

information into its own database for purposes of validating a customer's address. A reseller may obtain an updated copy of the SAG on a weekly basis. If a reseller's end user customer has an address that is not in the SAG, the reseller may contact the Ameritech reseller Service Center and have the address validated with Ameritech's Engineering organization, using the same procedure used by Ameritech's customer contact personnel for Ameritech retail customers. Additionally, customer address information is validated a second time by the electronic ordering interface when a reseller issues an order.

D. Electronic Access To The Loop Assignment System

56. On an initial sales call, Ameritech's retail service representatives use information from its loop assignment system to determine whether it is necessary to dispatch a technician to the customer's premises, for purposes of determining a due date. Ameritech also provides an electronic interface that allows each reseller's contact personnel to establish a due date, based on whether a field visit is required, while the end user is on the line.

57. This process applies to all orders of 4 or fewer lines. When an Ameritech retail customer requests more than 4 lines, the service representative must contact an Ameritech facility engineer to confirm the availability of facilities. The service representative then relays this information to the customer. Each reseller's customer is served in the same way through the reseller's contact at Ameritech. These procedures allow the reseller's personnel to establish a due date and determine if a technician must be dispatched in the same manner that the Ameritech service representatives make that determination.

E. Electronic Access To Information On Available Features

58. Ameritech provides each reseller with a periodic electronic download that shows the features available in each central office switch or telephone number prefix, similar to the arrangement with respect to the SAG as discussed above. This information can be loaded into the reseller's database for on-line access, and can be used by the reseller's contact personnel to discuss available features with end users in the same manner as Ameritech's customer contact personnel do.

F. Installation/dispatch Interface

59. Ameritech provides an electronic interface that allows a reseller's contact personnel to receive reports of changes in the status of an order each time the status changes. If additional verification of an order's status is required, the reseller can call the Ameritech Resale Service Center.

60. Ameritech also provides requesting carriers with electronic access to the Due Date Selection capability. This is the capability to select an order due date and appointment based on work force availability where outside work is required, and to select such a date while the requesting carrier is on-line with its customer. These capabilities provide resellers with an installation/dispatch interface that is equivalent to that available to Ameritech and its affiliates.

G. Number Assignment And Reservation Interface

61. Ameritech provides two types of interfaces for number assignment and reservation: "on-line" and "batch." When the batch interface is used, Ameritech provides the reseller with a Firm Order Confirmation (FOC) identifying the telephone number assigned to the end user, usually within 4 hours of receiving the order.

62. Ameritech's on-line electronic interface allows a reseller's customer service personnel to select a telephone number while the end user customer is on line, in the same manner as an Ameritech retail service representative. This arrangement provides resellers with a number assignment and reservation interface equivalent to that available to the service representatives of Ameritech or its affiliates.

63. Special handling is necessary when a customer wants a range of numbers or a vanity number. In these situations, the Ameritech service representative obtains the numbers via a manual process and provides them to the customer on a call-back basis. The same call-back procedure applies when a reseller's end user customer makes a similar request.

H. Electronic Ordering, Order Confirmation And Order Completion Interface

64. As described in the AT&T Agreement, Ameritech provides access to an electronic ordering, order confirmation and order completion interface via an electronic gateway. This gateway, which is currently used by resellers, uses the EDI Standard as defined by the TCIF. This interface provides for an electronic order acknowledgment that a request has been received, an order confirmation, a jeopardy notification and an order completion notification.

I. Other Interfaces

65. Ameritech provides resellers access to a recorded customer usage interface as described in the AT&T Agreement (§ 10.16.1). The Daily Usage Feed is formatted according to Exchange Message Record (EMR) standards. The usage information provides a reseller with the necessary call detail to allow it to bill its end user customers.

66. Ameritech also provides resellers on-line access to its existing Customer Service Records (CSRs) in a manner equivalent to that used by its own service representatives. This process is available for use by resellers to access records of end user customers that have committed to purchase resold service or have already switched to the reseller's service. This arrangement provides parity between resellers and Ameritech's retail service representatives. Upon a requesting telecommunications carrier's obtaining a letter of agency (LOA), a copy of the CSR for a customer account whose local service provider is Ameritech is furnished electronically.

