LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING

A PROFESSIONAL CORPORATION
232 SOUTH CAPITOL AVENUE, SUITE 1000
LANSING, MICHIGAN 48933
TELEPHONE: (517) 482-2400 FACSIMILE: (517) 318-9207
WEBPAGE: LOOMISLAW.COM

JACK C. DAVIS, PC
KARL L. GOTTING, PC
DAVID M. LICK
HARVEY J. MESSING
JAMES R. NEAL
KENNETH W. BEALL
MICHAEL G. OLIVA
JEFFREY W. BRACKEN
CATHERINE A. JACOBS
RONALD W. BLOOMBERG
MICHAEL H. RHODES
JEFFREY L. GREEN
GARY L. FIELD

SHERRI A. WELLMAN
JEFFREY S. THEUER
ELDONNA M. RUDDOCK
KEVIN J. RORAGEN
THERESA A. SHEETS
MICHAEL C. RAMPE
SARA L. CUNNINGHAM
TRACEY L. LACKMAN
HAI JIANG
GARY A. GENSCH, JR.
ANNA ROSE STERN
JAMES F. ANDERTON V

PLUMMER SNYDER
(1900-1974)

HOWARD J. SOIFER
(1949-2003)

GEORGE W. LOOMIS
QUENTIN A. EWERT
WILLIAM D. PARSLEY
RICHARD W. PENNINGS
OF COUNSEL

February 23, 2005

Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 31221
Lansing, MI 48990-7504

Re: **MPSC Case No. U-12320**

Dear Ms. Kunkle:

Enclosed in the above-referenced case is an original and 4 copies of a ***Comments In Support of MCImetro Access Transmission Services LLC and LDMI Telecommunications, Inc.'s Objections To SBC Accessible Letters***. An original Proof of Service is also enclosed. If you have any questions or comments, do not hesitate to contact me.

Very truly yours,

LOOMIS, EWERT, PARSLEY,
DAVIS & GOTTING, P.C.

? Hai Jiang
Signature Not Verified

Digitally signed by Hai Jiang
DN: cn=Hai Jiang, o=Loomis Law Firm, c=US
Date: 2005.02.23 16:29:53 -05'00'
Location: ahos

Hai Jiang

HAJ/tab
Enclosures
cc: Parties of Record

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's Own Motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Federal Telecommunications Act of 1996.	)))))	**Case No. U-12320**

COMMENTS IN SUPPORT OF MCIMETRO ACCESS TRANSMISSION SERVICES LLC AND LDMI TELECOMMUNICATIONS, INC.'S OBJECTIONS TO SBC ACCESSIBLE LETTERS

TelNet Worldwide, Inc., Quick Communications, Inc. d/b/a Quick Connect USA, Superior Technologies, Inc. d/b/a Superior Spectrum, Inc., CMC Telecom, Inc., Grid4 Communications, Inc., and Zenk Group Ltd. d/b/a Planet Access (collectively referred to as the "CLECs") hereby file these comments in support of the Objections of MCImetro Access Transmission Services LLC ("MCI") and LDMI Telecommunications Inc. ("LDMI") filed in this docket respectively on February 16, 2005 and February 18, 2005.

On February 10 and 11, 2005, SBC Michigan unilaterally issued five "Accessible Letters" to all CLECs. In Accessible Letter CLECAM05-037, SBC intends to unilaterally withdraw its state UNE tariffs, beginning as early as March 10, 2005, based on its skewed reading of several Federal Court of Appeals decisions. In Accessible Letters CLECALL05-017, CLECALL05-018, CLECALL05-019, and CLECALL05-020, SBC intends to unilaterally implement the FCC's "TRO Remand Order" based solely on its own interpretation of the order, and provides two unilateral, ready-to-sign, take-it-or-leave-it amendments to all interconnection agreements with the deadlines of February 21, 2005 and March 10, 2005.

SBC's Accessible Letters concern matters that have statewide impact on the telecommunications market in Michigan. By demanding that all CLECs agree with

SBC's skewed interpretation of the federal court decisions and the TRO Remand Order, and then unilaterally implementing the orders, SBC's issuance of those Accessible Letters are not in compliance with the competitive checklist in Section 271 of the 1996 Federal Telecommunications Act, the Commission's orders, and the change-of-law provisions in interconnection agreements. Further, SBC is not following the process for implementing the TRO Remand Order as set forth in paragraphs 233 and 234 of the order. The CLECs fully agree with the positions taken by MCI and LDMI in their Objections and fully adopt their Objections. In so doing, the CLECs urge the Commission to reject SBC's unilateral and unlawful actions.

The CLECs also join MCI and LDMI in their request that the Commission issue an order to counter SBC's unlawful actions as expeditiously as possible due to the urgent nature of SBC's Accessible Letters.

