

affirmative decision not to include its listings in the white pages directories of Ameritech Michigan or its affiliates.

9. Number administration

a. Who is the number administrator for Michigan?

RESPONSE

The Ameritech Network Services Engineering organization is currently responsible for the Code (Number) Administration function for the Ameritech region, which includes Illinois, Indiana, Michigan, Ohio, and Wisconsin.

Ameritech Michigan complies with the checklist requirement for number administration. Ameritech Michigan provides nondiscriminatory access to telephone numbers for other carriers. Until new number administration guidelines, plans, or rules are established, Ameritech Michigan will continue to assign central office codes (typically, the first three digits of a telephone number, referred to as an NXX) under existing industry guidelines (i.e., the Central Office Code Assignment Guidelines and the NPA Code Relief Planning Guidelines). All NXX number assignments will continue to be performed by Ameritech Michigan, subject to the oversight and complaint jurisdiction of appropriate regulatory agencies.

The Commission has previously addressed the issue of number administration in Michigan. In the U-10647 order, at page 75, the Commission stated:

"Ameritech Michigan serves as the Local Number Administrator for all five area codes in Michigan. City Signal requested that central office code prefixes, i.e., NXXs, be assigned to it for subsequent assignment to its customers. The Staff, GTE, and MCI supported this request, stating that the NXX assignments should be made according to the same rates, terms, and conditions as are applied to other LEC requests for NXXs.

Ameritech Michigan explained that it assigns NXX codes in accordance with the industry's central office code assignment guidelines, which were designed to provide competitively neutral assignment of NXXs and to manage those numbers as a finite resource. Ameritech Michigan represented that it will administer the assignment of NXX codes pursuant to City Signal's request in accordance with those industry guidelines.

Again, because the parties were in agreement on this issue, the ALJ found that no action by the Commission is necessary. The Commission agrees with the ALJ."

In its current role as number administrator in Michigan, Ameritech Michigan has, to date, assigned 96 NXXs to competing local exchange carriers (CLECs) which would support approximately 960,000 customer lines.

Messrs. Dunny (Paragraphs 112-115) and Mayer (Paragraphs 218-234) address number administration in more detail in their respective affidavits.

- b. If Ameritech Michigan or any of its affiliates is the number administrator for Michigan, is there a date certain by which it will no longer perform that function?

RESPONSE

No date certain by which Ameritech will no longer perform the Code (Number) Administration function has been determined. Ameritech has proposed to the Federal Communications Commission some time ago that the Code Administration function be handled by a neutral third party, and the FCC has orderēd such a transfer. Ameritech Michigan will transfer this function once a neutral third party administrator is established and in operation.

10. e. Database and signaling for call routing and completion:

- (1) What components of its signaling network does Ameritech Michigan or any of its affiliates not offer for sale to competing provider/entities?

RESPONSE

Ameritech Michigan is offering unbundled access to its signaling links and Signal Transfer Points (STPs). Carriers may obtain unbundled access for their own switching facilities to Ameritech Michigan's signaling network through its STPs in the same manner that Ameritech Michigan's switches gain such access. (See 47 CFR §51.319(e)(1)(ii)) Ameritech Michigan is also offering carriers unbundled access to its call-related databases, including the Toll Free (800) Calling Database, the Line Information Database (LIDB), and the long term local number portability database (when that database is deployed). (See generally 47 CFR §51.319(3)(2)) Carriers may obtain this access by physically connecting their own switches through an Ameritech Michigan STP to the Ameritech Michigan unbundled database. See, e.g., Ameritech's Tariff FCC No. 2, Sections 6.9.1, 6.9.4, mirrored in Ameritech Michigan's intrastate access tariff, MPSC No. 20R, Part 21, Section 1.

