

207. From an operational perspective, OS/DA included in bundled local service is provided to resellers, including ACI, on the same basis as Ameritech's retail customers. The only exception is when the reseller wants the operator services or directory assistance rebranded or unbranded, which, as described by Mr. Dunny, is subject to technical constraints.
208. Where Ameritech provides unbundled OS/DA, it provides access to the entire product, including any adjunct features necessary to allow competing providers full use of the product. 47 C.F.R. 51.217(c)(3)(iv). Ameritech supplies requesting carriers and ACI with call detail information, where technically feasible, so they can rate and bill OS/DA calls placed by their end users. Ameritech does not perform the rating and invoicing of such end user calls itself unless negotiated on an individual case basis.
209. Ameritech bills requesting carriers and ACI for operator calls handled on their behalf, where technically feasible, regardless of whether or how the carrier bills their end user. If a requesting carrier's or ACI's operator services traffic is received by Ameritech's office through separate direct trunks, the Ameritech Operator Services Platform records each call. These records are downloaded to Ameritech's Billing System, which then bills the requesting carrier or ACI. This process is completely mechanized. Where separate trunks are not used, Ameritech bills the requesting carrier or ACI for operator services calls via the Operator Services Call Analysis System (OSCAS) report. OSCAS

records are downloaded to Ameritech's Billing System for billing to the requesting carrier.

210. Ameritech bills requesting carriers and ACI for directory assistance calls handled on their behalf, where technically feasible, regardless of whether or how the carrier bills their end user. If the requesting carrier's or ACI's directory assistance traffic is received by the Ameritech office through separate direct trunks, the Ameritech Operator Services Platform records each call. These records are downloaded to Ameritech's Billing System, which then bills the requesting carrier. This process is completely mechanized. If the requesting carrier or ACI sends its traffic through a tandem, directory assistance traffic volumes are self-reported by the requesting carrier to the Ameritech Billing organization, which in turn bills the requesting carrier. These traffic volumes are reported by the carriers via facsimile or mail.
211. Each requesting carrier is assigned a company code that is used within OSCAS, based on its assigned central office code ("NPA/NXX") information. OSCAS utilizes operator services billing records to produce monthly summaries of call occurrences based on these company codes.
212. Ameritech also has a specific BFR process by which a requesting carrier or ACI can obtain access to additional, unbundled network elements which the Company does not

already provide to requesting carriers. Mr. Dunny explains the BFR process in his affidavit.

VIII. CHECKLIST ITEM (viii): WHITE PAGES

213. As described by Mr. Dunny, Ameritech will ensure that its directory publisher provides a White Pages listing to a requesting carrier's end users. The requesting carrier's obligations regarding the provision of data for listings are described in the AT&T Agreement (§ 15.2).

IX. CHECKLIST ITEM (ix): NUMBER ADMINISTRATION

214. A telephone number is an "address" consisting of ten digits that enables switching equipment throughout the nation to route traffic to and from a specific telephone number on the public switched telephone network. The address consists of three parts.

- The first three digits of a geographic-based telephone number represent its numbering plan area (NPA), more commonly referred to as "area code."
- The next three digits represent the central office code. The central office code is in the form of "NXX" where "N" is any digit from 2 to 9 and "X" is any digit from 0 to 9. Central office codes also are referred to as "NXX" or "CO" codes.
- The final four digits of the telephone number are its specific line address within a central office.

Thus, a geographic-based telephone number is in the format NPA-NXX-XXXX.

215. There are currently 792 central office codes within each NPA, and 10,000 telephone numbers within each central office code.
216. In order to provide full facility-based local exchange telephone service that is integrated into the public switched telephone network and capable of local exchange dialing parity, carriers must have an NXX code or codes assigned to their central offices from which they can assign specific telephone numbers to their local exchange lines.
217. Assignment of NXX codes is made by the Central Office Code Administrator in each NPA. That Central Office Code Administrator generally is the predominant local exchange carrier in each NPA. Ameritech currently is the Central Office Code Administrator for all NPAs in Michigan.
218. Central office code administration encompasses several different functions. These functions include code assignment, code activation, NPA relief planning and administration. Responsibilities associated with these functions include: assignment of central office codes in a fair and nondiscriminatory manner to all qualified applicants; notification to the industry of new code assignments and modifications to existing assignments to assure the proper routing and rating of calls; coordination of NPA relief planning when a new area code becomes necessary; and collection of data in order to promote the effective and efficient use of codes.

