

More detailed descriptions of Ameritech Michigan's provisioning of access to poles, ducts, conduits, and rights-of-way may be found in the attached affidavits of Messrs. Dunny (Paragraphs 71-72) and Mayer (Paragraphs 161-217).

The arbitrated agreement between AT&T and Ameritech Michigan (AT&T Agreement) provides for access to poles, ducts, conduits, and rights-of-way in Article XVI.

The interconnection agreements with Brooks Fiber, TCG, and MFS also provide for access to poles, ducts, conduit, and rights-of-way.

In addition, Ameritech Michigan offers access to poles via tariff today; specifically, MPSC Tariff 20R, Part 12, Section 6. Ameritech Michigan has recently filed a revision to its tariff for pole attachments. (Tariff 20R, Part 2, Section 6, filed September 27, 1996)

The AT&T Agreement addresses, among other things, conditions under which structures will be made available, the procedure, prerequisites, and charges associated with modifying structures, and installation and maintenance responsibilities and standards. (See Article XVI)

The AT&T Agreement describes how Ameritech Michigan provides access to the maps, records, and other information regarding its structures. This permits requesting carriers to incorporate Ameritech Michigan's structures into their network planning and engineering in the same fashion as Ameritech Michigan.

In addition, as previously indicated, Ameritech Michigan is creating a separate unit to administer its poles, conduits, and rights-of-way. No party, including Ameritech Michigan itself, will be allowed access to Ameritech Michigan's structures except through requests made to the Structure Leasing Coordinator. Access to available capacity will be allowed on a "first in time, first in right" priority queue basis. The Structure Leasing Coordinator will ensure that requests are administered without discrimination.

Ameritech Michigan will provide requesting parties with the field surveys and construction work necessary to make its structures ready for attachments as it does for itself.

- b. In terms of operation in Michigan, does Ameritech Michigan or its affiliates believe they have a different legal status concerning access to rights of way than competitive providers? If so, please provide the justification for any such difference.

## **RESPONSE**

All providers of telecommunications services have the same statutory right to occupy public rights-of-way as set forth in Sections 251-254 of the Michigan Telecommunications Act, as amended, MCL 484.2101, et seq., and MCL 484.4. See also Sections 251(b)(4) and 224 of the federal Act.

Ameritech Michigan also has a state-granted franchise by virtue of its incorporation in 1904 under Public Act 129 of 1883 and that of its predecessor corporation, Michigan Telephone Company, dating back to 1877. The Michigan courts have consistently recognized that where an entity such as Ameritech Michigan acquired its franchise by a grant from the state prior to the adoption of the 1908 Michigan Constitution, its franchise rights are contractual in nature and are not affected by subsequent legislation or constitutional changes. (See, e.g., *Traverse City v Consumers Power Co.*, 340 Mich 85 (1954)) Although a telephone company with a state-granted franchise need not obtain a local municipality's franchise to provide intrastate telecommunications services nor to carry out construction necessary to provide those services, it, like all other carriers, does need to obtain a permit from the municipality or other local governmental entity where construction will occur in public rights of way and to pay reasonable permit charges in connection with the cost incurred by the governmental agency to issue permits and regulate the use of the public rights of way.

From an operational perspective, as described in this response, Ameritech Michigan provides competing carriers with nondiscriminatory access to its poles, conduit, and right of way comparable to that Ameritech Michigan affords to itself. See, e.g., Section 16 of the AT&T arbitrated agreement.

- c. What are the pricing methodology and prices for access to poles, ducts, conduits, and rights of way? Be specific.

## **RESPONSE**

Ameritech Michigan has applied the FCC's pricing methodologies based on Section 224(d) and the FCC's rules and formulas found in Docket No. 86-212 dated July 23, 1987 (poles) and Docket No. 96-181, dated September 3, 1996 (conduit). Pricing under the FCC methodology is included in Ameritech Michigan's filed tariff. This pricing methodology is also consistent with the requirements of Section 361 of MTA.

The embedded fully allocated cost methodology described in the FCC order was used to develop the costs for pole attachments and conduit occupancy.

