

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission  
On Its Own Motion

Investigation Concerning Illinois Bell  
Telephone Company's Compliance with  
Section 271 of the Telecommunications Act  
of 1996

CC Docket No. 01-0662

**PHASE 1A COMPLIANCE AFFIDAVIT OF JAMES D. EHR**

**ON BEHALF OF SBC ILLINOIS**

**SBC ILLINOIS EXHIBIT 2.1**

**DATED: January 22, 2003**

I, James D. Ehr, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is James D. Ehr. My business address is 2000 W. Ameritech Center Drive, Location 4G60, Hoffman Estates, IL 60196. I am employed by SBC Management Services, Inc. in the position of Director of Performance Measures for Ameritech Corporation ("SBC Midwest").<sup>1</sup> In that position, I support SBC Illinois, which is a registered trade name for The Illinois Bell Telephone Company, as well as the four other SBC Midwest operating companies. I am currently responsible for the development, implementation and ongoing administration of the wholesale performance measurements system used by SBC in the Midwest region. This system allows SBC Illinois, competing local exchange carriers ("CLECs"), state regulators such as the Illinois Commerce Commission ("ICC" or "Commission"), and the Federal Communications Commission ("FCC") to monitor and evaluate SBC Illinois' performance in providing products, facilities and services to itself and to Illinois CLECs in a nondiscriminatory manner consistent with its obligations under the Telecommunications Act of 1996 (the "1996 Act"). In addition, I am responsible for providing periodic reports on wholesale performance, and investigating issues

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<sup>1</sup> Ameritech Corporation is a wholly owned subsidiary of SBC Communications Inc. Ameritech Corporation owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. I refer to these five operating companies collectively as "SBC Midwest".

raised with respect to SBC Illinois' performance (and the related performance reports) before state and federal regulatory agencies.

**PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND**

2. Since June 2001, I have been responsible for the processes and systems used by SBC Midwest to measure and report on the performance of its operations support systems (“OSS”) and the functions of pre-ordering, ordering, provisioning, maintenance/repair and billing. I have participated as SBC Midwest’s representative in several collaborative workshops on performance measures with state commissions and competing carriers throughout the SBC Midwest region.
3. Prior to assuming my present position, I worked as a Solutions Consultant in the Network Software Solutions (“NSS”) organization within SBC Services Inc. from October 1999 through May 2001. In that position, I was responsible for management of network results reporting programs and projects. This included direct management responsibility for the RRS and AskMe applications. RRS is the primary application for network 271 performance measurements (installation & maintenance) in the Ameritech five-state region, while AskMe is the primary application for those same measurements in the Southwestern Bell Telephone, L. P. (“SWBT”) region. In addition, I was the NSS organization’s lead for planning and strategy processes.
4. Prior to October 1999, I was a member of the Network Systems organization within SBC Midwest’s Information Services (“IS”) organization. In that role I was the IS lead for strategy and planning for all SBC Midwest IS' network OSS.

Additionally, I managed multiple IS projects and programs, including the design of network decision support and reporting applications. Overall, I have 14 years experience in information services within the telecommunications industry with SBC Midwest and other companies, and 18 years overall experience in the analysis, design, development, implementation and management of information systems projects and applications.

5. I earned a Bachelor of Science - Management Information Systems degree from Oakland University, Rochester, Michigan, in 1984 and a Masters of Business Administration degree from the University of Central Florida, Orlando, Florida, in 1994.

**PURPOSE AND SCOPE OF AFFIDAVIT**

6. The purpose of my affidavit is to respond to the request at paragraphs 715-716 of the ALJ's Phase 1 A Interim Order on Investigation ("Order") for additional information about the intervals that apply to the provisioning, maintenance and repair of loop/transport combination, also known as enhanced extended loops ("EELs"). This affidavit describes the extent to which these items are covered by existing performance measurements, that is, the extent to which these intervals are measured and reported within the performance measurement system. I also discuss recent developments in the six-month collaborative process that will impact this issue on a going-forward basis.
7. Enhanced Extended Links (EELs) are comprised of at least two components: an unbundled local loop and unbundled dedicated transport. EELs are currently

reported in the UNE provisioning and maintenance measures under the corresponding loop and dedicated transport submeasures, based on the characteristics of the EEL components. The provisioning measures in which this submeasure are reported are: PM 55 – Average Installation Interval; PM 56 – Percent Installations Completed Within Customer Requested Due Date; PM 58 – Percent Ameritech Caused Missed Due Dates; PM 59 – Percent Trouble Reports Within 30 Days (I-30) of Installation; PM 60 – Percent Ameritech Missed Due Dates Due To Lack Of Facilities; PM 61 – Average Delay Days for Missed Due Dates Due To Lack Of Facilities; PM 62 - Average Delay Days for Ameritech Caused Missed Due Dates; and PM 63 – Percent Ameritech Caused Missed Due Dates > 30 Days. Each of these measures calls for a standard of comparison of parity with SBC Illinois retail results or affiliate results (if applicable).

8. The maintenance performance measurements also report EELs under the corresponding dedicated transport or loop submeasure based on the trouble report. The following maintenance PMs include these disaggregations: PM 65 – Trouble Report Rate; PM 65.1 – Trouble Report Rate Net Of Installation and Repeat Reports; PM 67 – Mean Time To Restore; and PM 69 – Percent Repeat Reports. As with the provisioning measures, the Dedicated Transport – DS1 submeasure utilizes a parity standard of comparison.
9. In the recently completed six-month collaborative review, SBC Illinois and the participating CLECs reached agreement on a separate set of measurement categories for the above measurements that would be set aside for EELs. The submeasures under which EELs are to be reported are defined by the loop type; 2-

wire analog, 4-wire analog and digital. A Transport submeasure is also defined. These submeasures will be reported in each of the performance measures listed above. Agreement was reached in the collaborative to report these as diagnostic submeasures, meaning no standard of comparison has yet been defined. It is the collaborative's expectation that, after sufficient experience has been gained in reporting and analyzing EELs results, appropriate standards of comparison will be adopted. I have attached to this affidavit as Attachment JDE-1 a copy of the proposed revisions to SBC Illinois' Performance Measurement tariff that reflect these changes. SBC Illinois proposes to file these and other changes to its performance measurement tariff later this month in order to incorporate the changes agreed upon in the six-month collaborative.

10. This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January \_\_\_\_, 2003

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James D. Ehr

Director – Performance Measurements

STATE OF ILLINOIS

COUNTY OF COOK

Subscribed and sworn to before me

this \_\_\_\_ day of January, 2003.

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Notary Public