67. Ameritech also provides resellers with access to a wholesale billing interface. Billing, in this context, involves the provision of appropriate usage data by one telecommunications carrier to another to facilitate customer billing, with acknowledgments and status reports. It also involves the exchange of information between telecommunications carriers to process end-user billing.

68. Ameritech provides requesting telecommunications carriers with a daily usage feed and a monthly billing report to enable requesting telecommunications carriers to bill their end user customers. The electronic interface known as Exchange Message Record ("EMR") is used to transmit daily usage. Ameritech has used the industry-standard EMR

interface for many years with other carriers. Ameritech provides billing data for resale services through AEBS, a system developed by Ameritech and used for years to bill for local service. This system is well-suited to resale billing because such billing is essentially the same as the retail billing for which AEBS was designed. The AEBS format is an existing standard for billing local exchange services. Ameritech will continue to work in good faith with the Local Exchange Industry at the Ordering and Billing Forum (OBF) to define a standard for local exchange resale billing.

69. Ameritech provides monthly billing data for unbundled network elements in the Carrier Access Billing System ("CABS") format, which has been used to bill for access services since 1984.

70. As provided in the AT&T Agreement, Ameritech will process requests to change an existing end user's local exchange service to a reseller on a "transfer-as-is" basis. Under this arrangement, when an Ameritech end user selects a reseller to provide local service, the reseller tells Ameritech the telephone number(s) on which the reseller will assume service responsibility. This is necessary to ensure that the change order is placed against the correct line number. A change of carrier can be made at that time, but the account cannot be changed in other respects, for example to add or cancel features, except as may be otherwise permitted by the AT&T Agreement.

J. Other Operational Processes And Functionalities

71. Directory Listing — As described in the AT&T Agreement (§ 15.2), in order to have its end user customers listed in Ameritech's directory, a reseller must provide subscriber listing information as specified by Ameritech and its directory publisher. There

are a number of alternatives, both manual and electronic, that a reseller may utilize to provide updates (additions, deletions, changes, etc.) to its subscribers' listing information maintained in Ameritech's directory databases. Each directory has a directory "close date" after which changes, additions, and deletions cannot be made to listings. Listings not available by the close date are included in the next directory. I would also note that Ameritech has provided directory listings to customers of facilities-based carriers and other providers under contract for some time.

72. 911 Updates — Ameritech provides such updates through the resale service order process. Any updates to this information must be provided by the reseller to Ameritech via the resale ordering process.

73. Telephone Assistance Programs (e.g., Lifeline) — Ameritech has been willing to take responsibility on an interim basis for administering Lifeline services in the resale environment until a universal service fund is established in Michigan. Lifeline services are currently available for qualified end user customers through resale.

74. Under such a scenario, if an Ameritech Lifeline customer decides to subscribe to a reseller, the reseller would need to notify Ameritech of this change. The Ameritech service representative would maintain the customer's existing Lifeline account on the new order. The order would be passed through Ameritech's service ordering system, the monthly credit would be applied to the reseller's bill, and the reseller would be responsible for passing the credit to the end user. This same process would be used in those cases where the end user became eligible for the Lifeline program while subscribed to a reseller's service.

75. By contrast, if a new Lifeline customer established service with a reseller, a different procedure would apply. In that case, the reseller would be responsible for qualifying the customer for Lifeline eligibility; Ameritech would not be involved in that process. Upon completion of that qualification process by the reseller, the reseller would send the order to Ameritech and Ameritech would enter the appropriate information onto the customer's account information. The order would pass through Ameritech's service ordering system, the monthly credit would be applied to the reseller's bill, and the reseller would be responsible for passing the monthly credit to the end user.

76. Telecommunications Relay Service — Telecommunications Relay Service provides speech impaired and non-speech impaired individuals with a means to communicate with one another over the telephone. Operators are equipped with a voice-line and a Telecommunications Device for the Deaf (TDD), and relay message on-line between two parties. A hearing impaired person calling a party without a TDD typically dials an 800 number to reach a relay center. The relay center then places a voice call to the intended party. An operator at the relay center then facilitates a conversation between the two parties. The process can operate in reverse, as well, with the non-hearing impaired person calling the hearing impaired person. Any customer, regardless of local service provider, may access this service.

