ACCESS SERVICES FOR PRICING FLEXIBILITY
QUALIFYING SERVICES

<u>Trunking Basket</u>*
Voice Grade
LT-1
LT-3
Switched Sonet
Signaling
SS7
Telecom Relay Service

<u>Special Access Basket</u>
Metallic
Telegraph Grade
Direct Analog
Program Audio
Video (TV Analog, Digital, ASVS, AMVS, WAVS, SCVS)
AIT Base Rate Service
AIT DS1
AIT DS3
Optical Carrier Network (OCN) 3, 12, 48, 192 Point to Point
AIT OC-3, 12, 48, 192 Dedicated Ring
Sonet Xpress Service
GigaMAN (Gigabit Ethernet Metropolitan Area Network)
Multi-Service Optical Network (MON)

*Includes dedicated transport services (entrance facilities, direct trunked transport, flat-rated portion of tandem switched transport), channel terminations between the serving wire center and end user's premises, and the optional features and functions associated with these services.

SUMMARY OF RELIEF FOR REQUESTED MSAs

MSA	Dedicated Transport & Special Access		Channel Terminations to End Users	
	Phase I Relief (>15% WCs or >30% Revenue)	Phase II Relief (>50% WCs or > 65% Rev)	Phase I Relief (>50% WCs or >65% Revenue)	Phase II Relief (>65% WCs or > 85% Rev)
Louisville, KY-IN		YES	YES	
Non-MSAs, IN	YES			

Louisville, KY-IN			
Wire Center	Wire Center Name	Collocated with Alternative Transport	Collocator(s) w/Competitve Transport or Alternative Transport Provider
CHTWIN01			
GALNIN01			
JFVLIN01	JEFFERSONVILLE	Y	
NWALIN01	NEW ALBANY DS0	Y	
NWTNIN01			
SLBGIN01			
Total Wire Centers in MSA			6
Wire Centers w/Collocators using Alternative Transport			2
% of Wire Centers w/Collocators using Alternative Transport			33.33%
Total DT & SA Revenue in MSA			
DT & SA Revenue in Competitve Wire Centers			
% Competitive Wire Centers' Revenue to MSA Total for DT & SA			74.27%
Total CT to EU Revenue in MSA			
CT to EU Revenue in Competitive Wire Centers			
% Competitive Wire Centers' Revenue to MSA Total for CT to EU			83.54%

Petition Requirements as specified in Section 1.774(a)(3) of the Commission's Rules.

Non-MSA, IN			
Wire Center	**Wire Center Name**	**Collocated with Alternative Transport**	**Collocator(s) w/Competitve Transport or Alternative Transport Provider**
ANDRIN01			
ATTCIN01			
BCVLIN01			
BDFRIN01			
BLFDIN01			
BLMRIN01			
BNHLIN01			
BSWLIN01			
BURLIN01			
CFVLIN01			
CHRSIN01			
CLMBIN01	COLUMBUS DS0	Y	███████████████
CLMBIN02			
CNVRIN01			
CVTNIN01			
DALEIN01			
DRTNIN01			
EZTWIN01			
FRFTIN01			
FWLRIN01			
HLVLIN01			
HNTNIN01			
HOPEIN01			
HRCYIN01			
JSVLIN01			
KDVLIN01			
KGMNIN01			
KRKLIN01			
LADGIN01			
LAGRIN01			
LKVGIN01			
LNTNIN01			
MARNIN02			
MARNIN03	MARION NORTH	Y	███████████████

Petition Requirements as specfied in section 1.774(a)(3) of the Commission's Rules.

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Non-MSA, IN			
Wire Center	**Wire Center Name**	**Collocated with Alternative Transport**	**Collocator(s) w/Competitve Transport or Alternative Transport Provider**
MCCYIN01	MICHIGAN CITY	Y	████████████████
MCTWIN01			
MDTWIN01			
MLLTIN01			
MRCCIN01			
MRSHIN01			
MTPLIN01			
MTSMIN01			
MTZMIN01			
NSVLIN01			
NWCSIN01			
NWMRIN01			
OTRBIN01			
OXFRIN01			
PERUIN01			
RCPTIN01			
RKVLIN01			
RSDLIN01			
SNRGIN01			
MNLLIN01			
SPNCIN01			
STWTIN01			
TLCYIN01			
UPLDIN01			
VDBGIN01			
VINCIN01	VINCENNES DS0	Y	████████████████
WASHIN01			
WLBNIN01			
WVLDIN01			
WYTWIN01			
Total Wire Centers in Non-MSA			64
Wire Centers w/Collocators using Alternative Transport			4
% of Wire Centers w/Collocators using Alternative Transport			6.25%

Petition Requirements as specfied in section 1.774(a)(3) of the Commission's Rules.

