

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the complaint and request for)	
declaratory ruling of the Michigan Communication)	
Carriers Association; CMC Telecom, Inc.; and)	
Grid 4 Communications, Inc.; against Michigan Bell)	Case No. U-14975
Telephone Company d/b/a AT&T Michigan)	
to require AT&T to afford Complainants wholesale)	
rates consistent with applicable law.)	
_____)	

Rebuttal Testimony of Ryan P. McAnany
on Behalf of
The Michigan Public Service Commission Staff

November 17, 2006

Q. Please state your name and business address for the record.

A. My name is Ryan McAnany and my business address is 6545 Mercantile Way,
Lansing, MI 48911.

Q. By whom are you employed?

A. I am employed by the Michigan Public Service Commission as a Departmental
Analyst in the Telecommunications Division.

Q. What is your educational background?

A. I have a Bachelor of Arts Degree (double major) in Political Science and
Interdisciplinary Studies in Social Sciences with a preference in Public Policy. I also
have a Master of Arts in Public Administration and Public Policy. Both degrees are from
Michigan State University, East Lansing, Michigan.

Q. What is your professional work experience?

A. From October of 2003 to December of 2004, I worked as a student assistant in the
Service Quality Section of the Energy Division, at the Michigan Public Service
Commission. Beginning in January of 2005, I assumed my current full time position as a
Departmental Analyst working in the Telecommunications Division, at the Michigan
Public Service Commission. Since January of 2005, I have been working on the
Michigan Children's Protection Registry Act (commonly known as the Protect MI Child
Registry).

Q. Have you testified previously before this Commission?

A. No, I have not testified previously before this Commission.

Q. On whose behalf was your testimony prepared?

A. My testimony was prepared on behalf of the Michigan Public Service Commission Staff.

Q. What is the purpose of your testimony?

A. The purpose of my testimony in this case is to provide my analysis and opinion regarding the simplicity, efficiency, and functionality of the <http://clec.att.com/> website in regards to competitive local exchange carriers (CLECs) using this website to purchase and process resale orders. Specifically, I focused attention as to whether I was able to understand the process to order resale services as provided by AT&T, and if I thought that CLECs would be able to use this process.

Q. What is AT&T's and the CLECs position on this issue?

A. It is my understanding that AT&T believes that CLECs are provided with all of the information that they need to know, in regards to purchasing/ordering resale items, etc. It is also my understanding that AT&T believes that CLECs can obtain the information and processes for purchasing/ordering resale items, etc. by using the CLEC Handbook found in the <http://clec.att.com/> website. However, it is my understanding that CLECs disagree with AT&T, and feel that the website does not provide them with any information or process regarding the proper purchasing/ordering of resale items, etc.

Q. Have you ever visited this website (<http://clec.att.com/>) before?

A. No. I have never been to or used this website before, so I was using it from a novice perspective. I also did not use any other outside materials or staff assistance as a guide or explanation for using this website.

Q. Did you focus your review on the entire http://clec.att.com website?

A. No. The majority of my review pertained to the CLEC Handbook section for the Midwest states. I attempted to review and look at any information that pertained to resale (ordering, processing, products and services, etc.)

Q. How much time did you spend reviewing this website?

A. I spent a total of 5 days reviewing the information, documents, and links on this website. Of the 5 days, I spent approximately a couple of hours each day conducting my review.

Q. Was enough information provided in the website?

A. I found that there was an overwhelming abundance of information that was in the website. In fact, there may have been too much information provided. For the large amount of information that was provided in the website, I assumed that CLEC's would be presented with more than enough information than what they would need to know regarding resale products and services, etc. However in reality, it is very difficult to dissect the given information, and to understand what the information pertains too.

Q. What did you find useful about this website?

A. An area that I was able to easily find was Current Promotions. This was clearly labeled, and once I click on Current Promotions and specified the geographic area that I was interested in, the website gave me a listing of all current promotions for that area. For the most part, these promotion documents were easy to follow and brief. All of the promotion documents had a promotion code. The majority of the promotion codes were in bold, which help to make them stand out.

Q. What were some problems that you encountered?

A. The first problem that I encountered was that there was an abundance of information without direction. After reviewing the website, it appears that as documents are formed, they are then just attached to the website and no set process is given. An example of confusion is on page 7 (Ordering Section) of the Resale Overview document. When the “Assumption of Existing Agreement” link is clicked, the user is then taken to a new webpage labeled Handbook for 13 States (administrative forms). There are several Word documents on this page, and it is confusing as to what the user should do. It is also more burdensome when documents (other than pertaining to Midwest states) are presented here as well.

In general, the number of Word documents and attachments are extremely overwhelming and confusing. Another example of this is on the page of the Resale Overview. There is a link located here, which a user can click on to obtain information regarding guidelines and specifications for preordering. However, when I click on that link, it takes me to a new webpage titled, “Handbook for 13 States”. This page, which contains three sections (Job Aids, Manual Process Guidelines, and Mechanized Functionality and Manual Processes) is very confusing. The user is forced into reading the many word documents to try and obtain the information that they need. If the user clicks on the Manual Process Forms link, they are then given 20 Word documents. These appear to be forms to be used for manual ordering, however it is difficult to understand because there are so many, and there is also no real explanation on what to do. This type of problem was consistent throughout my review.