**These costs include capital costs for cost of money, depreciation, and related taxes, as well as maintenance and administrative operating expenses.**

**The pole attachment cost is based on the total embedded fully allocated costs for a bare pole, multiplied by a ratio of the portion of the usable space required for each attachment. One foot of the usable space per attachment is used as the basis for determining this ratio.**

**The conduit occupancy cost is based on the total cost per duct foot of available conduit. This cost is then divided by an average of 2 inner ducts per duct to arrive at a cost per inner duct foot.**

**Rates for poles and conduit in the arbitrated AT&T agreement will be based on the foregoing methodology as is required by the Commission's November 26, 1996 order in Case Nos. U-11151 and U-11152, pages 17-18.**

**The pricing of right-of-way will be done on a case-by-case basis due to the disparity in costs of individual units of right-of-way and the potential disparity in types of uses of right-of-way. However, the pricing methodology would be similar to that applied to conduit or ducts.**

**Section 251(b)(4) of the federal Act provides that access to poles, ducts, conduits, and rights-of-way is to be provided by carriers in accordance with "rates, terms and conditions that are consistent with Section 224." Ameritech Michigan offers such access under rates, terms, and conditions which comply with not only Section 224 and associated FCC regulations and orders, but also the Michigan requirements. These rates will be offered to telecommunications services providers on a nondiscriminatory basis.**

4. **Nondiscriminatory access to network elements (loops).**

- a. **What elements are offered by Ameritech Michigan or any of its affiliates operating in Michigan?**

**RESPONSE**

Ameritech Michigan offers a variety of local loop types from the central office to the customer premises, unbundled from local switching or other services pursuant to tariff or contract, on a nondiscriminatory basis throughout the state of Michigan. As described in Article IX, Section 9.2.1 and Schedule 9.2.1 of the AT&T Agreement, Ameritech Michigan offers the following specific loop types requested by AT&T:

2-Wire Analog Voice Grade Loop  
4-Wire Analog Voice Grade Loop  
2-Wire ISDN 160 Kbps Digital Loop  
2-Wire ADSL-Compatible Loop  
2-Wire HDSL-Compatible Loop  
4-Wire HDSL-Compatible Loop  
4-Wire 64 Kbps Digital Loop  
4-Wire 1.544 Mbps Digital Loop

In addition, unbundled access to the NID is addressed in Section 9.2.2 and Schedule 9.2.2 of the AT&T Agreement.

Ameritech Michigan currently offers unbundled basic analog 2-wire loops in Tariff MPSC No. 20R, Part 21, Section 2. Unbundled loops were first offered in March 1995 pursuant to tariffs as required by the order in Case No. U-10647.

Additional loop types, such as Analog 4-Wire, Coin, PBX Ground Start Coin, Electronic Key Line, 160 Kbps (ISDN BRI), ADSL Compatible 2- and 4-Wire, and HDSL Compatible 4-Wire, have been made available through negotiated or arbitrated agreements with requesting carriers. In the agreement between Brooks Fiber and Ameritech Michigan, unbundled loops are addressed in Sections 9.0-9.7. In the agreement between MFS and Ameritech Michigan, unbundled loops are addressed in Section 9.0-9.7. In the TCG Agreement, unbundled loops are addressed in Article IX, Section 9.1.

The Commission recently approved, on an interim basis, revised offerings of unbundled loops in its December 12, 1996 order in Case No. U-11156. The specific loop types addressed in that proceeding are:

2-Wire Analog Basic  
2-Wire Analog PBX Ground Start  
Electronic Key Line  
4-Wire Interface  
2-Wire Digital 160 Kb/s

Ameritech Michigan's unbundled loop offerings meet the requirements of both Michigan law and the federal Act. Ameritech Michigan offers a variety of local loop types from its central office to the customer's premises, unbundled from local switching, transport, or other services. (See generally 47 CFR §51.319(a)) Unbundled loops are pre-ordered, ordered, provisioned, maintained, and billed through standard facilities, interfaces, specifications, procedures, and practices.

In addition, Ameritech Michigan provides access to an unbundled NID. Consistent with the FCC's rules, Ameritech Michigan permits requesting carriers to connect their loops, via their own NIDs, to Ameritech Michigan's NIDs and the customer's inside wire. (47 CFR §51.319(b)(2); First Report and Order, Paragraphs 392-394)

Mr. Dunny's attached affidavit provides a more detailed description of access to unbundled loops (Paragraphs 73-76), and Messrs. Mayer's (Paragraphs 48-100) and Mickens' (Paragraphs 26, 57-58) affidavits address operational issues.

- b. What elements have been requested by entities seeking interconnection and access?

**RESPONSE**

All of the unbundled loops addressed in the AT&T Agreement and other negotiated or arbitrated agreements, as described in the response to preceding Subpart 4(a), have been requested by entities seeking interconnection and access.

- c. What elements have actually been sold to entities seeking interconnection and access?

**RESPONSE**

To date, over 10,000 unbundled basic analog 2-wire loops to serve both business and residence customers have been sold to requesting telecommunication carriers. See details provided in response to Attachment A, Questions 3, 5, and 6. In addition, several other types of

loops (e.g., ground start, 4-wire loops) have been provided to requesting carriers to serve specific customer applications.

- d. What entities have requested elements?

