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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

State Alarm, Inc. :
Complainant, :
v. : Case No. 95-182-TP-CSS
Ameritech Ohio :
Respondent. :
In the matter of the Self-Complaint :
of Ameritech Ohio Relative to its :
Service Provided to State Alarm, : Case No. 96-858-TP-SLF
Incorporated. :

COMMENTS OF STATE ALARM, INC. STATING DISSATISFACTION
WITH THE AMERITECH OHIO REPORT OF INVESTIGATION
AND WITH THE REMEDIAL ACTION TAKEN

I. Introductory Comments

On March 25, 1999, the Commission issued its Opinion and Order in these cases
(hereinafter, "March 25 Order"). The March 25 Order stated:

The Commission directs Ameritech to conduct ... a complete and comprehensive analysis of the circuits serving State Alarm, including a thorough investigation of the equipment and facilities in the central offices and outside facilities, up to and including the demarcation point at the client location. Ameritech should¹ file a written report with the Commission in this docket ... specifically setting forth the results of the investigation, the cause of any difficulties found and the remedial action taken, or to be taken, along with the date, to rectify the service problems discovered. See March 25 Order at 37.

State Alarm submits these Comments in response to the opportunity provided to State Alarm to
"file a written statement with the Commission indicating whether it is satisfied with the remedial
action taken or to be taken and the results thereof." Id. State Alarm is extremely dissatisfied with

¹ The concluding section of the March 25 Order states that Ameritech "shall" file the report. See March 25 Order at 42. This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Jean Schaeffer Date Processed 8-2-99

the procedures adopted by Ameritech Ohio to conduct its investigation, the results of that investigation, and the remedial actions described by Ameritech Ohio in its investigative report (hereinafter, "Report").²

Ameritech Ohio's extremely poor level of communication with the office and technical personnel that State Alarm designated as its contact persons is a very troubling aspect of Ameritech Ohio's investigation.³ At the hearing in these cases, an Ameritech Ohio witness stressed the level of coordination and cooperation that is needed between Ameritech Ohio and State Alarm because of the nature of the service -- *i.e.* supervised alarm service is provided by State Alarm over Ameritech Ohio circuits that are dedicated to State Alarm's service. See Tr. VIII (Dabner) at 20-22. In this light, State Alarm expected to be involved and consulted concerning the testing and remedial actions that were to be undertaken by Ameritech Ohio. Ameritech Ohio sent a letter to State Alarm in which it stated a desire to "coordinate matters arising out of the [March 25 Order]" and to obtain "a single point of contact in order to coordinate all issues" with Ameritech Ohio representatives Don Harr and Dale Metyk. See Letter (April 9, 1999) (Attachment "A"). The letter stated that Ameritech Ohio would "not, in the course of this network analysis, make any adjustments" without "State Alarm's direction." Id. Thereafter, however, Ameritech Ohio expressed little desire to keep State Alarm personnel involved and to coordinate its activities with State Alarm personnel.

During an April 23, 1999 telephone conference, counsel for State Alarm proposed the involvement of State Alarm's designated contact persons (Office Manager Brenda Dull and

² Ameritech Ohio filed its Report of Investigation in these cases on June 23, 1999. State Alarm filed a Motion for Extension to Comment on July 22, 1999, and requested a filing date of August 3, 1999. The State Alarm Motion for Extension was not opposed by Ameritech Ohio.

³ The hearing in these cases provided other examples of Ameritech Ohio being unwilling to cooperate with

Technical Services Director Tom Baytos⁴ with Ameritech personnel in the planning and implementation of the investigation so as to lessen the chance of disagreements such as those set forth in these Comments. Ameritech counsel rejected the proposal out of hand. As further elaborated upon later in these Comments, Ameritech Ohio provided very little information to State Alarm's designated representatives during the testing, made adjustments without consulting these State Alarm representatives, and made contact with State Alarm equipment without consultation or permission. See e.g. Ameritech Ohio Report, Analysis at 1 ("including customer provided wiring and/or equipment"). The product of the poor communications includes lack of clarity concerning the procedures used by Ameritech Ohio, poor test results, the disruption of service to State Alarm, and additional litigation.⁵

