

See, e.g., AT&T Agreement, Sch. 12.9.1(4). Except for space needed for switch conversion and growth or for augmentation and conversion of mechanical and electrical support systems and building infrastructure, Ameritech Michigan may reserve space in its central offices that is reasonably anticipated to be used within 3 years. 47 C.F.R. § 51.323(f)(4), See, e.g., AT&T Agreement, Sch. 12.9.1(7).

19. With virtual collocation, the requesting telecommunications carrier leases the collocated equipment to Ameritech for \$1 and arranges for its installation in Ameritech's central office. Ameritech's installation, maintenance, and repair of virtually collocated equipment will be equal-in-quality to comparable services which Ameritech provides to itself. 47 C.F.R. § 51.323(e).

20. With either physical or virtual collocation, Ameritech Michigan will provide an interconnection point or points, physically accessible by both Ameritech Michigan and the requesting carrier, at which the fiber optic cable carrying the requesting carrier's circuits can enter Ameritech Michigan's premises. 47 C.F.R. § 51.323(d)(1); See, e.g., AT&T Agreement, § 12.8.1. The interconnection points will be as close as reasonably possible to Ameritech Michigan's premises. See, e.g., AT&T Agreement, § 12.8.1. Space permitting, there will be at least two such interconnection points at Ameritech Michigan's premises at which there are at

least two entry points for the requesting carrier's cable facilities. 47 C.F.R. § 51.323(d)(2). See, e.g., AT&T Agreement, § 12.8.2. Ameritech Michigan will also allow interconnection of copper or coaxial cable if such interconnection is first approved by the Commission. 47 C.F.R. § 51.323(d)(3); See, e.g., AT&T Agreement, § 12.8.3.

21. Pursuant to § 51.323(b) of the FCC's Rules, equipment that may be collocated includes the following:

- Optical Line Terminating Multiplexers (OLTMs)
- Central Office Multiplexers
- Digital Cross-Connect Panels (DSX Panels)
- Optical Cross-Connect Panels (OCX Panels)
- Digital Loop Carrier Equipment
- Data Over Voice (DOV) Equipment
- Any other transmission equipment collocated as of August 1, 1996, necessary to terminate basic transmission facilities pursuant to 47 C.F.R. §§ 64.1401 and 64.1402

See, e.g., AT&T Agreement, § 12.5. These types of equipment have been deemed necessary to interconnect with Ameritech Michigan's network or to access unbundled network elements. 47 U.S.C. § 252(c)(6). As permitted by the FCC's Rules, collocation is not offered for switching equipment or for equipment used to provide enhanced services. 47 C.F.R. § 51.323(c). See, e.g., AT&T Agreement, § 12.5. Carriers may, however, collocate equipment used for signal regeneration ("hubbing") or for any other purpose authorized by the Act, this Commission, or the FCC. See, e.g., AT&T Agreement, § 12.5.

22. In order to link collocated equipment to the requesting carrier's network, the equipment may be connected to unbundled transport provided by Ameritech Michigan or to a facility owned by the carrier or leased from a third-party. 47 C.F.R. § 51.323(g). See, e.g., AT&T Agreement, § 12.6. In compliance with FCC Rule § 51.323(g), collocated equipment will be connected to Ameritech Michigan's network or elements via Ameritech Michigan Cross-Connection Service to:

- Ameritech Michigan End Office Integration Service
- Unbundled Loops
- Unbundled Local Switching
- Tandem Switching
- Unbundled Interoffice Transport
- Channel Service

23. Upon request, collocators may also cross-connect their collocated equipment, provided that both carriers' collocated equipment is being used for interconnection with Ameritech Michigan or for access to Ameritech Michigan's network elements, the carriers provide connecting transmission facilities that comply with Ameritech Michigan's technical and engineering requirements, and the connecting transmission facilities are contained wholly within space provided solely for physical collocation on Ameritech Michigan's premises. 47 C.F.R. § 51.323(h). See, e.g., AT&T Agreement, § 12.7.

