



August 6, 2003

Hon. Michael K. Powell, Chairman
Hon. Kathleen Q. Abernathy, Commissioner
Hon. Michael J. Copps, Commissioner
Hon. Kevin J. Martin, Commissioner
Hon. Jonathan S. Adelstein, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

:Re: *Verified Comments of Lance Honea on Behalf of Access One, Inc. regarding SBC's Application for Provision of In Region, InterLata Services in Illinois, WC Docket No. 03-167*

Dear Chairman Powell and Commissioners:

Access One, Inc. ("AOI") hereby provides comments to the Federal Communications Commission ("FCC") regarding the application of SBC Communications, Inc. ("SBC") for authorization to provide in-region interLATA service in Illinois. The purpose of these comments is to provide a basis for AOI's opposition to the granting of SBC's application.

AOI is a CLEC licensed to provide telecommunications services in the five former Ameritech states: Illinois, Indiana, Ohio, Michigan and Wisconsin. AOI provides a variety of simple and complex business services in Illinois to residential and commercial customer accounts.

47 USCS §271(c)(2)(B) puts forth 14 checklist items that must be satisfied. Of particular importance to AOI is SBC's obligation to provide nondiscriminatory access to its Operations Support System ("OSS"). The comments provided by AOI concerns problems that AOI has routinely experienced over a period of months or even years.

On a weekly basis, AOI has repeatedly addressed numerous deficiencies in SBC's OSS systems. Although AOI has raised many of these problems with SBC, the OSS issues that it has identified have yet to be resolved. Some of the issues include:

- SBC's continuous error rate with conversions of simple orders even though the orders are submitted electronically and only a billing record change is required.
- SBC has never correctly billed AOI for services it has purchased.
- SBC is incapable of handling any CLEC to CLEC order submitted by AOI.
- SBC's completion notices are unreliable.
- SBC is unreliable in processing complex orders electronically.

These issues have negatively impacted AOI's ability to compete with SBC in Illinois and have been the subject of hundreds of conference calls and repeated discussions with SBC, resulting in increased and needless delay to AOI's customers, the commitment of thousands of employee hours, and the resultant increased monetary cost to AOI.

I. SBC fails to Render Correct Billing to AOI.

AOI has never obtained an SBC bill that was correct. The following is a list of common SBC billing errors.

- Incorrect USOCs
- Miscellaneous Rates
- Inapplicable LNP charges
- “Unknown ANI” - AOI receives incorrect call records for orders that may belong to another carrier.
- Unauthorized calls – AOI submits call blocks on all EDI and manual orders to block incoming 800 (1700 times) 900, 976 (200 times, collectively), third party and collect calls (300 times, collectively). Data back to 2001. This is a problem that has increased over time.

II. SBC Fails to Electronically Complete Simple Orders.

Many of the orders for single POTS lines AOI submits fall to manual on SBC’s side of the network, even if when they are submitted electronically. Generally, AOI experiences problems with respect to customer loop conversions; there are significantly fewer problems for new service. Given the OSS systems SBC has in place, no customer should go down or lose service under a simple order. When this does happen the customer is out of service for hours or even several days. In one example this past year, a new install for three POTS lines took three months to get through SBC’s systems. While AOI made daily calls to resolve this matter, inexplicably SBC was unwilling to expend the resources or the time to address such an easily resolvable, but to the customer, serious problem.

Within the last two years AOI has submitted thousands of simple electronic orders to SBC. Of those, approximately seventy percent were either rejected, fail to process or require re-submission on SBC’s side of the interface. Of those orders, twenty-one percent result in the end user customer being out of service for some period of time.

These documented SBC errors occur even though the orders comply with SBC's WEBLEX form standards. AOI has tracked the average number of re-submittals that are necessary for simple orders. The following table documents simple orders from April 2002 to June 2003 and the related number of resubmittals necessary to complete the order:

Type of Simple Order	Average no. of submittals
Change orders (all)	2.27
Resale Conversions (POTS)	3.15
Resale Conversions As Is	2.28
UNE-P Conversion	1.74

AOI has experienced SBC problems for simple assumed customers, where the customer should be seamlessly transferred from one provider to another. For a simple customer transfer SBC must first issue a disconnect order where SBC removes the customer from the former service provider. SBC then must issue a new order in order to connect the customer to its new provider. This is a standard type of conversion in which the customer should never be out of service. This is supposed to be a simple billing change. However, AOI has experienced that in approximately 1 out of 30 simple orders the customer is out of service from between 4-16 hours, and even up to several days.

AOI has detailed SBC problems where the customers were out of service and needed a service dispatch but was ignored for 36 hours. Other examples include customers being out of service for 19 days while SBC failed to correct errors for a simple order.

AOI has lost dozens of customers through SBC's inadequate conversion methods for simple orders. AOI finds that end users will not tolerate the loss of service or excuse AOI as result of SBC failures.

