

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the matter of)
)
Application of Ameritech)
Michigan Pursuant to Section) CC Docket No. 97-137
271 of the Telecommunications)
Act of 1996 to Provide In-Region,)
InterLATA Service,)
in Michigan)

**AFFIDAVIT OF PAUL J. MONTI
ON BEHALF OF AMERITECH MICHIGAN**

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

1. My name is Paul J. Monti. My business address is 350 North Orleans, Chicago, Illinois 60654. I am the Ameritech Information Industry Services (AIIS) Account Director for Teleport Communications Group (TCG). In this position, I have overall responsibility for managing Ameritech's business relationship with TCG.

2. I received a Bachelor of Science degree in Business Administration from Illinois State University in 1980. I received an MBA from Loyola University in 1995.

3. I joined Illinois Bell Telephone Company in May 1981. In my sixteen years with Illinois Bell and Ameritech, I have held a number of positions, primarily in marketing and account management. I have been in my present position as the AIIS TCG Account Director since June, 1996. Before joining AIIS, I spent two years managing Ameritech's access expense relationship with various Independent Local Exchange Carriers. Prior to that, I spent approximately six years managing Ameritech's relationship with various Interexchange Carriers.

Previously, I held various product marketing and account management positions within Illinois Bell.

4. In this Affidavit, I will first describe the ongoing working relationship between Ameritech and TCG from my perspective as Account Director. I will then respond to certain points made in TCG's Comments filed in this proceeding on June 10, 1997, and in the supporting Affidavit of Michael Pelletier concerning trunk blocking and Operations Support Systems.

TCG/Ameritech Working Relationship

5. Ameritech has an account team specifically dedicated to manage Ameritech's relationship with TCG. The TCG team includes, in addition to myself, network planning managers and service managers who are assigned specifically to support TCG. The service managers are directly responsible for managing day to day operational issues (e.g., escalations, project activities). The network planning managers are directly responsible for managing network planning and implementation activities.

6. All members of our team meet regularly with TCG to address a wide variety of network planning and business issues. For example, Ameritech and TCG hold monthly performance review meetings, at which the previous month's performance and the current month's critical or hot issues are discussed. In addition, Ameritech and TCG hold separate regularly scheduled network planning meetings, at which joint network planning and interconnection issues are addressed. At these meetings, the Ameritech account team is supported, as appropriate, by Ameritech subject matter experts who bring their specialized expertise to bear on the particular matters being addressed. As a follow-up to the monthly

review meetings and the network planning meetings, Ameritech and TCG hold scheduled weekly conference calls to discuss the status of network planning implementation issues. In addition, of course, I am generally available as needed to respond to TCG concerns.

7. As Ameritech's Account Director for TCG, I am proud of our commitment to our ongoing relationship with TCG, and our responsiveness to TCG's needs.

Communications Concerning Trunk Blocking

8. TCG discusses a trunk blocking issue on pages 4-9 of its Comments. John Mayer of Ameritech addresses the technical aspects of the issue in his Affidavit. I will respond to TCG's accusations that Ameritech reneged on agreements to resolve the trunk blocking problem.

9. I know first-hand that Ameritech did not renege on commitments, as TCG claims at pages 6-7 of its Comments. If anything, I feel that TCG walked away from an agreed upon network architecture that the parties had arrived at in order to address the blocking issue.

10. I attended meetings between TCG and Ameritech on April 3 and 4, 1997. At those meetings, TCG (represented by Cathy Mason, Tom Schroeder and Bill Riggan) agreed to reconfigure the interconnection between TCG's and Ameritech's networks to establish trunking from each TCG point of interconnection to each of Ameritech's tandem switches.

11. A meeting was subsequently scheduled for April 23, 1997, to do the detailed planning for the reconfiguration that was agreed to at the April 3 and 4 meetings. At the April 23 meeting, however, TCG's representative, Bob Nichols, would not engage in any such planning, and would not assent to the reconfiguration that had been decided on at the previous meetings. Bob would agree only that he would consult with others at TCG, and that we could meet again, on May 22, 1997.