2. Meet Point Interconnection Via Fiber-Meet

24. Fiber-Meet is the second interconnection method that Ameritech Michigan is providing to satisfy the Checklist. 47 U.S.C. § 271(c)(2)(B)(i); 47 C.F.R. § 51.321(b). Fiber-Meet

is an interconnection architecture method whereby the parties interconnect their networks via an optical fiber interface, as opposed to an electrical interface, at a mutually agreed-upon location where one party's responsibility for service begins and the other party's ends. 47 C.F.R. § 51.321(b). If a Fiber-Meet is used to interconnect Ameritech Michigan's and the requesting telecommunications carrier's network, the parties will jointly engineer and operate a single Synchronous Optical Network ("SONET") transmission system. See, e.g., AT&T Agreement, § 3.3.1.

25. In a fiber-meet arrangement, each interconnecting party will assume a share of the cost of procuring, installing, and maintaining Optical Line Termination Multiplexing equipment ("OLTM") in its respective wire center for the relevant LATA in a capacity sufficient to maintain and provision all logical trunk groups. See, e.g., AT&T Agreement, §§ 3.3.2, 3.3.3.

26. Further, both Ameritech Michigan and the requesting carrier will designate a manhole or suitable entry-way immediately outside its wire center as a Fiber-Meet entry point and make all necessary preparations to receive fiber optic facilities into the manhole/entry-way. See, e.g., AT&T Agreement, §§ 3.3.4, 3.3.5.

27. Both parties will pull the fiber optic strands from the manhole/entry-way designated by the other party into their own wire center and connect strands to their own OLTM equipment. See, e.g., AT&T Agreement, §§ 3.3.6, 3.3.7.
28. Each party also will be responsible for providing its own transport facilities to the Fiber-Meet and for the cost to build out its facilities to the Fiber-Meet. See, e.g., AT&T Agreement, § 3.3.9.

B. Points of Interconnection and Trunking Architecture

29. The FCC's Rules require that interconnection be available at the line-side and trunk-side of the local switch, the trunk interconnection points for a tandem switch, central office cross-connect points, out-of-band signaling transfer points necessary to exchange traffic at those points and access call-related databases, and points of access to unbundled network elements. 47 C.F.R. § 51.305(a)(2). Ameritech Michigan offers to provide requesting telecommunications carriers with interconnection at all of these points as a standard offering. See, e.g., AT&T Agreement, § 3.5. Of course, upon request, Ameritech Michigan also will provide interconnection at other technically feasible points. 47 U.S.C. § 251(c)(2)(B); 47 C.F.R. § 51.305(a)(2). If Ameritech Michigan denies a request for a particular interconnection, it will be prepared to explain why that arrangement is not technically feasible. 47 C.F.R. § 51.321(d).

30. Interconnection at these points is offered under nondiscriminatory and reasonable terms at the same level of quality that Ameritech Michigan provides comparable interconnection to itself and its affiliates. 47 U.S.C. § 251(c)(2)(C), (D). See, e.g., AT&T Agreement, § 3.8. Equal-in-quality in interconnection is achieved through use of the same or equivalent facilities, interfaces, technical criteria and service standards as Ameritech Michigan itself uses. Order ¶ 224. See, e.g., AT&T Agreement, § 3.6. Upon request, Ameritech Michigan will also provide interconnection arrangements that are of greater or lesser quality. 47 C.F.R. § 51.305(a)(4). See, e.g., AT&T Agreement, § 3.6. In establishing such requirements, Ameritech Michigan fulfills its obligations under Section 271(c)(2)(B)(i) to interconnect with other carriers at technically feasible points at a level of quality that is at least equal to that which Ameritech Michigan provides to itself. 47 U.S.C. §§ 271(c)(2)(B)(i), 251(c)(2)(B), (C).

31. Ameritech Michigan intends to establish logical trunking to each tandem in a LATA in order to ensure network reliability, and, at the same time, to employ trunking arrangements similar to those it uses to interconnect to its own switches. Order, ¶ 203 (emphasizing importance of network reliability); 47 C.F.R. § 51.305(a)(3) (equal quality in interconnection). With logical trunking, separate trunk groups will be carried

over the same fiber-meet arrangement at a single Point of Interconnection ("POI") per LATA. See, e.g., AT&T Agreement, § 4.3. If the traffic volume between any two Central Office Switches at some future time exceeds the CCS busy hour equivalent of one DS1, the parties will establish new direct trunk groups carried over the single POI interconnection facilities between the two Central Offices. See, e.g., AT&T Agreement, § 4.3.2.