Non-MSA, IN			
Wire Center	**Wire Center Name**	**Collocated with Alternative Transport**	**Collocator(s) w/Competitve Transport or Alternative Transport Provider**
Total DT & SA Revenue in Non-MSA			
DT & SA Revenue in Competitve Wire Centers			
% Competitive Wire Centers' Revenue to Non-MSA Total for DT & SA			47.63%

Petition Requirements as specfied in section 1.774(a)(3) of the Commission's Rules.

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Appendix D
Ameritech Operating Companies Methodology

Ameritech Operating Companies (Ameritech) used the following methodology to satisfy the collocation and revenue requirements necessary to obtain pricing relief for the MSA/Non-MSA subject to this petition. Specifically, Ameritech did the following:

1) Identified wire centers within each MSA/Non-MSA.

2) Identified wire centers within each MSA/Non-MSA where service providers have obtained collocation with alternative transport facilities other than Ameritech provided transport, and identified service providers collocated with alternative transport facilities other than Ameritech provided transport.

3) Identified revenue attributable to qualifying Dedicated Transport and Special Access services (other than channel terminations to end user premises) for each wire center within the MSA/Non-MSA.

4) Identified revenue attributable to channel terminations between an end user's premises and the Ameritech end offices for each wire center within the MSA/Non-MSA.

MSA/Non-MSA Boundaries and Wire Center Mapping

Pursuant to the *Pricing Flexibility Order*, Ameritech identified the MSA/Non-MSA using data set forth in Public Notice Report NO. CL-92-40, "Common Carrier Public Mobile Services Information, Cellular MSA/RSA Markets and Counties", dated January 24, 1992. These MSAs/Non-MSA are based on the 1980 Census and are slightly different than current MSA boundaries.

To identify its wire centers, Ameritech used the National Exchange Carrier Association (NECA) Tariff No. 4 dated September 01, 2003, which identifies exchange carrier wire centers

where expanded interconnection for special and switched access services is available. Ameritech

then mapped the geographic area served by the wire center to current county maps. Where the

serving area of a wire center overlaps multiple counties, Ameritech used Network Engineering's

Expanded Geographic Interface System (EGIS) database to determine the physical location of

the wire center and then assigned the wire center to the county within which the wire center is

physically located. Ameritech then mapped the counties to the MSA/Non-MSA, based on the

1980 Census.

Collocation Wire Center Identification

Collocation information was obtained from the Collocation Implementation, Collocation

Point of Contact Tracking Database. Information available in this database includes the name of

the collocator, applications for collocation, wire center, implementation dates and alternative

transport, where applicable. Each wire center on which Ameritech relies to meet the

requirements for pricing flexibility must contain at least one collocator that uses transport

facilities owned by a provider other than the price cap LEC to transport traffic from that wire

center. Information from this database, which constitutes customer applications for service and

company billing records were used to identify specific collocators by wire center and determine

whether alternative transport was being provided. Additionally, a field team of collocation

managers physically verified these wire centers for competitors that have transport facilities

owned by a non-Ameritech provider. Only collocation arrangements where all make-ready work

(including the placement of non-Ameritech cable facility) had been completed and the CLEC

had possession of this arrangement were selected for this petition. Collocation information

contained in this petition includes only those wire centers identified to date and may be supplemented in future petitions. Appendix C identifies the collocators by wire center.

Revenue Identification and Assignment - General

Special Access and Dedicated Transport revenue for the twelve month period ending December 31, 2003 was gathered from the Ameritech Long Distance Industry Services (ALDIS) Data Warehouse database, which is based on the Carrier Access Billing System (CABS) billing system for carrier billed revenue.

The CABS billing system runs internal validation checks on each CABS bill for accuracy and completeness on a monthly basis. Each component used in the data gathering process was extracted from the CABS bill information database. Therefore, the extract database accurately reflects billed revenue. These same data tables are used to provide demand data for FCC annual price cap filings and other such filings requiring access services revenue and demand data.

Special assembly arrangements, individual case basis (ICB) arrangements, expanded interconnection and miscellaneous revenues have been excluded.

For each MSA/Non-MSA, the *Pricing Flexibility Order* defined two categories for the revenue test: 1) Dedicated Transport and Special Access, other than Channel Terminations to the End User (POP side); and 2) Channel Terminations to the End User (End User or EU side). To perform these tests, Ameritech revenues were first attributed to the appropriate wire centers, and then determined if the revenue was POP side or EU side.

