

13.) In the following paragraphs, we describe the reasons for such modifications, conclude that the primary cause (other than those deemed reasonable by the DOJ) was a surge or "spike" in demand that temporarily delayed manual order review, and describe the corrective measures taken by Ameritech.

53. Ameritech modifies due dates for the following orders:

- (a) those specifying a due date that has already passed at the time of submission;
- (b) those processed after 3 p.m. but requesting completion that same day;
- (c) those specifying a due date that falls on a weekend or holiday;
- (d) "force and load" levels -- that is, all new service and additional line orders, which may require a dispatch of engineering personnel; and
- (e) those that cannot be completed by the requested due date due to Ameritech service center resource issues.

54. Orders falling into the final category of modified due dates increased during May. See Schedule 8, p. 7 (data submitted jointly by Ameritech and AT&T to the DOJ). These increases coincide with sudden and unexpected upturns in order demand, which slowed processing times for manually completed orders, coupled with Ameritech's assignment of certain service representatives to address the "3E" issue discussed in Section III.E.1. below. Since that time, Ameritech has increased its force of service representatives in order to adjust to increased volumes, and as described below, processing times have improved despite continued increases in demand.

2. Firm Order Confirmation -- 855s

55. Ameritech's systems generate a "firm order confirmation" or "855" notice for each order accepted. Several commenters have criticized Ameritech for "late" 855 notices. (See, e.g., DOJ Eval. at A-17; AT&T Comments at 25 & Bryant Aff. ¶¶ 110-16.)

As shown in Schedule 9, although EDI order volume has increased, Ameritech has consistently issued 855s within 48 hours for nearly 80% of orders received for the last five weeks for which data is available. This provides evidence that Ameritech has adjusted to the increased volume and volatility of demand.

56. As Schedule 9 shows, the rate of 855s issued within 48 hours dropped to 41% for the week of May 19, 1997. We understand that this occurred for two reasons. First, AT&T submitted a comparatively large number of orders (nearly 5,500 over 3 days) to assume service for certain existing accounts and requested telephone directories. We understand that AT&T's requests deviated from standard industry practice. Normally, for customers who already have phone service, but still want a directory, carriers will request a telephone book from a toll-free service. As a result, Ameritech's system properly flagged those orders for manual review. Ameritech identified the cause of this problem and reformatted the orders to allow for flow-through. However, the time necessary to develop a solution delayed that week's 855 issuances. AT&T has since resumed order procedures that follow the standard industry practice.

The non-standard AT&T submissions were compounded by the occurrence of then-record order volumes overall. In response to the across-the-board increase in order volumes, Ameritech has increased its staff of service representatives. The speed of 855

shut down from midnight to 4 a.m. for data base updates and system backups. On days when there are a large number of 3Cs, ASON may not finish processing all of them before midnight, so the remainder are not delivered to the interface until the following morning.

60. The second category of late 865s involves split orders, and occurred where AT&T assumed one or more lines of a multi-line account and Ameritech continued to provide service to at least one line. Because of the mixed carrier situation, the legacy systems behind the interface did not provide notification that the order had been completed, and therefore, the 865 was not released. Ameritech implemented modifications to the interface on March 27, 1997 to ensure that an 865 is released when split orders are completed. We obtained and reviewed documentation that showed the implementation and testing of these modifications.

61. The third category of late 865s also involves the legacy systems. In this case, if there are any interruptions in the communications link between the legacy systems and the interface, service orders are completed and updated in the legacy systems, but no notification can be received by the interface. As soon as the process is restarted or the link is restored, the normal processing resumes in that the interface receives the necessary notification, and the 865s are sent out. Ameritech has changed its process for monitoring these communications links and the notifications from the legacy systems to reduce the number of such interruptions and, when they do occur, to more promptly identify and correct them. We obtained and reviewed documentation of the implementation and testing of these modifications.

