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November 15, 2000

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Dear Ms. Wideman:

RE: **Case No. U-12598**

Enclosed for filing is the Reply Brief of AT&T
Communications of Michigan, Inc. and TCG Detroit in the
above referenced case.

Sincerely,

Arthur J. LeVasseur
(af)

Enclosures

BEFORE THE MICHIGAN PUBLIC SERVICE CORPORATION

In the matter, on the Commission's own motion,)
 to establish service quality standards, including)
 enforcement provisions, for Ameritech Michigan)
 _____)

Case No. U-12598

**REPLY BRIEF OF AT&T COMMUNICATIONS
OF MICHIGAN, INC. AND TCG DETROIT**

AT&T Communications of Michigan, Inc. and TCG Detroit (collectively "AT&T") has reviewed Ameritech's initial brief determined that, on those matters that AT&T addressed in its initial brief, Ameritech has offered no new substantive information that requires further reply. Specifically, Ameritech has not shown that the Commission's decision to adopt enhanced performance standards for Ameritech Michigan violate any constitutional limitation on special or local laws or denies equal protection. Indeed, Ameritech has cited to no evidence in the record that would demonstrate that it is, in fact, similarly situated to the other telecommunications providers in Michigan for purposes of a constitutional analysis. The record that was developed in this case clearly demonstrates the contrary. Ameritech is an incumbent local provider serving some 5.4 million access lines with control of 95% of the residential and business market in its serving area, which is well above the threshold indicative of a monopoly. It admits it operates in markets that are not competitive. TR 177-180, 208, 209. It is the only provider whose performance was shown to have drastically deteriorated. Based upon the record before the Commission in this case, it is obvious that Ameritech has not proven that any other provider is similarly situated to it. Absent such a showing it cannot establish any constitutional infirmity.

Wherefore, AT&T requests the Commission reject Ameritech's claim that enhanced performance standards can not be adopted for Ameritech unless identical criteria are and applied to all other providers.

DATED: November 15, 2000

**AT&T Communications of Michigan, Inc.
and TCG Detroit**

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