At this time, Ameritech Michigan does not offer certain of the working physical components of its signaling network or SS7 links for sale. This includes the Ameritech STPs, SCPs, and SSPs. Ameritech Michigan provides access to these elements in a variety of interconnection products. Access to the STPs via ports and our SS7 interconnection arrangements are available today, both via tariff and in the AT&T arbitrated agreement. Ameritech Michigan also offers unbundled, nondiscriminatory access to Ameritech Michigan's AIN Service Management System (SMS) and AIN Service Creation Environment (SCE). See AT&T interconnection agreement, Schedule 9.2.5.

In its U-10647 order, the Commission noted that Ameritech Michigan was willing to provide access to the data bases (LIDB and 800) requested by City Signal on the same terms and conditions as offered to other LECs, and therefore, there was no need for the Commission to take action on this issue (p. 74). In its U-10860 order, the Commission further elaborated (p. 42) on the requirements in Michigan regarding access to data bases:

"Furthermore, providers are required by [Section 363 of the MTA] to allow access by other providers, on a nondiscriminatory basis and in a timely and accurate

manner, to data bases, including, but not limited to, the line information data base, the 800 data base, and other information necessary to complete a call within the exchange, either on terms and conditions as the providers may agree or as otherwise ordered by the Commission. The requirement that the LEC provide access to data bases on a nondiscriminatory basis means that whatever arrangements a LEC agrees to with one provider must be available to other providers as well."

Ameritech Michigan complies with all of the requirements identified by the Commission with regard to access to data bases.

The subject of access to call related databases and signaling links is discussed in more detail in the affidavit of Mr. Dunny (Paragraphs 116-128).

- (2) What provider/entities have requested access to databases and/or signaling from Ameritech Michigan or any of its affiliates?

RESPONSE

In addition to the current customer list (see response to subpart (3)), the following is a list of companies that have requested interconnection in Michigan under 251/252 of the Telecommunications Act of 1996:

AT&T
Brooks Fiber
KMC Telecom, Inc.
LCI International
MCI
MFS
POPP Telecom (have made a request for resale only)
Phone Michigan
Sprint
Sprint Spectrum
TCG (Teleport)
WinStar Wireless

Only some of these companies have specifically included signaling and database access in their request, but Ameritech Michigan believes that further discussions and development of implementation plans will eventually include signaling requirements for facilities-based carriers.

- (3) What provider/entities have purchased access to databases and/or signaling from Ameritech Michigan or any of its affiliates?

RESPONSE

Ameritech Michigan today provides signaling and database access to many various providers, including interexchange carriers, independent telcos, cellular providers, signaling providers, and other RBOCs. Many of these providers interconnect to Ameritech directly, while others gain access through hub providers. The following list represents the current parties interconnected to Ameritech Michigan for access to databases or signaling:

ALLTEL	RCI
ACI	SSC
AT&T	Sprint
Advantis	TCG
Brandenburg	Teledial
Cable & Wireless	Telstar Communications
DUO Telco	Baraga
GTE	L.O.M. Inc.
LCI	Blanchard Telco
MCI	Cherry Communications
Washington County	LDDS
WilTel/WorldCom	Westphalia
American Teleliatics	Wolverine
Cellular One	WINN Telco
Century Telco	US Signal
Cincinnati Bell	Shiawassee Telco
Consolidated	Springport Telco
CTS	Telstar Communications
Deerfield Farmer	Waldron Telco
Detroit Cellular	Ace Telco
Heartline	Allendale Telco
ITN	Barry County Telco
Lennon Telco	Carr Telco
Metromedia	Climax Telecommunications Corp.
One Call Communications	Drenthe Telco
Pacific Gateway	Kaleva Telco

11. Number portability

- a. Does Ameritech Michigan or any of its affiliates provide number portability in Michigan?