12. At our May 1, 1997 monthly service performance review meeting, I specifically stated Ameritech's concern and disappointment at the outcome of our April 23 meeting. At this May 1 meeting, TCG restated its commitment to the network architecture agreed upon at our April 4, 1997 meeting.

13. We met again on May 22, 1997, and TCG, contrary to the agreement reached on April 3 and 4 and reaffirmed by TCG on May 1, proposed a new and completely different architecture. Specifically, TCG proposed that all calls have access to all trunks. Ameritech was not prepared discuss this unusual and unexpected proposal at the May 22 meeting, and certainly did not agree to it at that time. As I understand, and as John Mayer explains in his Affidavit, we have since learned that when TCG's proposed architecture was subjected to trials elsewhere in the country, it was not successful, and that the architecture is not technically feasible for Ameritech at this time.

14. TCG claims that Ameritech proposed to establish direct trunking to end offices according to the alphabetical order of the offices. That is not so. The criteria for prioritizing offices for direct trunking that will be used with TCG are the sensible, standard criteria described in the Affidavit of John Mayer. (Ameritech does have, and showed to TCG, a list of end offices that, for the usual organizational purposes, lists the offices alphabetically. Mr. Mayer discusses the methodology for prioritizing offices in his reply affidavit. Ameritech did not, however, even suggest that it was going to prioritize end offices for direct trunking according to the alphabet.)

Communications Concerning Operations Support Systems ("OSS")

15. I also wish to respond to certain statements made by TCG concerning OSS. First, TCG states that it is using electronic interfaces made available by Ameritech only for processing

orders through ASR, and not for other OSS functions. (TCG Comments, p. 12.) It is important to understand that that has been TCG's choice. Starting on January 16, 1997, and on numerous occasions thereafter, Ameritech (and I in particular) offered to work with TCG to implement OSS interfaces for pre-ordering, provisioning, maintenance and repair, and billing for resale and unbundled network elements. The two letters from me to Michael Pelletier at TCG that are attached to my Affidavit demonstrate this. But, TCG has elected not to implement any OSS interfaces other than order processing via ASR.

16. TCG's statement that "Ameritech has informed TCG that the electronic interface for maintenance and repair cannot be utilized in conjunction with the channels that TCG orders pursuant to Ameritech's access tariffs" (TCG Comments, p. 12) is misleading. As TCG knows, neither the 1996 Telecommunications Act nor the Ameritech Michigan/TCG interconnection agreement calls for Ameritech to develop OSS interfaces for access tariff services. While Ameritech's T1/M1 maintenance OSS interface is capable of accommodating access services, Ameritech Information Industry Services has focused its OSS efforts to date primarily on resale and unbundled network elements. As I explained above, Ameritech has offered to work with TCG to implement the OSS interfaces called for under Ameritech's and TCG's interconnection agreement.

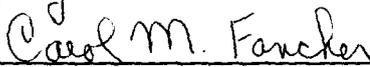
17. This concludes my affidavit.

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



Paul J. Monti

Subscribed and sworn before me this 1st day
of July, 1997.



Notary Public



My Commission expires: 03-13-00

06-24-1997 13:15

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Ameritech

Paul Mantl
Account Director

February 26, 1997

**Mr. Michael Pelletier
Director-Carrier Relations
Teleport Communications Group
1000 Town Center, Suite 150
Southfield, Michigan 48075**

Dear Mike:

On 1/17/97, as a follow-up to our 1/16/97 Ameritech/TCG electronic interface/bonding conference call, Ameritech provided TCG EDI technical specification documents. Ameritech is inquiring as to whether TCG has reviewed these documents and if TCG would like to schedule any conference calls or meetings to discuss Ameritech's documentation or begin to develop an EDI testing/implementation plan.

Ameritech looks forward to working with TCG to implement these electronic interfaces.

