ordered Ameritech Michigan to provide. Ameritech Michigan argues that if Sprint wants to use manual interfaces, it should be required to pay for additional costs associated with that decision.

Ameritech Michigan argues that Sprint's resale volumes are expected to be substantial. For example, Sprint stated that it wants to be able to send as many as 300 orders per day for this region until September 1, 1997. Ameritech Michigan argues that it cannot provide parity in processing time or reporting of manual orders or complaints. Accordingly, Ameritech Michigan argues, Sprint should not expect parity with other providers that use electronic interfaces for operations support systems. Further, Ameritech Michigan asserts, manual interfaces cannot be expected to operate on a "close-to-real-time" basis.

Ameritech Michigan argues that its proposed language should be adopted. However, if the Commission adopts Sprint's language, Ameritech Michigan argues, Sprint should be required to compensate Ameritech Michigan for all costs involved in providing manual interfaces, and should not expect parity in processing time with those carriers using electronic interfaces.

The arbitration panel noted that electronic interfaces have not yet been established and deployed on an industry wide basis. It agreed that for an initial evaluation period, Sprint should be allowed to enter the market using manual interfaces.

It appears to the Commission that the arbitration panel's decision should be upheld on this issue. There is no indication that a manual interface is not technically feasible, and Ameritech Michigan should provide this on an interim basis. However, the Commission agrees with Ameritech Michigan that Sprint should pay any additional costs caused by Sprint's delay in adopting an electronic interface.

The Commission further finds that Sprint's language does not require strict parity in processing time. Rather, any delay, which should be minimal, must be demonstrated to be required due to the manual nature of the interface.

The Commission therefore adopts the arbitration panel's decision, with the proviso that Sprint must compensate Ameritech Michigan for additional costs incurred because of the use of manual operations support systems processes.

Implementation Team

Ameritech Michigan argues that, subsequent to the November 14, 1996 oral presentations, the parties resolved their differences over how often the implementation team should meet.

The Commission notes that, in a letter dated November 27, 1996, Ameritech Michigan notified the arbitration panel that it believed this issue had been resolved, but that letter also noted receipt of a letter from Sprint indicating that no further issues had been resolved. It is thus unclear whether this issue is disputed, or to what the parties have agreed if they have reached an agreement.

The parties should implement their agreement on this issue, if they have reached an agreement. Otherwise, they should implement the conclusion of the arbitration panel.

Provisions Concerning Directories

Ameritech Michigan objects to the arbitration panel's decision that Ameritech Michigan "should directly communicate with Sprint in connection with the provisioning of directory listings and directories for Sprint retail customers." Arbitration panel decision, p. 17. By doing so, Ameritech Michigan asserts, the panel ignored the existence of Ameritech Publishing, Inc.,

the directory publisher, as a separate, nonsubsidiary corporation that sells advertising and publishes directories. Ameritech Michigan asserts that, "without basis in fact or law, the panel sought to institutionalize inefficiency and thus extra cost." Ameritech Michigan's objections, p. 26. In Ameritech Michigan's view, it makes sense for Sprint to deal directly with Ameritech Publishing, not to go through Ameritech Michigan.

In its November 26, 1996 order in Cases Nos. U-11151 and U-11152, the Commission found that the arbitration panel's determination concerning directories should be revised to reject the inclusion of AT&T's proposed language for Section 15.2.5, which is in all material respects identical to the language Sprint proposed. Accordingly, the Commission finds that Sprint's proposed language for Section 15.2.5 should be rejected, for the reasons stated in the November 26, 1996 order in Cases Nos. U-11151 and U-11152.

That order further reflected that Ameritech Michigan need not provide listings in the yellow pages. Although the Commission recognized the requirement that Ameritech Michigan provide listings in the white pages, it rejected AT&T's proposed language that would require the provision of a listing in the yellow pages.

Finally, the Commission adopted the arbitration panel's determination that listing information about the competing LEC, including addresses and telephone numbers for customer service, is required by law. See, e.g., MCL 484.2309(1); MSA 22.1469(309)(1). There is no material difference in the language proposed by Sprint in this case. Thus, Sprint's proposed Section 15.1.7 is adopted.