RESPONSE

Yes, Ameritech Michigan provides number portability in Michigan. (MPSC Tariff No. 20R, Part 21, Section 2) Ameritech Michigan provides interim number portability in compliance with the requirements of the MTA (Section 358), this Commission, the federal Act, and the FCC's order on number portability. (FCC Docket No. 95-116, issued July 2, 1996) Specifically, Ameritech Michigan is offering Remote Call Forwarding (RCF) and Direct Inward Dialing (DID). This Commission, both prior to the FCC's order (in the U-10647 order, p. 66) and subsequently (in the U-10860 order, p. 20), has recognized that RCF and DID are appropriate means of providing interim portability. The 1995 amendments to the MTA similarly require interim number portability to be provided via DID and RCF. (Section 358(4)) These are also the two methods that the FCC identified as appropriate, currently available number portability options. (CC Docket No. 95-116, July 2, 1996, at Paragraphs 19, 103, 110)

Ameritech Michigan's number portability offering is described in more detail by Mr. Dunny at Paragraphs 129-136 of his affidavit. Mr. Mayer discusses the operational aspects of number portability at Paragraphs 152-160 of his affidavit.

- b. If number portability is provided in Michigan, is it interim or true number portability?

RESPONSE

Ameritech Michigan currently provides interim Service Provider Number Portability (SPNP), both remote (RCF) and direct (DID).

- c. If number portability is provided in Michigan, is it carrier, geographic, or service number portability or any combination of the three?

RESPONSE

Ameritech Michigan is currently providing SPNP, or carrier Number Portability. To the extent that an end user customer wishes to retain a number within a wire center boundary, SPNP also provides geographic portability.

- d. If interim number portability is being provided, how are the costs being recovered and what is the pricing methodology?

RESPONSE

Currently, Ameritech Michigan is offering SPNP service at rates established in compliance with the Commission's U-10647 order. (MPSC Tariff No. 20R, Part 21, Section 2) New rates (based on TSLRIC) were recently approved by the Commission on an interim basis in the Commission's December 12, 1996 order in Case No. U-11155. In Ameritech Michigan's interconnection agreements with Brooks Fiber and MFS, the parties have agreed to bill competing providers for interim number portability charges, but to defer collection of such amounts subject to establishment by the Commission or the FCC of a methodology for the competitively neutral recovery of costs. This arrangement complies with the applicable FCC requirements. Ameritech Michigan proposed a similar arrangement in Case No. U-11155.

- e. If interim number portability is being provided, is it statewide?

RESPONSE

Interim number portability is a statewide service offering.

- f. If interim number portability is being provided, supply the schedule for implementation of true number portability by geographic location and type.

RESPONSE

Ameritech Michigan will implement service provider true number portability in compliance with the MPSC's order in Case No. U-10860 and the FCC's Order in Docket 95-116. In its June 5, 1996 order in Case No. U-10860, the Commission concluded "that Ameritech Michigan and GTE should be required to implement long term number portability in Michigan at the same time that implementation begins in Illinois ..." (MPSC Order, p. 29)

The FCC's 95-116 deployment schedule for SPNP in Michigan is as follows:

MSAs	Time Frame
Detroit	1/98 - 3/98
Grand Rapids	7/98 - 9/98
Ann Arbor	10/98 - 12/98
All Others	Bona Fide Request

Ameritech also co-chairs, with WinStar, a Michigan "True" Number Portability Workshop. The workshop is currently working with the telecommunication industry in Michigan to augment the FCC schedule to address Michigan-specific requirements and industry needs.

An implementation schedule for geographic or service portability has not been fully developed.

13. Reciprocal compensation

- a. Describe the mutual compensation arrangements that are in effect in Michigan for interconnected and/or competing providers. For purposes of this question, present two categories of providers – other incumbent carriers and competing carriers.

RESPONSE

Ameritech Michigan offers reciprocal compensation arrangements that permit both carriers involved in the exchange of local traffic to reasonably recover the additional costs associated with terminating each other's traffic.

Reciprocal Compensation Arrangements – Competing Carriers. Reciprocal compensation is available in Michigan offered via Tariff M.P.S.C. No. 20R, Part 21, Section 2. The tariff, as required by the U-10647 order, provided that, on an interim basis, each party would charge the other at the rate of \$0.015 per MOU for terminating local switched traffic. However, payment will be due only if traffic terminating on one party's network exceeds the traffic terminating on the other party's network by 5%. The 1995 MTA amendments (Section 359) required the establishment of local termination charges and were consistent with the Commission's prior order. In the Commission's U-10860 order, those interim arrangements were continued. Rate revisions were approved on an interim basis in the Commission's December 12, 1996 order in Case No. U-11156.