62. Fourth, the 865 notification may be sent out late simply because the order was not completed on time. This is not an OSS interface readiness issue.
63. By instituting the remedial measures described above, Ameritech significantly increased the rate of 865s delivered within 24 hours after order completion. Schedule 10 to our affidavit shows that the rate of 865s issued within 24 hours increased from 85% for the week of May 5, 1997 to 94% during the week of June 23, 1997. Ameritech has maintained or bettered that 94% level for each of the six preceding weeks.

D. Repair and Maintenance

64. As described in Ameritech's initial application, we reviewed internal testing and carrier-to-carrier testing for Ameritech's "application-to-application" interface for repair and maintenance. In addition, we reviewed actual usage of Ameritech's graphical user interface, or "GUI," (a method for CLECs to access Ameritech's application from a remote location) by Ameritech Pay Phone Services ("APPS"), an Ameritech affiliate that uses the GUI in the same manner that a CLEC would.
65. Based on our analysis, we concluded then, and conclude now, that Ameritech's repair and maintenance interface, and the GUI for using that interface, are operationally ready.
66. The DOJ does not contest the operational readiness of the T1M1 interface, but states that additional information as to the usage and testing of the GUI is needed. DOJ Eval. at A-22. At the outset, we do not agree with the DOJ's implicit belief that the GUI and its T1M1 foundation can be evaluated separately. The GUI is not a separate interface; rather, it is just a method for submitting trouble tickets across the T1M1 interface.

67. At any rate, though, the results of usage and testing of the GUI confirm our overall conclusion that the repair and maintenance function is operational. Page 1 of Schedule 11 shows the results of APPS' usage for May and June of 1997. APPS used the GUI to process all four types of repair transactions: (a) "creating" trouble reports; (b) "setting" or requesting information; (c) "getting" status reports; and (d) "events," or status notices issued upon the happening of certain events, without need for a request. The GUI processed nearly 24,000 transactions in May and nearly 11,000 for the first half of June. Of these transactions, 98% were accepted by the system.
68. CCT has been testing the GUI for several months, and is submitting tickets to the production trouble reporting system. The results of these tests have also been successful. CCT has tested all four transaction types, with an overall system acceptance rate of 85%. See Schedule 11, p. 2.

E. Billing

69. As presented in Schedule 2, page 2, over 30 CLECs are receiving monthly bills, both manual and electronic. Additionally, over 30 CLECs receive the "daily usage feed" which provides a record of daily call activity. Ameritech's daily usage feed contained 14.8 million messages for the month of May. In June, the volume increased to over 24.5 million messages.

1. "3E" Status

70. The commenters in this proceeding have taken issue with orders that fall into "3E status" in Ameritech's billing system. (DOJ Eval. at A-23, A-24; AT&T Comments at 24 &

Connolly Aff. ¶¶ 228-30; LTS Motion at 6.) This situation arises because edits of service orders take place at various stages during processing through Ameritech's legacy systems. The most significant edits occur in the interface when the order is transmitted to Ameritech. However, some additional edits can occur at the time the order is processed by the legacy billing system, which occur after the 865 completion notice is transmitted to the CLEC. Generally these edits relate to formatting errors for retail or wholesale orders. When an order is rejected by the billing system it is assigned 3E status. 3E status orders are then cleared, but historically this clearing function was not considered highly time-sensitive.

71. This situation has given rise to some unanticipated problems in the wholesale environment. Until wholesale orders are processed out of 3E status, there is the potential for double-billing. That is, as a result of 3E status, valid orders were rejected because Ameritech did not recognize the order as belonging to a CLEC customer.
72. Ameritech has attached a high priority to this issue and has undertaken three measures to address it. First, Ameritech has instituted edits in the OSS interface to address format errors before the order reaches the point where the billing system is updated -- in other words, the interface edits have been tightened to more exactly conform to the edits in the billing system. We obtained and reviewed the documentation of the completed software change requests showing the design and implementation of these edits.
73. Second, a dedicated group of technical specialists was established to promptly correct orders then in 3E status. This group also verified that any erroneous billing had been rectified.