K. Processes/transactions That Require Manual Interface

77. In two limited circumstances, a transaction may not flow through an operations support system electronically, and thus may require human intervention. The first cause is incorrect or incomplete submission to Ameritech. Complete and accurate submissions will

permit electronic flow-through. The second cause for manual intervention is the type or complexity of the order received. This cause is not based on an error, nor does it adversely impact the requesting carrier.

78. Incorrect or Incomplete Order: The use of mechanized interfaces requires that the requesting carrier accurately provide all information necessary to place an order, since this information will automatically be transferred to downstream systems and personnel working the order. Correct submission of the order assures that the requesting carrier's and Ameritech's databases match. If information is incomplete or inaccurate, the mechanized system will automatically return the order with an explanation of the error to the requesting carrier. The requesting carrier then corrects the errors and resubmits the order. Uncorrected, these orders might require downstream manual intervention, affect other customer services, and possibly require redesign by the requesting carrier. Returning incorrect orders to the requesting carrier, so that it can resolve the discrepancy at the order stage, also minimizes the need for manual interventions by both Ameritech and the requesting carrier on future orders.

79. Therefore, Ameritech's OSS contain certain order entry edits. These edits, which are designed to ensure that all data required to process and fulfill an order are complete and accurate, are of two varieties.

80. First, it is assumed that the electronic interfaces used by a requesting carrier to submit an order run a complete series of input edit checks, to insure that the order includes all data critical to processing and fulfillment. The permissible entries in each service order field are identified in the TCIF Customer Service Guidelines, Issue 5 to which Ameritech

currently refers requesting carriers who elect to use the electronic ordering interfaces. This specification is further supplemented in Ameritech's Electronic Service Ordering Guidelines. Ameritech provides these Guidelines to requesting carriers.

81. Second, after passing through the electronic interfaces, the order flows into front-end systems that compare the data provided in the order to a table of permitted values (e.g., the USOC codes of Ameritech's available services), to insure that further processing of the order proceeds smoothly, as well as to eliminate discrepancies between the requesting carrier's records and those of Ameritech.

82. Either of these types of edits may flag an order for return to the requesting carrier for correction of the error or omission. The order in question is returned to the requesting carrier for correction or completion when the error is detected by the system. The types of edits that would cause an order to be returned for data correction include: EDI syntax violation; EDI standard data element usage violation; required order heading information missing or invalid (e.g., due date, service address); inconsistent combination of activity codes (e.g., addition of a line on a disconnect order); invalid feature USOC(s); invalid data value (e.g., PIC, Yellow Page Heading); duplicate order number; telephone number not served by Ameritech; and missing data necessary to provide the requested feature (e.g., referral of calls w/o referral number).

83. Order Content or Complexity: Certain types of orders necessarily require manual intervention by virtue of their content or complexity. An example is an order submitted by a requesting carrier for a subset of the lines in an existing Ameritech account, including the listed number of the account. In this situation, the account has to be split and a

new account established for the lines remaining with Ameritech. Likewise, an order may require intervention due to the uniqueness of the services that must be provisioned and configured to fulfill the order. Other edits for manual intervention due to service type include: Centrex service, private lines, listing changes, system database unavailable, manual due date assignment required, split of existing Ameritech account and pending order(s) existing against account. In addition, orders carrying entries in any "remarks" files are always flagged for manual processing, in order to determine the effect of the entry on further processing. When an order of this type is identified, it is electronically forwarded to a service representative for review and, if necessary, modification of the information in the service order system.

84. At this point in the ordering process, manual intervention does not affect the requesting carrier because during the pre-ordering process it has already received information, such as the telephone number and a committed due date, needed to assure the requesting carrier that the order will be completed as submitted.

85. Other types of orders may require manual handling for facility assignment or some other step in the service provisioning process. For example, on orders for certain high-capacity data services, there is a need to determine whether the transmission quality of the specific loop facility chosen to fulfill the order is of sufficient quality to provide the service required. Such process-based screens for manual intervention apply in identical fashion to orders received from requesting carriers and from Ameritech's retail operations.

