have been involved in this litigation process from the outset and I can say, speaking for myself and the people on my staff, that even though our workday activities have been scrutinized in the most minute detail in these proceedings, we are not professional witnesses. We are employees doing our jobs, which are to maintain and improve Ameritech's OSS and the interfaces providing access thereto.

12. The comments from the CLECs attempt to "nit-pick" every conceivable flaw in Ameritech's OSS systems. They studiously ignore, however, all of the progress which has been made to date; the procedures which Ameritech has put into place to identify and resolve systems issues on an ongoing basis; and the role which the CLECs' own decisions have played as to when and how to access these systems. I have conceded the existence of minor problems and "bugs", which occur in any major information system whether new or existing. Any problems that were potentially service-affecting have been identified and resolved. None of these problems, moreover, were of a magnitude that would prevent a finding of operational readiness. Most importantly, in pressing their complaints, AT&T and other Ameritech competitors studiously ignore their own ever-increasing use of Ameritech's OSS to successfully serve end-users, as well as the processes and procedures that Ameritech has put in place to promptly address and resolve OSS-related problems as they arise. The litany of complaints trotted out by the CLECs is plainly litigation posturing, not a balanced view of OSS operational readiness.

13. AT&T, for example, never mentions that its ability to successfully process orders has dramatically improved over the first four months of 1977. AT&T never mentions the efforts which Ameritech has made to resolve system issues, such as the work-arounds which Ameritech has implemented -- at its expense -- to solve problems in AT&T's systems. AT&T nowhere

explains how it was able to enter the local marketplace in Michigan and Illinois last March and has been rapidly expanding its presence in those marketplaces since that time. If Ameritech's OSS systems were as unreliable and dysfunctional as AT&T claims now, AT&T's marketplace success (and the marketplace success of other carriers) would not be possible.

14. A telling example of AT&T's litigation strategy involves its claims regarding the potential for "double-billing". Contrary to AT&T's arguments, Ameritech is diligently attempting to identify those AT&T customers who may have been subjected to double-billing, so that bill credits can be issued. In marked contrast to the inflexibility with which AT&T approaches the double-billing problems in its comments, its operations personnel suggested a wait-and-see approach in which credits would be issued only if customers complained.

15. In an attempt to avoid the appearance that it is nit-picking, AT&T identifies two major themes in its materials criticizing Ameritech's OSS. These two themes are, first, a fundamental disconnect between the interfaces and Ameritech's back-end "legacy systems," and second, Ameritech's reliance on manual review. (Connolly Aff., ¶ 16; Bryant Aff., ¶¶ 7, 68). Neither of these themes is credibly supported. The first is based on just one example (*i.e.*, double billing) in which procedures associated with the processing of certain types of orders in the legacy systems led to a temporary problem -- not a systems problem -- that affected CLECs to a greater extent than it affected Ameritech retail. That problem, moreover, has been resolved, as the Illinois 6/20 HEPO correctly recognizes. It is quite a stretch for Mr. Connolly to point to this one situation and claim that the linkage between Ameritech's interfaces and its legacy systems is generally unsound. The second theme, finding fault with manual intervention,

has been rejected by state regulators and called into question by the DOJ, as I discuss below in connection with the ordering function.

16. Ameritech's obligation under this Commission's rules and regulations is to provide access to its OSS functionalities and to publish the interface specifications required to permit such access. Nowhere do these rules and regulations refer to "legacy systems." It appears that AT&T has identified the legacy systems as a fruitful area of potential ammunition for delaying Ameritech's receipt of interLATA relief. This isn't surprising, Ameritech's legacy systems, like the legacy systems of all of the RBOCs, are not entirely comprised of the latest technology. But, when problems are identified -- as in the case of double-billing -- appropriate modifications to these systems are made; in fact, even in the absence of any problems, there undoubtably will be modifications and upgrades to these systems that will benefit both Ameritech and all of the CLECs.2/

17. MCI is equally vehement in its opposition to OSS readiness -- with even less substance to support its position. Notably, most of MCI's complaints are based on AT&T's testimony or relate to interfaces that MCI does not yet use. For example, MCI contends that the electronic ASR interface for unbundled loops is inadequate (King Aff., ¶¶ 123-24) even though MCI is not yet ordering unbundled loops and has not even begun to test the interface. In contrast, CLECs that do use it -- CCT and MFS -- have indicated that it works well.

2/ Contrary to AT&T's characterization, however, this does not mean that CLECs must "grapple with more than 70 Ameritech 'legacy systems.'" (Connolly Aff., ¶ 19). Because CLECs access the legacy systems through interfaces, the only systems they deal with directly are their own systems and the interfaces. In many ways their use of OSS functions is far simpler than Ameritech's own.

Successful use of this interface by existing CLECs provides far more relevant information than speculative complaints by potential users.