Respectfully submitted,

TELNET WORLDWIDE, INC.,
QUICK COMMUNICATIONS, INC. D/B/A QUICK CONNECT USA,
SUPERIOR TECHNOLOGIES, INC. D/B/A SUPERIOR SPECTRUM, INC.,
CMC TELECOM, INC.,
GRID4 COMMUNICATIONS, INC.,
ZENK GROUP, LTD D/B/A PLANET ACCESS

Dated: February 23, 2005

By_____
Hai Jiang
Signature Not Verified
Digitally signed by Hai Jiang
DN: cn=Hai Jiang, o=Loomis Law Firm, c=US
Date: 2005.02.23 16:30:13 -05'00'
Location: ahos

One of their attorneys
Gary L. Field (P37270)
Hai Jiang (P67088)
LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING, P.C
232 S. Capitol Ave., Ste. 1000
Lansing, MI 48933
(517) 482-2400

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's Own Motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Federal Telecommunications Act of 1996.	)))))	**Case No. U-12320**

PROOF OF SERVICE

Tina A. Barlow, employed at Loomis, Ewert, Parsley, Davis & Gotting, P.C., being duly sworn, affirms that on this 23rd day of February, 2005, ***Comments In Support of MCImetro Access Transmission Services LLC and LDMI Telecommunications, Inc.'s Objections To SBC Accessible Letters***, she served the in the above referenced matter upon the parties as described on the attached Service List.

? Tina Barlow
Signature Not Verified
Digitally signed by Tina Barlow
DN: cn=Tina Barlow, o=Loomis Law Firm, c=US
Date: 2005.02.23 16:30:44 -05'00'
Location: ahos

Tina A. Barlow

Subscribed and sworn to before me on this 23rd day of February, 2005.

? Eleanor Vlahos
Signature Not Verified
Digitally signed by Eleanor Vlahos
DN: cn=Eleanor Vlahos, o=Loomis Law Firm, c=US
Date: 2005.02.23 16:31:04 -05'00'
Location: ahos

Eleanor Vlahos, Notary Public
Ingham County, Michigan
My Commission expires: 10/28/2005

MPSC CASE U-12320
SERVICE LIST

Administrative Law Judge
Hon. James N. Rigas
Administrative Law Judge
Michigan Public Service Commission
6545 Mercantile Way, Suite 14
P.O. Box 30221
Lansing, MI 48989
E-Mail: jnrigas@michigan.gov

Michigan Public Service Commission Staff
Mr. Steven D. Hughey
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
E-Mail: hugheys@michigan.gov

Mr. Orjiakor Isiogu
Director, Communications Division
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909
E-Mail: onisiog@michigan.gov

AT&T and TCG Detroit
Mr. John J. Reidy, III
Attorney at Law
AT&T Corp.
222 W. Adams, Ste. 1500
Chicago, IL 60606
E-Mail: jjreidy@att.com

Mr. Arthur LeVasseur
Fischer Franklin & Ford
500 Griswold Street, Suite 3500
Detroit, MI 48226-3803
E-Mail: artlev@voyager.net

Attorney General Mike Cox
Mr. Michael E. Moody
Assistant Attorney General
Consumer Protection Division
525 W. Ottawa Street
Lansing, MI 48933
E-Mail: memoody@michigan.gov

Building Communications, Inc.
Ms. Michelle E. Vocht
Mr. Lynn H. Shecter
Roy, Shecter & Vocht, P.C.
36700 Woodward Avenue, Suite 205
Bloomfield Hills, MI 48034
E-Mail: vocht@rsmv.com
shecter@rsmv.com

CLEC Association of Michigan
Mr. Roderick S. Coy
Mr. Leland R. Rosier
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
lrrosier@clarkhill.com
hrashes@clarkhill.com

Comcast Phone of Michigan, LLC
Mr. Richard Wolfe
Comcast Phone of Michigan, LLC
29777 Telegraph Road, #4400-B
Southfield, MI 48034
E-Mail: richard_wolfe@cable.comcast.com

Mr. Roderick S. Coy
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
hrashes@clarkhill.com

Focal Communications Corp.; IP Communications; Nextlink Michigan, Inc.; LCI International Telecom Corp.; Qwest Communications Corp.; Talk America, Inc., XO Michigan, Inc.; & Z-Tel Communications, Inc.
Mr. Michael S. Ashton
Fraser, Trebilcock, Davis & Dunlap PC
124 W. Allegan, Suite 1000
Lansing, MI 48933
E-Mail: mashton@ftdf.com

Horizon Telecommunications, Inc.
Mr. William Koval
Horizon Telecommunications, Inc.
5910 Landerbrook Drive
Mayfield Heights, OH 44124
E-Mail: william.koval@voyager.net

LDMI Telecommunications, Inc.
Mr. Jerry Finefrock
Mr. Brad Shires
LDMI Telecommunications, Inc.
27777 Franklin Road, Suite 500
Southfield, MI 48034
E-Mail: jfinefrock@earthlink.net
bshires@ldmi.com