86. Ameritech will continue its ongoing efforts to improve the proportion of orders that flow through its systems without manual intervention, because these efforts reduce the

significant expenditures needed to support manual processing of orders. Current candidates for additional mechanization effort include: assumption of partial accounts, new activity of existing accounts, simple private lines, line additions to existing Centrex service, simple listing changes and related orders. Additional types of orders to be targeted in the future as candidates for fully-mechanized flow-through will be determined by reviewing the results of orders submitted, and by analyzing these results to identify those order types that make up the largest percentage of effort required to process all orders submitted. In addition, Ameritech will continue to work with requesting carriers to identify the types of orders as to which they would benefit from additional mechanization effort.

87. Ameritech provides to carriers requesting access to OSS functions additional information regarding the interfaces utilized by Ameritech. This information regarding interface standards used by Ameritech permits requesting carriers to develop and maintain their own systems and procedures to make effective use of the interfaces.

88. All of Ameritech's interfaces are consistent with applicable industry standards as they exist today. As industry standards evolve, Ameritech will continue to review the changes in technology, consult with requesting carriers, and enhance its interfaces or the underlying systems as necessary. For example, Ameritech has provided requesting carriers with its interface standards and specifications, product lists, USOC tables, sample data from the SAG, available features and functions and a variety of other information relating to the interfaces. Ameritech has also shared its comprehensive EDI guidelines with AT&T and all other requesting carriers. Those guidelines detail the transaction sets for pre-ordering and

ordering functions, including customer service record retrieval, address validation and feature availability verification.

89. Ameritech has sought to ensure that its interfaces are usable in an effective and efficient manner by competing carriers. Ameritech provides a test facility for both its ordering and repair interfaces, and provides test data of the type that would be generated from its billing interfaces. Ameritech is in the process of developing a test facility for the pre-ordering interface. In addition, members of my AIIS team have already spent considerable time in informal training sessions with AT&T and many other carriers with respect to the use of these interfaces. AIIS will continue to do so with AT&T and other carriers. Ameritech also provides the carriers with extensive training on order creation and the interpretation of CSRs. This training, when combined with interface training and data identified above, provides the carrier sufficient information to determine how to most effectively integrate Ameritech's pre-ordering, ordering provisioning, maintenance/repair and billing processes into the carrier's business processes. The interface specifications then provide the information needed by the carrier to develop the interface required to facilitate its business processes.

90. These interfaces provide equivalent access to the same OSS functions that are available to Ameritech retail customer contact personnel. The interfaces assure that the availability, accuracy, and timeliness of information provided to requesting carriers is equivalent to that available to Ameritech or any of its affiliates.

91. In addition, Ameritech accepts orders for resale, access to unbundled network elements and interconnection through a manual process, such as facsimile transmission.

Ameritech will continue to do so, at least for a limited period of time and for limited volumes.

92. I have every reason to believe that these interfaces are capable of providing other carriers with access to Ameritech's OSS system functions that is equivalent to what Ameritech or any of its affiliates enjoy. Ameritech stands ready to assist other carriers in resolving any difficulty they encounter when accessing these OSS functions.

CONCLUSION

93. Based on my experience in performance measurement, Ameritech's performance benchmarks, as outlined in the agreements with Brooks Fiber, MFS, TCG and AT&T, give requesting carriers an excellent way to compare the quality of performance they receive from Ameritech with the quality of performance enjoyed by Ameritech and its affiliates. The benchmarks reflect Ameritech's actual experience and utilize the appropriate measurement criteria. In the case of resale and some network elements, the benchmarks are the same criteria that Ameritech currently measures for the purpose of tracking the quality of the services it provides to its own retail customers. In the case of interconnection and the remaining network elements, the benchmarks directly measure the quality of the service being delivered. In the case of access to OSS functions, Ameritech provides requesting carriers with access equivalent to that available to Ameritech or any of its affiliates. In addition, Ameritech provides sufficiently detailed information regarding its electronic OSS interfaces to enable carriers requesting access to Ameritech's OSS functions to develop and maintain their own systems and procedures to effectively use those interfaces.