Another important and troubling aspect of Ameritech Ohio's actions is that the Report makes scant reference to the design of the circuits that serve State Alarm, and no reference at all to a maintenance program for the facilities that serve State Alarm. Testimony in these cases stressed that Ameritech's poor design of alarm circuits is a major contributing factor to the service problems experienced by State Alarm. See State Alarm Post-Hearing Brief (October 9,

others on technical matters. See e.g. SAS Ex. E (Edelstein) at 5, Ins. 34-43.

⁴ State Alarm President Shury designated Mr. Baytos and Ms. Dull as contact persons in a conversation with Ameritech Ohio special service technician Dale Metyk, and this designation was further confirmed during the April 23, 1999 telephone conference. Mr. Baytos coordinates the technical activities of State Alarm, and was involved in the testing that Ameritech Ohio undertook in early 1991. Ms. Dull coordinates office activities, including the activities of State Alarm's operators and account information personnel. Ameritech Ohio also refused to designate a billing representative to work with Ms. Dull on billing matters that were likely to arise from the comparison of records that was suggested in the April 9, 1999 letter from Ameritech counsel. See State Alarm Motion for Mediation (July 8, 1999), attached Ameritech Letter (May 6, 1999).

⁵ State Alarm filed a Complaint with the Commission on June 10, 1999. In part, the Complaint refers to the service interruptions that resulted from Ameritech Ohio's investigations. See In re Complaint of State Alarm (June 10, 1999), PUCO Case No. 99-704-TP-CSS.

1997) at 35-41 and citations therein. Ameritech has ignored the Commission's strongest statements concerning the inadequacies of Ameritech Ohio service.

[T]he Commission finds it compelling in this case and generally disturbing that Ameritech does not have a periodic preventative maintenance program. The evidence also discloses that Ameritech does not have a periodic preventive maintenance program for State Alarm's circuits, lacks a facilities evaluation or replacement schedule, relies on outages and customer complaints about service to update/repair facilities, and, at one time, had a zero inventory management and replacement parts policy. Ameritech also acknowledges that the company has substantially reduced its workforce that addresses service affecting repair situations. March 25 Order at 34.

These important maintenance, planning, and customer service matters are the "remedial action[s] ... to be taken, along with the date, to rectify the service problems" as contemplated by the Commission. See March 25 Order at 37. State Alarm is dissatisfied with a report that does not address these matters.

II. Comments on Ameritech Ohio Testing

A. Client Legs

Ameritech's review of the problems discovered in its evaluation begins with a discussion of four circuit legs that terminate with missing 150A/CSU units (commonly referred to the "coil"). See Report at 7. The coil is a piece of Ameritech Ohio equipment on a circuit leg that is located on the premises of State Alarm's clients. Ameritech Ohio also states that "State Alarm did not inform Ameritech of the disconnect." Id. State Alarm personnel are instructed to not touch Ameritech Ohio's coil, and they did not disconnect the coils that are listed in Ameritech Ohio's Report.

None of the four circuit legs listed by Ameritech Ohio on page 7 of the Report should be active. Ameritech Ohio's January 20, 1999 equipment record for State Alarm (Attachment B) — ordered in ascending numerical order by account number — shows the circuits for which

Ameritech Ohio is billing State Alarm. Of the circuit identification numbers for these legs — 29, 44, 19 and 68 using the conversion chart (Attachment C) for alphabetic characters — only leg “29” appears on the list. The AE (or “29”) leg served a customer that has changed to a non-State Alarm security service, and the circuit leg was ordered out of service on May 10, 1999. The AV (or “44”) leg and the U (or “19”) leg were ordered out of service on April 15, 1996 and February 4, 1997, and Ameritech Ohio reported to State Alarm that they were due out of service on April 19, 1996 and February 10, 1997, respectively. Finally, State Alarm is unable, after checking recent Ameritech Ohio account information and information from prior years, to find an Ameritech Ohio listing for the “68” circuit leg. Ameritech Ohio should check its complete set of records and take whatever steps are necessary to quickly close these accounts and resolve any associated billing disputes associated therewith.

