

Addendum A to Reply Brief
MPSC Case No. U-12598

Staff Proposal No.	Objections
1.1	No justification has been offered for this standard, and there is no reason to narrow or restrict the confidentiality protections provided under the statute for documents provided to the Commission or Staff.
1.2	There is no justification offered either for the availability of records in the timeframe proposed or for the requirement that they be made available electronically, which is a major security concern. Any expense created by the proposed standard would be unnecessary.
1.3	Staff's proposed language, requiring availability "upon request," is much too restrictive and could be interpreted as requiring immediate availability. Staff has made no showing that the current 10 working day standard has prevented the production of records on a timely basis.
1.4	Conceivably, this proposal would authorize Staff to require the creation of additional reports, which have no use whatsoever for the operation of Ameritech Michigan's business and would drain resources from worthwhile tasks.
2.1	This provision is unnecessary, overly burdensome and costly. Tariffs are available to customers on the Internet. Also, Ameritech Michigan opposes the requirement that customers be provided with written estimates of special charges and detailed technical specifications not specifically mentioned in a tariff. This is an unnecessary drain on Ameritech Michigan's resources.
2.2	100% compliance as proposed by Staff would be extremely costly and there is no guarantee that, even then, the proposed standard would be met. The administrative burdens associated with these requirements would be substantial at the very least. Additionally, the proposal is very vague.
2.3	The changes proposed by Staff would be appropriate only as revisions to the Consumer Billing Rules and are not an appropriate subject for the Commission's service quality rules. Further, penalties are not appropriate for circumstances beyond Ameritech Michigan's control.
2.4	Staff's proposed standard could require Ameritech Michigan to provide a hard copy of <u>all</u> of its tariffs, maps, and numbers in a local calling area upon mere customer request, with a great deal of expense. Because Ameritech Michigan's tariffs are easily accessible, when balanced against the immense cost Staff's proposal could entail, Ameritech Michigan opposes this proposed standard. It is also patently unfair to impose a requirement on Ameritech Michigan alone and exempt other carriers from the same obligation. Further, Ameritech Michigan takes the position that its current methods of disseminating information about service offerings are sufficient.

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2.5	Ameritech Michigan believes that four changes are necessary in order to bring the proposed standard in line with current tariffs, industry standards and technical capabilities.
2.6	Ameritech Michigan strongly opposes subjecting any service quality standard to a 100% compliance requirement. In addition, these proposals would circumvent normal customer service channels and adversely affect the ability of our service representatives to take responsibility for customer problems.
2.7	Staff's proposal is unnecessary, and no explanation has been provided for why additional identity measures are required. No proof has been offered that current and planned measures are not sufficient. The various steps that have been taken and will be taken to address the problem of identify theft in Case No. U-12700 will address any problems.
2.8	Operator services of Ameritech Michigan are unregulated, and it is therefore inappropriate for the Commission to regulate the quality of those services. Certainly, if any standards are adopted for this service, they should be applicable to all providers and not be absolute, and therefore, unachievable standards.
2.9	Ameritech Michigan cannot necessarily get access to a customer's credit information unless the customer has specifically consented to our receipt of the information. With regard to such activities, Ameritech has no control over the process.
3.4	Ameritech Michigan has complied and does comply with the Miss Dig requirements, and Staff has given no indication of why Miss Dig should become a service quality issue or why a new standard is needed in this area. Moreover, by incorporating the Miss Dig requirements into the proposed standards, Ameritech Michigan and other providers could be subject to MPSC formal complaints for alleged non-compliance with Miss Dig. Staff has provided absolutely no justification for creating this major burden on its own and the Commission's limited resources, or on Ameritech Michigan's resources.
4.1	Taken at its broadest reading, the proposed standard would be unduly burdensome and prohibitively expensive, and it is difficult to interpret. Conceivably, Staff's proposed standard would require Ameritech Michigan to perform virtually continuous, complete inspections of its billions of dollars of outside plant and equipment to determine if any of the facilities are not in compliance with NESC standards. Not only would this be extremely expensive, but it would also require significant manpower that would otherwise be used to perform service installations and repairs.

