

**AT&T Reply Comment:**

See AT&T comments to 1 above.

3. The identity of any entities that have requested interconnection or unbundled elements from Ameritech Michigan or its affiliates. Include and identify those entities who indicated the desire to negotiate or are in mediation or arbitration with Ameritech Michigan or its affiliates for interconnection or unbundled elements at the time of this filing.

For the purpose of this item include: (a) the types of interconnection requested and/or purchased; (b) the specific unbundled elements requested and/or purchased; (c) the date each request was made; (d) the requests for which Ameritech and the entity entered into a binding agreement; (e) a copy of the agreement; and (f) proof of Michigan Public Service Commission approval under Section 252, if any.

**AT&T Reply Comment:**

On February 27, 1996, AT&T formally requested the commencement of Section 252 interconnection negotiations with Ameritech. AT&T's request encompassed all interconnection issues enumerated in Sections 251 and 252 of the Act and applied to each of Ameritech's local exchange companies, including Ameritech Michigan. (See AT&T's Petition and support documentation filed in Case No. U-11151 and U-11152). By its request, AT&T sought all services, functionalities, network connections, network elements, operational support, and access to "pathway" facilities (poles, conduit, ducts, and rights of way) that it requires to compete as a local exchange provider, including:

- Local Service Resale - the furnishing of services by Ameritech at wholesale for resale by AT&T.
- Unbundled Network Elements - the furnishing of unbundled network elements and combinations of elements by Ameritech to AT&T.
- Facilities Interconnection Arrangements - the connection of AT&T's network facilities to Ameritech's network facilities and the reciprocal compensation for the transport and termination of telecommunications.

- Collocation - the right to obtain dedicated space in Ameritech locations.
- Rights of Way, Conduits, Ducts, and Pole Attachments - access by AT&T to these critical pathway facilities of Ameritech.

AT&T requested that Ameritech provide these and other elements as required by the Act under contract terms that were just, reasonable and non-discriminatory. AT&T and Ameritech could not reach agreement on these issues and they were subjected to arbitration, with a final arbitration Order issued on November 26, 1996. AT&T expects that a final AT&T/Ameritech Interconnection Agreement will be submitted shortly for Commission approval.

AT&T is also aware that Ameritech and Brooks Fiber reached an Interconnection Agreement on September 12, 1996. That Agreement, however, does not address, in a meaningful way, a number of critical interconnection terms and conditions. For instance, the agreement addresses only unbundled loops -- not unbundled elements or wholesale service rates. Moreover, the agreement does not address Ameritech's obligation to provide parity in service performance.

Similarly, Ameritech negotiated an interconnection agreement with USN for resale services only. That agreement is likewise suspect. The agreement generally includes only wholesale service discounts which are contingent upon volume commitments. It does not address, in any way, interconnection or the provisioning of unbundled network elements.

AT&T will defer to Ameritech and the other relevant entities to identify additional information regarding the particulars of requests and negotiations and to characterize the competition that is claimed to have flowed from them. Once these entities have provided

the Commission with the necessary information, AT&T reserves the right to address the host of issues that will arise in connection with their responses, including: the extent to which any such entity is currently providing services; the areas in which service is being provided; the customers being served by such entities; the types of services being offered; the price and quality of the services being offered; the facilities being used to offer the services; and the percentage of Michigan traffic that these entities carry.

As to any negotiated interconnection agreements identified by Ameritech, Ameritech's prior conduct before the Wisconsin Public Service Commission demonstrates that careful inquiry is appropriate concerning the nature of any relationship between Ameritech and a competitive local exchange company which Ameritech identifies as providing competition within the meaning of the "actual competition" test in Section 271. As addressed in AT&T's September 18, 1996 letter in this docket, Ameritech has shown that it is willing to characterize negotiated agreements as "models" for competition without disclosing: (1) that it has a financial interest in the alleged competitor; (2) that the agreements contain impermissible tying arrangements designed to ensure Ameritech's monopoly position; or (3) that the agreement is limited as to the number of lines that the competitor will potentially serve. The facts described in AT&T's letter are informative as to the type of review and oversight of Ameritech agreements that is necessary in light of the requirement that Ameritech prove that it has satisfied the requirements found in Section 271.

6. With respect to the facilities and/or networks of Ameritech Michigan's competitors, identify: (a) the extent to which each competitor is using its own facilities to provide service as compared to the use of unbundled elements or resold services obtained

from Ameritech Michigan or its affiliates; (b) whether each competitor is currently constructing facilities in Michigan or has announced the intention to do so within a specified time period; (c) a comparison of the provision intervals and maintenance time for service Ameritech Michigan or its affiliates provides to competitors and to itself.