Q. What was the second problem that you encountered?

A. The second problem that I encountered was that some of the links provided did not work. For example, in the “Prepare to Become a Reseller” section of the Resale Overview document, the “SBC website” link that is given does not work. An additional example of a link not working is by going to the Product & Services button, then clicking on Directory, then going to Resale, and then clicking on Government and School listings. As I scrolled through the document, I went to the section called Ordering: Due Dates. A link was provided (Resale Due Dates), but once I clicked on the link, it stated that it could not be found. I noticed that the last time that the Word document was revised was 6/02/03. The link, based on the revision date, may be outdated. Also, when a user is in the Due Date Process document, some links are not in blue, rather they are just in the standard black color with an underline. It is more user-friendly when all links are in the normal blue color. The blue stands out more and makes the link more identifiable for users.

Q. What was the third problem you encountered?

A. The third problem was time consumption which seemed to be very significant when reviewing the website. When a user goes to the Ordering chapter of the CLEC Handbook, and then goes to the General Ordering Resale, the user is presented with 31 links. Just like the abundance of Word documents, there is an abundance of links. A great deal of time must be spent in trying to determine if that information is what the user is really looking for.

Q. What was the fourth problem you encountered?

A. The fourth problem was that the, Resale Training options seem limited. When visiting the website regarding the opportunities for resale training, I noticed that all of the

training sessions from July to November, for the Midwest states were in Indiana. It would seem to be more convenient and user-friendly if classes were offered in all of the Midwestern states that are covered by this website. I was not able to view the months prior to July.

Q. And finally what was the fifth problem you encountered?

A. The fifth problem is regarding the changes of notices to CLECs, I had a difficult time finding them. Since AT&T publishes Accessible Letters to notify CLECs of changes, one would assume that a button would be labeled as “Accessible Letters” or “Notifications of Changes”. Instead, the button through which a user can locate the Accessible Letters is designated as “IS Call Center”. Once the user clicks on this button, they must then click on “OSS Letters” in order to obtain the search engine for the Accessible Letters. Once I was in the search engine, I attempted to obtain access to the September 15, 2006 (CLECAM06-259) Accessible Letter. I first attempted to search for this letter by the individual state. After typing in the month of September (the month in which the letter was issued) and then the individual states of Wisconsin, Michigan, Ohio, Indiana, and Illinois, none of the searches returned this letter. However, I was able to find the letter when I typed in the letter number (CLECAM06-259). Not being able to find the letter by searching individual states leads me to question as to whether this search engine is working properly. However, I was able to find the letter by searching the month of September and using the category of “Ameritech (CLECAM)”. I only knew of searching with “CLECAM” because that was included in the letter number. A concern is that if a CLEC who is operating solely in Michigan and would like to find a letter, but does not have the Accessible Letter number, and their only information was the month

that it was sent, is there a way for that CLEC to find the information using this search engine?

Q. Overall, after reviewing the <http://clec.att.com> website (more specifically, the CLEC Handbook), what are your conclusions?

A. I found this website to be very overwhelming (information overload), difficult to understand at times, unable to locate information that I was seeking, time consuming, poorly constructed at times, and ultimately, I was unable to understand and identify the process of how to order and purchase a resale product.

Q. Do you have any suggestions for improvements to the <http://clec.att.com> website?

A. Yes. The website needs to be more user-friendly, specific and to the point, less congested with information, and easily understandable. A suggestion is creating an ordering/purchasing website that is similar to many companies. For example, it would be user-friendly to create a system that was similar to a “shopping cart”. The user would go to the website, open the “products and services” and then essentially be given a shopping cart of all of the items that are available to order. By doing so, AT&T could include general costs and a brief description of the items. The user would be able to have the option to add these items to their “shopping cart”. In the end, when the user was ready to order, the user would click on “purchase” and then it would review all items in their shopping cart. It would be at this time that forms and promotional codes would be entered in the system, etc.

Also, it would be helpful if documents that are placed on the website be in PDF or locked Word format. The majority of the documents are posted in Word and unlocked. This

means that spelling, punctuation, and grammar errors are all visible to those who visit this website. Also, with the documents being unlocked, tables and graphs can be shifted around too easily, making it a potential problem for users.

Ultimately, the current website has to be revised to try and minimize the many confusing Word documents and links that are presented to the users and to increase users understanding of the process and ordering of resale items. While my suggestions for possible improvements are just one of many that could be taken by AT&T to improve their website, in the end, the website needs to have a clear step-by-step process in regards to ordering resale items, an easy, clean, quick way to identifying the resale items, as well as the costs associated with those items, among other things.

Q. Does this conclude your testimony?

A. Yes, it does.

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the complaint of the
**Michigan Communications Carriers Association,
CMC Telecom, Inc., and Grid4 Communications, Inc.**
against **Michigan Bell Telephone Company, d/b/a
AT&T Michigan**, to require AT&T to afford complainants
Wholesale rates consistent with applicable law.

Case No. **U-14975**
(Efile Paperless)

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF INGHAM)

Pamela A. Walters, being first duly sworn, deposes and says that on November 17, 2006, she served a true copy of the Rebuttal Testimony of Orjiakor N. Isiogu and Ryan P. McAnany on behalf of the Michigan Public Service Commission Staff upon the following parties by depositing the same in a United States postal depository enclosed in an envelope bearing postage fully prepaid, plainly addressed as follows:

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Pamela A. Walters

Subscribed and sworn to before me
this 17th day of November, 2006.

Carol Ann Dane, Notary Public
State of Michigan, County of Eaton
Acting in the County of Ingham
My Commission Expires: 07/23/2011