**RESPONSE**

See response to Question 2(d) for entities that have requested unbundled loops in Michigan.

- e. What entities have actually purchased the elements?

**RESPONSE**

To date, Brooks Fiber and MFS have actually purchased unbundled loops from Ameritech Michigan.

- f. What entities are actually providing service utilizing in part elements purchased from Ameritech Michigan or its affiliates?

**RESPONSE**

To date, Brooks Fiber and MFS are providing service using Ameritech Michigan's unbundled loops. See also Ameritech Michigan's response to Questions 5 and 6, Attachment A.

- g. What is the pricing methodology utilized for the elements?

**RESPONSE**

Ameritech Michigan's existing and proposed unbundled loop services have been priced in accordance with state and federal regulatory requirements. See the response to Question 2.g describing the pricing methodology for unbundled network elements, which is applicable to unbundled loops.

- h. What is the time period from ordering an element to its provision by Ameritech Michigan or any of its affiliates?

**RESPONSE**

Once a valid service order is received by Ameritech, Ameritech will provide a firm order commitment date by which the loop(s) covered by the

service order will be installed. The provisioning intervals for unbundled loops are a composite of the intervals for local exchanges and access services. The intervals are based on existing intervals adjusted to reflect operational differences related to the need to complete physical work in the central office and the need to coordinate the activities of both service providers to reduce the down time for the end user customer. The current average intervals, assuming a field dispatch is not required, are:

Non-DS1 Unbundled Loop – Standard Customer Intervals

<u>Volume</u>	<u>Interval</u>
1 - 24	5 business days
25 - 48	6 business days
49 - 96	7 business days
97 or more	Negotiated

DS1 Unbundled Loop – Standard Customer Intervals

<u>Volume</u>	<u>Interval</u>
1 - 4	5 business days
5 or more	Negotiated

Ameritech Loops – Standard Intervals

	<u>Volume</u>	<u>Interval</u>
Non-DS1 Loops - Standard Intervals	1 to 24	5 business days
	25 to 48	6 business days
	49 to 96	7 business days
	97 or more	Negotiated
DS1 Loops - Standard Customer Intervals	1 to 4	5 business days
	5 or more	Negotiated

Mr. Mayer addresses provisioning intervals for unbundled loops in more detail in Paragraphs 88-95 of his affidavit.

5. Nondiscriminatory access to network elements (switching).
- a. What elements are offered by Ameritech Michigan or any of its affiliates operating in Michigan?

**RESPONSE**

As described in the AT&T Agreement, Article IX, Section 9.2.3 and Schedule 9.2.3, Ameritech Michigan provides unbundled access to local and tandem switching.

Ameritech Michigan also currently offers access to unbundled local switching through line side ports in its Tariff MPSC No. 20R, Part 21, Section 2, under authority of 1991 PA 179, as amended by 1995 216. This port offering is consistent with the requirements of the MTA.

Ameritech Michigan also has agreed to provide unbundled ports to Brooks Fiber, MFS, and TCG in Section 9.2 of their respective interconnection agreements.

Ameritech Michigan's offering of unbundled switching provides unbundled access to all local switching capacity unbundled from transport, local loop transmission, and other services. (See generally 47 CFR §51.319(c)) The requesting carrier obtains all switching features in a single element on a per-line basis. This element includes basic switching functions (e.g., connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks) and other switch capabilities (e.g., signaling, access to 911, operator services, directory assistance services, and all vertical features that the switch is capable of providing and that is available to the port type involved). Ameritech Michigan also provides custom routing when the customer wishes a routing arrangement which is different than that used in Ameritech Michigan's network. An example of custom routing would be where the customer wants directory assistance and operator services traffic carried on different trunks to permit branding with the name of the requesting carrier or use of the operator services or directory assistance provider of the carrier's choice.

Ameritech Michigan also offers tandem switching unbundled from transport, local loop transmission, and other services. Tandem switching creates temporary transmission paths between trunks interconnected at the tandem switch for the purpose of routing calls. The tandem switching port provides to the requesting carrier all available basic tandem switching functions and capabilities that are centralized in the tandem switch. Routing, screening, and blocking are provided where technically feasible and under the guidelines of standard switching translations and screening in use in that switch. Transiting refers to the delivery of traffic

between a requesting carrier and a third party local exchange carrier by Ameritech Michigan through the use of Ameritech Michigan's switches and trunks. As provided for in the AT&T arbitrated agreement, Ameritech Michigan will provide transiting service for AT&T.

Mr. Dunny discusses unbundled switching in more detail in his attached affidavit (Paragraphs 80-89), and Mr. Mayer's (Paragraphs 101-109) affidavit discusses operations relating to unbundled switching.