The Commission FINDS that:

a. Jurisdiction is pursuant to 1991 PA 179, as amended by 1995 PA 216, MCL 484.2101 et seq.; MSA 22.1469(101) et seq.; the Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 USC 151 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; MSA 3.560(101) et seq.; and the Commission's Rules of Practice and Procedure, 1992 AACS, R 460.17101 et seq.

b. The interconnection agreement, as adopted by the arbitration panel and modified by this order, should be approved.

THEREFORE, IT IS ORDERED that:

A. The interconnection agreement, as adopted by the arbitration panel and modified by this order, is approved.

B. A complete copy of the interconnection agreement, as approved by this order, shall be filed within ten days of the issuance of this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

MICHIGAN PUBLIC SERVICE COMMISSION

/s/ John G. Strand
Chairman

(SEAL)

I dissent, as discussed in my separate opinion.

/s/ John C. Shea
Commissioner

/s/ David A. Svanda
Commissioner

By its action of January 15, 1997.

/s/ Dorothy Wideman
Its Executive Secretary

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of **SPRINT COMMUNICATIONS COMPANY, L.P.,** for arbitration to establish an interconnection agreement with **AMERITECH MICHIGAN**	)	Case No. U-11203

DISSENTING OPINION OF COMMISSIONER JOHN C. SHEA

(Submitted on January 15, 1997 concerning order issued on same date.)

I am not able to join in the approval of the accompanying order. As I have stated previously, see, November 1, 1996 Dissenting Opinion in Case No. U-11138, the means to reach the result embodied in the accompanying order cannot, as the majority states, arise under federal law. Rather, the Michigan Telecommunications Act, 1991 PA 179, as amended by 1995 PA 216, MCL 484.2101 et seq.; MSA 22.1469(101) et seq., (the "MTA") is the only authority that should control this proceeding.

The MTA quite clearly spells out the necessary process for approving interconnection agreements. Under Section 303(2) of the MTA, the Commission has authority to approve interconnection arrangements between basic local exchange service providers. Indeed, Section 305(1)(b) forbids a basic local exchange service provider from refusing to interconnect. Section 352 sets forth the prices for interconnection. Section 203(1) of the MTA authorizes the Commission to issue orders only after a contested case held pursuant to the Michigan Administrative Procedures Act, MCL 24.201 et seq.; MSA 3.560(101) et seq. No such contested case was convened in this matter and there is no resulting record upon which the

Commission can fashion an order. Instead, this matter has reached conclusion under a federal mandate that is at odds with the due process provisions of the Michigan Administrative Procedures Act.

Failure to observe these mandatory provisions of state law renders this proceeding -- and the interconnection agreement at issue -- fatally flawed. Thus, while settlements between adverse parties should be encouraged, and while the interconnection agreement, as the majority intends to approve it, could be found after a contested case to be in the public interest, I must reluctantly dissent.

John C. Shea, Commissioner

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion, to establish a procedure for arbitration under the federal Telecommunications Act of 1996.	))))	Case No. U-11134

At the July 16, 1996 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. John G. Strand, Chairman
Hon. John C. Shea, Commissioner
Hon. David A. Svanda, Commissioner

ORDER

Section 252 of the federal Telecommunications Act of 1996, which amended the Communications Act of 1934, 47 USC 151 et seq., provides for the resolution of interconnection and other issues by negotiation between an incumbent local exchange carrier and other carriers. If the parties are unable to reach agreement, either party may request that the state commission arbitrate the dispute.

Because the first request for arbitration could be filed soon, there is insufficient time for the Commission to develop an arbitration process through rulemaking or a generic proceeding. Nevertheless, to provide a framework for arbitration and to provide notice to interested parties, the Commission issues this order to specify the procedure it intends to follow, although the parties may stipulate to a modification of this procedure. As set out below, the procedure is not mediation,

which is also available to the parties, nor is it a contested case, which Congress could have specified if it so intended.

The party requesting arbitration shall file a request with the Commission and serve it on the other party to the negotiations. The request shall specify the issues in dispute and the positions of the parties on each issue. The requesting party shall file with the request all information upon which it intends to rely. The other party shall file its response within 25 days, which shall also include all information upon which it intends to rely. The parties may end the arbitration process at any time by settling all matters in dispute.

