permitted to become effective, subject to further review by the Commission, if required, after the conclusion of the pending arbitration proceedings.

Respectfully submitted,

AMERITECH MICHIGAN

CRAIG A. ANDERSON (P28968)
444 Michigan Avenue, Room 1750
Detroit, Michigan 48226
(313) 223-8033

DATED: October 30, 1996

Ameritech

October 18, 1996

Mr. William Celio
Director of Communications Division
Michigan Public Service Commission
6545 Mercantile Way, P.O. Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-11104.

Dear Mr. Celio:

As you are aware, we have had several meetings and discussions over the past few weeks to discuss Ameritech Michigan's Statement of Generally Available Terms and Conditions (General Statement) as well as other related proceedings. As we have discussed, this filing was made pursuant to and in accordance with Section 252(f) of the Telecom Act of 1996. I am sending this letter to clarify how we intend to proceed as well as suggest to you the process that the Commission can use to consider the General Statement and related filings.

On September 30, 1996, Ameritech Michigan filed its application for approval of a Statement of Generally Available Terms and Conditions and supporting affidavits. The General Statement includes not only product descriptions and operational support for the services offered by Ameritech Michigan to other telecommunications carriers as required by the federal Act, but also includes the prices offered for the services with underlying cost support or references to applicable tariff rates. In some instances, the prices included in the General Statement would have been reviewed in that context for the first time by the Commission.

In addition to the Commission's consideration of the General Statement, there are a number of other proceedings which are considering pricing and cost issues related to services made available by Ameritech Michigan to its competitors pursuant to the federal Act. These proceedings include: MPSC Case Nos. U-11155 and U-11156 (considering price and cost issues relating to unbundled loops, local traffic termination, and number portability), U-11098 (MFS approval of negotiated agreement), U-11178 (Brooks Fiber approval of negotiated agreement), U-11138 (TCG arbitration), U-11151 (AT&T arbitration), U-11168 (MCI arbitration), U-11203 (Sprint arbitration). Today, Ameritech Michigan initiated another proceeding.

We are requesting Commission review and approval of cost studies related to other services required to be made available to competitors under Section 251 of the federal Act. We are requesting expedited handling of this proceeding so as to conclude concurrent with the date that the Commission renders an order in the General Statement proceeding. As previously discussed, we are willing to extend the time that the Commission has to review the General Statement filing until December 9, 1996 if the Commission would schedule the expedited cost docket to be completed by that time.

We believe the general statement as submitted for approval is complete and reflects the terms and conditions that Ameritech Michigan makes available including pricing. The Commission could approve the statement as submitted however the Commission may also permit the statement to take effect subject to its continuing review as permitted by Section 252(f) 3 & 4. Such continuing review could incorporate the cost and pricing information and determinations in any existing or future related proceeding. The statements generally offered prices could be modified to reflect cost and price determinations from other dockets, however, under the terms of 252(f)5 such prices in the statement do not relieve Ameritech Michigan from the duty to negotiate different prices for other requesting parties subject to the terms of the federal act.

Ameritech Michigan submitted its general statement in U-11104 based upon the recommendation of the Commission Staff. As previously discussed, we do not intend to rely solely on the general statement to satisfy checklist compliance. In the near future, Ameritech Michigan intends to file general market conditions information (Attachment A) and answers to the checklist compliance questions in Attachment B according to the procedural guidelines ordered in U-11104. It is not Ameritech Michigan's intent that our statement filing substitute for its future responses to the specific questions raised in Attachment A and B of the August 28 order in U-11104. The general statement together with our future responses to the questions in A and B, in addition to the information contained in our 271 application, should provide the Commission with an adequate record upon which to verify Ameritech Michigan's compliance with section 271(c) of the federal act.

Several parties to this proceeding have raised concerns regarding the availability of confidential information in this proceeding. We are offering under separate cover (attached) to provide the parties the confidential costs under the provisions in the U-10860, U-11155, & U-11156 protective order as amended by the Commission October 16 , 1996 order in these dockets.