- b. What elements have been requested by entities seeking interconnection and access?

**RESPONSE**

Many telecommunications carriers, based on their planned network architecture and market entry strategy, have not specifically requested any type of local switching elements from Ameritech Michigan. On the other hand, some telecommunications carriers (including AT&T) have requested access to unbundled local switching, as defined in the FCC's order in Docket 96-98 on August 8, 1996. For those carriers that have generally requested access to unbundled network elements, including local switching, see Ameritech Michigan's response to Question 2(b).

- c. What elements have actually been sold to entities seeking interconnection and access?

**RESPONSE**

To date, no local switching unbundled elements have been sold.

- d. What entities have requested elements?

**RESPONSE**

See response to Question 5.b.

- e. What entities have actually purchased the elements?

**RESPONSE**

To date, no telecommunications carriers have actually purchased any unbundled local switching elements.

- f. What entities are actually providing service utilizing in part elements purchased from Ameritech Michigan or its affiliates?

**RESPONSE**

To date, no telecommunications carriers have actually purchased any unbundled local switching elements.

- g. What is the pricing methodology utilized for the elements?

**RESPONSE**

Ameritech Michigan's existing and proposed unbundled switching services have been priced in accordance with state and federal regulatory requirements. See the response to Question 2.g describing the pricing methodology for unbundled network elements which is applicable to unbundled switching.

- h. What is the time period from ordering an element to its provision by Ameritech Michigan or any of its affiliates?

**RESPONSE**

Ordering and pre-ordering functions for unbundled local switching are handled via the Electronic Data Interexchange (EDI) format currently used to order resold services. Once an unbundled local switching service agreement has been established by a requesting carrier and a valid service order has been received, Ameritech will transfer the customer's local service to unbundled local switching within a time period no greater than the interval currently being used to transfer Ameritech's customers between interexchange carriers, assuming only software changes are required.

Mr. Mickens' affidavit discusses in more detail parity, performance, benchmarks, and reporting (Paragraphs 11-25). Mr. Mayer discusses intervals relating to switching at Paragraphs 103 and 109.

6. Nondiscriminatory access to network elements (transport).

- a. What elements are offered by Ameritech Michigan or any of its affiliates operating in Michigan?

**RESPONSE**

As described in Article IX, Section 9.2.4 and Schedule 9.2.4 of the AT&T Agreement, Ameritech Michigan offers unbundled dedicated interoffice transport facilities, unbundled dedicated entrance facilities, and shared transport transmission facilities, all of which are unbundled from local switching and loops. Ameritech Michigan also currently offers the following forms of special access transport in its access tariffs for use on an unbundled basis:

- Telegraph (0-75 baud or 1 to 150 baud) service
- Direct Analog (300-3,000 Hz)
- Ameritech Base Rate (2.4, 4.8, 9.6, 19.2, 56.0, 64.0 Kbps) service
- Ameritech DS1 (1.544 Mbps) service
- Ameritech DS3 (44.736 Mbps) service
- Ameritech OC-3 (155.52 Mbps) service
- Ameritech OC-12 (622.08 Mbps) service
- Ameritech OC-48 (2488.32 Mbps) service

Ameritech Michigan's interconnection agreements with Brooks Fiber, MFS, and TCG address the provision of unbundled local transport in Section 9.3.

Ameritech Michigan offers two types of unbundled interoffice transmission: (1) unbundled, dedicated, interoffice transport and entrance facilities, both of which are available for the exclusive use of a telecommunications carrier; and (2) shared interoffice transmission facilities for the shared use by more than one telecommunications carrier. (See generally 47 CFR §51.319(d)) Unbundled local transport is available where facilities exist between all points specified in the FCC's rules and may be requested for other technically feasible points under the BFR process. These interoffice facilities may be used to connect to Ameritech Michigan's switch or to the competitors' collocated equipment.

Mr. Dunny discusses access to unbundled transport in more detail in his attached affidavit (Paragraphs 77-79). Mr. Mayer discusses provisioning in his affidavit (Paragraphs 110-121).

- b. What elements have been requested by entities seeking interconnection and access?

**RESPONSE**

All of the types of unbundled transport addressed in the AT&T Agreement and other negotiated or arbitrated agreements, as described in the response to the preceding Subpart 6(a), have been requested by entities seeking interconnection and access. In addition to those unbundled elements offered in Ameritech Michigan's current agreements or tariffs, as well as those in the pending tariffs, certain carriers have requested that Ameritech Michigan provide items that are not unbundled network elements and are not required to be provided under the Act and the FCC interconnection order. These requests include "dark fiber" and network calling services spanning multiple switching and transport operations that are not directly interconnected, which the requesting carriers have either called "common transport" or have misidentified as "shared transport," which is a form of unbundled transport (i.e., transport unbundled from switching) offered by Ameritech Michigan.