**AT&T Reply Comment:**

As reflected in the attached chart entitled "Absence of Local Competition in Ameritech Territory -- Michigan," there is currently no real facilities-based local competition in Michigan. Of the 5,458,112 total Tier-1 LEC switched access lines in the State of Michigan, Ameritech serves 4,785,915 (or 87.68%)<sup>3</sup>, employing 442 switches. By contrast, there are currently only four CLEC end office switches in Michigan: a Brooks Fiber switch in Grand Rapids and an MCI Metro switch, a TCG switch and an MFS switch in Detroit. See map showing the location of CLEC switches in Michigan, attached. And although CLEC presence in the Ameritech Michigan territory has steadily increased over the last year (see "Growth of CLEC Presence in Ameritech-MI Territory -- December 1995 to September 1996," attached), total CLEC presence is dwarfed by Ameritech's continuing dominance of the local market. Out of a total of close to 5 million Ameritech Michigan access lines, CLECs have purchased only a mere 11,774 unbundled loops and are serving only approximately 20,000 business and residential access lines. CLECs are therefore serving only 0.4% of Ameritech's total access lines in Michigan.

Even in the LATAs with the greatest competitive activity -- Grand Rapids and Detroit -- competitive providers have a presence that is barely visible. Brooks Fibers, the only CLEC operating in the Grand Rapids LATA, serves only 1.1% of the available access

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<sup>3</sup> In its Informational Filing in this docket, Ameritech has claimed that the number of access lines has actually increased to 4,972,505. These numbers are therefore subject to verification.

lines. That number is even smaller in the Detroit LATA, where CLECs provide service over a total of only 0.22% of the total available access lines. See pie charts of CLEC Presence in the Grand Rapids and Detroit LATAs, attached.

AT&T does not currently have sufficient information to reply to Ameritech's assertions regarding the construction of new telecommunications facilities in Michigan. Moreover, due to the uncertainty of our interconnection arrangements with Ameritech, AT&T has not yet finalized its plans for the construction of new facilities in any Michigan LATA. As noted above, the Commission's final interconnection order was just issued last week. The parties are currently in the process of reviewing the Order for the purpose of submitting a final Interconnection Agreement for approval.

AT&T also lacks sufficient information at this time to comment on Ameritech's claims regarding the provisioning intervals and maintenance time for services Ameritech Michigan is providing its competitors. Nonetheless, as evident from the arbitration proceedings, it is Ameritech's stated position that it cannot and will not guarantee parity in the provisioning of unbundled network elements. Ameritech witness Warren Mickens guaranteed parity would not be provided to AT&T in the provisioning of unbundled network elements, including where the provisioning request is for a "platform" combination in which none of the alleged provisioning problems are relevant. (Case No. 11151/11152, Arb. Tr. 170-175). AT&T will submit additional relevant information as it becomes available.

8. The description and status of all complaints made to Ameritech Michigan or its affiliates, the Michigan Public Service Commission, the Federal Communications Commission, State of Michigan Courts, federal courts, or other governmental authority by

other carriers, competitors, or entities that have requested interconnection, access or the ability to resell Ameritech Michigan's or its affiliates' services.

**AT&T Reply Comment:**

**IntraLATA Presubscription:** This Commission is well aware of the series of complaints and other actions taken by AT&T and MCI against Ameritech with regard to Ameritech's repeated failure and refusal to implement dialing parity. (See Case No. U-10138). A discussion of these proceedings is conspicuously absent from Ameritech's submission on this point. Nonetheless, because of the Commission's familiarity with these proceedings, a detailed discussion will not be offered herein; a list of significant events should instead suffice:

- |          |  |
|----------|--|
| 2/24/94  | The Commission orders IntraLATA presubscription  |
| 8/17/94  | Ameritech appeals the Order to the Michigan Court of Appeals   |
| 3/10/95  | The Commission orders implementation of a task force's recommendations on presubscription  |
| 4/7/95   | Ameritech appeals the Order to the Michigan Court of Appeals   |
| 9/95     | Ameritech introduces legislation to effectively eliminate its presubscription obligations until Ameritech receives interLATA authority |
| 11/30/95 | The MTA is modified, providing for an approximately four month delay for implementation of presubscription                             |
| 1/1/96   | Ameritech converts 10% of its exchanges for presubscription; no additional exchanges are converted                                     |
| 1/2/96   | The Michigan Court of Appeals rejects Ameritech's August 1994 appeal   |
| 5/2/96   | AT&T and MCI file a motion to compel presubscription beyond the 10% converted in January   |
| 6/26/96  | The Commission orders 100% presubscription   |

- 7/9/96 Ameritech Petitions the Commission to stay presubscription and to reopen and rehear the presubscription proceedings; the Petitions are denied in October 1996
- 7/26/96 Ameritech files a non-compliant tariff and incurs Commission discounts
- 10/18/96 The Federal Court refuses to stay presubscription
- 11/20/96 The Ingham County Circuit Court orders Ameritech to comply with the Commission's presubscription orders
- 11/22/96 Ameritech asks the Michigan Court of Appeals to stay the Commission's Orders and the Ingham County Circuit Court Order
- 12/4/96 The Michigan Court of Appeals grants Ameritech's request for a stay

In short, despite the fact that Ameritech itself has acknowledged that consumers want and will benefit from intraLATA dialing parity, Ameritech has continued to resist the ordered implementation because it has not yet been allowed to enter the interLATA market. This makes it clear that Ameritech is not concerned about consumer benefit, but is instead focused solely on benefits to its own revenue potential.