Given the clarifications to Ameritech Michigan's submission, Ameritech Michigan would have no objection to agreeing to recommencing the 14 day comment period regarding its General Statement as of the date of this letter. Although the time period for response was originally established by the Commission's August 28th order in U-11104 Ameritech Michigan would not object to any comments submitted by interested parties regarding Ameritech Michigan's General Statement within 14 business days from the date of this letter. Ameritech Michigan believes this will allow interested parties additional time to respond to the clarifications described herein.

Ameritech Michigan believes that the process that we have proposed will facilitate the Commission's consideration of the General Statement while retaining consistency with the time frame contemplated by the federal Act, and thus, expediting the benefits of expanded local competition for Michigan's citizens.

Thanks for the time you have spent discussing our proposal and for your consideration on this matter.

Very truly yours,

Paul

Paul V. LaSchiazza
Vice President Regulatory
Ameritech Michigan

cc.U-11104 parties of record

Attachment

QUESTION NO. 12: In order for the requirements of Section 271(c)(2)(B) to be met, must all items in Section 271(c)(2)(B) be addressed in a single agreement or may they be made available through multiple agreements and/or tariffs or statements of generally available terms?

ANSWER TO QUESTION NO. 12: The statutory language, the legislative history, and the policies underlying the 1996 Act support the view that Ameritech Illinois may satisfy the "checklist" requirements of Section 271(c)(2)(B) through either:

* a single Section 271(c)(1)(A) agreement providing all 14 items in the "checklist" (even if the competing provider does not use all of them);
* a combination of Section 271(c)(1)(A) agreements that together provide all items in the "checklist";
* a Section 271(c)(1)(A) agreement or agreements supplemented by a Section 252(f) Statement and/or tariffs; or
* a Section 271(c)(1)(B) Statement of generally available terms

First, one way to meet the "checklist" requirement is through a Section 271(c)(1)(A) agreement that provides or offers each "checklist" item to a competing provider. It is entirely possible, however, that a single competing provider will not actually require or take all 14 items on the "checklist." For example, a telecommunications carrier that has purchased switches may not require unbundled switching under Section 271(c)(2)(B)(vi); an electric utility providing competitive local telephone service may not need access to the BOC's poles and rights-of-way under Section 271(c)(2)(B)(iii); and a competing carrier that constructs a network, or supplements with unbundled elements purchased from the BOC, may not need resale under Section 271(c)(2)(B)(xiv). If a single competing provider actually had to take all 14 items on the "checklist" from the BOC, the BOC might never qualify to enter the long distance business.

Not surprisingly, Congress did not impose such a requirement. Section 271(c)(2)(B) states only that "access or interconnection provided or generally offered . . . meets the requirements of this subparagraph if such access and interconnection includes each of the following." (Emphasis added.) The requirement in Section 271(d)(3)(A)(i) -- that access and interconnection provided under Section 271(c)(1)(A) has been "fully implemented" -- must be read in light of this formulation. Accordingly, as long as an agreement provides the 14 items, and an interconnecting provider that requests any items received them, even if the competing provider has not requested all 14 items, the agreement satisfies the statute.

Second, a BOC may satisfy the "checklist" through a combination of Section 271(c)(1)(A) agreements, as long as the BOC complies with the provisions of Section 252(i), regarding the obligation of local exchange carriers to make available to all competing providers any interconnection, service, or network element provided under an agreement approved by the State commission. Sections 271(c)(1)(A) and 271(c)(2)(A)(I) state that a BOC is required to provide "access and interconnection," and that this "access and interconnection" may be provided by "one or more agreements." Section 271(c)(2)(B) then states that the "access and interconnection" described in Sections 271(c)(1)(A) and 271(c)(2)(A)(i)(I) must meet the requirements of the "competitive checklist" set out in Section 271(c)(2)(B). There can be no doubt that the "access and interconnection" requirement to meet the terms of the "competitive checklist" is the same "access and interconnection" that may be satisfied by "one or more agreements" as stated in Sections 271(c)(1)(a) and 271(c)(2)(A)(i)(I). The statutory language explicitly states that Section 271(c)(2)(B) relates to "such access and interconnection," referring back to the "access and interconnection" provided by "one or more agreements" described in Sections 271(c)(1)(A) and 271(c)(2)(A)(i)(I). Therefore, interpreting Section

271(c)(2)(B) to require all items in the "competitive checklist" to be satisfied in a single agreement would nullify the statements in Section 271(c)(2)(A)(i)(I) that access and interconnection may be "pursuant to one or more agreements."