The arbitration panel shall consist of two technical staff people appointed by the Director of the Communications Division and one Administrative Law Judge (ALJ) appointed by the Director of the Administrative Law Judge Division. The ALJ will chair the panel, issue any communications to the parties, and rule on procedural matters. The arbitration decision of the panel will be by majority vote of the panel.

Following their appointment, the panel will meet to decide how best to proceed. The process will not be patterned after a contested case proceeding, but will be designed to inform the panel. As a result, the parties to the negotiations will be the only parties to the arbitration. They will not have a right to conduct discovery, although either may request that the panel order the production of additional information from the other party. Questioning will be done by the panel rather than by the parties. The panel will meet with the parties as necessary to complete its work within the time required by statute.

The panel will issue a decision on the merits of the parties' positions on each issue raised by the request for arbitration. Unless the result would be clearly unreasonable or contrary to the public

interest, the panel will limit its decision on each issue to selecting the position of one of the parties on that issue. The panel will issue a written decision with a brief explanation of the reasons for the decision on each issue and will serve its decision on the parties. The parties will have 10 days to file objections to the decision, after which the Commission will issue its decision approving or rejecting the resulting agreement.

The Commission FINDS that:

a. Jurisdiction is pursuant to 1991 PA 179, as amended by 1995 PA 216, MCL 484.2101 et seq.; MSA 22.1469(101) et seq.; Communications Act of 1934, as amended by Telecommunications Act of 1996, 47 USC 151 et seq.; 1969 PA 306, as amended, MCL 24.201 et seq.; MSA 3.560(101) et seq.; and the Commission's Rules of Practice and Procedure, 1992 AACS, R 460.17101 et seq.

b. Requests for arbitration under the Telecommunications Act of 1996 should be handled according to the procedure set out in this order.

THEREFORE, IT IS ORDERED that requests for arbitration under the Telecommunications Act of 1996 shall be handled according to the procedure set out in this order.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so in the appropriate court within 30 days after issuance and notice of this order, pursuant to MCL 462.26; MSA 22.45.

MICHIGAN PUBLIC SERVICE COMMISSION

(SEAL)

/s/ John G. Strand
Chairman

I concur as discussed in my separate opinion.

/s/ John C. Shea
Commissioner

/s/ David A. Svanda
Commissioner

By its action of July 16, 1996.

/s/ Dorothy Wideman
Its Executive Secretary

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion, to establish a procedure for arbitration under the federal Telecommunications Act of 1996	))))	Case No. U-11134

Concurring Opinion of Commissioner John C. Shea

(Submitted on July 16, 1996 concerning order issued on same date.)

As I have stated previously, see, concurring opinion in Case No. U-11125 dated June 26, 1996, I am not persuaded that the Michigan Legislature intended that the Commission exercise the authority set forth in the federal Telecommunications Act of 1996. I believe that the Commission must look to state law to find its authority to act.

In my view, the arbitration of disputes between incumbent local exchange carriers and other carriers must be authorized and governed by the provisions of the Michigan Telecommunications Act, 1991 PA 179, as amended by 1995 PA 216, MCL 484.2101 et seq.; MSA 22.1469(101) et seq. (the "Act").

Section 203a(2) of the Act, for example, authorizes the use of "any alternative means" of resolution of such disputes. I believe that the arbitration process contemplated by the majority's order in this matter should be governed by Section 203a(2).

Based on these and other applicable sections of the Act, I concur in the decision to establish the arbitration process set forth in the above-referenced order, but find authority for that process in state, not federal, law.