74. Third, on a forward-looking basis, Ameritech has dedicated a team of service representatives to promptly review and correct any orders that result in 3E status. We obtained and reviewed the team's "3E Score Card" for May and June 1997, which documents specific performance measurements that the 3E team analyzes on an ongoing basis to identify and resolve those orders in 3E status. We also observed these service representatives in action, noting that they identified and correctly processed "3E" status orders.

We also observed that the service center has implemented procedures to identify any customers with orders in "3E" status that are to be billed in the next Ameritech billing cycle. In such cases, Ameritech service representatives will "pull," or suspend, the Ameritech bill in order to ensure that the CLEC's customer will not receive a second bill.

75. The above-described Ameritech responses, including the combined implementation of automated and manual process controls, have significantly reduced the number of orders in "3E" status, and -- most importantly from the customer's perspective -- should vastly reduce or even eliminate the potential for double billing. As page 2 of Schedule 12 shows, the average cumulative balance of orders in "3E" status, as a percentage of orders received, has decreased from 18% for the week of May 5, 1997 to 6% of orders received for the week of June 23, 1997. As of June 29, 1997, 1,622 orders are in 3E status, and approximately 1,000, or 62% of these orders, are less than five days old.

2. Monthly Bills and Daily Usage Feed

76. Various carriers have complained about delays in receiving monthly bills and the daily usage feed. See, e.g., LCI Comments at 13-15. In April 1997, Ameritech installed new computer hardware and software to process the monthly bills. While the initial implementation of these improvements caused some delays, the new system is now processing bill data more quickly. Further, specific individuals have been assigned to ensure that bills are more timely.

In addition, Ameritech's systems were previously unable to release bills for any carriers until all bills were ready. System modifications effective May 12, 1997 now allow Ameritech to release feeds as they are completed.

Similarly, process controls have been implemented and assigned to specific individuals to ensure more timely delivery of daily usage feed data to CLECs.

IV. Capacity Readiness

77. As noted in Ameritech's application, the Andersen team helped design extensive tests of the capacity of Ameritech's electronic OSS interfaces, and reviewed the results of those tests. We concluded that Ameritech's interfaces had sufficient electronic capacity to handle forecast demand through the end of 1997.

78. Notably, the DOJ has carefully analyzed the results of our testing and appears comfortable with our conclusion as to Ameritech's electronic capacity. (DOJ Eval., at App. A-5, A-6, A-22.)

79. In Ameritech's application, we also analyzed Ameritech's manual capacity and concluded that Ameritech had plans in place to hire or utilize other existing internal service representatives to meet the forecast demand on manual resources through the end of 1997. The DOJ has expressed concerns, and some carriers have asserted outright, that Ameritech might lack sufficient manpower to handle future demand in the ordering area. (DOJ Eval. at A-15, AT&T Comments at 24.)
80. In response to these comments, we have updated our analysis of Ameritech's manual capacity and hiring plans. See Schedule 13. We used the same analytical approach as before: that is, we (a) obtained Ameritech's most recent forecast of monthly order demand; (b) estimated the percentage of orders requiring manual review, by type (using the same data we obtained and analyzed in the preceding sections of this affidavit); (c) estimated the "throughput time" necessary to fully process those orders; and (d) divided the required throughput time by the amount of available time per service representative, to obtain the number of service representatives needed to meet demand.
81. Our model projects that Ameritech would need approximately 391 service representatives by the end of the year. By combining its existing service representatives with those to be added under its current hiring plan, Ameritech would have 368 service representatives. If actual experience reflects the estimated manpower needs determined by our model, Ameritech plans to add the additional 23 representatives necessary by transferring personnel internally. Because Ameritech was able to add 37 representatives in May by this method, their approach appears reasonable and workable.