18. Sprint's litigation position is even more disingenuous. At the same time that it complains that it must have electronic interfaces now and that Ameritech's are not acceptable (Reeves Aff., ¶¶ 5-24), Sprint has taken the position nationally that it will not implement any electronic interfaces until industry-wide standard-setting bodies have completed their work and all incumbent LECs agree to adhere to the standards developed by those bodies. In fact, Sprint has acknowledged that it sought and obtained the right to preserve manual processing for all OSS functions in its arbitration proceedings. Since national standards for all existing local services and products are not yet available and any new standards will require substantial implementation work after their issuance, Sprint is no position to complain that Ameritech's current interface systems are inadequate. Indeed Sprint's arguments have been rejected by the MPSC, the Illinois 6/20 HEPO, and this Commission.3/

B. Interface Specifications and Issue 7.0

19. None of the parties opposing Ameritech's application in this docket contests that Ameritech has provided CLECs with the technical specifications they need to "build to" the OSS interfaces, as required by the Second Order on Reconsideration in CC Docket 96-98. Ameritech's ordering guides for resold services and unbundled network elements are addressed

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3/ On December 13, 1996, this Commission rejected Sprint's request that it delay the OSS compliance date of January 1, 1997 and require the industry to adopt and implement national standards for access to OSS functions. (Second Order on Reconsideration, ¶¶ 3, 14). This Commission found that it was "apparent from arbitration agreements and ex parte submissions that access to OSS functions can be provided without national standards," and that requiring such standards up front "would significantly and needlessly delay competitive entry." (Id., ¶ 13).

in Mr. Mickens' and my initial affidavits. OSS documentation and support also is discussed in the reply affidavits of Messrs. O'Sullivan, Murray, Monti, Larsen and the joint reply affidavits of Messrs. and Mme. Heltsley/Larsen/Hollis.

20. Borrowing a page from Sprint, MCI argues that interLATA relief is inappropriate until national standards are established. (King Aff., ¶ 22). This argument should be rejected for the same reasons outlined above. MCI goes even further, however, insisting that Ameritech should design and provide CLECs with pull-down on-screen menus for using the interfaces. (King Aff., ¶ 27). Ameritech is not required to "build to" its own interfaces. The CLECs have the responsibility/freedom to do that in whatever manner suits their needs. Ameritech has provided them with a logical mapping guide (King Aff., ¶ 38), which is meant to serve as an example of one way of connecting back-end systems to the interface.

21. Several of the CLECs criticize the ASR ordering/provisioning interface as non-standard. (Brooks Comments, p. 18; MCI Comments, p. 22 and n. 22; King Aff., ¶ 32; Reeves Aff., ¶ 20). As I explained in my initial affidavit (¶¶ 9-10), this is hindsight at best; when Ameritech implemented the ASR interface, there was no industry standard alternative. The MPSC and the Illinois HEPO both rejected arguments that Ameritech fails the checklist for not having anticipated where standards were headed. Issue 7.0 was not even approved by TCIF until June 1, 1997. Moreover, Ameritech has started to migrate to Issue 7.0, which provides for loop ordering via EDI.

22. MCI suggests (King Aff., ¶ 128) that Ameritech should have acted sooner, given that Issue 7.0 was put out for comment in February 1997, even though the balloting on its adoption was not held until four months later. I disagree. During that comment period, Issue

7.0 was subject to change based on suggestions from the industry; and TCIF did receive comments from the industry, which resulted in numerous changes to the original proposal.

23. Sprint points out that Ameritech voted against adoption of Issue 7.0. (Reeves Aff., ¶ 21). This has no bearing on our commitment to implement Issue 7.0 now that it has been adopted.

24. The process of implementing Issue 7.0 is not perfunctory. There are various issues to be worked out, including whether the interface will allow for combined loop/interim number portability ("INP") orders. In broader terms, some carriers have made significant investments building to prior interface specifications; the Issue 7.0 implementation process has to balance their interests with those of carriers starting fresh.

25. Attached as Schedule 2 are the minutes from the June 23, 1997 Ameritech EDI Service Ordering User Group Meeting which addressed the implementation of Issue 7.0. The participants included: five representatives from AT&T, six representatives from MCI, two representatives from Sprint, two representatives from WorldCom and one representative from LCI. At that meeting, Ameritech distributed a proposed EDI mapping for a new unbundled loop order. Ameritech explained that using this proposed mapping, unbundled loops could be provided as an enhancement to its current interface in a way that would not require significant changes. EDI mapping for interim number portability was also distributed. It was agreed that the carriers would provide business scenarios (*e.g.*, orders for loop/INP combinations) to which Ameritech would reply with transaction flows at the next scheduled meeting on July 15, 1997. The carriers also agreed to supply comments on the proposed EDI mapping for unbundled loops and INP. The parties also agreed to a timeline. EDI ordering for unbundled loops is targeted

for December 1997 based on the assumption that the requirements for these orders will be resolved by August 1, 1997.