32. If this type of logical trunking is not established, the most robust network possible will not be made available, as some tandems may exhaust capacity. In addition, concentrating all traffic between two carriers on a single trunk group at a single tandem would establish a single point of potential network failure for which no alternative route would be available. This would jeopardize the service that Ameritech Michigan provides to other carriers, other carriers' end users, and Ameritech Michigan's own end users.

33. Ameritech Michigan also believes that separate two-way trunks should be used to carry intraLATA toll switched traffic. See, e.g., AT&T Agreement, § 5.2.3. If intraLATA traffic is not on a separate trunk group from local traffic, Ameritech Michigan and the requesting carrier would be prevented from properly recording actual access minutes of use for billing purposes, which is detrimental to both the carriers and their customers. For the completion of local switched and

intraLATA toll traffic, Ameritech Michigan offers to provide two-way trunks dedicated to the purpose of integrating the end offices and/or tandem offices of both carriers. 47 C.F.R. § 51.305(f). See, e.g., AT&T Agreement, § 4.3. Local and intraLATA toll traffic may be routed on a single trunk, provided that the Calling Party Number and Called Party Number are passed to Ameritech Michigan with the call information. See, e.g., AT&T Agreement, § 4.6.

34. Ameritech Michigan will allow interconnection for access traffic through separate Access Toll Connecting Trunks ("TCTs"), which will provide tandem-transported switched access services to interexchange carriers. See, e.g., AT&T Agreement, § 5.2. TCTs will be provisioned to allow requesting telecommunications carrier end-users to connect to or be connected by any interexchange carrier ("IXC") connected to an Ameritech Michigan access tandem. See, e.g., AT&T Agreement, § 5.2.2. TCTs will provide a two-way trunk-side connection between the requesting telecommunications carrier office and an Ameritech Michigan access tandem. See, e.g., AT&T Agreement, § 5.2.3. TCTs will be jointly engineered by Ameritech Michigan and the requesting telecommunications carrier to carry the anticipated traffic to and from the IXC involved. See, e.g., AT&T Agreement, § 5.2.1. These trunks will use the same trunk circuit equipment, same transmission options, same signaling options, and same signaling protocols used by Ameritech Michigan to

connect to other local exchange carriers outside its exchanges.

II. CHECKLIST ITEM (ii):

ACCESS TO UNBUNDLED NETWORK ELEMENTS

A. General Unbundling Rules

35. The Checklist requires incumbent LECs to provide "Nondiscriminatory access to network elements in accordance with the requirements of Section 251(c)(3) and 252(d)(1). 47 U.S.C. § 271(c)(2)(B)(ii). The Checklist also specifies certain network elements that must be unbundled. These are local loop transmission from the central office to the customer's premises (subsection (iv)), local transport from the trunk side of a wireline LEC switch (subsection (v)), local switching (subsection (vi)), and databases and associated signaling necessary for call routing and completion (subsection (x)).
36. In its Order, the FCC added certain other core network elements that must be unbundled: network interface devices for access to customer interoffice transmission facilities, operations support systems functions (OSS), and operator services and directory assistance. See 47 C.F.R. § 51.319.
37. Each of these core network elements must be offered on an unbundled basis by all incumbent LECs. Incumbent LECs also

must allow requesting carriers to combine network elements. 47 U.S.C. § 251(c)(3); 47 C.F.R. § 51.315. Network elements must also be offered on an equal-in-quality basis. 47 C.F.R. § 51.313. As I will discuss, Ameritech Michigan provides nondiscriminatory and equal-in-quality access to the full range of core unbundled facilities and equipment, on both an individual and re-bundled basis. Upon request, Ameritech will provide other technically feasible network elements as required by the Act and Rules.

38. As noted above, the Checklist requires Ameritech Michigan to satisfy § 251(c)(3) of the Act, which states that incumbent LECs have a duty to provide:

nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory in accordance with the terms and conditions of the agreement and the requirements of this section and section 252. An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.

Ameritech Michigan provides nondiscriminatory unbundled access to network elements to all requesting telecommunications carriers for their use in providing telecommunications services to their customers. Access to network elements is offered on a nondiscriminatory and equal-in-quality basis under rates calculated consistent with the requirements of Section 252(d)(1) and the FCC's Rules.

