island Boulevard,
6 Tampa, Florida.

7

8 **Q. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES AS**
9 **DIRECTOR OF INDUSTRY POLICY.**

10 **A.** As Director of Industry Policy for Z-Tel, I have responsibilities for monitoring
11 and analyzing various performance issues related to SBC-Ameritech and the other
12 Regional Bell Operating Companies. This includes the issue of line loss
13 reporting.

14

15 **Q. ARE YOU THE SAME MICHAEL REITH THAT TESTIFIED EARLIER**
16 **IN THIS PROCEEDING?**

17 **A.** Yes.

18

19 **Q. PLEASE BRIEFLY THE PURPOSE OF YOUR TESTIMONY.**

20 **A.** The purpose of my rebuttal testimony is to respond to the testimony prefiled by
21 Beth Lawson of Ameritech. More specifically, I will respond to Ms. Lawson's
22 testimony that Ameritech provides parity of information to CLEC's by providing
23 the 836 Line Loss Notice. I will also respond to Ms. Lawson's incorrect assertion

1 that Ameritech's OSS systems rely exclusively on the 836 LLN in dealing with its
2 disconnected customers' accounts. Finally, I will describe the fields of data Z-Tel
3 believes that Ameritech should be compelled by the Commission to provide to Z-
4 Tel in order to achieve parity.

5 Z-Tel believes that Ameritech is required to provide Z-Tel with the same
6 OSS information on disconnected customers that Ameritech provides to its retail
7 operations. Therefore, I will explain Z-Tel's position that Ameritech should still
8 be required to provide Z-Tel with the information contained in the Local Loss
9 Report when a Z-Tel customer migrates to another carrier. Having said that, Z-
10 Tel does not oppose Ameritech's proposal to discontinue the Local Loss Report,
11 so long as the same information, plus additional information that is currently
12 provided to Ameritech's retail unit, is provided to Z-Tel as part of the traditional
13 836 Line Loss Notice process.

14 Z-Tel requests that the Commission, in order to achieve parity in the
15 provision of OSS information on lost customers, order Ameritech to provide the
16 following information in a single report to Z-Tel:

- 17 1. the working telephone number of the disconnect;
- 18 2. the completion date of disconnect;
- 19 3. the reason for the disconnect (disconnect reason code);
- 20 4. the telephone number to which the account is billed;
- 21 5. the order number; and
- 22 6. the contact name of a person at Ameritech that Z-Tel should
23 contact in the event of an error in the disconnect report.

1 This is information that SBC provides to CLECs in other states.

2

3 **Q. IN ITS APPLICATION FOR REHEARING, AMERITECH ASSERTED**
4 **THAT IT WAS RELYING EXCLUSIVELY ON THE 836 LINE LOSS**
5 **NOTICE, AND THAT IT SHOULD NOT BE REQUIRED TO PROVIDE**
6 **CLECS WITH THE INFORMATION THAT AMERITECH HAD**
7 **HISTORICALLY BEEN GIVING TO ITS WINBACK GROUP. HOW DID**
8 **THE COMMISSION ORIGINALLY COME TO THE CONCLUSION**
9 **THAT THE INFORMATION CONTAINED IN THE LOCAL LOSS**
10 **REPORT WAS REQUIRED TO BE PROVIDED TO CLECS?**

11 **A.** First, I would remind the Commission that Ameritech's application for rehearing
12 completely overlooks the entire history of this proceeding. The Commission must
13 remember that it required Ameritech to provide Z-Tel with the same OSS
14 information that Ameritech provides to its own retail operations because the
15 Commission learned through this proceeding that Ameritech was discriminating
16 in the type of information that was being provided to CLECs.