C. Operational Readiness

26. In my initial affidavit, I showed that Ameritech's OSS interfaces are operationally ready based on the internal testing, carrier-to-carrier testing and/or actual use they have undergone. All of the interfaces are up and running. Hundreds or, increasingly, thousands of orders are processed every day. The problems that have arisen have been resolved. In their reply affidavits, Messrs. Gates and Thomas also respond to operational readiness issues and, based on their independent assessment of additional operating data for the months of May and June, reaffirm their earlier finding that Ameritech's OSS is operationally ready. Their discussion of these issues should be read in conjunction with mine.

27. Faced with this evidence, the CLECs argue that, to meet the checklist, all interface functions and sub-functions must be in actual use, even those that have not been requested. (Connolly Aff., ¶ 61; MCI Comments, pp. 14, 22). They insist that every conceivable problem be identified and solved and the solution verified. (AT&T Comments, p. 26; Connolly Aff., ¶¶ 107-11, 127, 226; King Aff., ¶ 102). They even argue that interLATA relief should be withheld -- for some undefined period -- to ensure that Ameritech has an incentive to cooperate. (AT&T Comments, p. 26; Reeves Aff., ¶ 17; King Aff., ¶ 60). The unreasonableness of the CLEC's position is perhaps best illustrated by TCG's assertion that "The perfection of electronic interfaces is a necessary prerequisite . . . . These electronic interfaces must be shown to be failure proof." (TCG Comments, p. 12). Such extreme standards already have been rejected by the MPSC and the Illinois 6/20 HEPO, and should be rejected here.

1. Preordering

28. In my initial affidavit (at ¶¶ 25-26), I explained that the preordering interface has been internally tested, carrier-to-carrier tested with USN and MFS, and is in actual use -- for CSR retrieval -- by USN. MFS still considers itself to be in the test phase, although they are sending numerous CSR requests, which are identical to "production" requests, in that they access our production customer information database. Another CLEC, MidCom, also has established on-line linkage, and is accessing CSRs.

29. Use of the CSR sub-function during June 1997 is shown on the chart below:

Week ending	USN	MFS	MidComm
June 7	XXX	XXX	XXX
June 14	XXX	XXX	XXX
June 20	XXX	XXX	XXX
June 27	XXX	XXX	XXX

30. MCI and Sprint point out that no CLECs currently are using the telephone number and due date sub-functions. (Sprint Comments, p. 21; Reeves Aff., ¶ 8; King Aff., ¶ 66). However, this is purely the CLEC choice, and several CLECs have in fact tested those sub-functions.

31. MCI states that Ameritech has agreed to provide a sixth preordering function, which is available primary interexchange carrier ("PIC") inquiry. (King Aff., ¶ 61). In fact, Ameritech already provides this function as part of the feature availability file. (Electronic Service Ordering Guide, Version 3.3, pp. 3-6, 3-13).

32. MCI also insists (King Aff., ¶ 61) that Ameritech provide, as preordering functions, block direct inward dial (DID) number inquiry and DID trunk inquiry. These

functions are available, but the inquiries are handled manually — via phone calls. The same process is used for both resale and retail so equivalent access is being provided to CLECs.

33. AT&T and MCI object to Ameritech's use of Enterprise Application Protocol ("EAP") as a method of accessing and transporting EDI messages. (Connolly Aff., ¶ 201; King Aff., ¶¶ 64-65). This is a very simple application constituting a minor part of the EDI interface. It involves just four commands: log in, send, receive, and log out. When Ameritech implemented EAP, there was no industry standard alternative. Ameritech will, however, transition to the industry standard that is ultimately implemented.

34. MCI contends that only six users can access the preordering interface at once, and that the legacy systems can only handle eight simultaneous transactions. (King Aff., ¶ 69). This is incorrect. The number of users who can access the interface is not limited to six, although response times have been shown to deteriorate if more than six users send transactions through a single "server." Ameritech has addressed this issue in two ways. First, we are fine-tuning our existing server with the help of our hardware manufacturer and software vendor, which may double its current capacity. Second, a back-up server will be installed this month. Similarly, MCI cites no support for its contention that the legacy systems themselves can only handle eight simultaneous transactions. We investigated this issue and found it to be groundless.