- c. What elements have actually been sold to entities seeking interconnection and access?

**RESPONSE**

To date, all purchases of unbundled transport have been made pursuant to Ameritech Michigan's special access tariff, and therefore, purchases of such elements for use in providing competing local exchange service cannot be separated from the purchase of the same elements by the same carriers for other purposes, such as the provision of interstate or intrastate access service under the FCC's expanded interconnection rules.

- d. What entities have requested elements?

**RESPONSE**

Unbundled local transport has been requested by all carriers negotiating interconnection arrangements with Ameritech except for those that identify themselves as resale-only carriers. See details regarding requesting carriers in response to Question 2(d) and Attachment A, Question 3.

- e. What entities have actually purchased the elements?

**RESPONSE**

To date, all purchases of unbundled transport have been made pursuant to Ameritech Michigan's special access tariff, and therefore, purchases of such elements for use in providing competing local exchange service cannot be separated from the purchase of the same elements by the same carriers for other purposes, such as the provision of interstate or intrastate access service under the FCC's expanded interconnection rules.

- f. What entities are actually providing service utilizing in part elements purchased from Ameritech Michigan or its affiliates?

**RESPONSE**

To date, all purchases of unbundled transport have been made pursuant to Ameritech Michigan's special access tariff, and therefore, purchases of such elements for use in providing competing local exchange service cannot be separated from the purchase of the same elements by the same carriers for other purposes, such as the provision of interstate or intrastate access service under the FCC's expanded interconnection rules. See also Ameritech Michigan's response to Attachment A, Questions 5 and 6.

- g. What is the pricing methodology utilized for the elements?

**RESPONSE**

Ameritech Michigan's existing and proposed unbundled transport services have been priced in accordance with state and federal regulatory requirements. See the response to Question 2.g describing the pricing methodology for unbundled network elements which is applicable to unbundled transport.

- h. What is the time period from ordering an element to its provision by Ameritech Michigan or any of its affiliates?

**RESPONSE**

Outlined below are Ameritech Michigan's service interval benchmarks and the processes which will be used to maintain and measure such information. Competitors will receive information in each of these categories for Ameritech Michigan's performance with respect to its own

customers, with respect to the customers of all competitors and with respect to the customers of the individual competitor.

**DS1 Unbundled Transport**

- |                                     |            |
|-------------------------------------|------------|
| • On-Network Building               | 5 days     |
| • Facilities and Force Available    | 7 days     |
| • Facilities or Force Not Available | Negotiated |

**DS3 Unbundled Transport**

Negotiated

**OC-3 Unbundled Transport**

Negotiated

**OC-12 Unbundled Transport**

Negotiated

**OC-48 Unbundled Transport**

Negotiated

Mr. Mickens' affidavit discusses in more detail parity, performance benchmarks, and reporting (Paragraphs 11-25). Mr. Mayer discusses intervals for unbundled local transport at Paragraph 121.

7. Access to 911 and E911 services and directory assistance services to allow other providers' customers to obtain telephone numbers, operator call completion services, white pages listings, and databases and signaling.
- a. 911 and E911 services:
- (1) Does Ameritech Michigan or any of its affiliates offer 911 services to new customers/providers?

**RESPONSE**

Ameritech Michigan provides requesting carriers with access to 911 and E911 services that will enable requesting carriers to provide access to emergency service for their end users on a nondiscriminatory basis as compared to the access to emergency service provided by Ameritech Michigan to its local exchange customers residing in the same municipalities.

The federal Act requires that an incumbent LEC provide competing providers with "access to 911 and E911 services." See Section 271(c)(2)(B)(vii)(I); see also the FCC's First Report and Order, Paragraph 470. This obligation can only apply to the extent that such services are offered by Ameritech Michigan to the actual customers of 911 and E911 services; i.e., the state and local law enforcement agencies or public safety organizations in the state. By providing access to 911 and E911 services, competing LECs have the ability to enter data concerning their subscribers in the 911 database and to allow 911 calls from the subscribers of a CLEC to be transmitted to the appropriate public safety answering point (PSAP) of the state or local law enforcement agency via the incumbent LEC's 911 capabilities.

Ameritech Michigan currently provides 911 services to multiple public safety agencies within the Ameritech region. There are currently 58 service districts (57 E911 and 1 basic 911), with 202 public safety answering points (PSAPs) (177 E911 fully featured, 24 E911 voice only, 1 basic 911). Ameritech's 911 service is provided to public safety agencies on a county, municipality, or centralized dispatch center in order to extend emergency services to the citizens within their geographical communities.