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4.2	A standard requiring 100% compliance is infeasible, unreasonable, and prohibitively expensive. It is administratively difficult to track separate repair benchmarks for normal weekdays vs. weekends and holidays. Situations occur that involve circumstances beyond Ameritech Michigan's control, and thus should not be part of the calculation which measures Ameritech Michigan's compliance with the proposed service quality standard. The two-hour commitment requested by Staff would be impossible for Ameritech Michigan to administer because our current mechanized repair system does not have the ability to track pending workload by hourly intervals. Staff's proposal regarding repeat trouble reports is illogical and excessively punitive. Preferential treatment (8 hour commitments) for repeat reports would require Ameritech Michigan to build in capacity on a daily basis because it would unnecessarily push out repair intervals for customers reporting problems for the first time. Any credit considerations should include only those repair appointments that have been promised firm access arrangements. A \$50 credit for failure to do so is an excessively punitive measure. A credit of this magnitude would encourage customers to manipulate the system in an attempt to receive the \$50 credit. Staff's \$25 credit proposals are inconsistent with Rule 32 of the current MPSC service quality rules, as well as with Ameritech Michigan's limitation of liability tariff. Requiring a company to offer temporary call forwarding to all customers would be prohibitively expensive and difficult to administer. Ameritech Michigan strongly opposes these cellular telephone proposals. It is a program that is both unnecessary and administratively unwieldy.
5.6A	Ameritech Michigan does not believe that this proposed standard is appropriate. It flies in the face of telephone switch engineering standards that are in place throughout the United States – and, indeed, the world. A three second dialtone delay as suggested by Staff would require the addition of tens of millions of dollars in equipment that would go unused in all but the rarest of situations. This is an uneconomic deployment of resources and would result in a level of service that would not be noticed by customers as an improvement over the present dialtone intervals.
4.3	The fact that Ameritech Michigan now guarantees 14.4 Kb rates on the network ensures that our network is surpassing the transmission standards used 10 years ago. Imposing a mandatory requirement on Ameritech Michigan and Staff to implement a random testing program would not add value to either customers or the company.
5.3	A requirement that installation of basic residential service be completed in all cases within 3 working days is simply too costly and would be impossible to meet in all cases. Moreover, under no circumstances is it appropriate to require a \$25 per day credit for each day missed.

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5.4	Ameritech Michigan believes that a \$25 credit is excessive, overly punitive, and inconsistent with Ameritech Michigan's tariffed limitations on liability. Moreover, Ameritech Michigan objects to inclusion of credits in all cases involving a billing error, including those that favor the customer.
5.5	Because there does not appear to be a problem in this area of service quality, Ameritech Michigan opposes the creation of a new standard. Furthermore, Ameritech Michigan takes the position that no service quality standard should be subject to a 100% compliance requirement due to a variety of factors beyond Ameritech Michigan's control.
5.8	Ameritech Michigan recommends changes to Staff's proposal. Major failures should be excluded from the measure and the current three consecutive month reporting criteria should be used. Finally, Ameritech Michigan reiterates that smaller wirecenters or exchanges should be subject to a slightly different standard.
5.9	This proposal is very problematic. The costs and resources it would entail would be prohibitive and difficult to administer. It would cost Ameritech Michigan hundreds of millions of dollars to implement and would take years to reconstruct its entire loop plant as would be required. This enormous undertaking would cost at least \$500 million and take at least five years to accomplish.
6.1	Staff's proposal would permit individual customers to file formal complaints for alleged violations of service quality standards. This is totally inappropriate and would permit, or even encourage, customers to file complaints to pursue recovery of additional compensation beyond the bill credits to which they would already be entitled. This could generate hundreds if not thousands of additional formal complaints each year.