PIC Freeze litigation: In December 1995, on the eve of presubscription implementation, Ameritech Michigan sent its customers a bill insert which offered customers the ability to "freeze" their long distance services, allegedly to prevent unauthorized changes or "slamming." In reality, if a customer chose to freeze his or her account, the selection would also freeze the customer's intraLATA toll and local carrier. In February 1996, Sprint filed a complaint alleging that the bill insert constituted anti-competitive conduct.<sup>4</sup> (See Case No. U-11038). Ameritech responded by noting that by

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<sup>4</sup> AT&T and MCI intervened in Sprint's complaint and were eventually named parties.

"requesting protection from slamming, the subscriber is simply exercising control over his choice of telecommunications carriers." Ironically, customers had no choice of intraLATA carrier when the bill insert was distributed and in many instances would not for some time.

After a hearing on the matter, the Commission found that the bill insert was anti-competitive, deceptive and misleading. Prior to sending the bill insert, Ameritech Michigan had provided notice of the impending implementation of intraLATA dialing parity and used the terminology "intraLATA toll calling." Yet in the bill insert, Ameritech used the term "long distance" to mean both inter and intraLATA services. Moreover, the Commission found that Ameritech falsely implied in the bill insert that customers would be stuck with the carrier that slammed his or her account. In this way, Ameritech sought to create a sense of urgency to enroll in PIC protection just as intraLATA dialing parity was to be offered to some customers.

Perhaps the most telling fact revealed in this proceeding is the fact that the bill insert was created and distributed by the Ameritech division responsible for marketing Ameritech intraLATA toll services -- not the Ameritech division responsible for consumer protection or concerns.<sup>5</sup>

Degradation of Access Services: On October 30, 1996, AT&T filed a complaint against Ameritech with the Commission regarding the unabated degradation in the quality of access service Ameritech Michigan is providing AT&T in this State. (See Case No. U-11240). As alleged in AT&T's complaint, the quality of Ameritech's access service has steadily deteriorated over the last two years. AT&T's access customers currently

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<sup>5</sup> The Commission has already determined that the Order in this case should be made part of this docket.

experience lengthy delays in the provisioning of new service and suffer from service outages of an unreasonable duration. These problems result in lost revenues to AT&T and ever increasing customer dissatisfaction. MCI, a party to this case, has prefiled testimony detailing similar experiences.

Ameritech has stated that it believes that this complaint is irrelevant to the Commission's inquiries in this docket. AT&T disagrees. If Ameritech's existing systems and resources cannot properly meet service quality expectations with long-established services such as special access, what confidence can new competitors have in Ameritech's ability to support their purchase and provision of unbundled network elements under their own competitive brand name? If the quality of Ameritech service suffers in the wholesale or UNE services arenas, it is the competitors and their brand name integrity that will be injured.

Operational Implementation Delays with Brooks/City Signal: The saga endured by Brooks Fiber to gain interconnection arrangements with Ameritech is another indication of how "rapidly" local service competition is emerging in Michigan. Brooks (then City Signal) first gained Commission mandates for Ameritech interconnection in February 1995. In September 1995, Brooks finally secured a signed interconnection agreement with Ameritech. Following significant provisioning problems, Brooks found it necessary to take Ameritech to court within a couple of months of that agreement. Only after prolonged legal activity was Brooks then able to gain its current signed interconnection agreement with Ameritech which was approved by this Commission last week. Thus, to the extent any competition has emerged, Ameritech has controlled its scope, timing and

extent, and Ameritech has the ability to continue to do so in the future. See Chart of Operational Implementation Delay Scenario, attached.