The AT&T and TCG interconnection agreements address reciprocal compensation. See, e.g., AT&T arbitration agreement, Section 4.7. Ameritech has also negotiated agreements with two telecommunications carriers (Brooks Fiber and MFS) in Michigan which addresses reciprocal compensation and will negotiate individual interconnection and reciprocal compensation arrangements as requested and as required by Section 252, subject to this Commission's orders in MPSC Case No. U-10860. These agreements reasonably compensate each party for the additional costs of terminating the other party's calls.

Reciprocal Compensation Arrangements – Incumbent LECs. Direct dedicated end office-to-end office transport facilities or dedicated local tandem arrangements are used for transport and termination of local calls between Ameritech Michigan and other incumbent LECs, and no other types of calls (e.g., toll or switched access service, with the exception, in some cases, of Feature Group A) are transported over those dedicated local calling facilities. The compensation arrangements in place between Ameritech Michigan and other incumbent LECs were, until recently,

limited to arranging for each LEC to bear responsibility for one-half of the dedicated transport facilities which carry the calls between the central offices of the two LECs. For example, assuming facilities 10 miles in length connecting the end offices of LEC A and LEC B, of which 3 miles (from its central office to the exchange border) were provided by LEC A and 7 miles (from its central office to the exchange border) are provided by LEC B, then LEC A would compensate LEC B for 2 miles of transport, thus effectively making each LEC financially responsible for 5 miles of transport. Under those arrangements, no explicit compensation is provided for the use of terminating local switching facilities or for the use of tandem facilities. The Commission's June 5, 1996 and September 12, 1996 orders in Case No. U-10860 require that explicit usage-sensitive compensation for the use of switched network facilities for the termination of local calls from one incumbent LEC's network on another incumbent LEC's network (i.e., on extended area service, or EAS, routes) be established by January 1, 1997. A joint plan for implementation of EAS reciprocal compensation, as required by the Commission's orders, was filed with the Commission by Ameritech Michigan and GTE North, Inc., on November 1, 1996, and copies were served upon all parties to that proceeding.

Mr. Dunny discusses reciprocal compensation in more detail in his affidavit at Paragraphs 146-148.

- b. Where interconnection is in place, what is the relationship between traffic terminated on other networks in comparison with traffic terminated on the network of Ameritech Michigan or any of its affiliates operating in Michigan? This can be expressed in terms of percentages or specific calls, minutes of use, or other measure. For the purposes of this question, present the information in the same categories as in 13 A.

RESPONSE

Traffic Relationship - Competing Carriers. There is currently an imbalance in the amount of traffic that competing carriers terminate on Ameritech Michigan's network by approximately 400%. In other words, Ameritech Michigan terminates four times as much traffic on competitive carriers' networks than competitive carriers terminate on Ameritech Michigan's network. See Table 5.a.1 provided by Ameritech Michigan in response to Question 5, Attachment A.

Traffic Relationship - Incumbent LECs. Ameritech Michigan currently has no information regarding the relative traffic flows for local calls between incumbent LEC exchanges. As required by the Commission's order in Case No. U-10860, Ameritech Michigan is in the process of

working with other incumbent LECs to develop methods for tracking those traffic flows. See the joint plan referenced in the preceding section.

14. Resale

- a. Are Ameritech Michigan's and any of its affiliates' services available in a manner consistent with state and federal law?