Sincerely,

Paul Mantl

Paul Monti
Account Director



January 22, 1997

Mr. Michael Pelletier
Director-Carrier Relations
Teleport Communications Group
1000 Town Center
Suite 150
Southfield, Michigan 48075-1193

Dear Mike.

The following confirms the issues discussed on our Ameritech/TCG 1/16/97 electronic interface/bonding conference call. As discussed, per the requirements of TA 96, as of 1/1/97, Ameritech (AIT) offers electronic interfaces for Pre-ordering, Ordering, Maintenance and Billing for resale and unbundled network elements.

Preordering

The same preordering interfaces are used for both resale and unbundled network elements. These interfaces require a private line direct connection (ie 56KBS or higher) to the AIT Electronic Commerce Network. These interfaces utilize a TCP/IP communications protocol. Preordering interfaces provide access to four systems/functions:

- 1.) Address Validation (ie SAG) and Feature Availability-address validation data is used to confirm that the address is formatted correctly, the location is served by AIT, and to determine the AIT serving central office. Feature availability information is used to determine which central office features may be offered to TCG end users. This information can be downloaded daily or is available monthly via diskette.
- 2.) Telephone Number Selection-can be used to select and reserve (limited period) individual numbers for new or additional services.
- 3.) Due Date Negotiations-used to select and reserve (limited period) due dates where AIT outside work force appointment is required.
- 4.) Customer Service Record (CSR) Retrieval-via e-mail. Presale: TCG must provide Letter of Authorization (LOA) to AIT prior to receiving CSR. On-sale/post sale: TCG must have LOA on file.

Ordering

TCG will utilize the existing ASR process to order all unbundled network elements with the exception of Interim Number Portability (INP) and unbundled line-side local switching ports. These services will be ordered via the electronic interface used to order resale services. For example: when ordering an unbundled loop with a ported number, TCG would submit an ASR for the unbundled loop and order INP via the electronic interface.

Billing

Unbundled elements ordered via the ASR process will be billed on TCG's existing CABS bill. Resale services and those services not ordered via an ASR (ie INP) will be billed via AIT's Electronic Billing System (AEBS). AEBS bills can be provided via NDM, magtape, or paper.

Maintenance

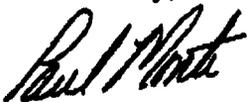
For resale and unbundled network elements, AIT's maintenance/trouble administration electronic interfaces will provide TCG the "real time" ability to create trouble tickets, track ticket status, and confirm ticket closure. To access this interface a private line direct connection is required.

Next Steps

On 1/17/96, AIT sent TCG the technical specification documents for its electronic interfaces via UPS. Once TCG has reviewed these specifications, follow-up meetings/conference calls will be scheduled to jointly develop testing and implementation plans.

Ameritech looks forward to working with TCG to implement these electronic interfaces.

Sincerely,



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of

Application of Ameritech Michigan
Pursuant to Section 271 of the
Telecommunications Act of 1996 to
Provide In-Region, InterLATA Services
in Michigan

CC Docket No. 97137

**REPLY AFFIDAVIT OF MICHAEL MURRAY
ON BEHALF OF AMERITECH MICHIGAN**

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

Michael Murray, being first duly sworn upon oath, deposes and states as follows:

1. My name is Michael Murray. My business address is 350 North Orleans, Chicago, Illinois. I have personal knowledge of the facts contained herein.

2. I received a Bachelor of Science degree in Marketing from Ball State University, in Muncie, Indiana, in May of 1983, and joined Ameritech (formerly Illinois Bell Telephone Co.) in February of 1984.

3. I was initially a Service Representative in Consumer/Residential services. I next moved to the MSC (Market Service Center) as a Communication Consultant. I then became an Account Service Administrator in Custom Business Services where I supported

fifteen major accounts in the Ameritech region and coordinated implementation and developed future forecasting needs.