Dated: December 4, 1996

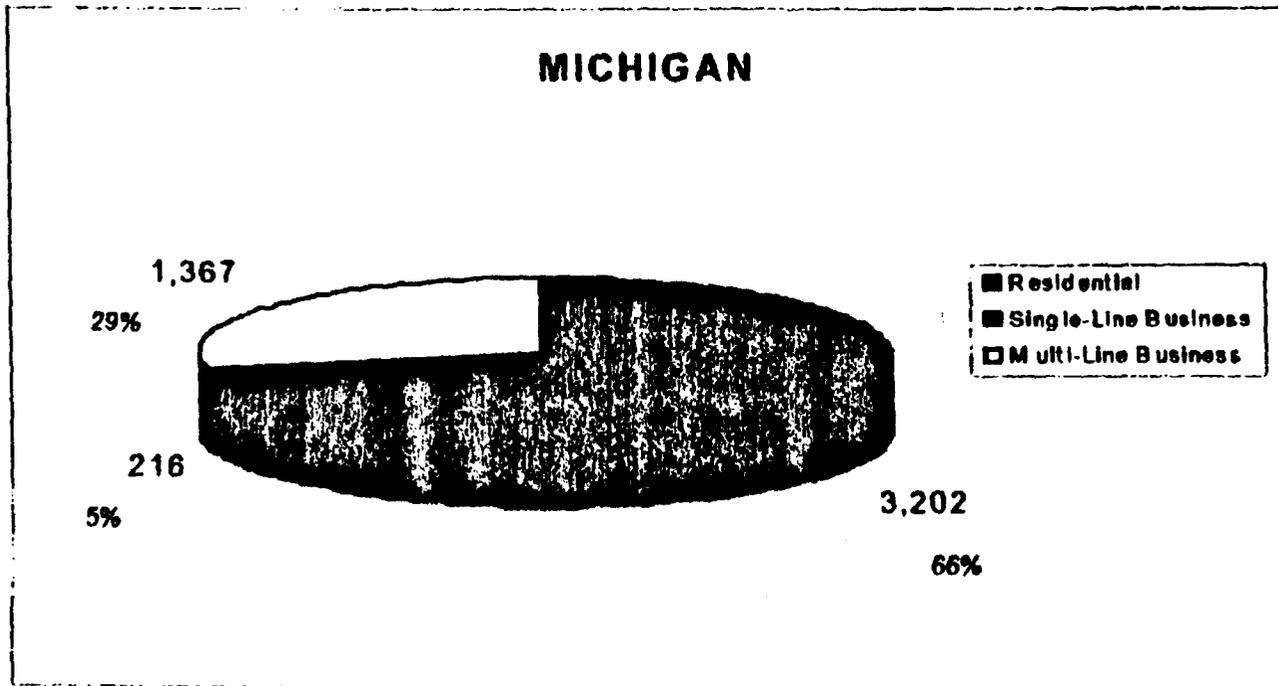
Respectfully submitted

Joan Marsh  
AT&T Corp.  
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Fax: (517) 230-8210

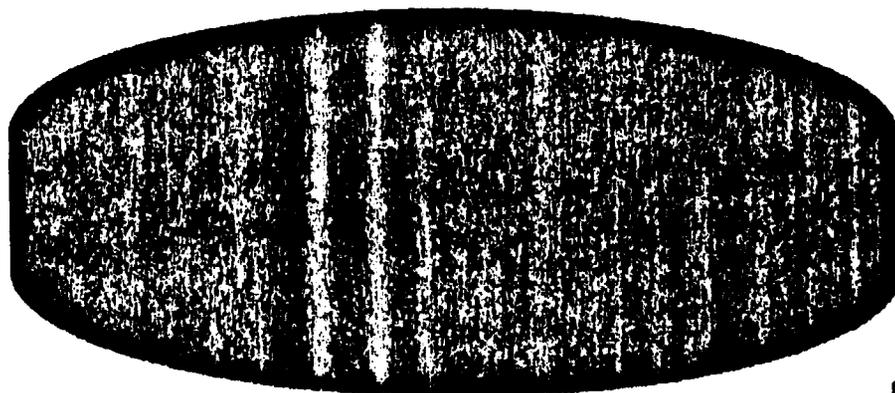
By: Art LaVasseur  
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**Attorneys for AT&T Communications of Michigan, Inc.**

