

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(1) OSS timeliness (percentage of transactions completed on time for pre-ordering, ordering, maintenance/repair, and billing)	AT&T Agreement, § 10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. See Friduss Aff., ¶61 (citing, as important measures of pre-ordering timeliness, "Pre-order B Service Center Response Time" and "BOC (Response Time" for various items, and noting such measures are proposed by Ameritech); <i>id.</i> , (citing, as important measures of ordering timeliness, "Firm Order Response Time" (including FOCs jeopardy, rejection, and completion notices), noting that Firm Order Response Time measures provided by Ameritech). In addition, Ameritech's "OSS Functions Cycle Time" Report, which disaggregates cycle times for each interface, was appended to Mr. Friduss's affidavit as an exemplar.
(2) OSS reliability (percentage of failed transactions, incorrect responses, and unprovided transactions for pre-ordering, ordering, maintenance/repair, and billing)	AT&T Agreement, § 10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. See Friduss Aff., ¶62 (noting that "Order Reliability is measured by the accuracy of the service order" and stating that "typical ordering performance measures . . . include [FOC and order jeopardy, rejection, and completion notices]," as proposed by Ameritech). In addition, Ameritech's "OSS Platform Reliability" Report, which disaggregates the percentage of correctly processed transactions for each interface, was appended to Mr. Friduss's affidavit as an exemplar.
(3) OSS availability (percentage of time each interface is available)	AT&T Agreement, §10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. Mr. Friduss does not discuss OSS availability other than to note that "Pre-order OSS Availability Reports are offered by SBC, perhaps because the importance of OSS availability is salutary. See Friduss Aff. ¶61. Ameritech's "OSS Platform Availability Report, which disaggregates the percentage of availability time for each OSS interface, was appended to Mr. Friduss's affidavit as an exemplar.

UNBUNDLED LOOPS - REPEAT REPORTS

April - May 1997

		# Trouble Tkts	# Repeat Reports	% Repeats
April	IL	118	2	1.69%
	MI	<u>289</u>	<u>3</u>	1.04%
	Tot	407	5	1.23%
May	IL	143	0	0.00%
	MI	415	1	0.24%
	OH	<u>0</u>	<u>0</u>	0.00%
	Tot	558	1	0.18%

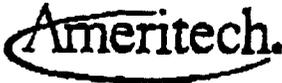
PROPRIETARY EXHIBIT

330 North Orleans
Floor 3
Chicago, IL 60654
Office 312/335-8828
Fax 312/527-3780

File

Neil E. Cox
President

*cc: John
Lorenson*



Sent via facsimile and U.S. Mail

June 25, 1997

Mr. William K. Ketchum
AT&T President - Central States
Regional Segment Organization
227 West Monroe Street - Suite 1300
Chicago, Illinois 60606

Dear Bill:

We have increased the number of employees in our Service Center twofold to meet your demands. However, if you wait until the July 4th Holiday to hit us, we will consider that hitting below the belt.

Sincerely,

Neil E. Cox

bcc: Casey Miller
Ted Edwards
Warren Mickens
Ray Thomas
Ed Wynn



June 23, 1997

Ed Cardella
AT&T
(Via FAX)

Several situations have come up in my service center recently that I want to bring to your attention in hopes that you will take some corrective action.

- * As we discussed on Friday, your service representatives are tying up my resources requesting status reports for accounts that we have already provided status on via an 855/865. I can provide you specific details on these requests if needed.
- * Next, your representatives are calling our Repair Bureau for status requests as well. Clearly, these calls should not be directed to the Repair Bureau. You are jamming our repair lines needlessly and callers with legitimate repair issues may not be able to get through because of this misuse.
- * Our center is also receiving requests from your reps for telephone number assignment. The agreement you signed with our company states that you would use the electronic pre-ordering interface to obtain telephone numbers.
- * On at least two occasions, our service reps have received calls from your reps, and when we answer, your people hang up. We checked the origin of these calls using caller ID and confirmed that they in fact came from an AT&T location.

My team wants to work with you to provide you the best possible service but I need your help. Based on our conference call Friday, you agreed to start using the 855/865 transactions to track the status of your orders in lieu of placing calls to my center. When will this begin? I will hold you to your word and will monitor calls to insure this is cared for.