35. Sprint and others claim that USN's use of the CSR functionality is inadequate for checklist purposes because USN does not use it when the customer is on the line. (Reeves Aff., ¶ 7; Connolly Aff., ¶ 215). As I pointed out in my initial affidavit -- which Sprint completely ignores -- and as the Illinois Hearing Examiner properly found, this is irrelevant, because the functionality is the same regardless of whether the end-user is on-line or off-line. Sprint also

claims (Reeves Aff., ¶ 7) that Ameritech agreed to a 6 second response interval for preordering and is not performing to that standard. This statement is factually incorrect. Ameritech never accepted Sprint's standard and the response times currently being achieved are commercially reasonable.

36. AT&T raises concerns about the street address guide, which currently is available via File Transfer. (Connolly Aff., ¶ 208). Attached as Schedule 3 is Ameritech's Public Notice of Network Change Under Rule 51.329(a) of the FCC's Rules, announcing that access to an on-line, real-time version of the street address guide will be provided in October 1997. This functionality will be described in detail in the next update to the ESO Guide, due out at the end of this month.

2. Ordering

a. Manual Review

37. AT&T and MCI claim that manual processing slows down processing, increases the potential for error, and negatively impacts manual capacity. (AT&T Comments, p. 24; Connolly Aff., ¶¶ 134-38; Bryant Aff., ¶¶ 140-46; MCI Comments, p. 21; King Aff., ¶¶ 79-91). These parties have been making these arguments since the outset of state regulatory proceedings. They criticize manual processing in all its applications; essentially their position is that access to OSS must be seamlessly electronic. This position has been rejected by the MPSC, the Illinois 6/20 HEPO and the DOJ.

38. Getting away from the extreme notion that manual processing is inherently bad, the CLECs' arguments in this area reduce to a list of specific complaints, none of which undermines operational readiness. As Messrs. Gates and Thomas show in their reply affidavit,

the key facts are that Ameritech has been able to successfully process thousands of CLEC orders, even as the frequency and number of CLEC orders continues to dramatically increase.

39. In a recent three day period, AT&T sent XXX orders with little or no advance notification. These orders came in from Wednesday, June 25, 1997 to Friday, June 27, 1997, just before the weekend on which Ameritech had announced, well in advance, that there was scheduled to be a software upgrade which would take the system down for somewhat more than one day. All of the orders were to add a speed dialing feature to existing accounts. Despite the lack of reasonable advance notice and the system upgrade over the weekend, which shut down the system from Friday evening to Monday morning, Ameritech processed all these orders without significant problems.

40. AT&T makes the assertion that Ameritech is dropping all 860 transactions to manual processing. (Connolly Aff., ¶ 128). While correct, this assertion is beside the point, as retail 860 transactions receive the same treatment. Moreover, 860s do not constitute a large percentage of the orders that Ameritech receives across the EDI interface. Indeed, the total number of 860s received between January 1, 1997 and June 27, 1997 is 1,392, constituting a trivial percentage of the total orders received of approximately 100,000. Thus, the manual processing of these orders does not make significant demands on Ameritech's manual capacity.

41. AT&T also points out that orders for new service are dropping to manual processing. (Connolly Aff., ¶ 129). Again, while correct, this assertion is beside the point. Like 860s, the new service orders ("N-orders") do not comprise a large percentage of total orders. Nonetheless, Ameritech does have plans to flow these orders through on a fully electronic basis. We expect to implement that change later this year.

42. AT&T contends that manual intervention is being caused by CSR time-outs. (Connolly Aff., ¶¶ 130-31). In fact, however, this was a situation that existed in January and February of 1997 and has not recurred since. A report that we ran on June 27, 1997 of all the CSR time-outs from January 1 to June 30, 1997, shows that the total number of CSR time-outs was 52, and, of those, 9 occurred in January 1997 and 43 occurred in February 1997.

43. AT&T is especially critical of orders that fall into "1P" status. (Connolly Aff., ¶¶ 122-27). As I explained in my initial affidavit, 1P status involves "back-end" system edits that permit orders to be processed properly, and these corrections generally are simple and quick. AT&T also contends that 1P status only affects CLEC orders and not retail orders. This is an inapt comparison. The fact is that retail orders do not fall into 1P status because the same adjustments to orders which occur during 1P status for CLEC orders are made to retail orders during the order entry process. In other words, the same flaws that cause CLEC orders to drop into 1P status prevent retail orders from being entered at all. Although performed at the front-end. The necessary adjustments to retail orders and the time it takes to make them are similar if not identical to what is involved in clearing 1P status for CLEC orders.

44. AT&T asserts that the level of manual intervention to which retail orders are subjected is so limited that Ameritech does not even track it. (Connolly Aff., ¶ 78). In support of this contention, AT&T cites to Ameritech Illinois' response to a data request in the Illinois checklist compliance docket, in which the following statement appears:

> Ameritech Illinois does not track and report the number of [retail] orders that were rejected or that required manual intervention (after the point of initial entry) for completion of the order.