Ameritech Michigan may not necessarily be the provider of 911 or E911 service to public safety agencies in its service territories. Where another provider offering service in the same territory is the public safety agency's designated provider of 911 or E911 service, that provider, of necessity, would have to make available access to

911 or E911 service to other providers, including Ameritech Michigan.

In Michigan, there is currently only one remaining public safety agency purchasing Ameritech's basic 911 service. All other customers of the service have elected to purchase E911 service. Due to technical obsolescence and lack of customer demand, Ameritech Michigan has grandfathered its basic 911 service offering, and its availability is limited to the one existing customer. Ameritech Michigan provides CLECs with access to the 911 services it provides to state and local law enforcement agencies, including both the enhanced 911 and the single grandfathered customer of basic 911 service. The fact that Ameritech Michigan no longer offers basic 911 service as a general offering to local government agencies is not inconsistent with the requirements of the federal Act and the FCC's order.

This Commission has previously addressed the issue of competing providers' access to 911 services. At Page 75 of the U-10647 order, the Commission stated:

"City Signal requested that Ameritech Michigan provide TRS [telephone relay services] and 9-1-1 services under the same terms and conditions as Ameritech Michigan provides those services to other LECs. The Staff supported this request, and Ameritech Michigan agreed to it.

The ALJ found that City Signal's proposal complies with Act 179. Because the parties were in agreement, he recommended that the Commission not take any action on this issue. The Commission agrees with the ALJ."

A recent complaint filed with the Commission by the City of Southfield (Case No. U-11229) relates in part to access to 911 services; specifically, it concerns additions to and maintenance of the 911 database in a multiple local exchange provider environment. Ameritech has prepared a document that details the methods, procedures, roles, and responsibilities of 911 service suppliers and other exchange carriers. The document has been circulated to the parties to the case (MPSC Staff, City of Southfield, TCG, and Ameritech), all currently licensed CLECs in the state, and to GTE North for comment. The document was then revised by Ameritech Michigan, incorporating the comments received. It is expected that this document will serve not only as a basis for an agreed-upon resolution of the complaint case, but also as a further enhancement

facilitating improved maintenance of for 911 databases in a multi-provider environment.

Mr. Dunny discusses access to 911 in more detail at Paragraphs 90-94 of his affidavit. Mr. Mickens discusses 911 at Paragraph 73.

- (2) Does Ameritech Michigan or any of its affiliates offer E911 services to new customers/providers?

**RESPONSE**

Yes. See preceding section. Ameritech Michigan currently has arrangements with four competing local exchange carriers (CLECs) for access to 911 or E911 services within its 911 service districts. The specific 911 service districts in which these CLECs are operating are listed in the response to Question 7a(4).

- (3) What competing providers/entities have requested to purchase 911 and/or E911 services from Ameritech Michigan or any of its affiliates?

**RESPONSE**

All new competing providers currently offering service (i.e., Brooks Fiber, TCG, MFS, and MCI Metro) have requested to be given access in their respective service areas to the 911 networks currently being utilized to provide service in a given municipality, county, or other geographical area in which Ameritech Michigan has been selected as the 911 or E911 service provider. WinStar Wireless also has entered into a 911 service agreement.

In addition, twenty-nine incumbent local exchange carriers have taken part in offering 911 or E911 emergency services within the multiple municipalities in which Ameritech Michigan has been selected as the 911 or E911 service provider for those given geographical communities.

- (4) What competing providers/entities are purchasing 911 and/or E911 services from Ameritech Michigan or any of its affiliates?

**RESPONSE**

TCG, MFS, MCI Metro, and Brooks Fiber are currently provided access to the 911 or E911 networks which Ameritech Michigan

utilizes to provide 911 or E911 service through the specified control offices serving the following municipalities/counties:

**ANN ARBOR CONTROL OFFICE – MCI, TCG, MFS**

Wayne  
Washtenaw  
Monroe  
Lenawee  
Jackson  
Livingston

**ROCHESTER CONTROL OFFICE – MCI, TCG, MFS**

Macomb  
Oakland  
Genesee  
Shiawassee  
St. Clair  
Wayne  
Washtenaw  
Livingston  
Saginaw  
Tuscola

**GRAND RAPIDS CONTROL OFFICE – BROOKS FIBER**

Berrien  
Cass  
Calhoun  
Kalamazoo  
Van Buren  
Allegan  
Barry  
Ottawa  
Kent  
Ionia  
Muskegon  
Oceana  
Newaygo  
Mecosta

7. b. Directory assistance services:

- (1) What competing provider/entities have requested to purchase directory assistance services from Ameritech Michigan or any of its affiliates?