Never call the repair bureau if you need status on an order. Please check for an 855/856 first. If for whatever reason you have not received notification, you can check status by either requesting a post-CSR, or by calling the service center.

As we discussed, the pre-ordering interface will allow you to access telephone numbers electronically, thereby eliminating the need to call our service center. You need to get up and running on this interface as soon as possible. I understood you to say that all testing would be completed and you would be ready to use this interface by October, 1997.

Last of all, can you shed any light on why your folks are hanging up when we answer? This is very frustrating and puzzling to me.

Please work with me on these issues so that both our teams can focus on more productive tasks. I can be reached at 227-2988 if you would like to discuss this further.

Sincerely,

Barbara Perschbacher
Staff Manager - Customer Service
414-227-2988

PROPRIETARY EXHIBIT

Information Industry Services
350 North Orleans Street
Floor 3
Chicago, IL 60654
Office 312/335-6532
Fax 312/335-2927

Warren L. Mickens
Vice President
Customer Operations



June 17, 1997

VIA FAX 810-204-0329 & US MAIL

Mr. William Riggan
Central Region Vice President
Teleport Communications Group
1000 Town Center, Suite 150
Southfield, Michigan 48075

Dear Bill

This letter is to confirm our understanding of the interconnection trunking matters that we discussed on June 6 and June 12, including those referenced in your May 9 letter to me.

With reference to your May 9 letter:

1. We agree that Local and Toll groups will be combined. Orders have been issued, the conversion will be coordinated so there is no service impact and the orders will complete between late June and August 1.
2. We are establishing Local and/or Toll trunk groups directly between Ameritech end offices and TCG. Because each company provides its own transport facilities for its trunks and as agreed, we will each install the trunk groups as two-way but they will carry traffic as one-way groups rather than in both directions. We will continue to work with you to address the administrative, engineering and capital expense allocation issues that prevent us from utilizing these as two-way groups at this time.

We have jointly identified many candidate offices for direct trunking. We anticipate implementing most of these groups. The groups will be prioritized based on traffic volumes, tandem service levels and the need for tandem relief.

3. We are getting mixed signals from TCG on the interconnection architecture. Both you and Tom Schroeder, TCG Director from Staten Island agreed to establish trunking from each of the TCG POIs to each of the Ameritech Tandems. We are in agreement with this network architecture.

However, Bob Nichols, also with TCG in New York, advocated staying with the existing architecture or as stated at the May 22 meeting, a new architecture which we do not do for ourselves. We need clarification on the TCG position.

If we use the architecture of establishing trunk groups from each tandem to each TCG POI, then Ameritech will be able to treat the TCG POIs as we do our own end offices.

Mr. William Riggan
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June 17, 1997

That is, the first choice route is via direct end office trunk groups - originating Ameritech end office to TCG POI; the second choice is from the originating Ameritech end office to terminating TCG POI's tandem to the TCG POI; the third choice is from the originating Ameritech office to the originating office's tandem to the terminating TCG POI; and the fourth choice is from the originating end office to the originating end office's tandem then on the intermachine group to the terminating TCG POI's tandem to the TCG POI.

We can also preplan emergency reroutes to handle network disasters and/or severe overloads. By establishing trunking from each TCG POI to each Ameritech tandem, we will have a full range of options for these disaster recovery preplans. These reroutes would be instituted under the direction of the Ameritech and TCG Network Management Centers to improve call completions.

4. Ameritech will provide TCG examples of specific trunk group data that can be used in the regular service meetings. We will provide you with this report by June 23.
5. Ameritech has planned the transmission facilities to the Plymouth and Troy TCG POIs. When these transport facilities are completed, trunks will be established and traffic routed to these POIs. The phases associated with this network rearrangement as well as the timeline were presented at the May 22 joint planning meeting.

Additionally, you have agreed to identify any specific blocking situations you have observed. As we discussed, our traffic data indicates that there is no blocking of TCG traffic at this time.

As in the past, we look forward to furthering our relationship through continued joint planning sessions.