4. I am currently the Service Manager assigned to the MCI account. I joined the Ameritech Information Industry Services (AIIS) team in May of 1996 as a Service Manager supporting telemanagement firms, and moved into the Resale division supporting MCI, also as a Service Manager, in February, 1997. As Service Manager, I am the primary Ameritech customer service contact for MCI. I manage regional implementation, development and ongoing operational support of resale and unbundled products and services. Our goal is to ensure timeliness and consistency of services to maintain parity and exceed customer expectations. I am also responsible for the coordination and implementation of projects, and I serve as an escalation point to resolve service issues relating to the provisioning, maintenance and billing process.

5. In this affidavit, I will describe the relationship between MCI and Ameritech Michigan from the perspective of the account service manager. I will then respond to allegations made by MCI witness Samuel King regarding problems that MCI claims it has experienced with Ameritech Michigan.

6. MCI and Ameritech Information Service Industries hold weekly conference calls in support of MCI's operations. These meetings are the vehicles used to air questions and concerns relating to products and or services. They have been very successful in developing a cohesive relationship between the two organizations. Initially, at the time MCI launched its service, AIIS and MCI conducted daily conference calls in order to ensure MCI's successful entrance into the market. Typical items discussed and resolved related to

EDI and to orders processed via the gateway. We also had detailed discussions about orders that required additional processing from our AIIS Service Center. These meetings proved to be very successful, and MCI felt comfortable enough with MCI's progress that these daily calls have been eliminated as unnecessary. We have now switched our focus to weekly conference calls involving MCI's and AIIS's Service Centers. These calls are also proving very productive in the resolution of any issues and concerns raised by either MCI or AIIS.

7. Mr. King makes several allegations about the service that AIIS has provided to MCI. I will address each of these in turn.

8. First, Mr. King claims that AIIS took two months to set up a meeting on trunking. (King Affidavit, ¶ 40). That claim is highly misleading. Although a face-to-face meeting may not have occurred prior to April 16, I personally was involved in numerous conference calls with MCI during which we thoroughly discussed PBX trunking, digital trunking, and similar services, and we provided information about these services in response to MCI's inquiries. The April 16 meeting simply recapped and further discussed with some of the same MCI players, as well as some new individuals that MCI brought onto the scene, the same information that had previously been discussed in these conference calls. Mr. King's suggestion that we did not answer MCI's questions prior to the April 16 meeting is simply false.

9. Mr. King also claims that Ameritech Michigan provided inaccurate information to MCI on a few occasions. (King Affidavit, ¶ 41.) MCI admits that these examples are "not of overwhelming importance." (*Id.*) In fact, Mr. King's examples represent isolated instances that were addressed in the normal process of servicing an account, and Ameritech's

prompt response in each case demonstrates that its account support system is operating as intended.

10. Mr. King's first allegation relates to USOCs for ordering toll restrictions. (King Affidavit, ¶ 41.) It is important to note that this service virtually restricts an end-user from making calls anywhere on his or her line, and thus it is rarely, if ever, ordered by end-users. I reviewed daily report records and confirmed that MCI submitted only one order for this restriction, and thus MCI's implication that this problem was widespread is baseless. However, Ameritech Michigan did provide an incorrect USOC for toll restriction service in the Product and Service Guide that it provides to resellers. We worked with MCI to fix this problem as quickly as possible, and we were able to provide the correct USOC in approximately two weeks. At that time, MCI did not voice any dissatisfaction with the timeliness of our response.

11. Mr. King also misleadingly claims that Ameritech gave MCI incomplete information about ordering 900/976 call blocking. (King Affidavit, ¶ 41.) Although the Product and Service Guide, which reflects the correct USOC, does not mention that an accompanying LCC (line class code) must be present to restrict the line, this information is provided in the initial customer training that AIIS provides to all resellers. The Product and Service Guide, which serves as but one of many tools that Ameritech provides to resellers in its support function, should not be viewed in isolation. When questions arise beyond the scope of this resource, resellers properly should refer to the appropriate tariff, which describes all services in full detail, or raise the issue with AIIS. That is the purpose of the support function that we provide at AIIS and have been providing to MCI effectively.