Pages 8 through the top of 12 of the Report reviews circuit legs that Ameritech Ohio determined were “out of parameters.”⁶ In July, State Alarm conducted tests of decibel levels in the manner described during the hearing in these cases. See SAS Ex. B (Baytos) at 11. The results are displayed in Attachment D,⁷ which also displays the results of Appendix F to the Report. Of approximately 150 active legs, twenty-five tested too negative (or, “too long”) according to the “immediate action” parameters displayed in the Report, and no legs tested too

⁶ The Report is unclear as to whether the “excessive” decibel (“DB”) readings are reported from the mid-range of the acceptable levels or from the fringes of the acceptable levels..

⁷ Attachment D is organized according to “Line” numbers. See SAS Ex. B (Baytos) at B-1. The “100 SYSTEMS” serve the Boardman (South Youngstown) area, 200 and 300 the Youngstown area, 400 the Akron area, and 500 the Cleveland area.

positive (or, “too hot”).⁸ See Report at 2. Ameritech Ohio should verify its readings, in cooperation with State Alarm personnel, and bring all circuit legs within parameters.

A few of the reviews in the Report concerning circuit legs that were found to be out of parameters require additional attention. Most cite “unknown” causes, but Ameritech Ohio unflinchingly states that the cause may be a “[r]equest by State Alarm for maladjustment.” See Report at 8-10. State Alarm has made requests for adjustment of alarm circuits, but not for maladjustment of the circuits. See SAS Ex. BR at 9-11. The report of improper adjustments to Ameritech Ohio coils on page 12 of the Report also blames “[u]nknown personnel,” but implies State Alarm involvement by stating that the adjustments were made “without authorization.” See Report at 12. The Report’s accusations cast doubt upon the objectivity with which it was prepared.⁹

A few reports directly blame State Alarm for problems on circuit legs. State Alarm checked the EM leg listed on page 10 of the Report and the DU leg listed on page 11 and found no noise as the result of State Alarm equipment. The reports on the AK leg on page 11 of the Report and the BT leg on pages 11-12 are confusing and wrong. For leg AK, it makes no sense for a State Alarm technician to adjust the Ameritech coil in order to “cease transponder response.” See Report at 11. Instead, State Alarm personnel could simply remove the State Alarm panel on the customer’s premises or turn off the power. State Alarm would not want to do so, in this instance, because the account is active and was operating properly on the day that it

⁸ Much of the improvement from the readings reported for the hearing is due to termination of service on the worst legs that served State Alarm’s clients.

⁹ Blame shifting has been the hallmark of the Ameritech Ohio defense in these cases. See State Alarm Post-Hearing Reply Brief at 8-11 (“It’s The Customer’s Fault!”).

was checked in preparation for these Comments.¹⁰ State Alarm personnel did not touch the Ameritech Ohio coil for leg BT. The service was recently switched to another system, and a disconnection order was issued on July 1, 1999. The disagreement and confusion over the circuit legs just reviewed should be the subject of communication between Ameritech Ohio personnel and the designated representatives of State Alarm so that these instances can be resolved.