RESPONSE

Ameritech Michigan provides for resale to telecommunications carriers at wholesale rates all of its telecommunications services which are provided at retail to customers who are not telecommunications carriers. Ameritech Michigan's offering of telecommunications services for resale is consistent with both the MTA and the federal Act. In its U-10860 order, the Commission referred to the resale requirements in Section 357 of the MTA and noted that the resale obligations under Michigan law were not inconsistent with the requirements of the federal Act. (U-10860 Order, pp. 35-36)

Resale of Ameritech Michigan's telecommunications services is addressed in Article X of the AT&T Agreement. In addition, Ameritech Michigan offers its telecommunications services for resale pursuant to tariff. (Tariff MPSC No. 20R, Part 22, and 20U, Part 22) On September 27, 1996, Ameritech Michigan filed enhancements to its tariffed resale offerings and submitted informational tariffs addressing telecommunications services which are unregulated in Michigan.

Ameritech Michigan makes "lifeline" programs - i.e., state or federally mandated programs designed to promote universal service by providing qualified low income residential end users with certain credits toward line connection fees (and, in some cases, toward monthly usage charges) - available for resale. Mr. Mickens addresses the operational aspects of resale of lifeline services at Paragraphs 74-76 of his affidavit.

With respect to "sunsetting" and "grandfathered" services, in accordance with the FCC's regulations, Ameritech Michigan makes those services available for resale by carriers to end user customers receiving those services at the time they select another carrier as their service provider until the services are no longer offered. (See 47 CFR §51.615; First Report and Order, Paragraph 968)

With respect to promotional offerings, Ameritech Michigan's resale offerings reflect the requirements of the FCC's First Report and Order that short term promotions of up to 90 days need not be made available for resale. See also Section 10.5.2 of the AT&T interconnection agreement. However, the FCC's First Report and Order leaves additional issues relating to such restrictions on resale to the states. (Paragraph 952) Section 357 of the MTA provides that promotional and discounted

offerings are not required to be made available for resale. Therefore, Ameritech Michigan believes that the Commission should recognize that promotions and discounts need not be made available for resale in Michigan, as mandated in the MTA and consistent with the Act and the First Report and Order.

Ameritech Michigan's resale offering further provides that carriers will receive notice of any new Ameritech Michigan retail telecommunications services via tariff filings or as provided in agreements between carriers. These new and revised retail telecommunications services also would be available for resale by carriers on a wholesale basis.

Ameritech Michigan offers wholesale prices for its retail telecommunications services as set forth in its tariffs and in the pricing schedule attached to the AT&T Agreement. Tariff prices were calculated on a service-by-service basis, using the methodology specified by the FCC order. Prices in the AT&T Agreement were established pursuant to the proposed decision of the arbitration panel and the Commission order in the AT&T arbitration. (First Report and Order, Paragraphs 911-915) In addition, Ameritech Michigan's pricing provides a corresponding "mirrored" wholesale rate for each applicable retail rate for telecommunications services, in accordance with the FCC's order.

The subject of resale is discussed by Mr. Dunny at Paragraphs 149-158 of his affidavit and by Mr. Mayer at Paragraphs 132-135 of his affidavit. Mr. Mickens discusses numerous issues relating to resale in his affidavit, including Paragraphs 16, 24, 30, and 44-50.

- b. Are there currently any formal disputes related to the pricing of services for resale? If so, identify.

RESPONSE

With the exception of arbitration proceedings pending before the Commission, no.

AT&T, MCI, and Sprint filed requests with this Commission to arbitrate interconnection agreements with Ameritech Michigan; the pricing of services for resale was one of the issues in those proceedings.

- c. Are there currently any formal disputes related to the services or the definition of services available for resale by Ameritech Michigan or any of its affiliates?

RESPONSE

With the exception of arbitration proceedings pending before the Commission, no. The services and definition of services available for resale was an issue in the arbitration cases referred to in the answer to Question 14.b.

- d. Have any provider/entities requested to purchase services from Ameritech Michigan or any of its affiliates at the specific tariffed rates (this does not include negotiated arrangements)? Identify.

RESPONSE

Today, various services offered by Ameritech Michigan may be purchased at retail rates for purposes of resale in situations where Ameritech Michigan may have no specific knowledge of the customer's intended use of the service for resale or where no separate tracking mechanism so identifies the service. (For example, a dedicated circuit may be purchased for resale by an IXC, or toll services may be resold.) However, Ameritech Michigan assumes from the context that the question here refers to the resale of Centrex service or the wholesale provision of telecommunications services. As described in more detail in the answer to Question 4 of Attachment A, at least six providers are currently reselling Centrex service in Michigan which they are purchasing at retail rates pursuant to tariff and contract.