82. The DOJ and certain carriers have expressed concern with respect to Ameritech's processing results for the week of April 28, 1997, in which Ameritech experienced a sudden upturn in EDI order volume which, at that time, was the highest volume of orders received. (DOJ Eval., at A-14 through A-16; AT&T Comments at 24 & Bryant Aff. ¶¶ 84-85, 91-103.9, Brooks Comments at 21; LCI Comments at 18.) Since that time, however, Ameritech has increased its staff of service representatives to adapt to the increase in demand. As described in the preceding sections, these measures have improved Ameritech's processing results even though weekly volumes have surpassed (and, in the most recent week, doubled) the April 28 figures. We thus reaffirm our conclusion that Ameritech has and is planning for adequate manual capacity.

V. **Conclusion**

83. Notwithstanding the comments raised by the other parties in the proceeding, we believe that the results of performance confirm the operational readiness of Ameritech's OSS interfaces.

84. This concludes our affidavit.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

Rod Thomas
Rod Thomas

Subscribed and sworn before me this 2nd day of July, 1997.

Petrina Lenior
Notary Public

My Commission expires: 12/12/98



J. Russell Gates
J. Russell Gates

Subscribed and sworn before me this 2nd day of July, 1997.

Petrina Lenior
Notary Public

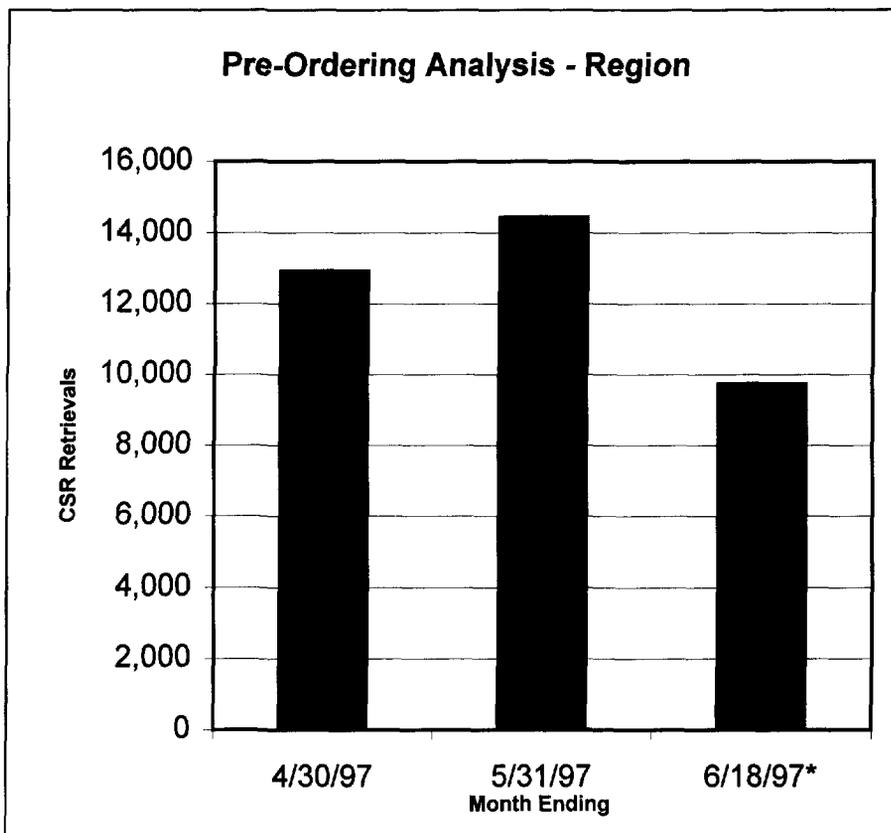
My Commission expires: 12/12/98



Pre-Ordering Analysis (Production and Test) - Region

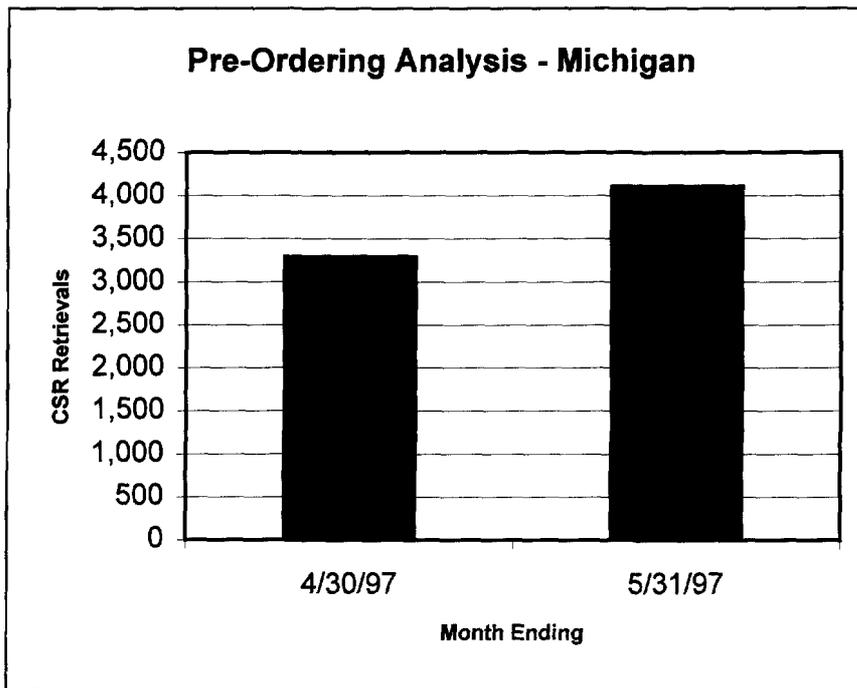
Month Ending	CSR Retrieval	TN Reservation (T20)	Due Date Negotiation (R20)	Total Transactions
	A	B	C	A+B+C
4/30/97	12,917	30	16	12,963
5/31/97	14,428	1	0	14,429
6/18/97*	9,730	0	0	9,730
Total	37,075	31	16	37,122