The Report does not describe the importance to be placed on the list of "inactive accounts" that it displays.¹¹ See Report at 16. However, most of the accounts listed by Ameritech Ohio were ordered out of service by State Alarm in communications with Ameritech Ohio representatives. Ameritech Ohio records should confirm both the receipt of these instructions and communications back to State Alarm concerning the date these accounts were due out of service. For clarity sake, State Alarm's investigation reveals the following:

- leg LF was due out of service on May 3, 1999;
- leg AD was due out of service on May 24, 1996;
- leg BB was due out of service on February 26, 1996;
- leg DV was due out of service on July 29, 1996;
- leg NA does not appear on Ameritech Ohio's equipment records;
- leg M was due out of service on May 2, 1994;
- leg MJ was due out of service on December 18, 1998;
- leg MB was due out of service on January 5, 1999;
- leg LP was due out of service on November 3, 1998;
- leg JC was due out of service in May of 1995;
- leg AS was due out of service on April 11, 1997;

¹⁰ State Alarm is not "using Scan Alert system for this subscriber." See Report at 11. ScanAlert service was requested for the State Alarm client, but Ameritech Ohio refused to provide the substitute service. Such refusals to provide Scan Alert service are part of a pending complaint case against Ameritech Ohio. See In re Complaint of State Alarm (June 10, 1999), PUCO Case No. 99-704-TP-CSS.

¹¹ State Alarm representative Brenda Dull provided a list of State Alarm accounts to Ameritech Ohio early in the investigation process. Ms. Dull stated at that time that the list that was immediately available contained some inactive accounts, and that she would make herself available if questions arose concerning the interpretation of the list. Ms. Dull was not contacted concerning the account information and Ameritech Ohio did not ask for any assistance other than to gain access to certain facilities.

- leg LL was due out of service on September 28, 1998, but is still being billed to State Alarm;
- **leg JM is a working system**, and State Alarm is being billed by Ameritech Ohio for the service;
- leg CF was due out of service on February 17, 1998;
- leg U was ordered disconnected on November 20, 1998, but is still being billed to State Alarm (further disconnect instructions have been issued by State Alarm);
- leg DF was due out of service on November 22, 1992, and State Alarm's client moved within the same building (current client ED on the same main circuit);
- leg AQ was due out of service on November 3, 1998;
- leg N was ordered out of service in December of 1998, but was not removed; and
- leg S was due out of service on June 13, 1996.

Ameritech Ohio account personnel are aware of all the above cited disputes concerning billings for legs that have not been disconnected according to State Alarm's instructions.¹² Leg JM, listed as an active account by State Alarm, is client 15 on the 300 Line in Attachment D which shows that Ameritech technicians were able to obtain decibel level readings from an active State Alarm transponder for this account. This contradicts Ameritech Ohio's assertion that the "State Alarm transponder [was] not responding and/or verified as such." See Report at 16.

Ameritech Ohio should further investigate areas of disagreement that are revealed in State Alarm's review and communicate its results with designated business and technical representatives of State Alarm. Ameritech Ohio should expedite its evaluation of the status of leg JM and work to resolve billing disputes as quickly as possible.

¹² Ameritech Ohio has agreed to make billing adjustments for the situation involving leg N, retroactive to the first of 1999. While State Alarm has made some progress in obtaining credits on its accounts, Ameritech Ohio does not seem willing to restate bills to take into account reduced mileage and late payment charges that should be associated with the credits.

B. Master Circuits

As stated in the Report, three of Ameritech Ohio's master circuits¹³ directly connect to the master control center in Boardman. See Report at 14. State Alarm's Morse Polling Computer originates its signal at a zero decibel level, and no interface exists between State Alarm's facilities and those of Ameritech Ohio on any of these circuits. All three of these master circuits have the same master control signal levels, yet Ameritech Ohio states that the signal level delivered to master circuit 72 PMNA 186261 (*i.e.* 200 Line to Youngstown) and master circuit 6 PA 3323 (*i.e.* 300 Line to Youngstown) suffer from "excessive attenuation," by different amounts, in comparison to master circuit 7 PA 3321 (*i.e.* the 100 Line; not listed by Ameritech Ohio and implicitly neither over amplified or attenuated). Ameritech Ohio's conclusion that the 100 Line is not experiencing either high or low signal levels while the 200 and 300 Lines are experiencing differing degrees of excessive attenuation is ridiculous. See Report at 16.