94. This concludes my affidavit.

Schedule 1
End Office Integration

COMPANY "XYZ"

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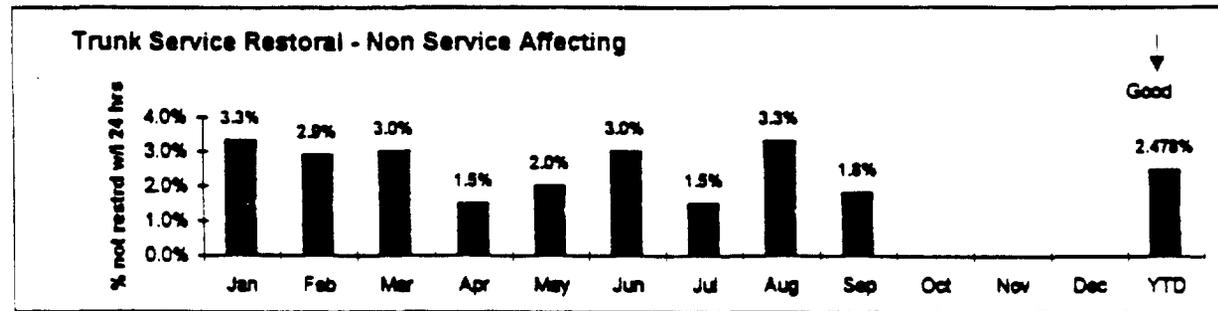
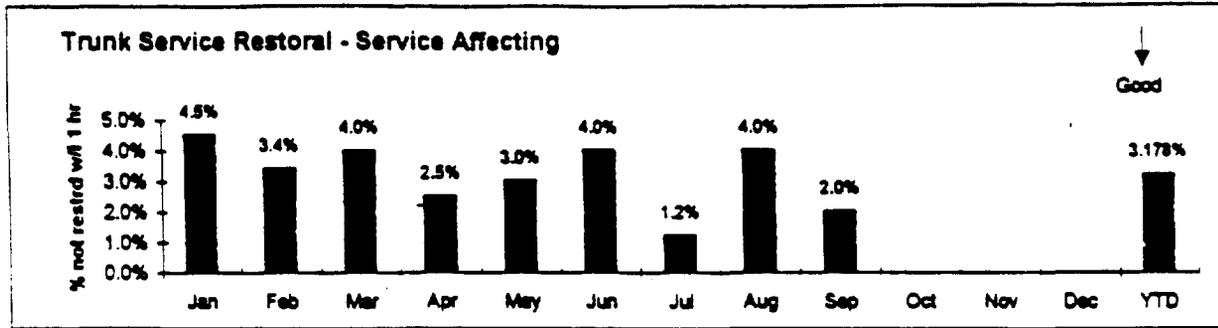
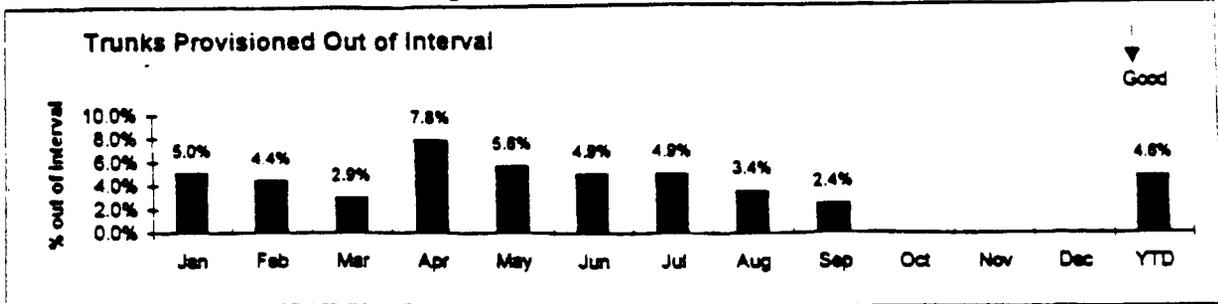
INITIATIVE ANALYSIS REPORT