*Approximate



Pre-Ordering Analysis (Production and Test) - Michigan

Month Ending	CSR Retrieval	TN Reservation (T20)	Due Date Negotiation (R20)	Total Transactions
	A	B	C	A+B+C
4/30/97	3,291	1	0	3,292
5/31/97	4,107	0	0	4,107
Total	7,398	1	0	7,399



**Actual Use, Carrier-to-Carrier Testing, and Internal Testing
Summary Matrix
(As of 6/30/97)**

Product Groups	Pre-Ordering (EDI)					Ordering & Provisioning (EDI & ASR)						Repair & Maintenance*				Billing & Usage				
	Customer Service Record Retrieval	Street Address Validation Guide Aid	Central Office Feature Availability	Telephone Number Selection	Due Date Negotiation	Assuming an Account "As Is"	Assuming an Account "As Specified"	Disconnect an Account/Service	New Account/Service	Changing an Account/Service	Firm Order Commitment/Acknowledgment	Order Completion	Proactive Jeopardy Notification	Trouble Report Creation	Trouble Report Information Request	Trouble Report Information Update	Proactive Status Notification	Monthly Bill	Monthly Electronic Bill	Daily Usage Feed (DUF)
Resale	1,2,3	1,3	1,3	1,2,3	2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3	1,2,3					1,3	1,3	1,3
UB-Local Switching-Line Ports	1,2,3	1,3	1,3	1,2,3	2,3		2,3	2,3	2,3	2,3	2,3	2,3						3	3	3
Service Provider Number Portability	1,2,3				2,3		2,3	1,2,3	2,3	1,2,3	2,3	2,3						1,3	3	
UB-End Office Integration EOI							1,3	1,3	1,3	1,3			1,2,3	1,2,3	1,2,3	1,2,3		1,3	1,3	
UB-LOOPS	1,2,3	1,3			2,3		1,3	1,3	1,3	1,3								1,3	1,3	
UB-Local Switching-Trunk Port							3	3	3	3								3	3	
UB-Tandem Switching							3	3	3	3								3	3	
UB-Local Transport							3	1,3	3	3								3	3	

1	Actual use
2	Carrier-to-carrier test
3	Internal test

* Actual use activity relates to PPS - Ameritech Pay Phone Services and only for resale product groups.