Appendix D
Ameritech Operating Companies Methodology

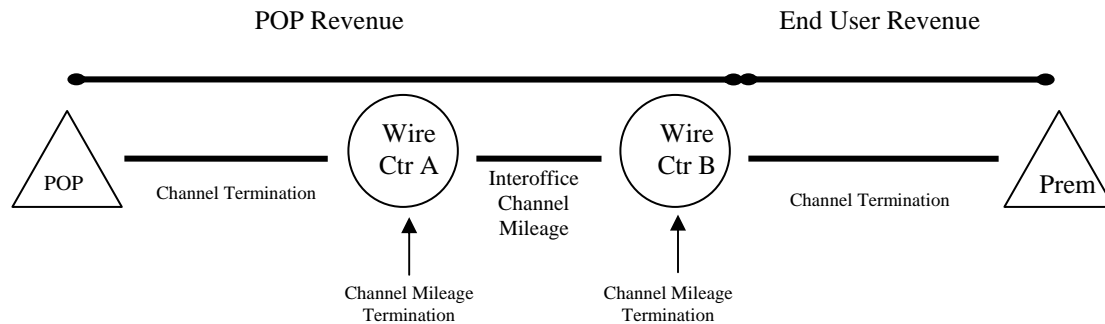**Revenue Allocation Methodology – Wire Centers**

Ameritech revenues were first attributed to the wire centers in each MSA/Non-MSA as detailed in the table below:

Rate Element	Methodology
Channel Terminations and Entrance Facilities	Directly mapped to wire center
Channel Mileage Terminations (CMTs; a.k.a. Fixed Channel Mileage)	Directly mapped to wire center
Interoffice Channel Mileage (CM; a.k.a. Channel Mileage per Mile)	Attributed 50% to each wire center at the two ends of each individual circuit; For SONET rings, the mileage was evenly allocated to the nodes in the ring.
Direct Trunk Transport (DTT) Mileage	Attributed 50% to each wire center at the two ends of each individual circuit.
Direct Trunk Transport (DTT) Fixed	Directly mapped to wire center
Other Recurring Charges (e.g. Muxing)	Directly mapped to wire center
Non-Recurring Charges	Directly mapped to wire center where known; the remaining Non-Recurring revenue was allocated based on channel termination revenue.

Interoffice Channel Mileage revenue was attributed equally to each wire center at the two ends of each circuit. For Multi-Point Multiplexing circuits each leg is considered to be a separate and distinct point-to-point circuit. The following diagrams provide further clarification of Ameritech's revenue allocation to wire centers.
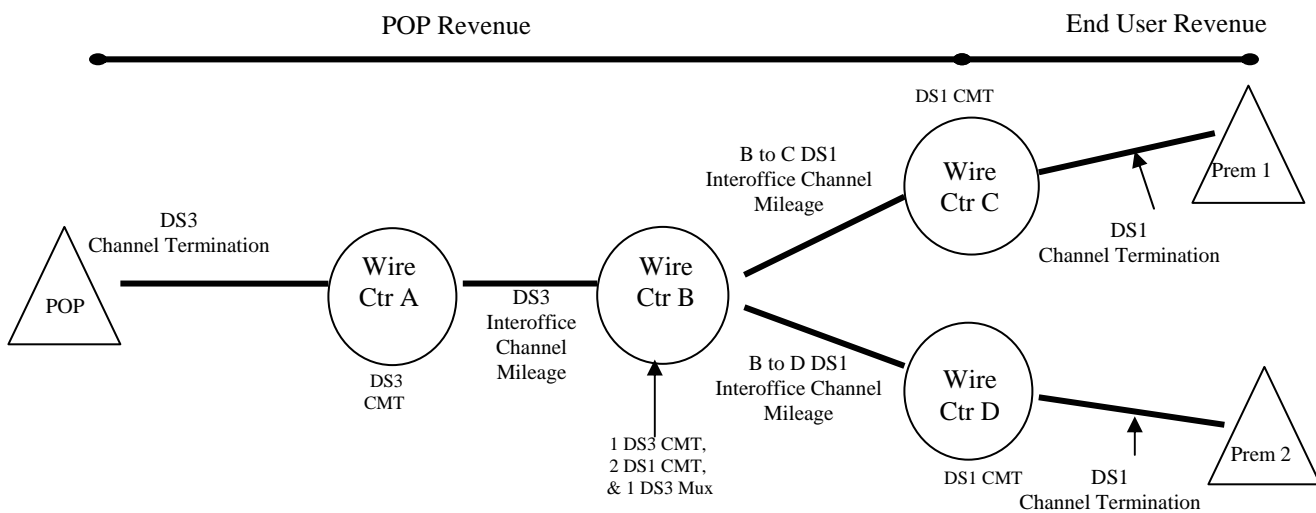
Appendix D
Ameritech Operating Companies Methodology