219. As local exchange competition has continued to evolve, the FCC has taken steps to ensure that central office codes are administered and assigned consistently and in a nondiscriminatory manner.
220. The FCC began the process of adopting numbering administration guidelines, plans and rules for number administration on June 21, 1991, when it directed Bellcore, the current North American Numbering Plan Administrator (NANPA), to take the lead in developing industry guidelines for number administration which could be applied uniformly and which would use the finite numbering resource in the most efficient and effective manner possible. Bellcore initiated an industry effort for the development of such guidelines under the auspices of the Exchange Carriers Standards Association (now known as the Alliance for Telephone Industry Solutions (ATIS)), the Carrier Liaison Committee and the Industry Carriers Compatibility Forum (ICCF), and periodically reported its progress to the FCC.
221. On July 23, 1993, the ICCF notified the FCC that the industry had completed its work and had accepted CO Code (NNX/NXX) Assignment Guidelines. The FCC acknowledged that the Guidelines produced through this industry effort satisfied the Commission's initial charge to Bellcore to develop standards by which NXX codes can be assigned in a fair and impartial manner under principles which promote the most effective and efficient use of codes and numbers.

222. The current version of the Central Office Code (NXX) Assignment Guidelines is dated September 1996. The current version of the NPA Code Relief Planning Guidelines is dated March 1996.
223. Ameritech has followed both sets of guidelines in its role as the Central Office Code Administrator.
224. The FCC took another major step in the process of adopting numbering administration guidelines, plans and rules in its July 13, 1995 Order in the number administration docket. In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, Report and Order, July 13, 1995 (the "NANP Order"). In the NANP Order, the FCC ordered that administration of central office codes be centralized at the national level and transferred to an independent third party national administrator. The FCC also created the North American Numbering Council (NANC) for the purpose of providing "the Commission advice and recommendations reached through consensus to foster efficient and impartial number administration as telecommunications competition emerges." NANP Order, ¶ 46.
225. Ameritech has been an active participant and leader in the creation of the NANC and will comply with any new rules, plans and guidelines which may be established under its auspices. In fact, Ameritech is committed to being one of the first administrators to transfer its central office code responsibilities.

226. Section 251(e)(1) of the Act provides as follows:

(1) **COMMISSION AUTHORITY AND JURISDICTION.** -- The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis. The Commission shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction.

227. In its Second Report and Order, the FCC held that "the action taken in the NANP Order satisfies the Section 251(e)(1) requirement that the Commission create or designate an impartial numbering administrator." Second Report and Order, ¶ 264. Moreover, until such time as the functions associated with NANP administration are transferred to a new NANP administrator, the Commission "authorize[s] Bellcore and the incumbent LECs to continue performing the number administration functions they performed prior to the enactment of the 1996 Act." Id., ¶ 328. And the FCC concluded that "incumbent LECs should apply identical standards and procedures for processing all numbering requests, regardless of the identity of the party making the request." Id., ¶ 334.

228. The current process for obtaining an NXX assignment is relatively simple. First, the code applicant makes a request to Ameritech using the Central Office Code Assignment Request and Confirmation Form. The Central Office Code Administrator date stamps the request and then determines if the request is in compliance with the code assignment guidelines. If it is, then the Administrator selects an unassigned code for assignment,

honoring requests for specific numbers if available. The Administrator normally responds to the applicant within 10 working days from receipt of the application with the assignment. If the application is denied, the Administrator provides specific reasons for the denial, and information on where to appeal the decision.