John C. Shea, Commissioner

Andrew Isar, *Director - Industry Relations*

Telecommunications Resellers Association
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Gig Harbor, WA 98335
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Via Facsimile and Regular Mail

MICHIGAN PUBLIC SERVICE
FILED
JAN 6 1997
COMMISSION

27 December 1996

Mr. John T. Lenahan
Assistant General Counsel
Ameritech
30 South Wacker Drive, Floor 39
Chicago, IL 60606

RE: Section 271 Issues in Dispute, MPSC Case No. U-11104

Dear Mr. Lenahan:

By letter dated December 17, 1996, you requested that parties to the Michigan Public Service Commission's (Commission) investigation into Ameritech's entry into its in-region interLATA market, in the above-referenced matter, identify undisputed Ameritech Michigan responses to Attachments A and B of the Commission's August 28, 1996 Order (Order) in this proceeding, and any Ameritech Michigan responses which the party believes can be resolved, so as to narrow outstanding issues. The Telecommunications Resellers Association (TRA), on behalf of its members, and as an interested party to this proceeding, wishes to respond.

TRA is a national trade association comprised of more than 510 telecommunications service providers and their suppliers, engaged in the provision of value-added telecommunications services throughout the country. TRA members are typically small to medium-sized service providers offering a variety of telecommunications services, increasingly including local exchange services. Several TRA members are active in the State of Michigan. TRA's interest in this and similar proceedings is in protecting, preserving and promoting competition within the interexchange marketplace, as well as in speeding the emergence and growth of resale and ultimately facilities-based competition in the local exchange/exchange access services markets.

Resellers have achieved a solid foothold in the domestic interexchange marketplace and are making significant inroads into the international, wireless and enhanced services arenas. TRA members have learned from hard experience that the market is an effective regulator, only if market forces are adequate to discipline the behavior of all market participants. If one or more such participants posses significant market power and are in a position to impede the competitive provision of service, governmental intervention will remain essential to protect the public interest.

Despite their success in interexchange markets, resale carriers are uniquely vulnerable to anticompetitive abuses. Not only are resale carriers generally dwarfed in size and resources by their underlying network providers, but they are entirely dependent upon them for the network services necessary to provide retail services to their customers. Resellers are particularly vulnerable to service order provisioning delays, competitive abuse of confidential carrier data, manipulation of service quality, and untimely, inaccurate or incomplete call detail reporting and certainly of strategic rate manipulation.

While TRA is not in a position to dispute Ameritech Michigan's factual responses to Attachments A and B the Commission's Order, it remains greatly concerned over Ameritech Michigan's general portrayal of compliance with the requirements of Section 271(c) of the Telecommunications Act of 1996, 47 U.S.C. Section 271(c), for in-region, interLATA market entry. From TRA's perspective, the matter of Ameritech's compliance with Section 271 certainly becomes more than an exercise of identifying specific Ameritech responses to the Commission's Order over which there is disagreement or that TRA perceives may be resolvable.

Of immediate concern to TRA is Ameritech's contention that the mere presence of competition in the local market constitutes meaningful competition. Unlike the interexchange market, that segment of Michigan's telecommunications services subscribers who have access to competitive local exchange carriers is virtually nonexistent. Until a majority of the public may benefit from the existence of meaningful local competition, TRA believes that a public interest determination can not favor Ameritech's in-region interLATA market entry. Otherwise Ameritech remains the "bottleneck" provider of interconnection, services, and access. To be sure, limited competitive local exchange market entry does not equate to widespread underlying carrier options for local service resellers, such as most TRA members, who will continue to depend almost exclusively on Ameritech for network interconnection, unbundled elements and services for the foreseeable future. There is a significant difference between a theoretically "contestable" market and an actually "contested" market. While competitive potential may evolve into actual competition significant enough to discipline the incumbent LEC market power, the lag in time before meaningful competition actually emerges in the local market will likely be substantial.

Ameritech Michigan relies heavily on the existence of interconnection agreements with competitors to demonstrate compliance with Section 271(c). However, the existence of interconnection or resale agreements with

larger competitive local exchange carriers, or the submission of a Statement of Generally Available Terms and Conditions in no way equates to the existence of functional interconnection and services resale. Ameritech Michigan will not dispute that countless issues, such as access to operational support systems, for example, and numerous procedures, have yet to be functionally and fully implemented. Few, if any, competitive local exchange companies can today claim that they are able to reliably provision and provide competitive local services when utilizing Ameritech's network or services. House Conference Report No. 104-458 stated of Section 271 that:

> The requirement that the BOC "is providing access and interconnection" means that the competitor has implemented the agreement and that the competitor is operational. This requirement is important because it will assist the appropriate State commission in providing its consultation and in the explicit factual determination by the [Federal Communications] Commission under new section 271(d)(2)(B) that the requesting BOC has fully implemented the interconnection agreement elements set out in the "checklist" under new section 271(c)(2).