This statement does not say that the rate of manual intervention is so low that it is not tracked; it just says that manual intervention is not tracked. The reasons for this are simple. Ameritech enters retail orders directly into the legacy systems. As I explained in my initial affidavit, the legacy systems are carrier blind; the rates of manual intervention -- for all orders -- in those systems are shown on Schedule 9 to my initial affidavit.

45. AT&T and MCI contend that Ameritech should be willing to discuss which orders are being manually reviewed and why on an order-by-order basis. (Bryant Aff., ¶ 130). Ameritech has, in fact, been providing AT&T with weekly summary information on manually reviewed orders for over six months. Ameritech also holds daily conference calls with AT&T regarding AT&T's orders; if a particular type of order is triggering manual review on a regular basis, that is discussed on the conference call. However, as daily order volumes increase, it is unreasonable to expect Ameritech to generate explanatory data for each and every manually reviewed order.

46. AT&T witness Bryant states that Ameritech changed the format of its order status reports in order to hide the level of manual review. (Bryant Aff., ¶ 129). This is untrue. The change in the format of the report was based on AT&T and Ameritech agreeing to reports which could be communicated electronically in spreadsheet format so as to avoid the manual faxing process. I would point out that attachment 39 to Ms. Bryant's affidavit, which is an excerpt from one of these reports, shows that the report is 342 pages long.

47. AT&T insists that change orders and listing changes should not be dropped to manual review. (Connolly Aff., ¶ 133). The situation is not as simple as AT&T would suggest.

Listing changes are processed manually because they often involve customer preferences — for example, caption listing, indented listings, and things of that nature. (Connolly Aff., p. 65)

b. Order Rejections

48. It is important to understand that there is nothing wrong *per se* with the fact that CLEC orders are rejected. Order rejection is a routine and expected part of the ordering process which serves the interest of both the CLEC and Ameritech. Accurate order entry data is necessary for Ameritech's back-end legacy systems to successful process the order. It is far more efficient for the order to be returned immediately to the CLEC for correction, than for it to be rejected later in the order processing stream. It is also in the CLEC's interest to ensure that all customer data is accurate so that its end users obtain the service they request in a timely manner.

49. More so than any other cause, the order rejection rate experienced by a CLEC depends on the quality of the order information which it sends to Ameritech - not on what Ameritech does with that information. Invalid CLEC orders can have two sources: (1) systematic problems in the CLEC's order generation systems which misformat data or otherwise do not generate the information which is required by Ameritech's ordering system; or (2) human error. AT&T was experiencing high rates of order rejection in December and January due to both factors. For example, the largest number of rejected AT&T orders in this time frame resulted from the fact that AT&T's system did not assign a new order number to resubmitted orders; Ameritech eventually resolved this problem, as I described in my original affidavit, by modifying its systems to accept the numbering convention preferred by AT&T. This was an AT&T system design problem. Other AT&T orders were rejected because they involved

accounts that were already AT&T accounts or because they contained inaccurate phone numbers, area codes, PIC codes, addresses and other customer-specific information. This presumably reflected human error at the service representative level.

50. One would expect these kinds of errors to decline over time and they have. Systems conflicts are reduced as either a CLEC or Ameritech implements "fixes" or "work-arounds" to address them and service representative error declines as CLEC personnel become more familiar with the required procedures. These factors undoubtedly explain the improvement in AT&T's order experience from January through April. However, as new CLECs continue to implement these systems, overall error rates may potentially rise on a temporary basis as those CLECs progress through the learning curve process. And, of course, human error can never be totally eliminated.

51. Accordingly, this Commission should not draw any conclusions about the operational readiness of Ameritech's OSS systems based on a bare analysis of the rejection rates themselves. The important question is why orders are being rejected. If Ameritech systems are rejecting otherwise valid CLEC orders on a large scale, that would clearly raise questions about the operational readiness of its interfaces. This has not happened. If, on the other hand, CLEC orders are being rejected because there are systems conflicts (because the CLEC misdesigned its systems or for other reasons) or because the CLEC's service representatives are making mistakes, then even a high rejection rate would not signify lack of operational readiness on the part of Ameritech. As I showed in my original affidavit, the overall rejection rates being experienced by carriers like AT&T are declining and as the Illinois 6/20 HEPO concludes, are

at reasonable levels. Orders are being rejected for reasons that are CLEC-related, not Ameritech-related.

52. It is also inappropriate to assume that the Commission can or should establish standards to measure whether parity exists between the order rejection rates experienced by Ameritech internally and a CLEC. Ameritech has not designed separate order entry systems for itself to interface with its legacy systems. Furthermore, Ameritech's internal systems have editing processes built into them that ensure that orders cannot be sent to "downstream" systems until the data is correct. There is no "rejection" per se -- an order simply cannot be released until the service representative has completed it correctly. Although this is the functional equivalent of the order rejection process used for the CLECs, Ameritech systems do not generate data that could be compared to the CLEC order input experience. Moreover, to the extent that Ameritech Illinois' service representatives are more experienced or better trained, they will make fewer errors on their orders. This has nothing to do with the operational readiness of the systems.