This construction of Section 271 is supported not only by the statutory language, but also by the design, object and policy of the 1996 Act as well. A manifest purpose of the 1996 Act is to open local exchange markets by means of interconnection agreements between BOCs and competing providers of telephone exchange service. The requirement of the "competitive checklist" serves to further this purpose by removing potential barriers to entry into the local exchange business, and ensuring that potential entrants have access to those services that may be critical to competition. See House Committee on Commerce, Report to Accompany H.R. 1555, H.R. Rep. No. 104-204, 104th Cong., 1st Sess. 76-77 (July 24, 1995) ("checklist" requirement constitutes "tangible affirmation that the local exchange is indeed open to competition"). There is no reason inherent in these goals to require that all of the "checklist" items be included in a single agreement. The goal of the "checklist" is simply to confirm that generally applicable interconnection terms have been made available so that competitors are able to enter the market; it matters not that all of the terms do not actually appear in a single agreement. In short, from a policy perspective, it is difficult to conceive of a reason why Ameritech Illinois should not be allowed to rely on more than one agreement in meeting the requirements of the "competitive checklist."

Third, a BOC may also satisfy the "checklist" requirement based on a combination of a Section 271(c)(1)(A) agreement or agreements and a statement of generally available terms approved by the State commission under Section 252(f) or tariffs that fulfill the same function. The permissibility of doing so is compelled by

the underlying principle that the timing of a BOC's entry into the long distance business cannot be left to the mercy of interconnecting parties.

Fourth, the BOC may satisfy the "checklist" requirement by filing an approved Section 252(f) Statement under Section 271(c)(2)(B).

In short, a number of options exist, and Ameritech Illinois is committed to providing all "checklist" items to any competitor. It would be absurd to say that Congress intended to prevent Ameritech Illinois from competing in the long distance business based on a scenario in which Ameritech Illinois is doing everything within its power to comply with the "checklist" requirement but has no control over the independent business decisions of its competitors not to avail themselves of a certain "checklist" item or items.

Therefore, Ameritech Illinois believes that the FCC should and will interpret Section 271 to permit Ameritech Illinois to rely on negotiated and arbitrated agreements, a statement of generally available terms, tariffs, or any combination thereof, to satisfy the "checklist" requirement of Section 271(c)(2)(B) for at least three reasons.

In the first place, the statutory language supports such an interpretation. Section 271(c)(2)(B) states that the "[a]ccess or interconnection provided or generally offered by a Bell operating company to other telecommunications carriers meets the requirements of this subparagraph if such access and interconnection includes" the "checklist" items. Section 271(c)(2)(B) (emphasis added). By its terms, therefore, Section 271(c)(2)(B) allows for the use of a general statement of terms.[1] Moreover, the verb "provide" means "[t]o bring about

[1]This interpretation also is supported by the structure of the 1996 Act as a whole. Section 252(f) provides that, in general, a BOC "may prepare and file with a State commission a statement of the terms and conditions that such company generally offers within that State to comply with the requirements of section 251 and the regulations thereunder and the standards applicable under this section." Section 252(f). Thus, a BOC may file a statement of generally available terms at any time under Section 252(f).

or ensure by foresight; arrange for or stipulate beforehand . . . . To get ready, prepare, or procure beforehand . . . ." New Webster's Dictionary 1203 (College ed. 1975). The statute's use of the language "provided . . . by" a BOC, therefore, means that the BOC must "bring about" or "arrange for" the "checklist" item. It does not require that the other contracting party actually put it to use. In short, a BOC satisfies Section 271(c)(2)(B)'s requirement that it "provide" the "checklist" items when it makes a "checklist" item available, although no competitor decides to take it.