Certain pre-ordering, repair & maintenance, and daily usage feed functions operate the same for multiple product groups. Test and actual use information within the matrix for these functions are shown once and replicated for other relevant product groups.

Electronic Carrier Activity

Pre-Ordering

Carrier-to-carrier testing

MidCom
USN Communications
WorldCom/MFS

Actual use

MidCom
USN Communications
WorldCom/MFS

Approximately 40 telecommunication carriers receiving street address guide and central office feature availability files (i.e., on a mailing list)

Approximately 15 telecommunication carriers have access rights to receive the street address guide and central office feature availability files electronically through the file transfer protocol

Ordering & Provisioning

Carrier-to-carrier testing

AT&T
Communications Buying Group, Inc.
Dial Direct Co.
LCI International
MCI Metro
Network Recovery Services
USN Communications
WinStar Telecommunications

EDI - Actual use

AT&T
MCI Metro
Network Recovery Services
The Millennium Group
USN Communications

ASR - Actual use

AT&T
Brooks Fiber
Consolidated Communications, Inc.
Focal Communications
ICG Telecom Group
NextLink
Phone Michigan
Teleport/TCG
Time Warner
WinStar Telecommunications
WorldCom/MFS

Electronic Bonding / Trouble Administration

Carrier-to-carrier testing

Ameritech Pay Phone Services
Consolidated Communications, Inc.
USN Communications