- e. Are any provider/entities purchasing services for resale at the currently tariffed rates (this does not include negotiated arrangements)? Identify.

RESPONSE

See answer to Question 14.d.

- f. Are any negotiations pending for the purchase of services for resale?

RESPONSE

Yes. See answer to Question 4 of Attachment A for details on negotiations concerning resale.

- g. Are any provider/entities currently purchasing services for resale pursuant to a negotiated arrangement? Identify.

RESPONSE

As described in the answer to Question 4 of Attachment A, a negotiated agreement has been reached with US Network, but no services have been purchased to date for resale.

- h. What is the amount of annual revenue generated by providing services for resale? For purposes of this question, segregate by affiliated providers and non-affiliated providers.

RESPONSE

Subject to the assumption described in the answer to Question 14(d), the annual revenue that is projected to be generated through the end of 1996 from the resale of services to providers offering local exchange service via Centrex is \$5,985,864, based on actual revenues through July 1996 of \$3,491,754. This revenue is received from the resale of services at retail rates to those providers referred to in the answer to Question 4 of Attachment A, all of which are non-affiliated providers. There is currently no resale in this context to affiliated providers.

- i. What is the percentage discount for services for resale:
- (1) The specific tariffed resale rates;
 - (2) Negotiated rates by specific contract.

RESPONSE

The rates for the resale of services at wholesale rates in the AT&T Agreement have been established by Commission order at a 22% discount off of retail rates. The rates for resale of services at wholesale rates are included in the tariff filed with the Commission on September 27, 1996. The discount rates included in that tariff range from 5% to 22%.

The resale rates for US Network are included in the interconnection agreement between US Network and Ameritech Michigan which has been filed with this Commission.

Resale of Centrex service at retail rates is provided at the tariffed rates for Centrex loops and at the rates negotiated between Ameritech Michigan and the reseller for the unregulated portion of the service.

2. I received a Bachelor of Science degree from Western Michigan University in Engineering in 1972. I received a Masters of Business Administration from Michigan State University in 1989.

3. I joined Michigan Bell Telephone Company in January 1973. My initial position was Engineer in the Network Engineering Department, with responsibilities for wire center planning, current planning, and outstate facilities. In March of 1977, I was promoted to Manager - Network Engineering, with responsibility for outstate facilities and capital budget. In June 1980, I became Manager of Switching Systems, responsible for switching operations staff and Southfield/University District toll and crossbar. In March of 1984, I became Manager - Network Engineering, with responsibility for network planning. In October 1984, I was promoted to Director - Network Engineering, with responsibility for equipment estimating. In November of 1986, I became Director - Human Resources, with responsibility for management employment and the initial management development program coordination. In July of 1988, I became Director of Large Business Services, with responsibility for circuit provision centers/special services design. In April of 1989, I became Director of Marketing, with responsibility for carrier services billing quality. In April of 1990, I became Senior Director in the Personnel

Department, with responsibility for human resources. In July of 1990, I became Senior Director in the Process Engineering Information Systems group. In April of 1991, I took responsibility for Program Implementation and Billing Operations. In June of 1992, I became General Manager of Switching Systems for Michigan Bell Telephone Company. In April of 1993, I was promoted to Vice President of Customer Operations for AIIS. In August of 1995, I assumed my present responsibilities as Vice President of Marketing and Sales for AIIS.