229. When the NXX code is assigned, the Administrator or the applicant inputs the NPA, NXX and other relevant data into the Routing Data Base System (RDBS) in order to ensure that the public is aware that the new code is open. Ameritech has used this process to assign 112 NXXs to new local exchange providers in Michigan. Ameritech discharges its responsibilities as Central Office Code Administrator in Michigan under the oversight and complaint jurisdiction of the FCC and/or the MPSC.
230. Until the date when a new numbering administration is in place, Ameritech will continue to provide nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers in accordance with the current Central Office Code (NXX) Assignment Guidelines and the current NPA Code Relief Planning Guidelines or their successors. After that date, Ameritech will comply with any new procedures, guidelines, plan, or rules.

X. CHECKLIST ITEM (x): SIGNALING AND CALL-RELATED DATABASES

231. **Signaling Links.** Ameritech's interconnection Agreements grant unbundled access to Ameritech's signaling links and signaling transfer points ("STPs"). As set forth in detail by Schedule 9.2.5 of the AT&T Agreement, if a requesting carrier purchases unbundled switching capacity, Ameritech provides access to its signaling network and to the STPs connected to the switch in the same manner Ameritech itself obtains such access. In addition, Ameritech provides requesting carriers with unbundled access for connecting their own switching facilities to Ameritech's signaling network and STPs. A carrier may obtain such access at one of Ameritech's "local" STPs in the same manner that Ameritech's switches gain access to Ameritech's signaling network.
232. **Call-Related Databases.** For purposes of switch query and database response through Ameritech's SS7 network, the AT&T Agreement provides unbundled access to Ameritech's Line Information Database (LIDB), Toll Free Calling Database, downstream number portability database (when it becomes technically feasible) and AIN call-related databases. Specifically, a requesting carrier's switches may obtain physical access, through an Ameritech STP, to the unbundled Ameritech database. If a requesting carrier purchases local switching capacity, Ameritech will allow the requesting carrier to use Ameritech's service control points ("SCPs") in the same manner, and via the same signaling links, as Ameritech itself. This is set forth in detail in Schedule 9.2.5 of the AT&T Agreement.

233. Ameritech's mediation procedures and protocols will follow established processes and procedures already in place for SS7 interconnection, as well as for access to LIDB and Toll Free databases. Ameritech believes mediation of access should include, but not be limited to, the following:

- Certification that the requesting carrier's switch is compatible with Ameritech's SS7 network;
- Certification that the requesting carrier's switch is compatible with Ameritech's AIN SCP;
- Certification that the requesting carrier's switch is compatible with requested AIN application residing on Ameritech's SCP;
- Agreement on procedures for handling maintenance and troubleshooting related to AIN services;
- Usage forecasts provided by requesting carriers, so that Ameritech may provide sufficient SS7 facilities for all requesting carriers;
- Mechanisms to control signaling traffic at agreed-upon levels, so that Ameritech's SS7 facilities can be fairly shared by all requesting carriers;
- Mechanisms to restrict signaling traffic during testing and certification, as necessary to minimize risks to the service quality experienced by customers served by Ameritech's network and those of other carriers, while compatibility and interconnection items are verified; and
- Mechanisms to ensure protection of the confidentiality of proprietary information of both carriers and customers.

Ameritech continues to work with industry fora to define proper mediation functions on a national basis. It should be recognized that the specific implementation of

mediation functions may vary depending on differences in network systems and architectures and the needs of the interconnecting parties.

234. **Service Management Systems.** Ameritech provides requesting carriers with access to its Service Creation Environment (SCE) and Service Management Systems (SMS). Specifically, under Schedule 9.2.5, § 3.1 of the AT&T Agreement, Ameritech provides the information necessary to enter directly, or format for entry, information relevant for input into Ameritech's SMSs. In addition, Ameritech will provide requesting carriers and ACI with the same access to design, create, test and deploy AIN-based services through the same SCE that Ameritech provides to itself.
235. Ameritech already has for some time provided other carriers and end users with access to its SMS on a service specific basis. Ameritech already has jointly designed and developed AIN services with other carriers.
236. Ameritech believes that mediation for SMS and SCE access is needed to protect the interests of all carriers and customers that share common service creation and service management capabilities. For the SMS access that it already provides, Ameritech has implemented mediation mechanisms that permit third parties to manage service data stored in Ameritech's AIN SCP, while at the same time protecting information belonging to other providers and customers sharing the same SCP.