39. Later in this affidavit, I will discuss Ameritech Michigan's compliance with the requirements of the Act and the FCC Rules relating to each core network element. First, however, I will discuss Ameritech Michigan's compliance with several general requirements imposed by the FCC's Rules regarding access to all network elements.
40. As required by 47 C.F.R. § 51.307(c), Ameritech Michigan provides network elements to requesting carriers in a manner that allows them to provide any telecommunications service that may be offered by means of that element. See, e.g., AT&T Agreement, § 9.1.1.
41. Ameritech Michigan also provides access to the facilities or functionality of a network element separately from access to other elements, and for a separate charge. 47 C.F.R. § 51.307(d).
42. Ameritech Michigan does not impose any limitations, restrictions, or requirements on requests for or use of an element that impairs a requesting carrier's ability to provide a telecommunications service in the manner it intends. 47 C.F.R. § 51.309(a). See, e.g., AT&T Agreement, § 9.1.1.
43. Ameritech Michigan allows a requesting carrier to purchase an unbundled element in order to provide exchange access service

to itself. 47 C.F.R. § 51.309(b). Regarding local switching, such elements are provided for use in providing access services consistent with the requirements of the FCC's First Reconsideration Order, ¶¶10-13, and carriers "may not use that switching element to provide interexchange service to end users for whom that requesting carrier does not also provide local exchange service."

44. Requesting carriers are entitled to exclusive use of an unbundled network facility, and to use of features, functions, or capabilities of that facility, for a set period of time. 47 C.F.R. § 51.309(c). Nevertheless, Ameritech Michigan retains the obligation to maintain, repair, or replace unbundled network elements. 47 C.F.R. § 51.309(c).

45. Certain requirements call for more detailed discussion. These are: (1) Ameritech Michigan's duty to provide other technically feasible network elements; (2) Ameritech Michigan's duty to provide access that is equal-in-quality, and (3) Ameritech Michigan's duty to combine network elements upon request.

1. Bona Fide Request Process For New Elements and Points and Methods of Interconnection

46. Although I will discuss the network elements that Ameritech Michigan provides via standard offerings later in this affidavit, I should first describe the process by which CLECs

may request and obtain new or different unbundled network elements not previously provided by Ameritech, as well as new points and methods of interconnection.

47. When a requesting carrier desires to (1) interconnect to Ameritech's network at a new point or to purchase new or different unbundled elements not previously provided, (2) achieve interconnection or access to a network element that is different in quality from what Ameritech provides itself, or (3) receive a customized element or interconnection, Ameritech addresses the matter via its Bona Fide Request ("BFR") process. See, e.g., AT&T Agreement § 2.2 and Sch. 2.5. The BFR process in Michigan works as follows: First, requesting carriers specify precisely what they want on the detailed BFR Form. Second, Ameritech has 30 days in which to conduct a preliminary analysis of the technical feasibility and regulatory compliance of the request and to prepare a preliminary report for the requesting carrier. Third, if that carrier then authorizes further development, Ameritech has up to 60 days to analyze the request further and conduct price and costs analyses before providing a final BFR Quote, including proposed price and implementation terms. Moreover, in some circumstances Ameritech Michigan is required to provide a BFR Quote within the initial 30 days. See, e.g., AT&T Agreement, Sch. 2.2. A requesting carrier may cancel the BFR at any time, but remains responsible for Ameritech Michigan's reasonable development costs.

48. The BFR Form seeks information on preexisting access to an element at a particular point, and Ameritech Michigan will consider such access significant evidence of technical feasibility of access at substantially similar points. Access to a network element or a combination of elements may be considered feasible at a particular point, even if such access requires novel use of, or some modification to, Ameritech Michigan equipment. Thus, Ameritech Michigan will include consideration of any modifications to facilities to the extent necessary to accommodate interconnections or access to network elements. The BFR Form also offers to requesting telecommunications carriers the option of entering into nondisclosure agreements, but does not impose overly broad, restrictive, or coercive nondisclosure requirements.