Figure 1: Point to Point Circuit

POP Revenue   End User Revenue

POP — Channel Termination — Wire Ctr A — Interoffice Channel Mileage — Wire Ctr B — Channel Termination — Prem

Channel Mileage Termination (Wire Ctr A)

Channel Mileage Termination (Wire Ctr B)

Channel Terminations: Assigned Directly to Appropriate Wire Center
Channel Mileage Terminations: Assigned Directly to Appropriate Wire Center
Interoffice Channel Mileage Revenue Assignment: 50% of Total Mileage to Wire Center A
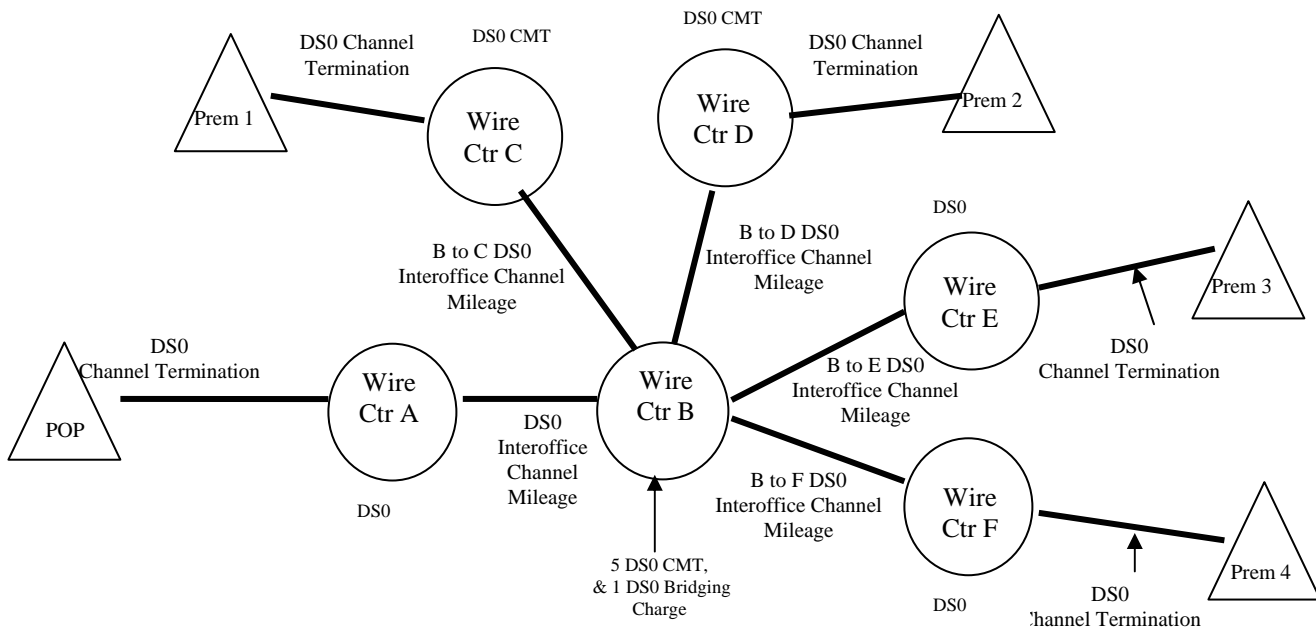   50% of Total Mileage to Wire Center B

Figure 2: Multi-Point – Multiplexing

POP Revenue   End User Revenue

DS1 CMT

POP — DS3 Channel Termination — Wire Ctr A — DS3 Interoffice Channel Mileage — Wire Ctr B

B to C DS1 Interoffice Channel Mileage — Wire Ctr C — DS1 Channel Termination — Prem 1

DS3 CMT

1 DS3 CMT, 2 DS1 CMT, & 1 DS3 Mux

B to D DS1 Interoffice Channel Mileage — Wire Ctr D — DS1 Channel Termination — Prem 2