17 Ameritech provides both retail services to customers, as well as wholesale
18 services to CLECs that compete against Ameritech. For those CLECs that use
19 Ameritech's facilities to provide services to end users, Ameritech controls and
20 manages the provisioning of those facilities, and therefore maintains all of the
21 OSS information relating to the customers' services, particularly for UNE-P
22 CLECs such as Z-Tel. Consequently, Ameritech's personnel enter data and have
23 access to data about the facilities that are used to serve both Z-Tel customers and

1 Ameritech's customers. For Ameritech's customers, Ameritech has several
2 different databases that share information about Ameritech's customers. Chief
3 among these systems is the Ameritech Service Order Negotiation system
4 (ASON). All service orders for Ameritech and Z-Tel customers are completed
5 using the ASON system. So, any change in a customer's service is provisioned
6 through the ASON systems, including any disconnection and new installation of
7 services. (See Ameritech's responses to Z-Tel's Interrogatories, attached hereto
8 as Exhibit 7.1)

9 The Commission found that Ameritech was discriminating against Z-Tel
10 and other CLECs because Ameritech was providing Ameritech's retail operations
11 (including its Winback group) with significantly more information about
12 disconnected Ameritech customers, than it was providing to CLECs about their
13 own disconnected customers.

14 Remember that up until about June 2000, Ameritech provided its own
15 retail group with the 836 LLN, and included on that report the name of the carrier
16 to whom an Ameritech customer migrated. Ameritech modified that report,
17 removed that information from the report, and then developed for its Winback
18 group a special report that included significant amounts of information that
19 Ameritech did not make available to its competitors, including the reason why a
20 customer migrated from Ameritech (i.e. whether the customer migrated to a UNE-
21 P CLEC, a CLEC that did its own switching, or a CLEC that was a reseller of
22 Ameritech's services.) The Commission concluded that providing this
23 information to its Winback group, while not providing the same information about

1 disconnected customers to CLECs was discriminatory and in violation of the
2 Illinois Public Utilities Act.

3 I would note that the Commission's order focused on the type of
4 information that Ameritech is required to provide to CLECs to achieve parity. It
5 was not concerned with the name of the report, or the moniker that Ameritech
6 attaches to its reports. In the earlier part of the case, Ameritech referred to the
7 report given to its Winback group as the "Disconnect Report." Now it refers to
8 this same set of information as its "Local Loss Report." The name of the report,
9 or how it is organized is irrelevant. In Z-Tel's opinion, what is important is that
10 we have the ability to gain access to the same relevant information as
11 Ameritech's retail operations have access to.

12

13 **Q. WHAT INFORMATION WAS AMERITECH PROVIDING TO ITS**
14 **WINBACK GROUP THAT IT WAS NOT PROVIDING TO CLECS?**

15 A. Ameritech's 836 LLN provided the "working telephone number" of the customer,
16 and the date of disconnection. Ameritech's Local Loss Report provides 1) the
17 CLEC identifier, 2) the working telephone number, 3) the reason the customer
18 migrated from Z-Tel (the type of carrier to whom the customer migrated), 4) the
19 customer ID, 5) the transaction code, 6) the customer code associated with the
20 billed number, 7) the billed number, 8) the customer code associated with the
21 account, 9) the main telephone number associated with the account, and 10) the
22 state code associated with the account, and 11) the type of facilities used to serve
23 the customer.

1

2 **Q. WHY HAS Z-TEL NOT RELIED UPON THE LOCAL LOSS REPORT**
3 **EVEN THOUGH THE COMMISSION MADE THAT INFORMATION**
4 **AVAILABLE TO IT IN ITS ORDER?**

5 **A.** Ameritech and SBC have created an administrative nightmare in the manner in
6 which they provide Z-Tel with this Local Loss Report. In fact, Ms. Lawson even
7 admits that CLECs should not rely on the LLR because of its incompleteness in
8 information. (Lawson Testimony, line 109.)