FOR

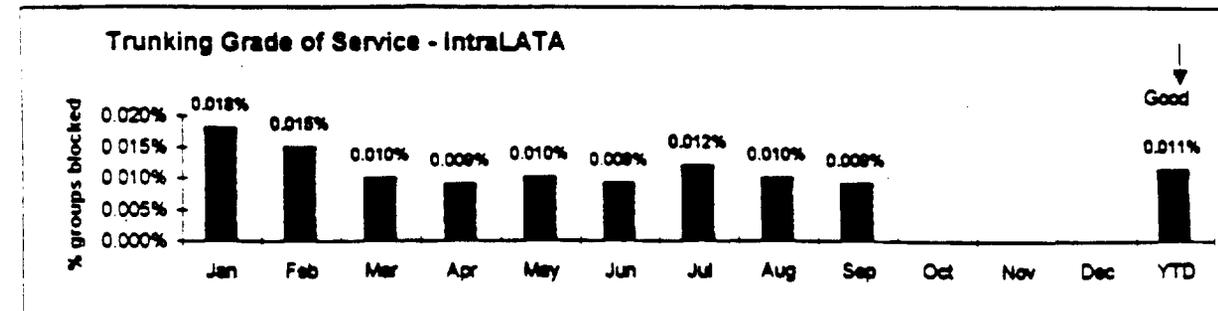
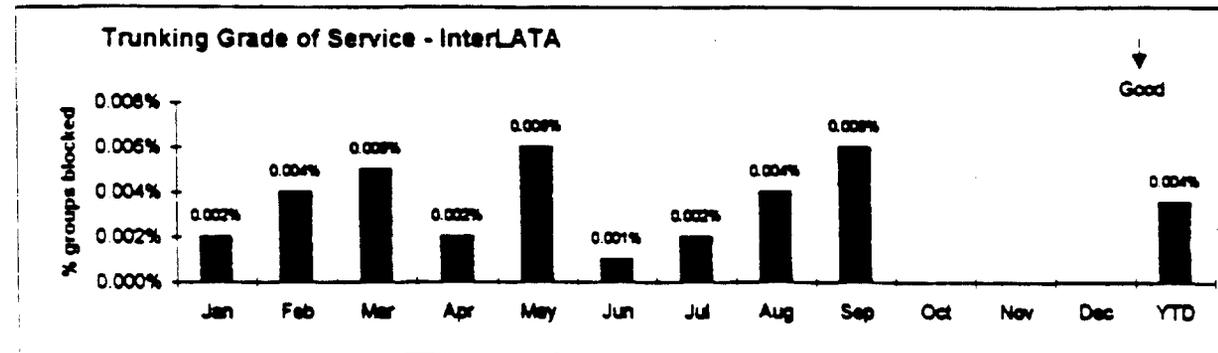
SEPTEMBER 1996

COMPANY "XYZ"