12. Mr. King also misleadingly alleges that Ameritech did not tell MCI that an order for Caller ID with name had to be accompanied by an order for Caller ID in order to be effectively processed. (King Affidavit, ¶ 41.) In fact, because many resellers were transmitting orders for this service without providing both the USOCs required to provision this feature, AIIS notified MCI and other resellers that some resellers were making this mistake. This notification occurred prior to MCI's production date of February of 1997. Moreover, this very matter was discussed during our weekly conference calls with MCI operations and development personnel, and resolved satisfactorily as part of our normal support function.

13. Finally, Mr. King's concerns about MCI's experience with USOCs (King Affidavit, ¶ 113) are not justified. AIIS has made every effort to provide resellers with USOC documentation in order for them to successfully enter the marketplace. This is not so simple a task as Mr. King implies; each of the five Ameritech states has its own individual tariffs. AIIS has worked to make access available to each state's specific USOCs via multiple avenues. Although it has been a very time consuming task, AIIS has successfully loaded each state's USOCs onto its Web site, completing the process at the end of June 1997. In addition, USOCs can be found in the state approved tariffs.

14. In conclusion, the examples raised by Mr. King's affidavit show clearly that that AIIS has developed a support structure for dealing with issues that arise between itself and resellers such as MCI. AIIS maintains an ongoing relationship with personnel from the various resellers and has effectively addressed all of the matters raised by Mr. King. Mr. King provides no concrete evidence that MCI is currently experiencing any problems. To

the contrary, our experience with MCI, far from showing any widespread problems, demonstrates that AIIS has diligently and effectively responded to the isolated issues raised by MCI in the normal course of business.

Further affiant sayeth not.

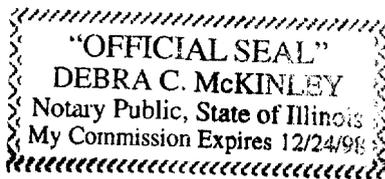
I swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

Michael D. Murray
Mike D. Murray

Subscribed and sworn before me this 1 day
of July, 1997.

Debra C. McKinley
Notary Public

My Commission expires: 12/24/98



4. The purpose of my affidavit is to respond to the concerns expressed by the DOJ in its evaluation in this docket of the "USOC" and "FID" documentation Ameritech has provided to the CLECs.

5. Specifically, in its Appendix A (A-24), the DOJ says that "[al]though several CLECs have commented on the dramatic improvements in Ameritech's interface and ordering documentation, some note that further clarification is required, in particular with respect to 'USOCs' and 'FIDs,' the codes that Ameritech uses to identify services and features." In support of this statement, the DOJ cites the affidavit of Wayne Charity, ¶¶ 8-10, which is attached to LCI's Comments as Exhibit C. In that part of his affidavit, Mr. Charity claims that "[o]ne of the problems LCI has encountered has been Ameritech's refusal to provide LCI with up-to-date and accurate access to its Universal Service Order Codes ('USOCs')."

6. Ameritech has provided LCI (and other requesting carriers) with up-to-date and accurate access to USOC and FID information, and has done so in a variety of ways. For example, during October 1996, LCI received resale training on ordering and billing and was given copies of the AIIS Service Center's USOC and Field Identifier ("FID") guide books. FIDs modify the USOC and provide additional information, such as contract terms.

7. On April 4, 1997, Ameritech expanded online documentation to include ordering guides for unbundled network elements and resale services and other OSS information. The Resale Services Ordering Guide includes information on USOC, Class of Service, FID and/or other details necessary to provision customer orders accurately in all five states, and should be a CLEC's source for accurate and up-to-date product ordering information. LCI has had access to the AIIS website since November 1996.