# ***Breakdown of Ameritech's Access Lines by Customer Class in Michigan (000)***



# ***Competition for Residential Customers In Ameritech-MI Service Territory***



## **TOTAL RESIDENTIAL ACCESS LINES**

Ameritech-MI = 3,202,000  
Brooks Fiber = 5,000  
Other CLEC's = 0

Percentage MI Residential subscribers With  
Competitive Choice = 0.15%

■ Ameritech
■ Brooks

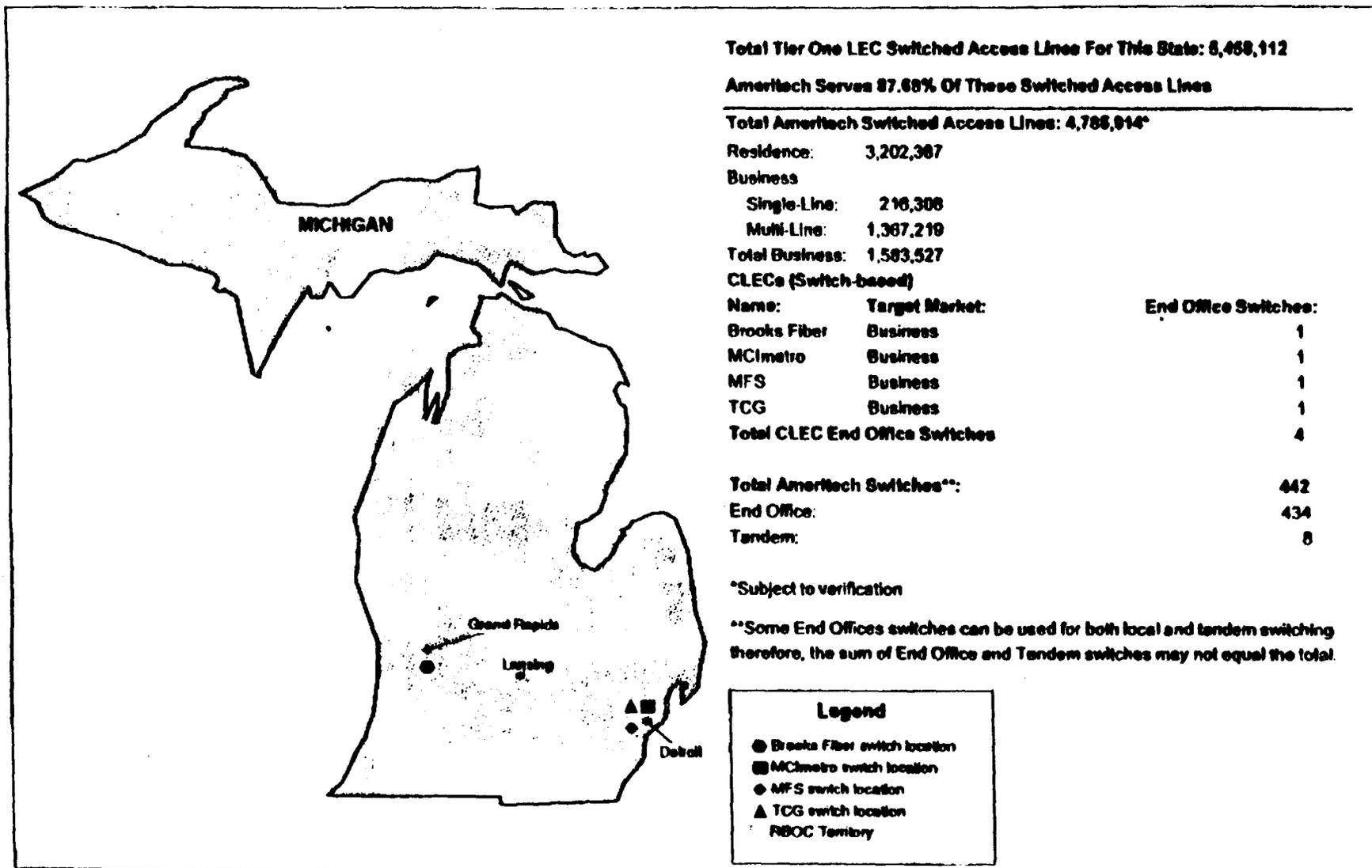
# Status of CLEC Applications in the Ameritech Region\*

## MICHIGAN

Company Name (CLEC)	Status of Application	Local Exchange Tariff Filed	Interoffice Transmission Facilities	Switches Deployed	Interconnection Agreement Reached	Agreement Approved by Comm.
Ameritech Communications Inc. (ACI)	Granted					
AT&T	Granted				In Arbitration	
Chimax Telephone Company	Granted					
Continental Telecomm. of MI, Inc.	Granted					
ComCast MI Telephony Communications of Michigan, Inc.	Pending					
ComCast Telephony Communications of Michigan, Inc.	Pending					
LCI	Granted					
Phone Michigan	Granted					
Sprint	Pending				In Arbitration	
Winter Wireless	Granted					
USN Communications, Inc.	Granted				11/1/95 (Resale Only)	
Coast to Coast	Pending					
Tele-Phone Communications (TPC)	Pending					
Cytel	Pending					
BCI	Pending					
MCI Metro	Granted	Yes	Detroit	Detroit	In Arbitration	
TC	Granted		Detroit	Detroit	In Arbitration	11/2/96
Brooks Fiber Communications	Granted	Yes	Grand Rapids	Grand Rapids	8/12/96	
MFS Intelenet of Michigan, Inc.	Granted	Yes	Detroit	Detroit	5/28/96	8/22/96
19	12 = Granted 7 = Pending	3	4	4	3	2

\*None of the foregoing provides detail on the operational status of entities, the nature of the services offered, the class of customers served, the underlying facilities used, or the geographic scope of the services offered. All information has been compiled from public sources.