237. To protect all carriers and customers, the mediation mechanisms that Ameritech believes are necessary for SMS and SCE access include, at a minimum:

- Capabilities to protect each carrier's information;
- Agreements on handling maintenance and troubleshooting related to AIN services;
- Usage forecasts provided by requesting carriers so that Ameritech can provide sufficient resources for other requesting carriers, and capabilities to ensure that the parties abide by such forecasts;
- Procedures to ensure, prior to deployment, that each service will properly operate within Ameritech's network;
- Procedures to verify proper deployment of each service in the network; and
- Mechanisms to insure protection of the confidentiality of proprietary information of both carriers and customers.

238. Access to the service creation process supports carriers, including ACI, wishing to use Ameritech's service creation capabilities, as well as those carriers with their own compatible service creation capabilities. Initially, at least until Ameritech's vendors develop the capabilities to allow third parties independent and secure access to Ameritech's service creation capabilities, carriers who wish to use Ameritech's service creation capabilities must do so on a joint basis with Ameritech. As with the issue of mediated access to its SCPs, Ameritech will continue to work within industry fora to define the mediation functions necessary for safe and reliable access to the SMS and SCE. It should be recognized that the specific implementation of those mediation

functions may vary depending on differences in network systems and architectures and the needs of the interconnecting parties.

XI. CHECKLIST ITEM (xi): NUMBER PORTABILITY

239. Since interim number portability will only be provided as a transitional service until long-term database number portability is deployed, it is important that any interim method of number portability (i) be technically feasible, (ii) be available now, (iii) not result in significant additional costs and (iv) port numbers with a minimum of loss of functionality. As the FCC found in its Telephone Number Portability First Order, CC Docket 95-116 (July 2, 1996) at ¶ 110, Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID") meet this criteria, and may be deployed to satisfy a LEC's duty to offer interim number portability. Accordingly, in the AT&T Agreement (§§ 13.2-13.5), Ameritech provides RCF ("SPNP-Remote") and DID ("SPNP-Direct"), as well as LERG reassignment (also called NXX Migration) as interim number portability options. Ameritech's provision of these three INP options has been approved by the MPSC.
240. SPNP-Remote is provided using the same type of central office feature used to provide RCF service. To provide number portability, the end user's previous telephone exchange service is discontinued, and the telephone number associated with that service is re-used as part of the SPNP-Remote service. The carrier to whom the number is ported assigns one of its own telephone numbers to be associated with the exchange

services it provides to the end user. If a call is directed to the number formerly associated with the service Ameritech provided the end user, SPNP-Remote is programmed to originate a new call to the number assigned by the requesting carrier. The call is then routed over the EOI trunks to that carrier.

241. RCF can effectively serve customers who receive many simultaneous calls to one number by adding additional call paths to the ported telephone number. Ameritech provides this additional call path feature today with SPNP-Remote.

242. Ameritech also provides SPNP-Direct (sometimes referred to as flexible DID-type service). SPNP-Direct is provided by using the same features that are used today to provide DID PBX trunks. In order to use SPNP-Direct, the requesting carrier or ACI must first establish a direct trunk group from the Ameritech end office serving the end user to the requesting carrier's switch. Once the trunk group is in place, the end user's service can be discontinued, and the number formerly associated with that exchange service can be added to the numbers associated with the requesting carrier's trunk group. Any call directed to the number formerly associated with Ameritech's service will be completed to the requesting carrier's or ACI's switch via the DID-like trunk group. Prior to connecting the call, Ameritech's switch sends the actual number dialed to the requesting carrier's switch so that the carrier can route it to the appropriate end user's exchange service.

243. Ameritech today provides SS7 signaling with SPNP-Remote and has developed, market-trailed, and added SS7 signaling on trunks for Brooks Fiber which normally use MF signaling for SPNP-Direct (flexible DID).