9 The 836 LLN and the LLR is provided to Z-Tel in two separate reports. In
10 order for Z-Tel to use the information provided on the LLR, it would have to
11 redesign its software systems to read both the LLR and the 836 LLN. Ms.
12 Lawson also says that the LLR contains information about the “due date of the
13 disconnect order” not the actual date that a customer was disconnected (Lawson
14 Direct, line 106.) In addition, the LLR does not include lost lines for customers
15 that partially migrate their services. (Lawson Direct, Line 111; Ameritech
16 Accessible Letter, Lawson Exh. 3.1.) Ameritech also advised in June, 2002 that
17 they would not add partial migrations to the loss report (despite our requests), and
18 that they would not devote resources to ensure the accuracy of these reports.
19 With these limitations, it is difficult for a CLEC to have to combine information
20 from both the 836 LLN and the LLR to get the complete set of information. That
21 is why Z-Tel has not used the LLRs.

22

1 **Q. MS. LAWSON STATES THAT AMERITECH NO LONGER RELIES ON**
2 **THE LOCAL LOSS REPORT. DOES THIS MEAN THAT**
3 **AMERITECH'S RETAIL BUSINESS UNITS DO NOT HAVE ACCESS TO**
4 **THIS SAME INFORMATION?**

5 **A.** No. Ameritech may not generate a "Local Loss Report" for its Winback group,
6 but based on information that Ameritech has provided in its responses to
7 discovery requests, it still does provide this same information, and more to its
8 retail business units.

9
10 **Q. WHAT INFORMATION DO AMERITECH'S RETAIL UNITS HAVE**
11 **ACCESS TO?**

12 **A.** Ameritech may no longer rely upon the LLR for its Winback efforts, but that does
13 not mean that the only information Ameritech's retail business units have access
14 to the customers' disconnect date and working telephone number. Ameritech's
15 responses to Z-Tel's discovery requests indicate that its ASON is the "electronic
16 interface that Ameritech's retail . . . service representatives use to create, edit,
17 distribute and control service orders for changes to customers' services and
18 account records." (Response to Interrogatory 7.) ASON service orders related to
19 Ameritech retail customers may be viewed by Ameritech retail service
20 representatives. In addition, when a customer migrates from Ameritech, the
21 information regarding that customer's account is sent to downstream systems.
22 (Response to Interrogatory 7.)

1 From what I can tell in Ameritech's responses to Z-Tel's interrogatories,
2 the records for disconnected customers usually contain at least the following types
3 of information on a customer:

- 4 The working telephone number
- 5 The reason for the disconnect
- 6 The customer ID
- 7 The order number associated with the change
- 8 The central office exchange that services the customer
- 9 The due date of the disconnection (or order)
- 10 The completion date of the disconnection (or order)
- 11 The name and address of the customer
- 12 The billing address for the customer
- 13 The service and equipment used to serve the customer (central office related
- 14 information)

15
16 (Attached is a copy of the ASON record for an Ameritech disconnected customer,
17 Z-Tel Exh. 7.2, and a Z-Tel disconnected customer, Exhibit 7.3.)

18 Ameritech acknowledges that a copy of the ASON record on disconnected
19 customers is delivered directly to its ACIS billing systems to immediately cease
20 billing customer that have migrated from Ameritech.

21

22

23

**Q. AT THIS TIME, IS THIS INFORMATION ON A DISCONNECTED
24 CUSTOMER PROVIDED TO Z-TEL IN THE 836 LLN?**

24

25

**A. No. As I indicated, the only information provided to Z-Tel in an 836 LLN is the
26 working telephone number of the customer, and the date of completion of the
27 disconnect order.**

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28

1 **Q. OF THE INFORMATION THAT IS IN THE RECORDS OF THE LOST**
2 **CUSTOMERS, WHAT INFORMATION IS USEFUL TO Z-TEL?**

3 **A.** In order to process accurately Z-Tel's service disconnection and billing for its
4 customer, Z-Tel believes that, at a minimum, Ameritech should be compelled to
5 provide Z-Tel with information that includes: the working telephone number of
6 the disconnect, the date of disconnect, the reason for the disconnect (disconnect
7 reason code), the number to which the account is billed, the order number, and the
8 contact name of a person at Ameritech that Z-Tel should contact in the event of an
9 error in the disconnect report.