# Absence Of Local Competition In Ameritech Territory -- Michigan



Total Tier One LEC Switched Access Lines For This State: 6,458,112

Ameritech Serves 87.68% Of These Switched Access Lines

Total Ameritech Switched Access Lines: 4,788,914\*

Residence: 3,202,367

Business

Single-Line: 216,308

Multi-Line: 1,367,219

Total Business: 1,583,527

CLECs (Switch-based)

Name:	Target Market:	End Office Switches:
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Brooks Fiber	Business	1
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MCI metro	Business	1
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MFS	Business	1
-----	----------	---

TCG	Business	1
-----	----------	---

<b>Total CLEC End Office Switches</b>		<b>4</b>
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<b>Total Ameritech Switches**:</b>	<b>442</b>
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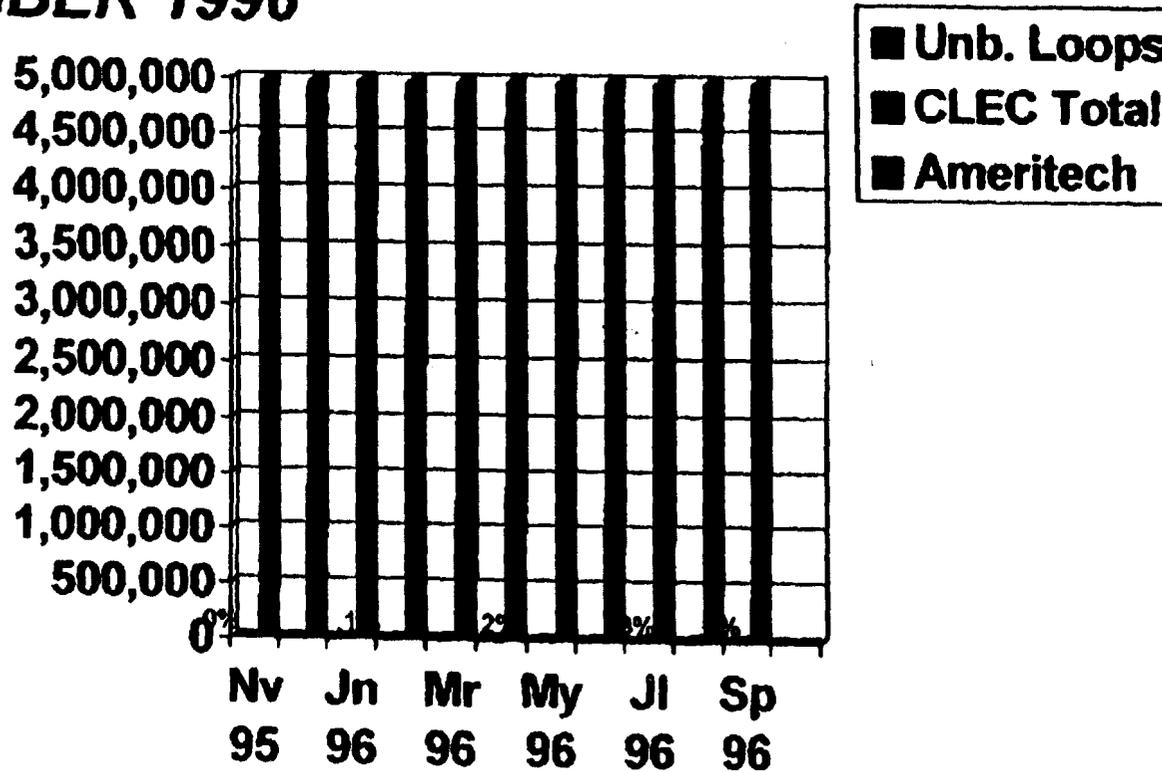
End Office:	434
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Tandem:	8
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\*Subject to verification

\*\*Some End Offices switches can be used for both local and tandem switching therefore, the sum of End Office and Tandem switches may not equal the total.

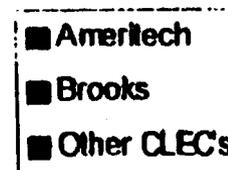
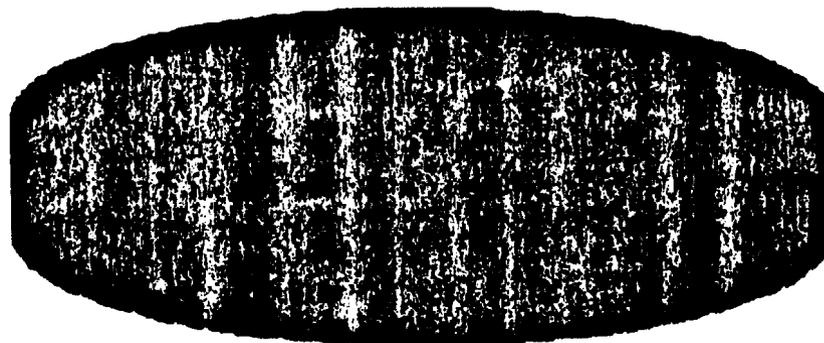
# GROWTH OF CLEC PRESENCE IN AMERITECH-MI TERRITORY DECEMBER 1995 TO SEPTEMBER 1996