DS1 CMT

Channel Terminations: Assigned Directly to Appropriate Wire Center
Channel Mileage Terminations: Assigned Directly to Appropriate Wire Center
Multiplexing: Assigned Directly to Wire Center B
Interoffice Mileage Revenue Assignment: 50% of DS3 Mileage to Wire Center A
                                            50% of DS3 Mileage to Wire Center B
                                            50% of B to C DS1 Mileage to Wire Center B
                                            50% of B to C DS1 Mileage to Wire Center C
                                            50% of B to D DS1 Mileage to Wire Center B
                                            50% of B to D DS1 Mileage to Wire Center D

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Figure 3: Multi-Point – Bridging

Channel Terminations Assigned Directly to Appropriate Wire Center
Channel Mileage Terminations: Assigned Directly to Appropriate Wire Center
Bridging Charge: Assigned Directly to Wire Center B
Interoffice Mileage Rev Assignment: 50% of A to B DS0 Mileage to Wire Centers A and B, respectively
50% of B to C DS0 Mileage to Wire Centers B and C; respectively
50% of B to D DS0 Mileage to Wire Centers B and D; respectively
50% of B to E DS0 Mileage to Wire Centers B and E; respectively
50% of B to F DS0 Mileage to Wire Centers B and F; respectively

STN/SONET Ring and SONET Express (Shared SONET) revenue was assigned

directly to the wire center where applicable as follows:

- For those SONET nodes that reside at a central office, the Node and Port revenue

  was assigned directly to the wire center.

- For those SONET nodes that reside at a customer premise, the Node and Port revenue

  was assigned directly to the wire center associated with the customer premise.

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Ameritech Operating Companies Methodology

- SONET ring mileage revenue was evenly allocated to the nodes in the ring. For example, mileage revenue for a five node ring was assigned 20% (1/5) to each wire center.

Non-recurring revenue was assigned to a wire center when the product charge was wire center specific. However, there are many non-recurring charges that are not assessed at that level (e.g. order charges); and therefore, the wire center could not be identified. Since most non-recurring charges are associated with channel terminations, the remaining non-recurring revenue was allocated to the wire centers based upon the channel termination revenue.

Revenue Allocation Methodology – POP vs. End User

Since channel terminations can be used to provide transport between a LEC wire center and either an IXC's POP or an End User's premises, a method was needed to identify the other end of the circuit so that the revenue would be properly classified as POP or End User. Ameritech had initially considered doing this by using the customer's ACNA, but determined that this would only identify the type of customer ordering the circuit, not the customer using the circuit, nor the other end of the circuit. Ameritech instead used the Circuit Location (CKL) number to determine the location at the other end. Regardless of the type of customer placing the service order, when circuits between a POP and an End User premises are set up for billing in Ameritech's CABS system, CKL 1 is used to designate the channel terminations between the serving wire center and the carrier POP. All other CKLs are used to designate channel terminations between the serving wire center and the end user's premises.

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Ameritech Operating Companies Methodology

After the revenue was attributed to the appropriate wire center, it was then assigned to the

POP side and EU side based upon the combination of service class, rate element, and CKL as

detailed in the following table:

Rate Element	Service	Methodology
Channel Termination and Entrance Facilities	SONET Ring and SONET XPRESS (shared SONET)	100% POP
Channel Termination and Entrance Facilities	All other services (e.g., DSO, DS1, DS3, LT1, LT3)	CKL 1 is POP revenue; CKL 2 and up are End User
Channel Mileage Terminations (CMTS; a.k.a. Fixed Channel Mileage)	All	100% POP
Channel Mileage (CM; a.k.a. Channel Mileage per Mile)	All	100% POP
Direct Trunked Transport (DTT) Mileage and Fixed	All	100% POP
Other Recurring Charges (e.g., Muxing)	All	100% POP
Non-Recurring Charges (NRCs)	All	CKL 1 is POP revenue; CKL 2 and up are End User

Appendix E

Ameritech Operating Companies (Ameritech) are required to provide to each party upon which it relies as a collocator in Appendix C, the information it provides about that party in its petition, even if the price cap LEC requests that the information be kept confidential. Ameritech is to certify in its pricing flexibility petition that it has made such information available to the party. That certification and copies of the information it has provided to such parties follow herein.

Pursuant to § 1.774(e) of the Commission's rules, I, Joel Rodriguez, hereby certify that I have sent letters to the collocating parties upon which Ameritech relies in this filing, informing them of the information about them that is included in this petition. The letters were given to UPS on February 17, 2005, with overnight delivery specified. A copy of each of the letters is attached.

/s/ Joel Rodriguez
_____
Joel Rodriguez

February 18, 2005

**LETTERS
REDACTED**