Clearly, interconnection and service "availability" and functionality are not the same. The reliable provision of competitive local services based on Ameritech interconnection or resale must be a prerequisite for consideration of Ameritech in-region interLATA market entry.

Other issues clearly stand out as well. Before Ameritech can be allowed in its in-region interLATA market, it must also demonstrate that at least one facilities-based carrier offers competitive services "predominantly" over its own network, pursuant to Section 271(c)(1)(A), e.g. utilizes far more than 50% of its own facilities, not just those leased from Ameritech; that a facilities-based carrier serves both residential and business subscribers; and that Ameritech is capable of demonstrating that all of the requirements of the competitive checklist under Section 271(c)(2)(B) are being functionally provided.

Additionally, Ameritech's apparent efforts to impede local competition belie representations that it is in compliance with Section 271(c) of the Act. Delays in implementation of intraLATA presubscription in Michigan or efforts to prohibit "aggregation" of end-user usage volumes for reseller discounts as recently sought in Illinois, give the appearance of impeding competitive entry, e.g. that Ameritech is engaging in the very type of strategic manipulation that TRA members have historically experienced in

the interLATA market. Accordingly, evidence that Ameritech is acting in a non-discriminatory manner must further be demonstrated, before favorable consideration should be given to its in-region interLATA market entry.

TRA has very serious concerns about the premature entry of Ameritech Michigan into the in-region interLATA market, based in part upon the experience of its members in the interexchange market. In the late 1980s the interLATA market was initially dominated by one carrier. After nearly a decade, the dealings of TRA's resale carrier members were marred by substantial and persistent anticompetitive abuses. It has been only recently, in a fairly robust marketplace where such abuses have diminished.

Given the unique vulnerability of resale carriers, particularly smaller carriers, to anticompetitive abuses by entities upon whom they depend for network services, the timing and conditions for Ameritech's entry into the in-region interLATA market are critical. Although Ameritech may be able to demonstrate that local competition is developing, TRA does not believe that the highly limited availability of functional competitive offerings and recurring examples of efforts to seemingly impede competitive entry are consistent with Congress' prerequisites for in-region interLATA market entry. These are fundamental concerns which must be adequately addressed by Ameritech before a "narrowing" of issues is possible.

TRA does not object to Ameritech's entry into its in-region interLATA market, so long as Ameritech has complied with the requirements of Section 271 in substance, not simply in appearance. We look forward to working with Ameritech in addressing these issues, and ultimately to Ameritech becoming a valued underlying carrier to the industry.

Sincerely,

Telecommunications Resellers Association

Andrew O. Isar

Andrew O. Isar

cc: Michigan Public Service Commission

BROOKS
FIBER COMMUNICATIONS

January 6, 1997

MICHIGAN PUBLIC SERVICE
FILED

JAN - 7 1997

COMMISSION

Ms. Dorothy Wideman, Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

RE: Case No. 11104 Commission's Own Motion To Consider Ameritech Michigan's Compliance With The Competitive Checklist In Section 271 Of Telecommunications Act Of 1996

Dear Ms. Wideman:

Enclosed for filing in the above matter is a copy of information Brooks Fiber recently provided to the FCC regarding some of the difficulties we are experiencing with Ameritech of Michigan. As noted, there are still many unresolved issues with regard to Ameritech's compliance with Section 271 as it relates to Brooks. Additional documentation regarding further non-compliance with the 271 checklist is being compiled and will be forwarded to you as it becomes available.