## COMPARISON OF AMERITECH-MI ACCESS LINES TO CLEC ACCESS LINES

Total Ameritech-MI Access Lines	=	4,972,505
Total CLEC Access Lines	=	20,000
Total Unbundled Loops	=	11,774
TOTAL CLEC PRESENCE	=	0.4%
TOTAL UNBUNDLED	=	0.23%

# ***CLEC Presence in Ameritech-MI Service Territory***



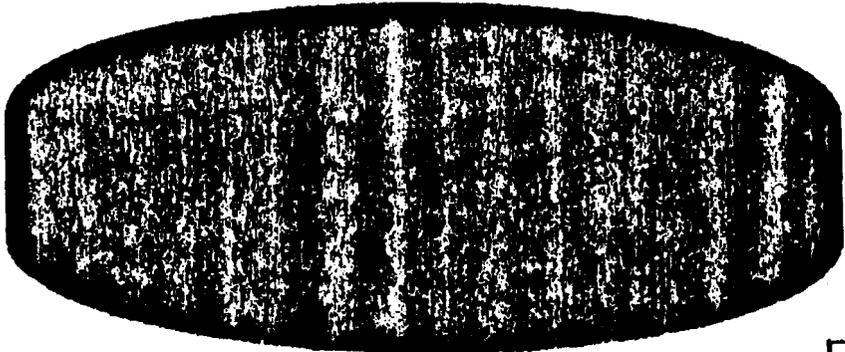
## **TOTAL ACCESS LINES\***

Ameritech-MI = 4,972,505  
Brooks Fiber = 15,000  
Other CLEC's = 5,000

TOTAL CLEC PRESENCE  
 $20,000/4,972,505 = .40\%$

\* Source Ameritech November 12, 1996, Informational Filing in MPSC Docket No U-11104