In the second place, the legislative history supports this result. As the Conference Report notes, the "checklist" is the "minimum" to be provided by a BOC under its agreement with a competitor "assuming the other party or parties to that agreement have requested the items included in the checklist." H.R. Rep. No. 104-458, 104th Cong., 2d Sess. 144 (1996) (emphasis added). See also id. at 121 ("The conferees note that the duties imposed under new section 251(b) make sense only in the context of a specific request from another telecommunications carrier or any other person who actually seeks to connect with or provide services using the LEC's network"). Thus, Congress recognized that an agreement might not cover all of the items in the "checklist" if a competing provider did not request a certain item or items from the "checklist." Congress obviously could not have intended to require that the agreements cover all of the "checklist" items when it knew that it was very possible, through no fault of the BOCs, that this would not in fact occur. A fortiori, when an agreement covers all "checklist" items and the competing provider that is the party to the agreement simply does not take an item that is provided pursuant to the agreement, that situation does not constitute a flaw in "checklist" compliance.

Finally, it is obvious that prohibiting a BOC from entering the long distance market simply because no competitor has requested one or more items

from the "competitive checklist" defies common sense and clashes with the design of the statute as a whole. The "competitive checklist" was Congress' ex ante prediction about what items relating to access and interconnection might be necessary to facilitate competition in the local exchange market. But the primary tool for opening the local market to competition was to be negotiated agreements between the BOCs and potential competitors. If no potential competitor desires a "checklist" item, the competing providers must have concluded that that item will not facilitate successful competition with the BOCs in the local market. Put differently, those competitors have concluded that they can compete more effectively by not accepting a BOC offer to provide them with the "checklist" item in question. Under these circumstances, it would be absurd to suggest that a procompetitive business decision not to take a "checklist" item made available by the BOC constitutes a failure by the BOC to satisfy the requirements of Section 271 of the Act.

The only sensible interpretation of the 1996 Act is to permit a BOC to file a statement of generally available terms and/or tariffs detailing the terms and conditions on which any item in the "checklist" not requested by any competitor would be made available to competitors upon request. If Ameritech Illinois could not rely on a general statement and/or tariffs, then the statutory scheme could be paralyzed. Ameritech Illinois could be denied access to the interexchange market simply because competitors in the local market do not want to use a service, such as unbundled local switching, that happens to be listed in the "competitive checklist." This result makes no sense.

The Section 271(c)(1)(A) preconditions to FCC approval should not be interpreted in an inflexible, hypertechnical manner that would bar entry into the interexchange market -- even though a BOC has negotiated agreements with facilities-based competitors; even though the competing providers are actually

supplying local exchange service in competition with the BOC; and even though the BOC has issued a general statement of terms and conditions that satisfies all of the items in the "competitive checklist." In short, any interpretation of the 1996 Act that denies Ameritech Illinois access to the interexchange business, even though it has opened the local market to competition, is contrary to the design and purpose of the statute as a whole.

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Telecommunication Act of 1996	}	Case No. U-11104

MICHIGAN PUBLIC SERVICE COMMISSION
FILED
NOV - 7 1996

BRE COMMUNICATIONS, INC.'S

NOTICE OF INTEREST

In accordance with the Commission's August 28, 1996 Order Establishing Procedures, BRE Communications, Inc. files this Notice of Interest to participate in this proceeding and requests to be placed on the service list.

Dated: November 5, 1996

BRE COMMUNICATIONS, INC.