4. Ameritech Information Industry Services is a business unit of Ameritech which has responsibility for providing sales and service to other telecommunications providers in each of the 5 states in which Ameritech provides local telephone service. This includes CLECs who are licensed to provide basic local exchange service, including Brooks Fiber, MCI Metro, Teleport, MFS, AT&T, and affiliated carriers providing local exchange service, including the Ameritech subsidiary that will provide in-region interLATA services.
5. The purpose of my affidavit is to describe how Ameritech Michigan has satisfied the 14 elements of the competitive checklist ("Checklist") set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 ("Act") by providing or making generally available every network element, product, and service described in the Checklist in the manner

required. In doing so, I will describe the elements, products, and services that Ameritech Michigan is offering to requesting carriers through Ameritech Michigan's approved interconnection agreements with Brooks Fiber communications of Michigan, Inc. ("Brooks Fiber"), TCG Detroit ("TCG" or "Teleport"), and AT&T Communications of Michigan ("AT&T"). The Brooks Fiber Agreement was negotiated by the parties and approved by the Michigan Public Service Commission ("Commission"), while the AT&T and TCG Agreements were arbitrated before being approved.

6. As part of my discussion, I will explain how Ameritech Michigan's contracts and offerings satisfy its duties under §§ 251 and 252 of the Act, the FCC's Rules implementing those sections ("Rules"), the FCC's First Report and Order (FCC 96-325 (Aug. 8, 1996) ("Order")), and the FCC's Second Report and Order (FCC 96-333 (Aug. 8, 1996) ("Second Report and Order")), the FCC's First Report on Reconsideration (FCC 96-394 (September 27, 1996) ("First Reconsideration Order")), and the FCC's Second Order on Reconsideration (FCC 96-476 (December 13, 1996) ("Second Reconsideration Order")).

7. As my affidavit will show, Ameritech Michigan is currently providing or has offered to provide all Checklist items to TCG, Brooks Fiber, and AT&T. Specifically, Ameritech Michigan is actually furnishing most of these items to both Brooks Fiber and TCG, and the balance are currently available

to TCG, Brooks Fiber, and AT&T upon request under the carriers' agreements on terms and conditions that satisfy the Checklist.

8. By way of background, I will briefly discuss the interconnection agreements on which Ameritech Michigan relies to show Checklist compliance. First, Ameritech Michigan has negotiated an interconnection agreement with Brooks Fiber that has been approved by the Commission. Brooks Fiber provides facilities-based and resold services to business and residential customers.

9. Second, Ameritech Michigan has reached an interconnection agreement with AT&T and TCG through a combination of negotiation and arbitration. The panel in the TCG arbitration issued its arbitration award on October 3, 1996, and the Commission issued its order on November 1, 1996, finding that the approved agreement satisfied §§ 251 and 252 of the Act. The panel in the AT&T arbitration issued its arbitration award in that proceeding on October 28, 1996, and the Commission issued an order on November 26, 1996, finding that the approved agreement satisfied §§ 251 and 252 of the Act. As required by the respective orders, the AT&T and TCG agreements have been filed with the Commission. The AT&T agreement offers, and includes the terms and conditions for, each and every element, product, and service mandated by the Checklist, §§ 251 and 252 of the Act, and the FCC's Rules.

10. The Brooks Fiber Agreement and the TCG Agreement contain Most Favored Nation ("MFN") clauses that, in accordance with § 252(i) of the Act, entitle the requesting carriers to obtain any interconnection, network elements, or service "upon the same rates, terms, and conditions as those provided" in other Ameritech Michigan interconnection agreements approved by the Commission. (Brooks Fiber Agreement, Section 28.15; TCG Agreement, Section 29.13) Consequently, Brooks Fiber and TCG may at any time request and obtain as applicable the same rates, terms, and conditions included in the Commission-approved AT&T Agreement, or in any other approved agreements. In this way, any Checklist item not covered by the agreements with Brooks Fiber or TCG, but covered by the AT&T agreement, is available to Brooks Fiber, TCG, and other requesting carriers on the same rates, terms, and conditions. Therefore, where I have provided for ease of reference a citation to the AT&T agreement, by way of example, such terms and conditions are equally available to other carriers with MFN clauses.