Actual use

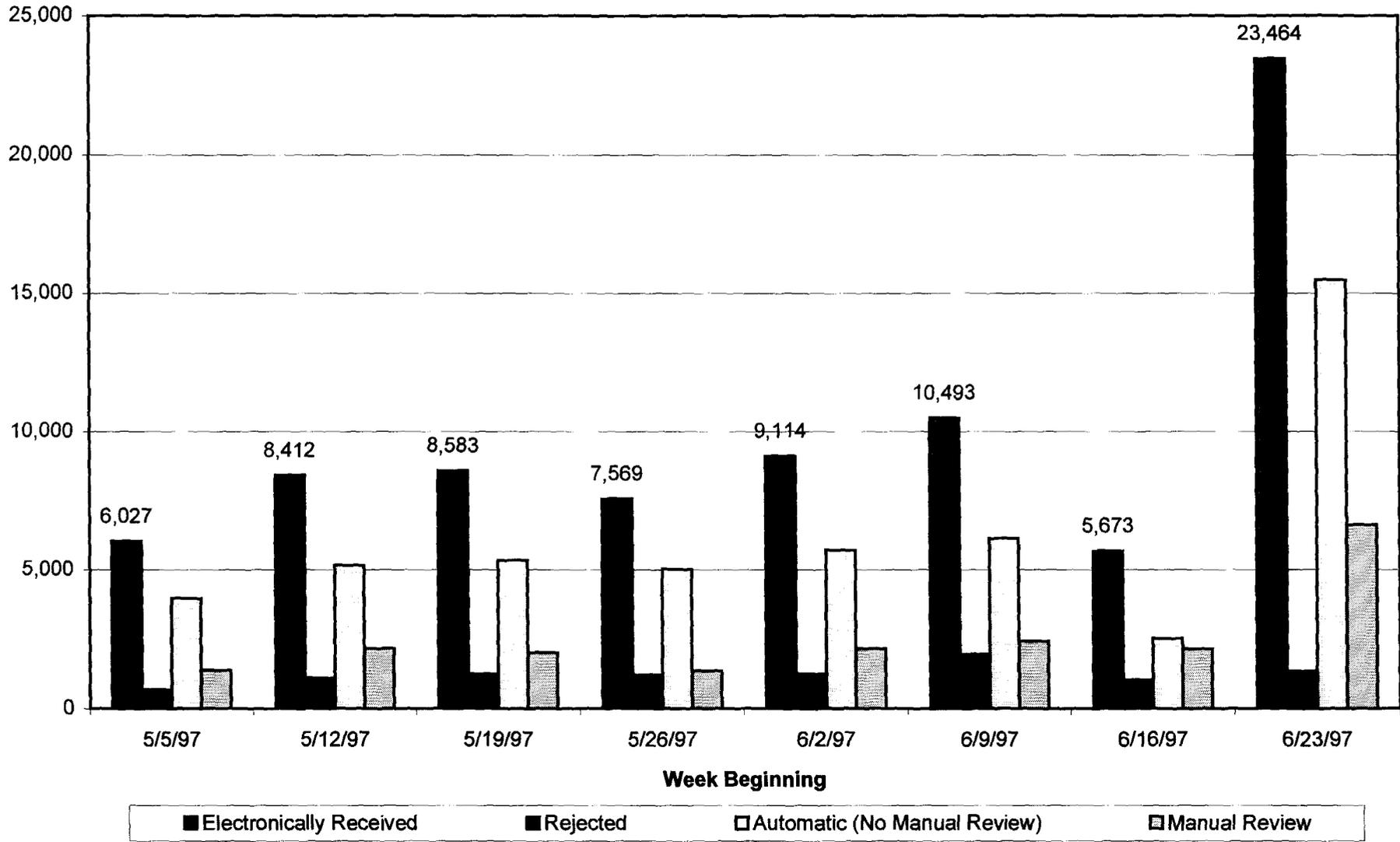
Ameritech Pay Phone Services

Billing and Usage

Actual use

	<u>Resale</u>	<u>UNEs</u>
Telecommunication carriers receiving monthly summary bills	33	12
Telecommunication carriers receiving electronic monthly bill detail	33	12
Telecommunication carriers receiving the daily usage feed	31	-