Richard C. Gould

By: Richard C. Gould (P31269)
BRE Communications, Inc.
4565 Wilson Avenue
Grandville, MI 49418

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL

STANLEY D. STEINBORN
Deputy Attorney General

6545 MERCANTILE WAY, STE 15
LANSING, MICHIGAN 48911

FRANK J. KELLEY
ATTORNEY GENERAL

November 7, 1996

MICHIGAN PUBLIC SERVICE
FILED
NOV - 7 1996
COMMISS

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, Michigan 48909

Dear Ms. Wideman:

RE: AMERITECH MICHIGAN, MPSC Case No. U-11104

In the MPSC's August 28, 1996 order in case U-11104, the Commission stated that Ameritech Michigan and other parties may file information related to general telecommunication market conditions in Michigan at any time in this docket.

The MPSC staff elects to file copies of two sets of comments which it filed in license applications under the Michigan Telecommunications Act. The first set of comments is from MFS and Intelenet of Michigan, Inc.'s (MFS) application in case U-11160. With regard to the current market conditions in Michigan, the MPSC staff stated:

> With regard to the requirement of section 301(2)(b), i.e. whether the granting of a license to the applicant would not be contrary to the public interest, staff has several concerns on current market conditions relative to competitive local exchange companies licensed in Michigan generally and the experience of MFS specifically during its 17 months of licensed business in Michigan.
>
> The first concern is whether these competitive local exchange licenses are creating choices for Michigan business and residential phone customers or are they merely creating corporate value for the license holders. MFS has had its competitive local exchange license for 17 months. According to a discovery response, it is currently serving only 72 subscriber local exchange customers. Also, MFS has not obtained an approved interconnection agreement.

> The second concern the Staff wishes to alert the Commission to is whether competitive local exchange providers plan to invest and build competitive facilities based service or will they continue to purchase and resell the incumbents' services. The market entry and short term strategy of competitive companies has been to resell the incumbents facility/services. However, for long-term viability of competitors and for the creation of real competition and choices for Michigan business and residential phone customers, it is essential that competitive local exchange providers invest and build their own communication facilities.

Further, in the AT&T Communications of Michigan license application case U-11169, the staff noted:

> With regard to the requirement of section 301(2)(b), i.e. whether the granting of a license to the applicant would not be contrary to the public interest, staff has the concern about current market conditions relative to competitive local exchange companies licensed in Michigan generally and the experience of AT&T specifically during its 10 months of licensed business in Michigan.
>
> The concern is whether competitive local exchange licenses are creating choices for Michigan business and residential phone customers or are they merely creating corporate value for the license holders. AT&T has had its competitive local exchange license for 10 months. According to a discovery response, AT&T is currently not providing basic local exchange service. Also, AT&T has not obtained an approved interconnection agreement.

The MPSC staff is attaching copies of the comments which were filed in both cases.

Very truly yours,

David A. Voges (P25143)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
(517) 334-7650 (office)
(517) 334-7655 (fax)

DAV:tlb
Atts.
c: Parties of Record
tb/9653857/Ltr

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
MFS INTELENET OF MICHIGAN, INC.
to expand its basic local exchange authority
to include all exchanges throughout the state
served by Ameritech Michigan and
GTE North Incorporated. /

Case No. U-11160

COMMENTS OF THE MICHIGAN PUBLIC SERVICE COMMISSION STAFF

This application is the second application filed by MFS Intelenet of Michigan Inc. (MFS) for authority to provide basic local exchange service. The first application was filed on October 24, 1995 and was docketed as case number U-10721. The Michigan Public Service Commission (MPSC), in it's May 9, 1995 order in case number U-10721, granted MFS a competing license to provide basic local exchange service in certain communities in southeastern Michigan that were served by Ameritech Michigan. In its decision, the MPSC first reviewed the statutory requirements as set forth in section 302(2) of the Michigan Telecommunications Act and the record and then concluded:

> Applying the statutory criteria for granting a competing license to the facts of this case, the Commission finds that MFS possesses sufficient technical, financial, and managerial resources and capabilities to provide basic local exchange service to every person within the geographic area of the license. The Commission further finds that granting the application will not be contrary to the public interest. (Page 8 of order).

The technical, financial, and managerial resources and capabilities of MFS have not changed significantly since this Commission granted the company it's initial license in U-10721. On that basis, staff submits that MFS again meets the requirements of section 301(2)(a).