Sincerely,



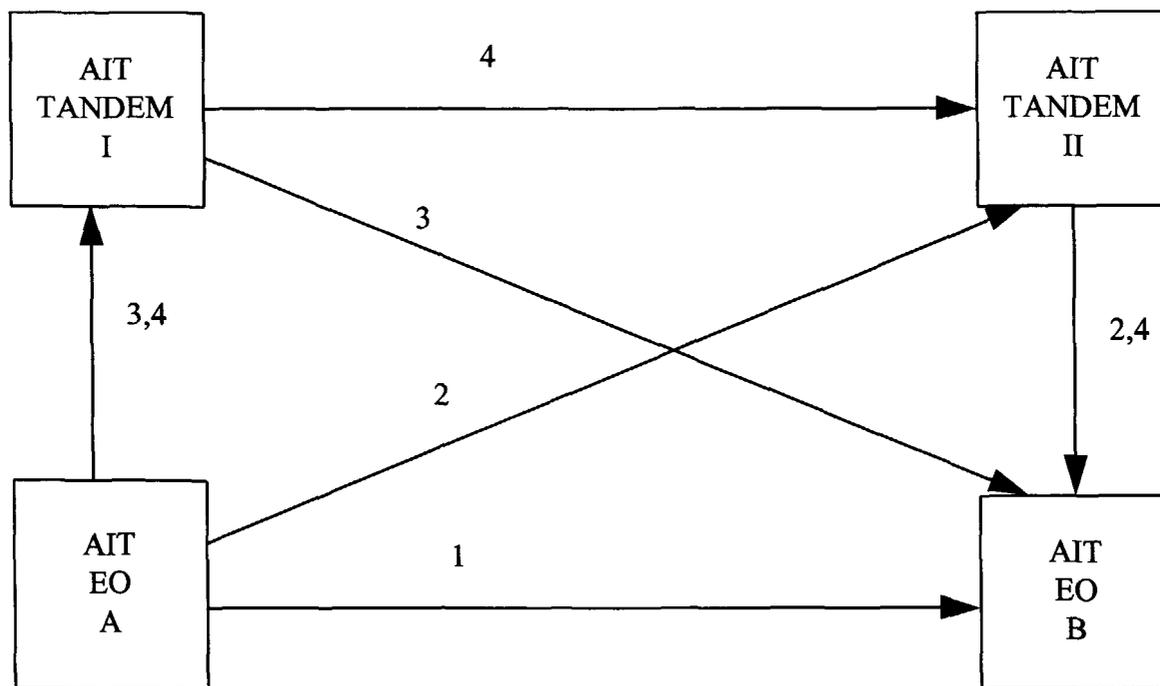
Warren L. Mickens
Vice President
Customer Operations

bcc: Jim Smith
Ray Thomas
Paul Monti
Sue West

PROPRIETARY EXHIBIT

EXHIBIT:

SYMPLIFIED TYPICAL MULTI ALTERNATE ROUTING ARRANGEMENT



PROPRIETARY EXHIBIT



PROPRIETARY EXHIBIT



**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On its Own Motion)	
)	
Investigation concerning Illinois Bell Telephone)	No. 96-0404
Company's compliance with Section 271(c) of)	
the Telecommunications Act of 1996)	

**INITIAL BRIEF OF TELEPORT COMMUNICATIONS GROUP INC.
ON REOPENED PROCEEDING**

Teleport Communications Group Inc. ("TCG"), on behalf of its Illinois operating affiliates, TCG Illinois, TCG Chicago and TCG St. Louis, hereby submits its Initial Brief in the reopened phase of this proceeding.

I. INTRODUCTION

This docket was initiated by the Commission on August 26, 1996 to develop information necessary for the Commission to meet its responsibility under Section 271 of the federal Telecommunications Act of 1996 ("federal Act") to provide comments to the FCC in the event that Ameritech Illinois ("Ameritech") files a request for approval of in-region interLATA service. During the next few months, a mammoth record was developed, as several rounds of testimony were offered, witnesses were cross examined and briefs were filed. After considering that record, the Hearing Examiner issued a proposed order finding that Ameritech had not met its burden under the federal Act. He found that Ameritech had failed to meet six of the fourteen checklist items contained in Section 271 (c) (2) (B). These six included (1) operational support systems, (2) poles, ducts and conduits, (3) unbundled loops, (4) unbundled local transport, (5) unbundled local switching, and (6) dialing parity. HEPO at 28-52.