# CLEC Presence in Grand Rapids LATA



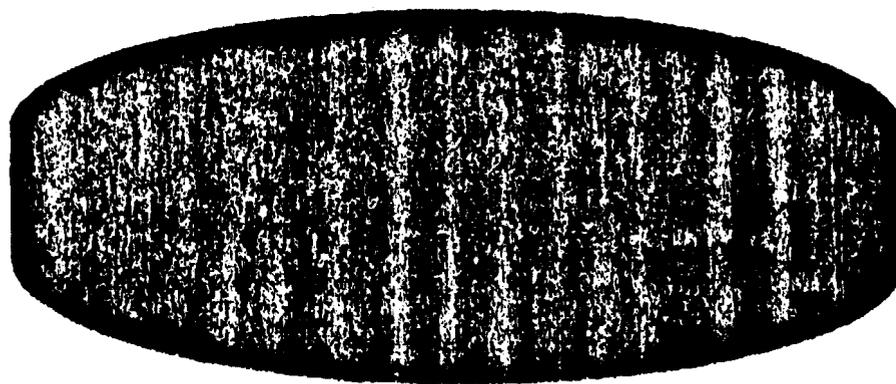
- Ameritech-MI
- Brooks Fiber

**TOTAL ACCESS LINES**

Ameritech-MI = 1,340,000  
Brooks Fiber = 15,000

CLEC Presence = 1.1%

# CLEC Presence in Detroit LATA



■ Ameritech

■ CLEC's

## TOTAL ACCESS LINES

Ameritech-MI = 2,265,000

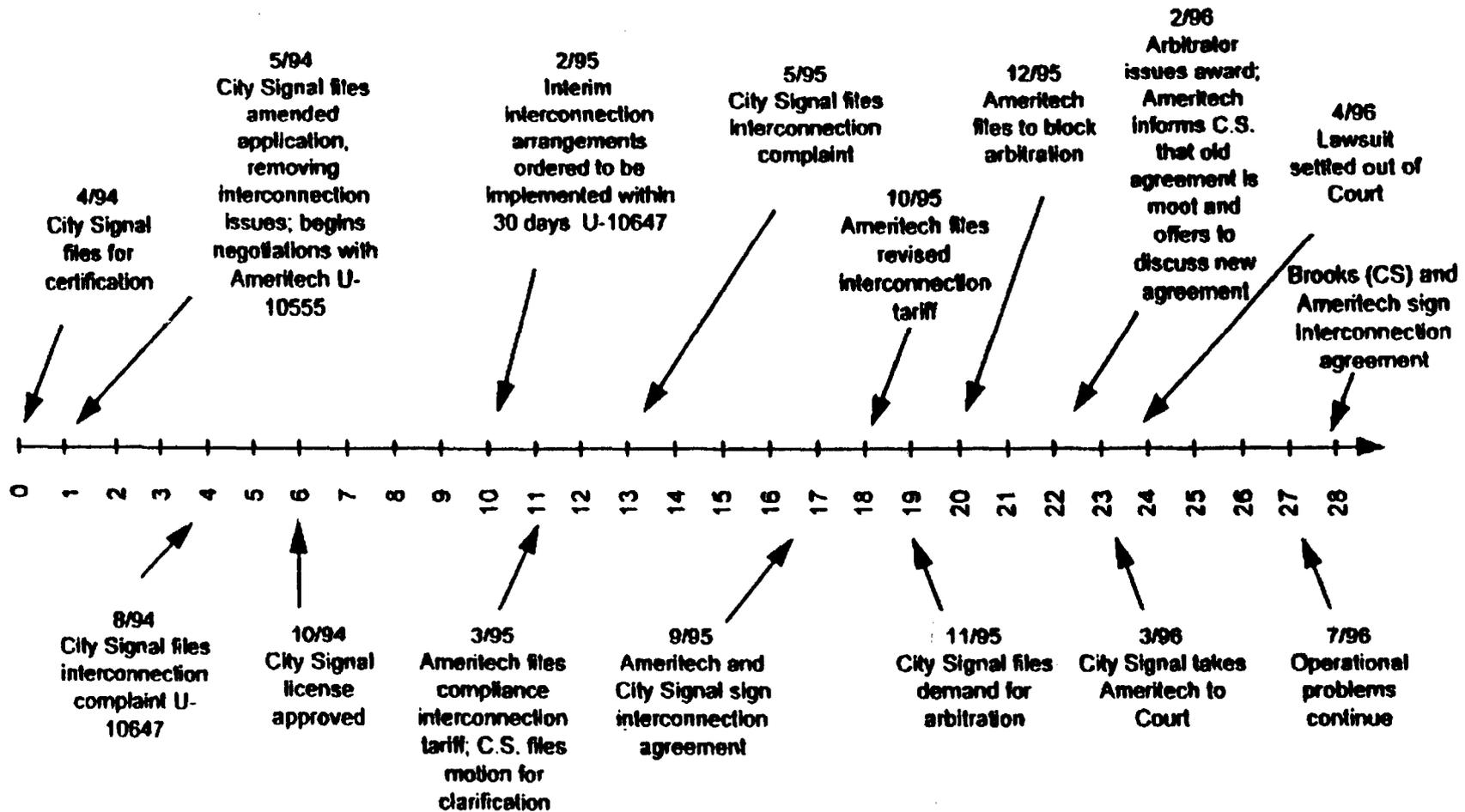
CLEC = 5,000

CLEC Presence = .22%

MPSC

Case No. U-11104

# Operational Implementation Delay Scenario City Signal (Brooks) Saga in Michigan



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 ) Case No. U-11104  
competitive checklist in Section 271 )  
of the Telecommunications Act of 1996. )  
\_\_\_\_\_ )

PROOF OF SERVICE

STATE OF MICHIGAN )  
 ) ss:  
COUNTY OF INGHAM )

Denise A. Pearl, being duly sworn, deposes and says that she served a copy of the Reply Comments of AT&T Communications of Michigan, Inc., to Ameritech's Submission of Information Related to General Telecommunications Market Conditions in Michigan, in MPSC Case No. U-11104 upon all counsel of record, as per the attached Service List, by mailing copies of said document in sealed envelopes with first-class postage prepaid to the addresses on said Service List and deposited same in a United States government mail receptacle in East Lansing, Michigan, on the 4th day of December, 1996.

AND FURTHER this deponent says not.

Denise A. Pearl

SUBSCRIBED AND SWORN TO before me this 4th day of December, 1996.

Rebecca J. Wolfe  
NOTARY PUBLIC

ROBECCA J. WOLFE  
Notary Public, Eaten County, MI  
My Comm. Expires Feb. 14, 2000

U-11104  
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444 Michigan Avenue  
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Fax: 313-496-9326

Craig A. Anderson  
Counsel

December 6, 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 the Ameritech Michigan's Notice of Intent to File Information.

Very truly yours,

*Craig A. Anderson*

Enclosure

cc: All Parties of Record

CAA:jkt

DEC 10 1996

STATE OF MICHIGAN  
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

**AMERITECH MICHIGAN'S NOTICE  
OF INTENT TO FILE INFORMATION**

Pursuant to the Commission's August 28, 1996 order establishing procedures in this docket, Ameritech Michigan<sup>1</sup> hereby submits its notice of intent to file information concerning compliance with the competitive checklist. Ameritech Michigan intends to file responses to the following questions included in Attachment B to the Commission's August 28, 1996 order:

**Information Related To Checklist Items**

1. Interconnection
- 2., 4., 5., and 6. Non-discriminatory access to network elements
3. Access to poles, ducts, conduits, and rights-of-way
- 7., 8., and 10. Access to 911 and E-911 services and directory assistance service to allow other providers' customers to obtain telephone numbers, operator call completion services, white pages listings, and data bases and signaling
9. Number Administration
11. Number Portability
13. Reciprocal Compensation
14. Resale

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<sup>1</sup>Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein), pursuant to assumed name filings with the state of Michigan.