49. In determining technical feasibility, Ameritech Michigan looks solely at technical or operational matters, and does not include consideration of economic, accounting, billing, space, or site concerns, except that space and site concerns may be considered in circumstances where there is no possibility of expanding the space available. However, specific, significant and demonstrable network reliability concerns will be regarded as relevant evidence that access to a requested network element at that point is not technically feasible. If Ameritech Michigan claims that it cannot satisfy a BFR because of technical infeasibility, including

due to adverse network reliability impacts, it will specify the reasons why to the requesting carrier and will be prepared to demonstrate to the Commission that such interconnection, access, or methods are technically infeasible including because it will result in specific and significant network reliability impacts.

50. If a requesting telecommunications carrier wishes to purchase a new network element or interconnection that is technically feasible, but which requires significant development or modification of existing facilities, systems software, etc., and is therefore expensive, Ameritech will agree to develop the interconnection or element where the requesting telecommunications carrier agrees, pursuant to Section 252(d)(1) of the Act, to bear the cost of developing the capability to provide that element, including a reasonable profit. The requesting telecommunications carrier also bears the cost of any expansion or modification necessary to provide the network element.

2. Equal Quality

51. The FCC's Rules require that, to the extent feasible, the quality of an unbundled network element, as well as the quality of the access to such unbundled element, that an incumbent LEC provides to a requesting telecommunications carrier is at least "equal-in-quality," or at parity, with what the incumbent LEC provides to itself. 47 C.F.R. §

51.311. Ameritech Michigan's interconnection agreements require such technical parity regarding network elements provided to itself, its affiliated and unaffiliated carriers. See, e.g., AT&T Agreement, § 9.4.

52. In addition, when Ameritech Michigan uses a facility, functionality, feature or information in the provision of a bundled service that is comparable to a network element, Ameritech Michigan provides it on an equal-in-quality basis. Where applicable, equal-in-quality is generally achieved by using comparable facilities, parameters, practices, procedures and systems to provision, provide and maintain network elements that are used with comparable facilities used to provide retail services for Ameritech Michigan retail customers.

53. Ameritech Michigan provides such parity in terms of the quality of access to, as well as the quality of, each unbundled element, including both physical and logical access to the element. See, e.g., AT&T Agreement, § 9.4. The term "logical" as used in this context refers to the ability of the requesting carrier to interact with unbundled databases or other facilities. An example of logical interaction with a network element might be the ability of both Ameritech Michigan's service representatives and those of the requesting carrier to interact with Ameritech Michigan's

telephone number selection database to select a telephone number for assignment to a new end user.

54. As required, Ameritech Michigan measures quality in this context from the perspective of the requesting telecommunications carrier. Ameritech Michigan provides access to its network elements that is at least indistinguishable from the quality that Ameritech Michigan provides to itself, a subsidiary, an affiliate, or any other party. See, e.g., AT&T Agreement, § 9.4.2. Of course, Ameritech Michigan will also provide, upon request, access to network elements that is different in quality from what it provides itself, where such access is technically feasible. See, e.g., AT&T Agreement, § 9.4.4.

55. As discussed in more detail by Mr. Mickens, Ameritech Michigan uses comparable objective performance characteristics, such as peak hours capacity, transmission standards, and interface specifications, protocols, procedures, and practices for unbundled network elements and comparable facilities it uses to provide retail service to achieve parity. For example, Ameritech Michigan designs interconnection to access network elements using the same peak hours capacity and transmission standards that it uses when it designs comparable interconnection in its own network. In cases where it is not technically feasible for Ameritech Michigan to provide such parity, it will be

prepared to prove that fact to the Commission. See, e.g., AT&T Agreement, § 9.4.2.

3. Combination or Rebundling of Network Elements

56. Ameritech Michigan's agreements meet each of the requirements regarding combinations set forth in 47 C.F.R. § 51.315. Unless otherwise requested, network elements are provided by Ameritech Michigan unbundled from other elements and facilities. Ameritech Michigan provides unbundled network elements in a way that enables requesting telecommunications carriers to combine them to provide a service to their customers. See, e.g., AT&T Agreement, § 9.3.1. This is usually accomplished through the use of standard interfaces, specifications, facilities, procedures and practices that facilitate a requesting telecommunications carrier's ability to combine network elements provided by Ameritech Michigan with other network elements, or with the requesting telecommunications carrier's own facilities. See, e.g., AT&T Agreement, § 9.3. Ameritech Michigan will also provide unbundled access to OSS necessary for requesting telecommunications carriers to purchase and combine network elements. See, e.g., AT&T Agreement, § 9.4.3.