**RESPONSE**

In Michigan, directory assistance service proposals have been made in response to requests from MFS, MCI Metro, TCG, and Brooks Fiber.

Ameritech Michigan's offering of directory assistance service complies with the checklist. Ameritech Michigan offers both operator systems and directory assistance to resellers and requesting carriers on a bundled basis and as a network element. Available offerings include manual call assistance, automated call assistance, line information database (LIDB) validation, directory assistance, and information call completion.

In instances where the carrier purchases Ameritech Michigan's retail telecommunications services for resale or its unbundled local switching, the reseller or carrier may purchase both rebranding and selective routing options for operator, directory assistance, and call completion services, using line class codes or other technical solutions, as long as compliance with the carrier's requests is technically feasible. Consistent with the FCC's discussion of the issue (First Report and Order, Paragraph 971), the carrier would pay Ameritech Michigan's costs, as determined pursuant to Section 252(d)(1) of the Act, of providing the requested branding or selective routing functions, to the extent that compliance with those requests is technically feasible and can be accomplished in a nondiscriminatory manner.

Ameritech Michigan also offers unbundled access to its operator services or directory assistance, or to related facilities or databases, for use by the requesting carrier to provide those services to its own customers. Such unbundled operator services or directory assistance is offered with optional rebranding.

In the U-10647 order at pages 73-74, the Commission addressed the provision of directory assistance services to competing providers:

"City Signal indicated that it has identified one of the various competing directory assistance service providers to provide services to it instead of contracting with

Ameritech Michigan. Consequently, City Signal is not asking the Commission to establish any terms and conditions for the provision of this service by Ameritech Michigan ...

The ALJ found that Ameritech Michigan is willing to provide access to the data base services under the rates, terms, and conditions set forth in its access tariff. He noted that there was no showing that Ameritech Michigan intends to discriminate against City Signal in this area. The ALJ therefore recommended that the Commission not take any action on this issue. The Commission agrees with the ALJ."

The November 1995 MTA amendments added Section 360, which requires that a provider of basic local exchange service shall establish a rate to other basic local exchange service providers for providing directory assistance no later than January 1, 1996, and allows providers to enter into an agreement on other terms and conditions. Ameritech Michigan complies with this requirement. (See, e.g., Ameritech's Tariff FCC No. 2, Section 9.7, mirrored in Ameritech Michigan's intrastate access tariff, MPSC 20R, Part 21, Section 1.) In its U-10860 order, the Commission affirmed the ALJ's conclusion that no further action was required with regard to directory assistance services (pp. 39, 42).

Mr. Dunny addresses directory assistance in more detail at Paragraphs 95-109 of his affidavit. Mr. Mayer addresses directory assistance provisioning and operational issues at Paragraphs 122-127, and Mr. Mickens addresses the issue at Paragraph 72.

- (2) What competing provider/entities have purchased directory assistance services from Ameritech Michigan or any of its affiliates?

## **RESPONSE**

Directory assistance services have been purchased by Brooks Fiber (operator services, toll, and assistance), MFS (regional DA), and MCI Metro (regional DA).

7. c. Operator services:

- (1) What competing provider/entities have requested to purchase operator call completion services from Ameritech Michigan or any of its affiliates?

**RESPONSE**

Operator service proposals have been made in response to requests from Brooks Fiber, TCG, MFS, AT&T, MCI Metro, and Sprint. Ameritech Michigan's offering of operator service complies with the checklist. Ameritech Michigan offers both operator services and directory assistance to resellers and requesting carriers on a bundled basis and as a network element. Available offerings include manual call assistance, automated call assistance, line information database (LIDB) validation, directory assistance, and information call completion.

In instances where the carrier purchases Ameritech Michigan's retail telecommunications services for resale or its unbundled local switching, the reseller or carrier may purchase both rebranding and selective routing options for operator, directory assistance, and call completion services, using line class codes or other technical solutions, as long as compliance with the carrier's requests is technically feasible. Consistent with the FCC's discussion of the issue (First Report and Order, Paragraph 971), the carrier would pay Ameritech Michigan's costs, as determined pursuant to Section 252(d)(1) of the Act, of providing the requested branding or selective routing functions, to the extent that compliance with those requests is technically feasible and can be accomplished in a nondiscriminatory manner.

Ameritech Michigan also offers unbundled access to its operator services or directory assistance, or to related facilities or databases, for use by the requesting carrier to provide those services to its own customers. Such unbundled operator services or directory assistance is offered with optional rebranding.

Mr. Dunny addresses operator services in more detail at Paragraphs 95-109 of his affidavit. Mr. Mayer addresses operator services provisioning and operational issues at Paragraphs 122-127.

- (2) What competing provider/entities have purchased operator call completion services from Ameritech Michigan or any of its affiliates?