244. SPNP-Remote and SPNP-Direct are ordered through the AHS Service Center (the NECC). All status and inquiries related to provisioning and maintenance of these products are handled by the NECC. Ameritech provides for the ordering of SPNP-Remote and SPNP-Direct via facsimile or an EDI format. The EDI format used for ordering INP is the same as that currently used throughout Ameritech for the ordering of resold exchange services. Both pre-ordering and ordering functions are supported through the use of this interface. As with unbundled network elements, requests for maintenance or repair of SPNP-Remote and SPNP-Direct can be made using an industry standard EBI. The EBI electronically provides confirmation of receipt, status and notification that the trouble has been resolved. INP will be provided to affiliates and subsidiaries of Ameritech on the same basis and pursuant to the same terms and conditions that apply to nonaffiliated carriers.

245. The intervals for provisioning INP are as follows:

SPNP-Remote	1-25 numbers	3 business days
	25+ numbers	Negotiated
SPNP-Direct	1-25 numbers	3 business days
	25+ numbers	Negotiated

SPNP-Direct Trunks	1-6 trunks	8 business days
	7-24 trunks	14 business days

These intervals are consistent with order intervals for comparable RCF and DID trunks in Michigan. Maintenance intervals for SPNP-Remote are also comparable to maintenance intervals for remote call forwarding and SPNP-Direct to DID trunk intervals in Michigan.

246. As the FCC has recognized, Ameritech is at the forefront of implementing long-term number portability. Ameritech plans to begin implementation of the location routing number (LRN) long-term solution in Michigan by the fourth quarter of 1997.

247. Ameritech has significant experience providing INP. Since March 1995, when first ordered by Brooks Fiber, until December 1996, Ameritech has ported in excess of 19,000 telephone numbers in Michigan. Ameritech has successfully processed INP requests from Brooks Fiber, MFS and TCG for accounts as small as 1 line and as large as 5,000 lines on a single order request. Ameritech has significant experience with both SPNP-Remote and SPNP-Direct technologies.

XII. CHECKLIST ITEM (xii): LOCAL DIALING PARITY

248. The AT&T Agreement addresses local dialing parity as required by Section 251(b)(3) and the Checklist. AT&T Agreement, Art. XIV.

249. Although it is not separately offered as an independent product or service, local dialing parity is an integral part of the interconnection arrangements established between Ameritech and competing local exchange carriers and available to all requesting carriers and ACI on a nondiscriminatory basis. These interconnection arrangements and the resultant local dialing parity are provided by Ameritech via its interconnection agreements or its authorized tariffs filed with the MPSC.
250. The obligation to provide local dialing parity is reciprocal, i.e., under Section 251(b)(3) all local exchange carriers, including both incumbent LECs and new entrants, have the obligation to provide local dialing parity. This symmetry is essential so that customers do not experience unnecessary changes to their dialing patterns. Each competing local exchange provider is responsible for programming translations into its network to enable its end user customers to dial the end user customers of other local exchange providers without dialing an access code.
251. As a result of the local dialing parity capabilities which are part of the interconnection arrangements between Ameritech and requesting carriers, end user customers are able to select a local exchange provider of their choice and within a defined local calling area, and dial the same number of digits to make a local call with no unreasonable dialing delay and without the necessity of access codes or additional digits to identify the called party's local exchange service provider.

252. Originating calls from competing telecommunication carriers' subscribers which are routed to an Ameritech central office are processed in accordance with requirements for local switching set forth in Bellcore LSSGR TR-TSY-000511 and incur no unreasonable dialing delay.
253. Dialed digits transmitted or received by Ameritech's switching network utilize the same internal translations and routing tables when completing a call, without regard to the destination or origination of the call. Call completion for calls originating on another carrier's network is provided with the same speed of connection and completion as provided for calls between two Ameritech customers connected to the switched telephone network at similar levels. For example, a call received from another carrier is connected to the called subscriber at the terminating office in the same manner as if the call was originated by an Ameritech end user customer. The same is true of calls originating on Ameritech's network and destined for an end user customer served by the network of a competing local exchange carrier.
254. Local switching systems of Ameritech and of other carriers have the same hierarchical position in the public switched telephone network. This results in identical dialing patterns for all local exchange service carriers.
255. Section 251(b)(3) of the Act permits all competing providers to have nondiscriminatory access, with no unreasonable dialing delays, to OS/DA, the two dialable services

referred to in Section 251(b)(3). Ameritech makes its OS/DA available to competing providers of local exchange service if those providers choose to use Ameritech's OS/DA rather than provide their own or contract with another source.