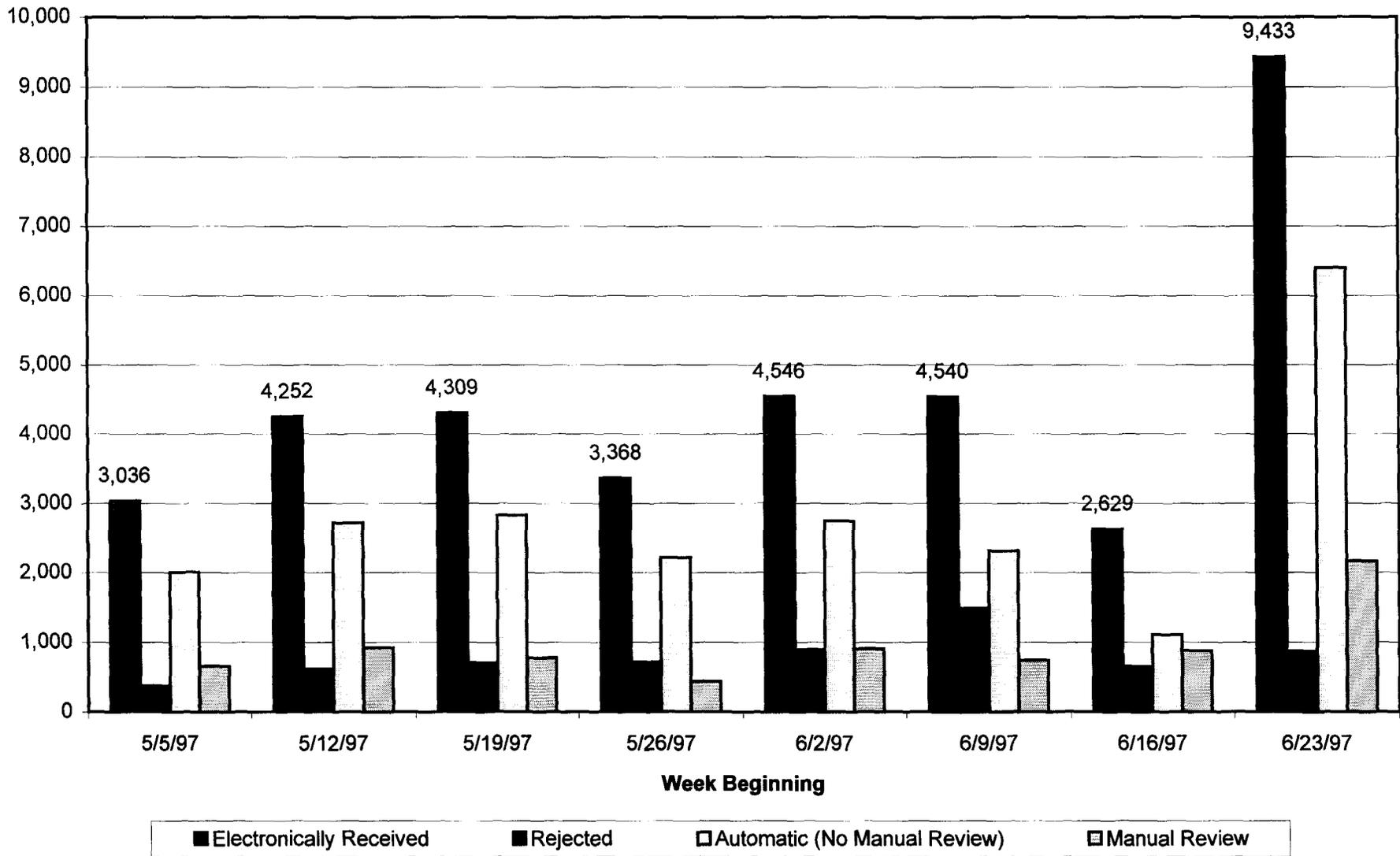
Electronic Ordering Analysis - Region



Electronic Ordering Analysis - Region

Week Beginning	Electronically Received	Rejected Total	Rejected Percent	Automatic Total	Flow Percent	Manual Review Total	Manual Review Percent	Manually Received
	A	B	B/A	C	C/(A-B)	A-B-C	(A-B-C)/(A-B)	D
5/5/97	6,027	675	11%	3,976	74%	1,376	26%	1,870
5/12/97	8,412	1,091	13%	5,157	70%	2,164	30%	2,383
5/19/97	8,583	1,239	14%	5,333	73%	2,011	27%	3,122
5/26/97	7,569	1,210	16%	5,005	79%	1,354	21%	2,300
6/2/97	9,114	1,246	14%	5,714	73%	2,154	27%	3,611
6/9/97	10,493	1,947	19%	6,132	72%	2,414	28%	2,949
6/16/97	5,673	1,022	18%	2,513	54%	2,138	46%	3,012
6/23/97	23,464	1,341	6%	15,498	70%	6,625	30%	2,769
Total	79,335	9,771	12%	49,328	71%	20,236	29%	22,016

Electronic Ordering Analysis - Michigan



Electronic Ordering Analysis - Michigan

Week Beginning	Electronically Received	Rejected Total	Rejected Percent	Automatic Total	Flow Percent	Manual Review Total	Manual Review Percent	Manually Received
	A	B	B/A	C	C/(A-B)	A-B-C	(A-B-C)/(A-B)	D
5/5/97	3,036	376	12%	2,004	75%	656	25%	283
5/12/97	4,252	611	14%	2,718	75%	923	25%	403
5/19/97	4,309	703	16%	2,832	79%	774	21%	344
5/26/97	3,368	713	21%	2,221	84%	434	16%	346
6/2/97	4,546	894	20%	2,744	75%	908	25%	790
6/9/97	4,540	1,486	33%	2,313	76%	741	24%	347
6/16/97	2,629	645	25%	1,108	56%	876	44%	377
6/23/97	9,433	869	9%	6,400	75%	2,164	25%	425
Total	36,113	6,297	17%	22,340	75%	7,476	25%	3,315

Electronic Ordering Analysis - Region