**RESPONSE**

Operator services have been purchased by Brooks Fiber, TCG, and MFS.

8. d. White pages listings:

- (1) What competing provider/entities have requested to include their customers in the listings of Ameritech Michigan or any of its affiliates?

**RESPONSE**

The following competing providers/entities have either received an offer from an Ameritech entity to include their customer listings in Ameritech's white pages directories or have requested that an Ameritech affiliate include their customers in Ameritech's white pages directories:

AT&T  
BRE (Phone Michigan)  
Brooks Fiber Communications  
Climax Telephone  
Communication Buying Group, Inc.  
Consolidated Communications Telecom Services, Inc.  
Focal Communications Corporation  
Frontier Telemanagement, Inc.  
ICG Access Services, Inc.  
Intermedia Communications, Inc.  
LCI International  
MCImetro Access Transmission Services, Inc.  
MFS Intelenet, Inc.  
MIDCOM Communications, Inc.  
Millenium Group  
Nextlink of Ohio, Inc.  
ONESTOP Communications, Inc.  
SBMS  
Scherers Communications Group, Inc.  
Sprint Communications Company, L.P.  
TCG Detroit  
TCG Illinois  
TCG Milwaukee, Inc.  
TCI Telephony Services of Illinois, Inc.  
Time Warner Communications of Ohio, L.P.  
Time Warner Communications of Indiana, L.P.  
Time Warner Communications of Milwaukee, L.P.  
United Communications Systems, Inc.  
USN Communications, Inc.  
US One Communications  
US Xchange  
WinStar Telecommunications

Ameritech Michigan's arrangements with competing carriers regarding white pages listings complies with the checklist. In the AT&T arbitration decision (U-11151 and U-11152, November 26, 1996, pp. 14-16), the Commission found that the provisions of the interconnection agreement relating to directories, as approved by the Commission, complied with the requirements in the federal Act.

Customers of other carriers are provided with listings in white pages directories published for Ameritech Michigan. These listings are provided free of charge. All white pages listings will have the same appearance and presentation, and requesting carriers' customer listings are interfiled with Ameritech Michigan's. Listings other than the primary listing for that customer or listings in directories that would not normally include that subscriber are made available at reasonable charges.

In its U-10647 order, the Commission recognized that Ameritech Michigan should be required to provide City Signal with directory listings on the same terms and conditions as Ameritech Michigan offers to other LECs. However, the Commission noted that Ameritech Michigan was not required to hold itself out to provide a published directory to competing LECs (p. 73). In its U-10860 order (at pp. 41-42), the Commission elaborated on requirements relating to directory listings:

"The Commission finds that the statute requires each local exchange provider to provide each of its customers with an annual printed directory of all published numbers within the community of interest for that customer, including ported numbers. It does not require that an incumbent LEC provide free directories to the retail customers of its wholesale customers or to AECs to whom it sells loops and ports. There are a variety of ways in which a provider might obtain the directory that it must provide to its customers, with no particular way prescribed by statute. A provider is thus free to contract with another provider or with a vendor to meet the statutory requirement, if it does not intend to publish the directory itself."

Ameritech Michigan's arrangements with competing carriers complies with the requirements identified by the Commission.

Mr. Dunny addresses white pages listings in more detail at Paragraphs 110-111 of his affidavit. Mr. Mickens discusses operational aspects of directory listings at Paragraph 72.

- (2) What competing provider/entities have their customers listed in the white pages directories of Ameritech Michigan or any of its affiliates?

**RESPONSE**

The following competing providers/entities have agreements to have their customers included in the white pages directories published by Ameritech Michigan or its affiliates:

Brooks Fiber Communications of Michigan  
Climax Telephone  
Communications Buying Group, Inc.  
Consolidated Communications Telecom Services, Inc.  
Focal Communications Corporation  
Frontier Telemanagement, Inc.  
ICG Access Services, Inc.  
LCI International  
MCImetro Access Transmission Services, Inc.  
MFS Intelenet, Inc.  
NEXTLINK of Ohio  
TCG Detroit  
TCG Illinois  
TCG Milwaukee, Inc.  
TCI Telephony Services of Illinois, Inc.  
Time Warner Communications of Ohio, L.P.  
Time Warner Communications of Indiana, L.P.  
Time Warner Communications of Milwaukee, L.P.  
USN Communications, Inc.  
United Communications Systems  
WinStar Telecommunications

- (3) What provider/entities have chosen not to utilize inclusion of their customers in the white pages listings of Ameritech Michigan or any of its affiliates?

**RESPONSE**

Ameritech Michigan and its directory publishing affiliates are unaware of any certified local exchange company operating within the geographic scope of the white pages directories that has made an