With regard to the requirement of section 301(2)(b), i.e. whether the granting of a license to the applicant would not be contrary to the public interest, staff has several concerns on current market conditions relative to competitive local exchange companies licensed in Michigan generally and the experience of MFS specifically during its 17 months of licensed business in Michigan.

The first concern is whether these competitive local exchange licenses are creating choices for Michigan business and residential phone customers or are they merely creating corporate value for the license holders. MFS has had its competitive local exchange license for 17 months. According to a discovery response, it is currently serving only 72 subscriber local exchange customers. Also, MFS has not obtained an approved interconnection agreement.

The second concern the Staff wishes to alert the Commission to is whether competitive local exchange providers plan to invest and build competitive facilities based service or will they continue to purchase and resell the incumbents' services. The market entry and short term strategy of competitive companies has been to resell the incumbents facility/services. However, for long-term viability of competitors and for the creation of real competition and choices for Michigan business and residential phone customers, it is essential that competitive local

exchange providers invest and build their own communication facilities.

In conclusion, the Staff does not object to MFS's request for an expansion to its license to provide basic local exchange service in Michigan. However, staff does want the Commission to be cognizant of current competitive and market conditions in the Michigan telecommunications industry.

Respectfully submitted,

MICHIGAN PUBLIC SERVICE COMMISSION STAFF

David A. Voges (P25143)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
(517) 334-7650 (office)
(517) 334-7655 (fax)

DATED: September 25, 1996

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of
AT&T COMMUNICATIONS OF MICHIGAN
to amend its license to provide basic local exchange
service to add the Upper Peninsula and Saginaw
LATA exchanges currently served by Ameritech
Michigan and GTE North. /

Case No. U-11169

COMMENTS OF THE
MICHIGAN PUBLIC SERVICE COMMISSION STAFF

This application, seeking authority to provide basic local exchange service in Michigan's upper peninsula and in the Saginaw LATA, is the third application filed by AT&T Communications of Michigan, Inc. (AT&T)[1]. The first application, filed on May 3, 1995 and docketed as case number U-10845, requested a license to provide service in the Grand Rapids LATA exchanges. The second application, filed on February 28, 1996 and docketed as case number U-11052, requested AT&T's license be amended to provide service in the Detroit and Lansing LATA exchanges.

The Michigan Public Service Commission (MPSC), in its November 8, 1995 order in case number U-10845 granted AT&T a competing license to provide basic local exchange service in the Grand Rapids LATA exchanges. In its decision, the MPSC first reviewed the statutory requirements as set forth in section 302(2) of the Michigan Telecommunications Act and the record and then concluded:

[1]All three of AT&T's applications restrict the exchanges to be served to those exchanges currently served by Ameritech Michigan or GTE.

> Applying the statutory criteria for granting a competing license to the facts of this case, the Commission finds that AT&T possesses sufficient technical, financial, and managerial resources and capabilities to provide basic local exchange service to every person within the geographic area of the license. The Commission further finds that granting the application will not be contrary to the public interest. (Pages 3 and 4 of order).

Further, in its decision in U-11052, the Commission stated:

> Amending AT&T's license to provide basic local service is in the public interest; and, AT&T should continue to be bound by the regulatory requirements for basic local exchange service switched access service, and toll services set forth in the Commission's November 8, 1995 order in Case No. U-10845. (Page 2 of order).

The technical, financial, and managerial resources and capabilities of AT&T have not changed significantly since this Commission granted the company its initial license in U-10845. On that basis, staff submits that AT&T again meets the requirements of section 301(2)(a).

With regard to the requirement of section 301(2)(b), i.e. whether the granting of a license to the applicant would not be contrary to the public interest, staff has the concern about current market conditions relative to competitive local exchange companies licensed in Michigan generally and the experience of AT&T specifically during its 10 months of licensed business in Michigan.

The concern is whether competitive local exchange licenses are creating choices for Michigan business and residential phone customers or are they merely creating corporate value for the license holders. AT&T has had its competitive local exchange license for 10 months. According to a discovery response, AT&T is

currently not providing basic local exchange service. Also, AT&T has not obtained an approved interconnection agreement.