53. Generally, as I explained in my initial affidavit (¶¶ 62-71), the reject rate depends on the content of the orders coming across the interface, which Ameritech does not control. Moreover, there is going to be a learning curve for every CLEC. Understanding that fact, Ameritech has made every effort to provide extensive and easily-understood OSS documentation and support. That said, when erroneous orders are received, they can be and have been corrected. But this has nothing to do with whether the interface, as a system, is operational, stable or reliable.

54. AT&T has conceded that the large number of LPIC reject errors AT&T has experienced are due to AT&T's manual process for confirming that central offices in Michigan support intraLATA toll subscription ("2PIC"). Where 2PIC is not supported in a central office, orders that have LPIC information are automatically rejected.

55. In my opinion, the LPIC/2PIC issue represents an ideological spat between Ameritech Illinois and AT&T that had no systems implications whatsoever. When a CLEC submits an order for a new customer, the order must include a designation of the interLATA PIC carrier and the local/intraLATA PIC (LPIC) carrier. In those areas where 2-PIC is not available, by definition, Ameritech is the LPIC. Although 2-PIC has been implemented throughout Illinois as a result of this Commission's Customers First order, the same situation does not apply in Michigan. The 2-PIC issue has been hotly contested in Michigan and the IXCs have been very vocal in their dissatisfaction with the pace of 2-PIC implementation. In any event, today, in Michigan exchanges where 2-PIC does not yet exist, Ameritech Michigan must be designated the LPIC on the CLEC order -- there is no other lawful carrier.

56. Nevertheless, when AT&T submitted resale orders in those Michigan exchanges it refused to designate Ameritech as the LPIC. AT&T claimed that it should be designated as the LPIC because Ameritech is obligated to resell its intraLATA toll service. Ameritech Michigan explained to AT&T that, even in the case of resale, the underlying carrier must be listed as the LPIC -- not the resale carrier -- to properly direct toll traffic to the appropriate carrier and to properly bill for the calls. This is true for all resale situations, both interLATA and intraLATA, regardless of who the resale and underlying carriers are. Undaunted by these network realities, AT&T still persisted in designating itself as the LPIC. Ameritech was finally

forced to modify its system to automatically list Ameritech Michigan as the LPIC in those cases where AT&T placed an order for a customer in an area where 2-PIC is not available and refused to designate Ameritech Michigan as the LPIC carrier.

57. AT&T states that, when it entered the market in Michigan, Ameritech failed to advise it that 30% of its switches were not programmed to allow for any intraLATA carrier other than Ameritech. (Bryant Aff., ¶ 170). It is inconceivable, however, that AT&T, the largest interexchange carrier in the nation, did not know that Michigan was not fully converted to provide intraLATA toll. This information is public knowledge from an industry perspective. In fact, it was well publicized that Ameritech paid fines for this reason. Meanwhile, AT&T continued to issue orders with invalid LPIC information. When told the correct way to identify Ameritech as the LPIC, AT&T refused — causing additional orders to reject.

c. Miscellaneous Issues

58. MCI objects to the fact that error messages only disclose one error per order (King Aff., ¶ 144). Until recently, MCI's description was correct. However, in response to CLEC concerns, Ameritech tested, starting on June 2, 1997, and implemented, on June 30, 1997, a new systems release that identifies numerous errors: up to ten errors per "header" in the order and, in addition, up to ten errors per telephone number in the order.

59. MCI contends that, for a number of its "migration" orders, Ameritech unexplainably added or dropped certain features on the customers' accounts. (King Aff., ¶ 105-06). However, Ameritech explained that resale accounts migrated through a CLEC may include services that are not subject to resale, such as voicemail; since they cannot be migrated "as is" they are dropped from the account. On the other hand, some services must be subscribed even

if not ordered by the CLEC, such as touchtone service. These services are added in the ordering process. Therefore, the additional loss of features is an expected part of the process-not a system error.

60. AT&T states that Ameritech's service representatives had manually added the second USOC necessary for ordering Caller ID With Name. According to AT&T, Ameritech then suddenly and without advance notice began issuing 855 rejection notices for orders lacking the second USOC. (Bryant Aff., ¶ 158). This is not what happened. In fact, Ameritech was requested by AT&T to begin rejecting these orders to insure that AT&T service representatives would be trained correctly with respect to ordering Caller ID With Name.