11. To put my affidavit in context with the other affidavits being filed by Ameritech Michigan: I describe what products and services Ameritech Michigan is providing and making generally available; Mr. Mayer describes Ameritech Michigan's operational readiness to satisfy the Checklist, i.e., how its products and services are being and will be provided from an

operational standpoint; and Mr. Mickens describes how Ameritech Michigan is ensuring and will continue to ensure that the products and services it provides to Brooks Fiber, TCG, AT&T and other requesting carriers are "equal-in-quality" to those it provides to itself, its affiliates, and other carriers and customers as required by FCC Rule C.F.R. 51.311.

I. CHECKLIST ITEM (1): INTERCONNECTION

12. A Bell Operating Company ("BOC") such as Ameritech Michigan may satisfy the interconnection requirements of the Checklist by providing or generally offering "[i]nterconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1)." 47 U.S.C. § 271(c)(2)(B)(i). As detailed below, Ameritech Michigan's agreements with Brooks Fiber, TCG, and AT&T fully comply with this mandate.

A. Methods of Interconnection

13. Consistent with § 251(c)(2)(A) of the Act and the FCC's Rules, Ameritech Michigan offers to provide interconnection with its network for the transmission and routing of telephone exchange traffic, exchange access traffic, or both. 47 C.F.R. § 51.305(a)(1); Order ¶ 184. See, e.g., AT&T Agreement, § 3.1. Ameritech Michigan will provide interconnection at any technically feasible point within its network via physical or virtual collocation, a "Fiber-Meet" arrangement, or by any other requested interconnection method

which is consistent with the Act and to which the parties agree prior to the applicable Interconnection Activation Date. 47 U.S.C. § 251(c)(2)(B), (c)(6); 47 C.F.R. § 51.321(a), (b). See, e.g., AT&T Agreement, § 3.2. Both collocation and Fiber-Meet arrangements are discussed in more detail below.

14. The access Ameritech Michigan provides to points of interconnection will be equal-in-quality (as defined by the FCC Rules 51.311) to what Ameritech Michigan provides to itself (except where requested otherwise), and will meet the same technical criteria and standards used in Ameritech Michigan's network for a comparable arrangement. 47 U.S.C. § 251(c)(2)(C); 47 C.F.R. § 51.305(a)(3), (4). This issue is described by Messrs. Mickens and Mayer.
15. Ameritech Michigan currently furnishes Brooks Fiber, TCG, MCI Metro, and MFS with collocation arrangements.

1. Physical and Virtual Collocation

16. Except where technically infeasible or because of space limitations, Ameritech Michigan provides physical collocation on its premises of carrier-owned equipment necessary for interconnection with Ameritech Michigan's network for the transmission and routing of local exchange or exchange access traffic or for access to Ameritech Michigan's unbundled network elements as required by 47 U.S.C. § 251(c)(6) and 47

C.F.R. § 51.321(e). See, e.g., AT&T Agreement, § 12.1. Virtual collocation of carrier-designated equipment is available where technically feasible. See, e.g., AT&T Agreement, § 12.1.

17. Ameritech Michigan's physical collocation offering allows a requesting telecommunications carrier to place its equipment in a dedicated space, which is separated from Ameritech Michigan's equipment area. The requesting carrier may choose to further separate its designated area from those of other carriers by adding an enclosure. The requesting carrier arranges for the maintenance and repair of its equipment through an approved contractor. 47 C.F.R. § 51.323(j). Such carrier may have access to its equipment at all times, subject to compliance with Ameritech Michigan's reasonable requirements regarding safety and security. 47 C.F.R. § 51.323(i). See, e.g., AT&T Agreement, § 12.17.

18. Requesting telecommunications carriers can reserve physical collocation space subject to certain reasonable conditions. See, e.g., AT&T Agreement, § 12.9.1. A requesting carrier with active physical collocation arrangements, or ordering active arrangements, can reserve an amount of space equal to the space involved in the active physical collocation arrangement in the office. See, e.g., AT&T Agreement, Sch. 12.9.1(1). Reservations are prioritized on the basis of when they are received, consistent with 47 C.F.R. § 51.323(f)(1).