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ATTORNEY GENERAL

October 31, 2001

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

Dear Ms. Wideman:

RE: Ameritech Michigan, MPSC Case No. U-13007
BOH Docket No. 2001-1227

Enclosed for filing in the above matter is the original and four copies of the **Attorney General's Reply Brief,** together with Proof of Service.

Very truly yours,

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ONI:leg
Encs.
c: Honorable George Schankler, ALJ
All Parties of Record
MPSC U-13007 Cover Letter

PROOF OF SERVICE

Ameritech Michigan
MPSC Case No. U-13007

The undersigned certifies that a copy of **Attorney General's Reply Brief** was served upon the parties listed below by mailing the same to them at their respective addresses with first class postage fully prepaid thereon, or by State Interdepartmental mail as indicated, on the 31st day of October, 2001.

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STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the application of
Ameritech Michigan for a determination
that directory assistance services provided
to end-users are competitive services under
the Michigan Telecommunications Act.
_____/

Case No. U-13007
BOH No. 2001-1227

ATTORNEY GENERAL'S REPLY BRIEF

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October 31, 2001

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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ATTORNEY GENERAL'S REPLY BRIEF

I. INTRODUCTION

Attorney General Jennifer M. Granholm submits the following Reply Brief pursuant to the schedule established in this case by the Administrative Law Judge (ALJ). The Attorney General is in receipt of the Initial Briefs filed by the Telecommunications Association of Michigan (TAM), MCImetro Access Transmission Services, LLC (a WorldCom company, hereafter referred to as "WorldCom"), the Michigan Public Service Commission (MPSC) Staff, the Michigan Pay Telephone Association (MPTA), AT&T Communications of Michigan (AT&T) , and Ameritech Michigan.

II. ARGUMENT

In its Initial Brief Ameritech Michigan argues, among other things, that its directory assistance (DA) service provided to end-users are competitive. In support of its argument the Company refers to the testimony of Ms. Sandy Moore regarding the DA services that are ostensibly available as competitive alternatives to Ameritech Michigan's DA services. As the Attorney General indicated in her Initial Brief, when properly examined the alleged alternatives

to Ameritech Michigan's DA services are found to be wholly inadequate and very poor substitutes to the DA services which Ameritech Michigan presently provides to its end-users. Ameritech Michigan contends that its DA services satisfy the provisions of Section 208 of the MTA, MCL 484.2208. Consequently, the Company argues that DA services should be determined to be competitive. The Telecommunications Association of Michigan supports Ameritech Michigan's application and joins in requesting that the MPSC "determine that DA service is competitive in the State of Michigan and declare the service to be deregulated." (TAM's Initial Brief, p. 2).

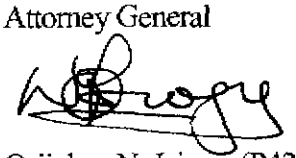
The MPSC Staff takes the position that the cost study submitted by Ameritech Michigan with its application in this case is defective. According to the MPSC Staff, Ameritech Michigan should be required to submit a cost study based on the same assumptions and parameters previously approved by the MPSC in Case No. U-11831. Nonetheless, it is the MPSC Staff's position that despite the defective nature of the Company's cost study, "Ameritech Michigan's DA services may, consistent with the criteria set forth in § 208 of the MTA be declared competitive." (MPSC Staff's Initial Brief, p. 11.) Like Ameritech Michigan, the MPSC Staff contends that "telephone customers throughout the State have alternatives for obtaining directory assistance information." (*Id*., p. 12.) For reasons stated in her Initial Brief, the Attorney General disagrees with the assertion that "there is a functionally equivalent service reasonably available to end-users." (*Id*., p. 12). As the Attorney General previously indicated, while there is an emergence of competition in the DA services market, the current alternatives to the DA services being provided by Ameritech Michigan are by no means functionally equivalent to Ameritech Michigan's DA services.

III. RELIEF

For the reasons stated above, as well as those contained in her Initial Brief, the Attorney General respectfully requests that the Michigan Public Service Commission deny Ameritech Michigan's request to declare retail directory assistance services competitive at this time.

Respectfully submitted,

JENNIFER M. GRANHOLM
Attorney General



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