III. CLEC-to-CLEC Conversion Orders

SBC has no process in place that allows CLEC-to-CLEC conversion orders to be accomplished seamlessly. It is AOI's experience that customers will be out of service almost 100 percent of the time. In fact, it has become AOI's business practice to inform its potential customers that if they switch from another CLEC to AOI the chances that the customer will be out of service during the switch is near 100%. In order to facilitate a seamless transfer, AOI has requested a vendor meet. In a vendor meet, technicians from AOI and SBC would meet in the field in order to coordinate the customer's transfer. SBC has repeatedly refused this request. AOI further requested that SBC provide a written account of its standards for completing a CLEC-to-CLEC conversion. SBC refused this request also. SBC seems to have no motivation to solve this problem, even though this should be a seamless switch nearly 100 percent of the time. Instead, SBC is completely failing because nearly 100 percent of the time the customer will be out of service during a CLEC-to-CLEC conversion.

IV. Complex Orders – electronically submitted.

AOI places complex orders for services such as DID, PBX, and CENTREX. Complex orders fall to manual and SBC personnel attempt to work them manually. However, because of the complexity of the order, there is a much greater chance of

human error. Within the last two years, AOI has submitted hundreds of electronic complex orders. Of those, approximately 97% had problems on SBC's side of the network. And of those 97% with problems, 27% involved lost service to end users from hours to several days. SBC complex errors result in: resubmittals, miss-tagged lines, multiple dispatches, invalid rejects, and manual errors.

Additionally, the manual nature of SBC's systems require manual submission of complex orders results in orders that are repeatedly rejected, necessitating resubmittals. The following table shows the average number of order resubmissions for complex orders between April 2002 and June 2003:

Type of Complex Order	Average no. of submittals
Resale CENTREX Conversions	5.81
Resale PBX/DID Conversions	5.45
UNE-P PBX/DID Conversions	4.17

V. Invalid Completion Notices.

SBC issues a completion notice, but the customer calls to complain that there is no dialtone at the premises. AOI must go to the customer's premises to perform a cross connect of the outside wiring to the inside wiring at the Network Interface Device ("NID") only to find out that the customer does not have dialtone at the network interface -- SBC's completion notice was invalid. AOI then must submit a trouble ticket to SBC. Once SBC resolves the trouble ticket (i.e., performs the work that should have been done

prior to its completion notice) AOI must initiate another vendor visit of its technician. This obviously inconveniences the customer because the customer is out of service awaiting dialtone. Further, SBC's error likely decreases customer goodwill between AOI and its end user because AOI's customer likely does realize that SBC is at fault (nor does it likely care *who* is at fault – the customer simply needs a dialtone and AOI has yet to provide it). SBC's invalid completion notice further increases the costs incurred by AOI (e.g., two non SBC technician vendor visits rather than one, time, labor, etc.), and decreases the efficiency of AOI's employees.

VI. AOI's Lost Revenue and Increased Expenses

AOI estimates that in the last two years it has lost revenues incurred at least \$32,000 as a result of SBC's poorly executed orders. These losses are directly attributable to revenue lost due to conversion delays. We have also lost some customers who chose not to go forward with the conversion. The amount of revenue lost as a result of outages and service interruption is much more substantial. Access One has lost sales to customers of not only local service, but also associated revenues (long distance, internet, etc.) it would have otherwise received. These losses are compounding on a monthly basis. This has also resulted in approximately \$140,000 in increased employee expense to address SBC's deficient OSS systems.

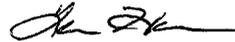
Conclusion

Contrary to the recommendation of the Illinois Commerce Commission, SBC does not satisfy the requirements of Section 271 of the Federal Act, particularly those

requirements relating to nondiscriminatory OSS. OSS functionality is a reliable measurements of SBC's lack of 271 compliance as it negatively impacts AOI's end user customers. On the customer side, SBC's OSS is significantly deficient in handling even simple orders for AOI's customers. SBC experiences almost complete meltdown in the area of complex orders that are repeatedly rejected or delayed. On the business side, SBC has been unable to correctly bill AOI for services ordered by AOI and rendered by SBC. SBC's repeated billing errors costs AOI time and money and may impact AOI's end user customers. For these reasons AOI opposes the grant of in region interLATA authority in Illinois for SBC until such time SBC decides to effectively resolve these problems.

STATE OF ILLINOIS)
)
COUNTY OF COOK)

I, Lance Honea, being first duly sworn, deposes and states that the above Verified Comments of Access One, Inc. were compiled by me or under my direction and that the contents and statements contained therein are true to the best of my knowledge, information and belief.

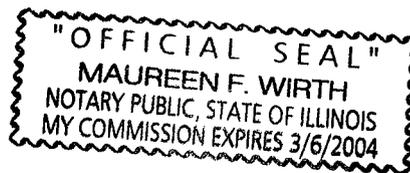


Lance Honea

SUBSCRIBED AND SWORN to
Before me this 6th day of August, 2003.



Notary Public



My commission expires on 3/6/04.