57. In addition, upon request Ameritech Michigan will provide, as a single, combined network element, facilities that comprise more than one network element. Ameritech Michigan will perform the functions necessary to combine elements that are

ordinarily combined within its network, in the same manner in which they are typically combined by it. See, e.g., AT&T Agreement, § 9.3.3. Ameritech Michigan will also perform functions necessary to combine elements, if they are not ordinarily combined in the requested manner in its network, or even though they are not ordinarily combined at all in its network, it is technically feasible to make such combination reasonably function as a single combined element and provided that would not undermine the ability of other carriers to access unbundled elements or interconnect with Ameritech Michigan's network. See, e.g., AT&T Agreement, § 9.3.3. Upon request, and as technically feasible, Ameritech Michigan will combine its network elements with facilities and equipment of the requesting telecommunications carrier where it is technically feasible to make such combination function as a single combined element.

58. Network elements are not combined where the combination will impair network reliability or security or undermine the ability of other carriers to access unbundled elements or to interconnect with Ameritech Michigan's network. See, e.g., AT&T Agreement, § 9.3.3. If Ameritech Michigan finds that a requested combination is not technically feasible, including because it cannot be made to function as a single element, or will impair network reliability or security, or will undermine the ability of other carriers to access unbundled elements or to interconnect with the Ameritech Michigan's

network, it will explain why to the requesting telecommunications carrier and be prepared to prove that fact to the Commission.

59. Requesting telecommunications carriers order combinations of elements by specifying to Ameritech Michigan the network elements or facilities they seek to have combined. Requests for combinations that are not already being provided by Ameritech Michigan are processed through the BFR Process. See, e.g., AT&T Agreement, § 9.6.

60. Ameritech Michigan currently provides 3 network element combinations as standard offerings: Unbundled Element Platform with Operator Services and Directory Assistance; Loop Combination; and Switching Combination No. 1. The details of these combinations are set forth in Schedule 9.3.4 of the AT&T Agreement. Some examples of other potential combinations that can be requested through the BFR Process are listed in the AT&T Agreement, § 9.3.5.

B. Core Unbundled Network Elements

61. As required by the Act and Rules, Ameritech Michigan offers nondiscriminatory access to the following unbundled network elements:

- Local Loop Transmission;
- Network Interface Device;
- Local and Tandem Switching;
- Interoffice Facilities;
- Signaling Links and Call-Related Databases;
- Operations Support Systems Functions; and
- Operator Services and Directory Assistance.

See, e.g., AT&T Agreement, § 9.2, Schs. 9.2.1-9.2.7. These are the core network elements required under the Checklist and the FCC's Rules. See 47 C.F.R. § 51.319. Some of these elements are required by the Checklist and therefore are discussed in separate sections. Other core elements, however, are not specified in the Checklist, but were required to be unbundled by the FCC, and are discussed in this section. The non-checklist core network elements are discussed in this section.

1. Network Interface Device

62. The FCC's Rules (47 C.F.R. § 51.319(b)) require that Ameritech Michigan allow requesting carriers, and other carriers that provide their own local loops, to access end user customer inside wire through a connection between their own adjoining NID and Ameritech Michigan's NID. Ameritech Michigan will enable requesting telecommunications carriers to do so upon request. The requesting telecommunications carrier will establish the connection through an adjoining NID device it provides. See, e.g., AT&T Agreement, Schs. 9.2.2, 9.5(3.1). Due to the variety of NIDs currently in place in Ameritech Michigan's network, Ameritech Michigan uses several methods to provide requesting telecommunications

carriers access to the customer's inside wire, all of which meet the requirements of the FCC's Rules. See, e.g., AT&T Agreement, Sch. 9.5(3.2). Accordingly, Ameritech Michigan's unbundled NID offering satisfies the FCC's Rules.