10

11 **Q. DOES SBC COMMUNICATIONS PROVIDE THIS INFORMATION TO**
12 **OTHER CLECS IN OTHER SBC TERRITORIES?**

13 **A.** Yes. All of the above information (with the exception of the disconnect reason
14 code) is already provided by SBC in either the PacBell territories or the
15 Southwestern Bell Telephone Company territories.

16 Ameritech provides only the working telephone number and the date of
17 disconnection. However, SWBT provides the following data fields:

- 18 1. Z-Tel's OCN;
19 2. the Bill to number of the account;
20 3. working telephone number;
21 4. completion date of the loss;

22 PacBell provides the following data fields:

- 1 1. The name of the person whom Z-Tel should contact for
- 2 questions on the loss report;
- 3 2. The telephone number of the contact person
- 4 3. The order number;
- 5
- 6 4. The working telephone number;
- 7
- 8 5. The disconnect due date;
- 9
- 10 6. The completion date.
- 11

12 **Q.** Why is this information useful to Z-Tel?

13 **A.** Z-Tel often experiences data inconsistencies with Ameritech's OSS. These
14 additional data fields will allow Z-Tel to identify problems and quickly initiate
15 corrective action. For example, the order number ~~would have~~^g helped Z-Tel
16 investigate the "N Order" problem described in my earlier testimony. Having an
17 Ameritech contact name and number will facilitate the correction of any
18 continuing line loss or account problems. As a final example, having the billing
19 telephone number will allow Z-Tel to verify when the customer has multiple lines
20 billed to the same account.

21

22 **Q.** **WHY WOULD THE DISCONNECT REASON CODE BE USEFUL TO Z-**
23 **TEL?**

24 **A.** Ameritech indicated in the initial phase of this case that it collected the
25 Disconnect Reason Code (DRC) and forwarded this information to its Winback
26 group. I presume that Ameritech uses this information to market its former

1 customers. For the same reason, the Disconnect Reason Code will assist Z-Tel to
2 compete in the same way that Ameritech has used this information – to winback
3 customers that have migrated to another carrier. This information, on the same
4 report as the 836 LLN, will allow Z-Tel to more efficiently and effectively market
5 that customer based on all available information. Z-Tel may or may not market a
6 customer if the DRC indicates that the customer was lost to Ameritech, lost to a
7 different CLEC, or moved to another territory. However, Z-Tel should have the
8 same opportunity to use this information as Ameritech.

9
10

11 **Q. PLEASE SUMMARIZE YOUR TESTIMONY, AND Z-TEL'S REQUEST**
12 **FOR RELIEF ON REHEARING.**

13 **A.** Z-Tel opposes Ameritech's efforts to cut back on the information that is made
14 available to Z-Tel and other CLECs when a customer migrates to another carrier.
15 Z-Tel understands that Ameritech's retail business units use the records generated
16 through the ASON systems to manage its customers' accounts, including its ACIS
17 billing systems, when a customer disconnects Ameritech's services. Z-Tel
18 believes that Ameritech is or should be required to provide that same level of
19 information to Z-Tel.

20 Z-Tel also objects to the current Ameritech process by which it delivers
21 information through two different reports. We also object to the fact that
22 Ameritech does not provide Z-Tel with the same level of information that SBC's
23 other affiliates provide to Z-Tel.

1 To achieve parity, Z-Tel requests that the Commission order Ameritech to
2 provide information from the ASON system that Z-Tel can use to effectively
3 manage its customer records. However, in the interests of trying to propose a
4 reasonable solution, Z-Tel would agree to limit the information that Ameritech is
5 required to provide to be equal to the line loss information that SBC's other
6 affiliated companies provide in the other SBC regions. More specifically, Z-Tel
7 requests that the Commission order Ameritech to provide the following
8 information in a single report:

- 9 1. the working telephone number of the disconnect;
- 10 2. the completion date of disconnect;
- 11 3. the reason for the disconnect (disconnect reason code);
- 12 4. the telephone number to which the account is billed;
- 13 5. the order number;
- 14 6. the contact name of a person at Ameritech that Z-Tel should
15 contact in the event of an error in the disconnect report.

16
17 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

18 **A. Yes.**