256. When a competing facilities-based provider contracts with Ameritech to use Ameritech's OS/DA, that competing provider is able to offer OS/DA to its end users with no unreasonable dialing delays, at least to the extent that the call is handled within Ameritech's network. In addition, the competing carrier is capable of programming its switch to route traffic to Ameritech's directory assistance and operator services using the same codes (e.g., 0, 411, or 555-XXXX) as Ameritech.
257. In instances where a competing provider offers local exchange service to its end users via the resale of Ameritech's local exchange service, that competing provider's end user customers are able to access Ameritech's OS/DA in exactly the same manner as Ameritech's local exchange end user customers.
258. Ameritech has substantial experience providing local dialing parity. Ameritech's network handles thousands of inter-network calls with full local dialing parity on a daily basis.

XIII. CHECKLIST ITEM (xiii): RECIPROCAL COMPENSATION

259. The procedures for providing reciprocal compensation are discussed in Part I of my affidavit and in Mr. Dunny's affidavit.

XIV. CHECKLIST ITEM (xiv): RESALE

260. Services made available to requesting telecommunications carriers for resale are equal in quality to services provided by Ameritech to itself or to any subsidiary, affiliate or any other party to which Ameritech directly provides the service, including Ameritech's retail customers. Ameritech provides resale services with the same timeliness that such services are provided to Ameritech's affiliates or other parties, including Ameritech's retail customers.

261. Except as otherwise provided in the AT&T Agreement, a reseller is the primary point of contact for all of its resale customers (§ 10.13.1(a)). However, Ameritech will, on a limited basis, retain the ability to interface with a reseller's end users for interactive testing and to ensure quality of service.

262. Ameritech refers directly to the reseller all end user inquiries regarding any reseller service or product in accordance with the procedures set forth in the AT&T Agreement and any implementation plan between the parties. Ameritech uses its best efforts to ensure that all Ameritech representatives who receive inquiries regarding a reseller's services do not in any way disparage or discriminate against the reseller or its products

or services. Ameritech also provides training for all of its employees who may communicate, either by telephone or face-to-face, with a reseller's customers, to assure that the foregoing requirements are met. Furthermore, the same quality standards that Ameritech requires of its employees when contacting an Ameritech customer (e.g., honesty, respect and courtesy) apply when its employees have contact with a reseller's customers.

263. As set forth in § 10.13.2 of the AT&T Agreement, Ameritech will provide electronic interfaces for the transferring and receiving of data necessary to perform the pre-ordering, ordering and provisioning functions (e.g., customer service record, telephone number selection and due date selection). These interfaces will be administered through gateways serving as the single point of contact for the transmission of such data. The interfaces will be consistent with the Alliance for Telecommunications Industry Solutions (ATIS), Telecommunications Industry Forum (TCIF), Electronic Data Interchange (EDI) Customer Service Guideline, Issue 5 and other industry standards.

264. Service orders are placed by requesting carriers, and provisioned by Ameritech, in accordance with the procedures described in the interface specifications Ameritech has provided to requesting carriers.