2. Access to Operations Support Systems Functions

63. Section 51.319(f) of the FCC's Rules requires incumbent LECs to offer unbundled, nondiscriminatory access to their Operations Support Systems ("OSS") functions. These are functions supported by Ameritech Michigan's databases and information which support pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled elements and resold services. As required by the FCC, Ameritech Michigan will provide access to these functions via electronic interfaces on or before January 1, 1997 where Ameritech customer contact personnel use electronic interfaces and manual interfaces where they do not, and in each case, such access will meet the equal-in-quality requirement I previously discussed. 47 C.F.R § 51.319(f)(2). These interfaces will be made available consistent with the requirements of the FCC's Rules as clarified in the Second Reconsideration Order on or before January 1, 1997. Ameritech Michigan will also provide requesting telecommunications carriers with access to the functionality of any internal gateway systems, which are defined as electronic interfaces used by Ameritech Michigan for accessing these systems in performing these OSS functions

for its own customers. Order 523. Ameritech Michigan's proposed offerings for each of the required interfaces are described below.

64. Pre-Ordering, Ordering, and Provisioning. Where applicable, Ameritech Michigan will provide unbundled nondiscriminatory and equal-in-quality access to the electronic interfaces for the transfer and receipt of data necessary to perform pre-ordering, ordering, and provisioning functions. These interfaces are consistent with any applicable industry standards, as described in § 10.13.2(a) and Schedule 9.2.6 of the AT&T Agreement. As Messrs. Mayer and Mickens explain in more detail, the interfaces for these OSS functions are currently being upgraded to meet the FCC's January 1, 1997 deadline.

65. The OSS functions provided through these interfaces include:

- Access to Telephone Number Selection, which will give requesting telecommunications carriers service representatives the same ability Ameritech Michigan service representatives have to select and reserve telephone numbers from the Ameritech Michigan-maintained pool of available telephone numbers.
- The same capacity as Ameritech Michigan service representatives to determine Feature Availability, that is, what features/services may be currently offered to an end-user served by a given central office or telephone number prefix.
- Access to the Due Date Selection capability. The ability for a competing carrier's service representative to have the same ability as an Ameritech Michigan service representative to select an interval order due date and appointment based on

work force availability and whether outside work is required.

- Access to Address Validation capability. This is the same ability procedure Ameritech Michigan service representatives have to determine whether a given address is valid, that is, properly expressed, existing, and within the Ameritech Michigan service territory.
- Access to Order Entry, which is the ability to transmit to Ameritech Michigan an order for initial service, subsequent change activity, account disconnection, or a change of local service provider, on the same basis as Ameritech Michigan's service representative.

66. Ameritech Michigan also provides requesting telecommunications carriers with a Customer Service Record ("CSR") for a customer. In order to protect customer proprietary information at the pre-ordering stage, the requesting telecommunications carrier need only obtain a Letter of Authorization ("LOA") from a customer and provide such documentation to Ameritech Michigan prior to receiving a CSR. See, e.g., AT&T Agreement, § 10.11.1. Ameritech Michigan reserves the right to perform random audits of a requesting telecommunications carrier's LOAs to ensure accuracy.

67. As for OSS provisioning features, Ameritech Michigan enables requesting telecommunications carriers to verify the status of orders by providing them with an electronic initial order confirmation, order completion information, and any status recorded as part of Ameritech Michigan's order management

that indicates when an order is in jeopardy of not being completed on time. All of these capabilities are made available to requesting carriers by Ameritech on the same basis as its own service representatives.

68. Maintenance and Repair. Ameritech Michigan provides requesting carriers with an electronic interface for transferring and receiving data necessary to perform maintenance and repair functions. See, e.g., AT&T Agreement, § 10.13.3(a). This interface is consistent with applicable existing industry standards and will be administered through a gateway serving as a single point of contact for the transmission of data. See, e.g., AT&T Agreement, Sch. 9.2.6(2.0). Through this interface, Ameritech Michigan enables requesting telecommunications carriers to electronically transmit to Ameritech Michigan a trouble report and receive an initial status, based on preliminary testing by Ameritech, and an appointment commitment. on the same basis as its own service representatives. Ameritech Michigan also provides to requesting telecommunications carriers an update to the trouble report status each time that status is updated by Ameritech Michigan personnel.

69. Billing. Ameritech Michigan electronically provides requesting telecommunications carriers with a daily usage feed and a monthly billing report to enable requesting telecommunications carrier to bill its end users. See, e.g.,