8. Furthermore, a comprehensive User Documentation update process posted on our Reseller Website details the process that Ameritech has developed to ensure that the Resale Services Ordering Guide and all of our other documents reflect the most current and accurate data and USOC information, in parity with Ameritech's retail units.

9. On June 24, 1997, the reseller Website online documentation was expanded to include state-specific lists of all USOCs and associated English description.

10. LCI and other CLECs have been provided access, thus far without charge, to trained AIIS Service Representatives to assist in ordering and provisioning. AIIS Service Representatives will identify individual USOCs if a CLEC provides the description. In addition, Cathy Wyban, AIIS Service Manager, and I also provide LCI with information on specific USOCs anytime LCI requests assistance.

11. LCI has access to information to interpret CSR USOCs and FIDs as stated above. Moreover, during April 1997, a list of USOCs for Ameritech's products and services not available for resale was provided to Bill Jones, product development manager for LCI.

12. The Resale Services Ordering Guide combined with Retail and Resale tariffs provide CLECs with the information they need to provision services accurately. Although not required, Ameritech has provided supplemental data files, online documentation, and instruction to LCI and other CLECs to assist them in ordering and provisioning service. Separate data files are available that include information on USOCs, Class of Service, Central Office Feature Availability, Street Address Guide, and Ameritech products and services not available for resale. LCI has received copies of all these files. An augmented USOC file exists for Illinois USOCs, and expansion of the Illinois file as well as coverage for Ameritech's other four states is planned

to be up on the Website later this year. This augmented USOC file compiles previously available information into a single database. Additionally, AIIS provides extensive online documentation for ordering unbundled network element and resale services as well as an electronic services ordering guide. Personal instruction is also available, as part of a formalized training program as well as from individual AIIS employees.

13. In addition to this ordering and provisioning documentation that we provide to requesting carriers (including LCI), we routinely meet with carriers and share information that may be useful to them in their interactions with AIIS. For example, in September 1996, AIIS arranged and hosted LCI employees Bill Jones, Forest Lucas, Beth Rausch, and Gary Carter during their visit to AIIS' Service Center in Milwaukee, Wisconsin. We gave these LCI employees a tour of the Service Center and demonstrated how LCI's orders would be processed in an EDI environment. Resale service ordering and provisioning procedures were also reviewed, and Dennis Dallmann, an Ameritech employee from the AIIS Repair and Maintenance Center, gave these LCI employees a presentation on reseller repair and maintenance procedures.

14. In early October 1996, we conducted a three-day reseller training session for LCI's employees at LCI's Dublin, Ohio location. The training included an overview of basic telephony, resale products and services, resale ordering, provisioning and billing procedures, and resale maintenance and repair procedures. Each LCI employee who attended this training was given a full set of training materials, including the documentation noted in paragraph 6.

15. In mid-January 1997, LCI employees Bill Jones, Tracy Strombotne, Jim Taylor, and Beth Rausch attended an EDI seminar sponsored by AIIS in Chicago. These LCI employees were introduced to Rick Dishman, AIIS' EDI Implementation Manager for LCI. Since that

time, I understand that Mr. Dishman has had numerous conference calls and meetings with LCI to assist LCI in its efforts to complete electronic bonding with the AIIS Resale Service Center.

16. Also, in early May 1997, we hosted LCI employees Ron Osgood and Jim Taylor (and LCI's Attorney Gene Cohen) at an OSS presentation and tour of the AIIS Resale Service Center. During that session, we conducted demonstrations of live orders being processed, and Mr. Dishman provided these LCI employees with an on-line demonstration of the EDI pre-ordering procedures. Mr. Dishman subsequently established weekly conference calls with Mr. Osgood to assist LCI in establishing its electronic bonding capability.

17. In short: Ameritech has gone the "extra mile" in providing LCI (and all other requesting carriers) with the written documentation, information, training, and support that enable them to have a meaningful opportunity to compete in the local exchange markets in the Ameritech region.

18. This concludes my affidavit.