265. Any service order activity resulting in local carrier changes will comply with the requirements of 47 C.F.R. § 64.1100, which governs the processing of carrier change requests.
266. Ameritech provides provisioning support to requesting carriers on the same basis that it provides such support to its retail customers. The Resale Service Center will be open from 8:00 a.m. to 5:00 p.m., Monday through Friday. These hours may be expanded as mutually agreed to by the requesting carrier and Ameritech, and as the needs of the business require.
267. After receipt and acceptance of a service order, Ameritech provides the requesting carrier with service status notices on an exception basis. Ameritech also provides timely engineering support when required. Where Ameritech provides installation, the requesting carrier will instruct its customer to contact the carrier if the customer requests a service change at the time of installation. This can be done while the technician is still at the customer's premises, and will allow the customer to discuss the matter directly with the carrier without the involvement of a third party.
268. Except as specifically provided in the Agreements, or pursuant to an order of a court or commission of competent jurisdiction, Ameritech does not initiate any disconnect, suspension or termination of a requesting carrier's customer's resale service, unless directed to do so by the requesting carrier by transmission of a service order, or by

Ameritech's receipt of proper authorization to change such customer's primary local exchange carrier to a carrier other than the requesting carrier.

269. Mr. Rogers's and Mr. Mickens's affidavits provide a detailed discussion of the OSS functions and other interfaces that Ameritech utilizes in providing resale.

MISCELLANEOUS MATTERS

270. **IntraLATA Toll Dialing Parity.** Although it is not a checklist requirement under the Act, I will also briefly address intraLATA toll dialing parity.
271. IntraLATA toll dialing parity enables end user customers of a LEC to place intraLATA toll calls through a presubscribed carrier of their choice on a 1+ basis without dialing a carrier access code or other extra digits. With intraLATA toll dialing parity, end user customers are able to presubscribe to a carrier or carriers of their choice, which may include a separate interexchange interLATA carrier, a separate intraLATA toll carrier and a separate local exchange carrier. Under the intraLATA toll dialing parity methodology implemented by Ameritech, commonly referred to as full 2-PIC, end users have the option of selecting different intraLATA toll and interLATA toll carriers.
272. Under intraLATA toll dialing parity in the areas where it has been implemented in Michigan, intraLATA toll traffic does not automatically default to the customer's LEC. New end user customers that make no intraLATA toll carrier selection need to dial an

access code or 800 number to place intraLATA toll calls. Because balloting is not required, existing end user customers retain their LEC as their intraLATA toll presubscribed carrier until they select another carrier. Local calls, 911, public announcements (976), and 0- calls are excluded from intraLATA toll dialing parity.

273. Ameritech provides testing, notification, ordering, provisioning, installation, billing, maintenance and repair procedures that have effectively and efficiently implemented intraLATA toll dialing parity.
274. After successful testing of the 2-PIC feature software, Ameritech implemented intraLATA toll dialing parity in 10 percent of its Michigan exchanges for intrastate calls on January 1, 1996. As a part of the implementation process, switch translations were required to define, on a call-by-call basis, the proper routing, i.e., a local route through Ameritech or a toll route to the presubscribed intraLATA toll carrier. Additional exchanges implemented intraLATA toll dialing parity so that, as of December 2, 1996, 50 percent of its access lines in Michigan had such parity. Ameritech will implement intraLATA toll dialing parity in additional exchanges representing an additional 20 percent of its access lines coincident with this filing, and the remaining exchanges and 30 percent of access lines will possess intraLATA toll dialing parity at least 10 days prior to Ameritech's entry into the Michigan interLATA market.

275. Ameritech has implemented ordering procedures for presubscription under the 2-PIC methodology. The procedures include order writing and processing procedures and forms, methods, training, and service observation and monitoring. These procedures address both pre- and post-conversion processes. The procedures reflect the applicable regulatory requirements in Michigan. The procedures advise end user customers of their selection options as to interexchange carriers and other intraLATA toll carriers in a carrier-neutral manner. The procedures are designed to make the carrier selection process convenient for end user customers, and to assure that the processing of requests to implement or change these selections is effective, accurate and prompt.
276. Billing changes and notifications have also been implemented for 2-PIC. Billing notifications and descriptions used for preferred carrier selection change charges and the presubscription re-bill process are prepared and appear on the end user customer's bill, as appropriate.
277. Changes to operational systems, ordering (both end user and carrier), billing, provisioning and maintenance have been made to implement 2-PIC. These procedures are designed to assure accurate implementation and to provide proper routing of intraLATA toll calls in a 2-PIC dialing parity environment. Procedures for handling "wrong PIC selections" also have been implemented.