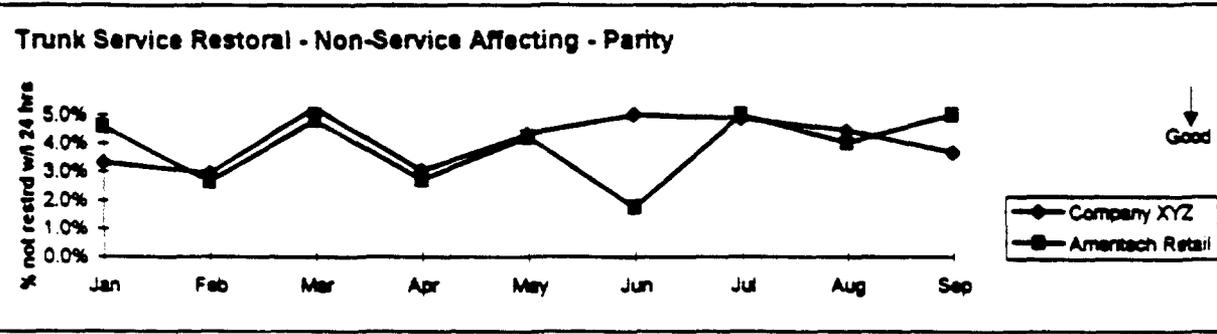
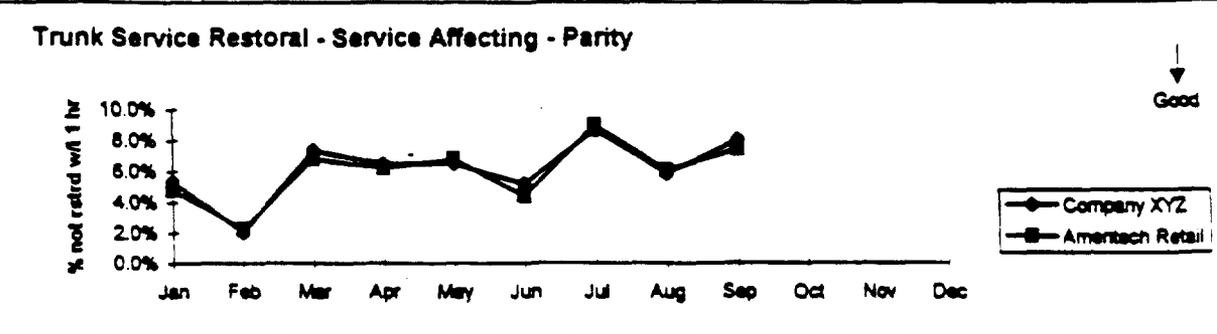
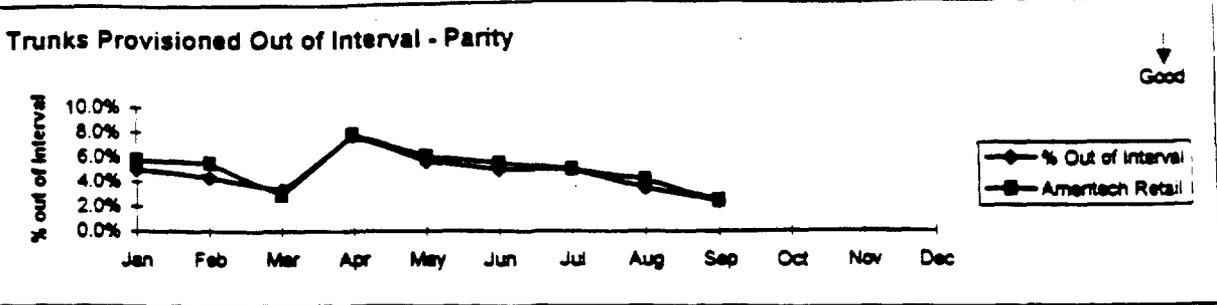
End Office Integration Performance for 1/1/96 to 9/30/96



SERVICE PERFORMANCE MEASURES



COMPANY "XYZ"
End Office Integration Performance for 1/1/96 to 9/30/96



**This Section Will Display
Customer Specific Data**

End Office Integration Glossary and Calculation Data

GLOSSARY

InterLATA Trunks	Trunks used by Ameritech to carry interLATA traffic between an Ameritech tandem office and the CLEC office.
Grade of Service	The proportion of calls that cannot be completed due to the call-handling capability of the trunk group.
Intralata Access Trunks	Trunks used by Ameritech to carry local and toll traffic between an Ameritech tandem office and the CLEC office.
Non-Service Affecting	An outage is considered non-service affecting when less than 20% of the trunks in the trunk group have a service outage.
Out of Interval Provisioning	A trunk is provisioned "out of interval" if the service is not made available within the negotiated interval. Provisioning intervals may be based on the volume ordered.
Service Affecting	An outage is considered service affecting when greater than 20% of the trunks in the trunk group have a service outage.

CALCULATIONS

Out of Interval Provisioning	Out of Interval provisioning is calculated by determining the number of trunks outside the agreed upon interval and dividing by the total number of trunks provisioned in the reporting period.
Grade of Service	Grade of Service is calculated by taking the number of trunk groups experiencing blockage and dividing by the total number of trunk groups in the reporting period.
Trunk Service Restoral	Trunk Service Restoral is calculated by dividing the total number of trunk groups not restored within the agreed upon time frame by the total number of trunk group outages reported in the reporting period.

Schedule 2
Resale Pots

COMPANY "XYZ"

WHOLESALE RESALE

QUALITY INITIATIVE ANALYSIS REPORT

POTS

FOR

SEPTEMBER 1996

COMPANY "XYZ"
Wholesale Resale Performance for 1/1/96 to 9/30/96