61. AT&T's assertion that 96% of its orders sent to actual market entry have been migration or change orders (Bryant Aff., ¶ 65) which involve a mere record change is misleading. Over 90% of all of AT&T's orders have been "assume as specified" orders. Such orders include changes in features and/or PIC/LPIC, which are more than mere record changes. Simple "assume as is" orders are a very low percentage of AT&T service orders processed to date (< 5%).

62. AT&T states that its order volume, for the most part, has increased steadily in April and May rather than fluctuated widely. (Bryant Aff., p. 48). Attached as Schedule 4 hereto is a chart identifying AT&T's order volumes by day from 4/1/97 to 6/16/97. The data refute AT&T's claim.

63. AT&T states that it notified Ameritech on April 28, 1997 that it was submitting 3,770 orders. (Bryant Aff., ¶ 100). This notification occurred after 7:00 p.m. on the evening

before the orders were sent to Ameritech. That is hardly notification such that Ameritech could easily prepare to deal with this volume in such a short time frame.

64. AT&T discusses the fact that some orders which are originally classified as rejected are later classified as completed. (Bryant Aff., ¶ 151). The report that is being referenced reflects the status of an order in the database in the time that the report is generated. Generally, the status does not change if an order has been rejected. However, there have been several occasions where Ameritech has "re-flowed orders" either to accommodate AT&T or where a scenario existed whereby we rejected an order in error. In all cases, we worked with AT&T to determine whether they would like to resubmit the order, or have them re-flowed. The "issue" raised by AT&T is merely a case where the order has been re-flowed, and causes a change in the database (because the purchase order number stays the same).

65. AT&T and others make an issue out of the fact that there were various trouble logs with which I was not thoroughly familiar at the time of regulatory proceedings in Wisconsin. (Connolly Aff., ¶¶ 90, 112). As AT&T points out, there are a large number of these logs. Their purpose is for the persons in my IT department to keep track of any and all issues and potential issues in their areas of responsibility. While I do not necessarily read every piece of paper that my IT department generates, I do keep abreast of issues. When issues are escalated to me it is done in the form of oral reports, meetings, memos, e-mails, and phone messages. Occasionally, as AT&T points out, the severity of a given problem may not be accurately reflected in one or another of these logs. This does not indicate a lack of attention or appreciation by my personnel of the problems that could affect the customers of CLECs. On the contrary, at the time these log entries are made the facts are not always completely known

and the impact of these facts may not have been discerned. The truth is that these logs are nothing but a red herring. The real issue is that when significant problems are identified, whether by Ameritech personnel, or the personnel employed by the CLECs, those problems are addressed and resolved, including all the problems that were identified during the Wisconsin proceedings based on log entries. Really, Ameritech should be given credit for keeping track of this important information.

66. MCI and others allege that the current experience with the EDI ordering interface does not provide assurance that the ordering process will go smoothly when the mix of orders coming from CLEC involves the more complex business services such as Centrex or ISDN. (King Aff., ¶¶ 114-18). Here again, however, they are overstating the case. These orders do not involve a different interface. The same EDI transactions will be used--850s for orders, 860s for changes to orders, 855s for order confirmations and 865s for order completions. The difference is simply a matter of putting in the appropriate USOCs. The ordering of these products is described in the ordering guides and mapping has been prepared for Centrex, although not for ISDN. We are, in fact, actively meeting with AT&T to ensure that they will be in a position to place orders for these services when they decide to do so.

67. MCI began EDI testing with Ameritech on June 13, 1997. This testing is being performed on the customer test system in preparation for the production 3.2 release implementation, scheduled for June 30, 1997. Ameritech has received all test orders and responded according to the MCI test plan. From our point of view, MCI is prepared to go to release 3.2 on June 30, 1997. Additional testing will be performed according to MCI's needs.

3. Provisioning

a. Firm Order Confirmations

68. AT&T complains about late firm order confirmations ("FOCs" or "855s"). (AT&T 25; Bryant Aff., 110-16). Messrs. Gates and Thomas respond in detail to AT&T's complaint in their joint reply affidavit. Gates/Thomas Reply Aff., ¶¶ 5, 56, Schedule 9.

b. Order Completion Notifications

69. AT&T and others complain about the timeliness of Ameritech's Order Completion Notifications ("865s"). These complaints lack merit and are in responded to in detail in Schedule 5 to my reply affidavit and in the joint reply affidavit of Messrs. Gates and Thomas. (¶¶ 57-63, Schedule 10).

70. MCI has reported 47 cases of late or no 865 order completion transactions. MCI classifies these cases as "late" because the due date is past and a completion transaction was not sent within 24 hours after the due date.

71. After investigating the orders within the Ameritech MOR-TEL system, it was found that 39 orders were in a completion status and the completion was sent to MCI. In 4 cases either a jeopardy or 855 order confirmation was sent indicating that the due date needed to be rescheduled because of customer not ready, no access, etc. 3 cases are in a pending status and had not been completed or placed in jeopardy. The last order was rejected. In all cases, with the exception of the 3 pending cases, a confirmation transaction was sent to MCI.