Mr. Roderick S. Coy
Mr. Leland R. Rosier
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
lrrosier@clarkhill.com
hrashes@clarkhill.com

MCImetro Access Transmission Services, LLC
Mr. James Denniston
Senior Attorney
Public Policy Northern
MCI Telecommunications Corporation
205 N. Michigan Avenue, Suite 1100
Chicago, IL 60601
E-Mail: James.Denniston@mci.com

Mr. Albert Ernst
Mr. Stewart Binke
Dykema Gossett
124 W. Allegan, Suite 800
Lansing, MI 48933
E-Mail: aernst@dykema.com
sbinke@dykema.com

McLeodUSA Telecommunications Services, Inc.
Mr. William A. Haas
V.P. and Associate General Counsel
McLeodUSA Telecommunications Services, Inc.
6400 C. Street, S.W.
P.O. Box 3177
Cedar Rapids, IA 52406-3117
E-Mail: whaas@mcleodusa.com

Mr. Roderick S. Coy
Mr. Leland R. Rosier
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
lrrosier@clarkhill.com
hrashes@clarkhill.com

Michigan Cable Telecommunications Association
Mr. David E.S. Marvin
Fraser, Trebilcock, Davis & Dunlap PC
124 W. Allegan, Suite 1000
Lansing, MI 48933
E-Mail: dmarvin@ftdf.com

Michigan Consumer Federation
Ms. Kathleen F. O'Reilly
414 A. Street, Southwest
Washington, DC 20003
E-Mail: kforeilly@igc.com

Mr. Rick Gamber
Executive Director
Michigan Consumer Federation
4990 Northwind Drive
East Lansing, MI 48223
E-Mail: mcf@acd.net

Michigan Pay Telephone Association
Mr. Roderick S. Coy
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
hrashes@clarkhill.com

SBC Michigan
Mr. John Dempsey
Dickinson Wright PLLC
215 S. Washington Square, Suite 200
Lansing, MI 48933-1816
E-Mail: jdempsey@dickinson-wright.com

Mr. Craig A. Anderson
SBC Michigan
444 Michigan Avenue, Room 1750
Detroit, MI 48826
E-Mail: craig.anderson@ameritech.com

Sprint Communications Company L.P.
Joseph R. Stewart
Senior Attorney
Sprint Communications Company L.P.
50 W. Broad Street, Suite 3600
Columbus, OH 43215
E-Mail: joseph.r.stewart@mail.sprint.com

Mr. Roderick S. Coy
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
hrashes@clarkhill.com

Telecommunications Association of Michigan
Mr. Harvey Messing
Loomis, Ewert, Parsley,
Davis & Gotting, P.C.
232 South Capitol Avenue, Suite 1000
Lansing, MI 48933
E-Mail: hjmessing@loomislaw.com

Telecommunications Resellers Association
Mr. Andrew Isar
Director, State Affairs
Association of Communications Enterprises (ASCENT)
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335-8349
E-Mail: aisar@millerisar.com

Verizon Wireless
Mr. Roderick S. Coy
Mr. Haran C. Rashes
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328
E-Mail: rcoy@clarkhill.com
hrashes@clarkhill.com

U.S. POSTAL MAIL ONLY
Hon. George Schankler
Administrative Law Judge
Michigan Public Service Commission
6545 Mercantile Way, Suite 14
Lansing, MI 48910

Julie Kaminski Corsig
Davis Wright & Tremaine LLP
1500 K. Street, NW, Suite 450
Washington, DC 20005

Robert J. Aamoth
Andrew Klein
Daniel M. Steinway
Kelley, Drye & Warren LLP
1200 Nineteenth Street, NW, Ste. 500
Washington, DC 20005-1272

William R. Ralls
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328

Brad Kruse
McLeodUSA
6400 C Street SW
Cedar Rapids, IA 52406-3177

Timothy P. Collins
Mediaone Telecom of Michigan, Inc.
14909 Beck Road
Plymouth, MI 48170

Terry Monroe
Vice President, State Affairs Comptel
1900 M Street, NW, Ste. 800
Washington, DC 20036

Howard J. Siegel
V.P. of Regulatory Policy
IP Communications Corporation
9430 Research Blvd.
Echelon II, Suite 120
Austin, TX 78759

Thomas Lonergan
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Ann Schneidewind
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Thomas O'Brien
Corecomm Michigan, Inc.
450 West Wilson Bridge Road
Worthington, OH 43085

Ms. Robin Gleason
Vice President Ameritech
201 North Washington Square, Rm 920
Lansing, MI 48933

Mr. Thomas E. Maier
Clark Hill PLC
212 East Grand River Avenue
Lansing, MI 48906-4328

Ernestine Ransom
AT&T Corporation
222 West Adams, Suite 1500
Chicago, IL 60606