Respectfully submitted,

Todd J. Stein, Esq.
Regulatory Specialist

TJS:pkv

enclosure

cc: Joint Service List (attached) and Mr. William Celio (MPSC)

2855 Oak Industrial Drive NE • Grand Rapids, Michigan 49506-1277 • 616-224-4300 • Fax 616-224-5100

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the Matter of the Commission's Own Motion to consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of Telecommunications Act of 1996	))))	Case No. U-11104

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the Matter of the Commission's Own Motion to consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of Telecommunications Act of 1996	))))	Case No. U-11104

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the Matter of the Commission's Own Motion to consider Ameritech Michigan's Compliance with the Competitive Checklist in Section 271 of Telecommunications Act of 1996	))))	Case No. U-11104

JOINT SERVICE LIST

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ADMINISTRATIVE LAW JUDGE
Administrative Law Judge
Michigan Public Service Commission
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Lansing, MI

BROOKS
FIBER COMMUNICATIONS

December 30, 1996

Katherine Brown, Anti-Trust Division
Telecommunications Task Force
U.S. Department of Justice
555 - 4th Street NW, Room 8104
Washington, DC 20001

via OVERNIGHT COURIER

Dear Ms. Brown:

As follow-up to our meeting on November 25th we are forwarding additional information describing some continuing operational issues with Ameritech that affect our ability to deliver excellent customer service. Even though we have over 18 months of actual in-service experience and have an operational interconnection agreement with Ameritech, coordination problems still exist.

The introduction of competition into the local exchange arena is a very complex undertaking. The complexity is compounded by the simple fact that facilities-based providers, such as Brooks, require an extraordinary high degree of cooperation from a supplier who, in fact, is in direct competition with the new entrant. Traditional supplier/buyer business relationships are simply not relevant. The ground rules and operational procedures for introducing competition must be completely thorough and rigid to prevent monopoly abuse. We hope that the attached examples illustrate this condition.

Since late July, when we signed our interconnection agreement with Ameritech, there has been a noted improvement in Ameritech's service delivery to Brooks. Ameritech is certainly aware of these current issues, and has agreed to work with Brooks to find a satisfactory resolution. We are forwarding these examples to your attention, to illustrate that additional work is still necessary in this very fragile area.

In addition, at your request, we are also enclosing some examples of our media advertising.

If you have any questions or wish to discuss any issue please call me at (616) 224-4359.

Sincerely,

Martin W. Clift, Jr.
Director of Regulatory Affairs

enclosures

2855 Oak Industrial Drive NE • Grand Rapids, Michigan 49506-1277 • 616-224-4300 • Fax 616-224-5100

Brooks Fiber Communications of Michigan
Service Affecting Examples with Ameritech

Inability Of Loops To Be Reconnected At Customer Premise

Description: For a variety of reasons, including at the request of Brooks or due to the unavailability of existing facilities, new loops are provisioned in lieu of reusing the current loop. Such provisioning requires that an Ameritech technician be dispatched to the customer's premise to *disconnect* the existing inside wire to the "old" loop. During this visit however, the Ameritech technician does not ***reconnect*** the inside wire to the new loop. Instead, a Brooks technician must be dispatched to reconnect the service. In the meantime, the customer is left without service. This, we believe, causes unnecessary customer dissatisfaction and requires an unnecessary field trip by Brooks to the customer's premise. In these instances, Ameritech should reconnect the inside wire to the new loop while at the customer's premise.

Inability For Brooks Customers To PIC Ameritech IntraLATA Toll

Description: Brooks local exchange customers are currently unable to "PIC" to Ameritech for intralata toll service. Ameritech does not accept "PIC'd" intralata toll traffic from a Brooks' customer. In order for these customers to switch their local service to Brooks, these customers must switch their existing Ameritech intralata toll service to another carrier. This restriction precludes certain customers from switching to Brooks' local service because they have term contracts with Ameritech for intralata toll. (See Attachment 1). These customers cannot terminate their term agreements with Ameritech without penalty. Ameritech should either waive these customer termination liabilities, or enable Brooks to pass the intralata traffic to Ameritech. A "fresh look" provision would enable customers choose the carrier of their choice without penalty.

Unreliable Electronic Interfaces With Ameritech

Description:

1. *Unbundled Loop Provisioning:* There is currently no reliable electronic means of interfacing with Ameritech's loop order system. Brooks' service orders are entered into a "satellite" Ameritech database which is entirely