Staff does not object to AT&T's request for an expansion to its license to provide basic local exchange service in Michigan. However, staff does want the Commission to be cognizant of current competitive and market conditions in the Michigan telecommunications industry.

Respectfully submitted,

MICHIGAN PUBLIC SERVICE COMMISSION STAFF

David A. Voges (P25143)
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
(517) 334-7650 (office)
(517) 334-7655 (fax)

DATED: October 4, 1996
tb/9653528/comments

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider **AMERITECH MICHIGAN's** compliance with the competitive checklist in Section 271 of the Telecommunications Act of 1996. /

Case No. **U-11104**

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF INGHAM)

TINA L. BIBBS, being first duly sworn, deposes and says that on **November 7, 1996**, she served a true copy of **NOVEMBER 7, 1996 LETTER TO DOROTHY WIDEMAN** upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

CRAIG A. ANDERSON
MICHAEL A. HOLMES
Ameritech Michigan
444 Michigan Avenue
Room 1750
Detroit, MI 48226-2517

RODERICK S. COY
STEWART A. BINKE
Clark Hill P.L.C.
200 N. Capitol Ave., Ste. 600
Lansing, MI 48933

NORMAN C. WITTE
115 W. Allegan Ave., 10th Floor
Lansing, MI 48933-1712

DAVID E.S. MARVIN
MICHAEL S. ASHTON
Fraser, Trebilcock, Davis & Foster
1000 Michigan National Tower
Lansing, MI 48933

TODD J. STEIN
Brooks Fiber Communications
2855 Oak Industrial Drive, N.E.
Grand Rapids, MI 49506-1277

LINDA L. OLIVER
Hogan & Hartson, L.L.P.
555 Thirteenth Street, N.W.
Washington, D.C. 20004

ORJIAKOR N. ISIOGU
Assistant Attorney General
Attorney General Dept.
Special Litigation Division
630 Law Building
Lansing, MI 48909

ALBERT ERNST
Dykema Gossett PLLC
800 Michigan National Tower
Lansing, MI 48933

HARVEY J. MESSING
SHERRI A. WELLMAN
Loomis, Ewert, Parsley,
Davis & Gotting
232 S. Capitol Ave., Suite 1000
Lansing, MI 48933

TIMOTHY P. COLLINS
Clark Hill
255 S. Woodward Ave., Suite 301
Birmingham, MI 48009-6185

LARRY SALUSTRO
AT&T Communications of MI, Inc.
4660 S. Hagadorn Road
Suite 640
East Lansing, MI 48823

RICHARD P. KOWALEWSKI
Sprint Communications Company
8140 Ward Parkway, 5-E
Kansas City, MO 64114-8417

MARK J. BURZYCH
Foster, Swift, Collins & Smith
313 S. Washington Square
Lansing, MI 48933

RICHARD D. GAMBER, JR.
Michigan Consumer Federation
115 W. Allegan, Suite 500
Lansing, MI 48933

ANDREW ISAR
Telecommunications Resellers Assn.
P.O. Box 2461
Gig Harbor, WA 98335-4461

Tina L. Bibbs
TINA L. BIBBS

Subscribed and sworn to before me

this 7th day of November, 1996.

Carol Ann Dane, Notary Public
Eaton County, Michigan
My Commission Expires: 7/23/2000

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Ameritech

COPY

444 Michigan Avenue
Room 1750
Detroit, MI 48226
Office 313-223-8033
Fax 313-496-9226

Craig A. Anderson
Counsel

MICHIGAN PUBLIC SERVICE COMMISSION
FILED
NOV 12 1996

November 12, 1996

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-11104.

Dear Ms. Wideman:

Enclosed for filing in the above-referenced case is an original and fifteen copies of Ameritech Michigan's Submission of Information.

Very truly yours,

Craig A. Anderson

Enclosure

cc: All Parties of Record

CAA:jkt