72. MCI has requested tracking numbers from a sample of the orders that have been confirmed, completed or in jeopardy. These have been supplied to MCI and are being investigated. The past due report is being used by the Service Center to insure that orders do

not go into a past due condition. My IT department is working daily with the MCI service representative reviewing this report.

73. We found that the Service Center was enter an incorrect order number in MOR-TEL. In several cases, the order number contained an alphabetic "O" instead of a numeric "0". This condition would stop an 865 completion notification because the SOD completion order number would not be found. The Service Center has taken training measures to correct this condition.

74. MCI raises the issue that the ASR provisioning interface for unbundled network elements lacks jeopardy notification and order completion notification. (MCI Comments, p. 21; King Aff., ¶ 135). These functionalities will be available for loops as a result of the implementation of Issue 7.0 of the TCIF customer service guidelines.

75. Attached as a Schedule 5 to my reply affidavit is a graph showing that the 865 problem has been eliminated.

c. 870 Jeopardy Transaction Issues

76. MCI has reported 15 cases where 870 jeopardy transactions have been received from Ameritech and the order due date is past. MCI is questioning if the order is still in jeopardy and if so, what will release it and allow the order to complete. MCI is concerned that if the order is not in a jeopardy state, the follow-up completion transaction was not received.

77. In 10 cases, the MOR-TEL system reflected that the order was in a completion state. However, of the 10 cases, 6 reflected that an 870 jeopardy was the last transaction sent to MCI. This is a known condition that has been reviewed with MCI. It caused by a timing issue in connection with the OSS. The order completion is received from SOD and the jeopardy

is generated by SAM. If a jeopardy is issued on the order and it still gets completed, it is possible for the SOD completion to be received before the SAM jeopardy. This will be resolved in the next release. No jeopardy will be sent if the order is in a completion state.

78. The remaining 4 cases have been responded to on June 20, 1997. In 3 of these cases, a jeopardy condition existed and needed to be confirmed to MCI. The other case reported completion to MCI.

4. Repair and Maintenance Issues

79. The information I presented in my initial affidavit (at ¶¶ 89-94) showed that the repair and maintenance interface is fully operational and provides the functionalities that CLECs need in order to maintain their customers' equipment. Messrs. Gates and Thomas reaffirm this fact in their joint reply affidavit, based on their independent analysis. (Gates/Thomas Reply Aff., ¶¶ 64-68, Schedule 11). The graphical user interface ("GUI") tool has now been installed on the premises of CCT, USN and Sprint. There are four core functionalities of the repair and maintenance interface as outlined on Schedule 3 to Mr. Meixner's initial affidavit. These include trouble report creation, trouble report information request, trouble report information update and proactive status notification. CCT has tested the interface by sending trouble tickets via the GUI Tool and has tested all four of these functionalities. Sprint will start submitting trouble tickets as of July 15, 1997. Another CLEC, the Millennium Group, has submitted an application to utilize the GUI Tool.

80. Mr. Connolly insists that the actual use of the T1M1 interface through the GUI Tool by Ameritech Pay Phone Services ("APPS") should not be considered as evidence of operational readiness based on what it describes as the lack of an arm's length relationship

between Ameritech and APPS. (Connolly Aff., ¶ 224). He never explains how this has anything to do with whether a computer-based system is operational. Moreover, he undercuts his own argument by making an issue out of alleged problems that APPS has had with the interface.

81. APPS's experience with the repair and maintenance interface shows that it works and that problems are few. APPS ran a total of 23,833 transactions in May 1997, including 2,609 trouble tickets with a success rate of 93.8%, 2,608 trouble report information requests with a success rate of 94.1%, 292 trouble report information updates with only 6 errors, and 18,324 proactive status notifications. In June 1997, there were a total of 23,024 transactions, including 2,579 trouble tickets with a success rate of 92.6%, 2,253 trouble report information requests with a success rate of 94.7%, 309 trouble report information updates with only 2 errors, and 17,883 proactive status notifications.

82. It is important to understand that the GUI tool is a new option which the company has made available to smaller CLECs. It is not an interface itself, rather, it is a tool which CLECs can use to access the T1M1 interface without fully deploying all of the systems which the IXCs have in place. The "problems" experienced by Ameritech's pay phone service unit, APPS, primarily involved the GUI Tool — not the T1M1 interface. That is why Ameritech did not offer the GUI to CCT until the "bugs" had been worked out. In effect, the pay phone organization performed "first customer" testing function for the GUI before it was offered to other CLEC users.

83. The GUI interface was originally developed for smaller IXCs to report access service troubles. Only minor, mostly cosmetic changes were required to adapt it to local service