Rather than use Ameritech Ohio circuit numbers for the 400 and 500 Lines, the Report identifies these lines as "IXC channel 23" and "IXC channel 24." See Report at 16; also Appendix F. These designations identify communication channels that are internal to systems that are not owned or controlled by Ameritech Ohio. Ameritech Ohio should be concerned with the signal handed off to its facilities rather than with the facilities of others that contain no amplifiers or bridges with which signals can interfere. The readings taken by Ameritech Ohio technicians at State Alarm's location in Boardman are incomprehensible,¹⁴ and State Alarm can only conclude

¹³ For reference purposes, these are the 100, 200, and 300 Lines. See SAS Ex. B (Baytos) at B-1; also Attachment D.

¹⁴ For instance, Attachment D reproduces the contents of Appendix F to the Report and compares the results with those of State Alarm. The Ameritech Ohio results bear no relationship to the active accounts that exist on the 400 and 500 Lines.

that the technicians became confused when dealing with the facilities that are internal to State Alarm. This confusion is a prime example of why closer coordination of Ameritech Ohio and State Alarm efforts are needed to evaluate the service that is being provided to State Alarm.¹⁵

State Alarm disagrees with the results of Ameritech Ohio's reported tests on the master circuits, and questions Ameritech Ohio's methods. For instance, State Alarm did not observe the use of oscilloscopes (or Morse Signal Monitors, see Report at 1) during the testing of the master circuits.¹⁶ As a result, Ameritech Ohio's report that many of its master circuits meet parameters is also suspect, and Ameritech Ohio should retest the master circuits that serve State Alarm with the assistance of State Alarm personnel.

Ameritech Ohio describes its procedures for testing circuit legs (see Report at 1-4), but does not describe the tests conducted on the master circuits. The lack of this description precludes a detailed review of the Ameritech Ohio testing process. State Alarm does not agree that its signal is over amplified on its 400 Line (see Report at 15, top of page¹⁷) or that its signal is excessively attenuated on its 500 Line (see Report at 15, bottom of page). State Alarm uses oscilloscopes to look at the true signal being sent along the circuitry that serves State Alarm. By the observation of Ameritech Ohio's technical work in Akron during its evaluation of circuits, State Alarm concludes that Ameritech Ohio made its measurements by generating tones to test

¹⁵ The Report states that two network technicians spent 64 hours in State Alarm's facilities in Youngstown (actually, Boardman). See Report at 5. This was an extraordinary amount of time for their task, during which they asked for no help other than to ask for the location of the telephone room.

¹⁶ The use of oscilloscopes was the topic of testimony in these cases. See State Alarm Post-Hearing Reply Brief (October 30, 1997) at 4-7 ("The Great Oscilloscope Debate").

¹⁷ In a confusing and contradictory manner, the Report states that the State Alarm signal towards the interexchange carrier for the 400 Line shows both excessive attenuation and excessive amplification.

the master circuits and recording the results based on assumptions regarding the operation of State Alarm's equipment. Incorrect assumptions lead to incorrect results.¹⁸

State Alarm checked its signal on the 500 Line and determined, by measurement of the actual signal, that State Alarm's bridges transmit the signal to the Ameritech Ohio 829 equipment at a near perfect, zero decibel level. The signal from the connection between State Alarm's long-distance carrier and the State Alarm equipment in Terminal Tower (*i.e.* the "channel bank" in Cleveland) is transmitted at a given decibel level and received by State Alarm's Tellabs bridges at that same level. In the event that Ameritech Ohio uses its test equipment to send a tone based on the assumption that the signal entering State Alarm's Tellabs bridges arrives at a level other than its true level, Ameritech will obtain a result that is different than the zero decibel level recorded by State Alarm. Ameritech Ohio's apparent test method is dependent on the involvement of State Alarm technicians in the review process. Once an incorrect assumption enters into Ameritech Ohio's calculations, Ameritech Ohio may make adjustments to its equipment that takes the circuit out of acceptable parameters. State Alarm's "adjustment" becomes Ameritech Ohio's "maladjustment."

State Alarm believes the events of early June on the 500 Line, addressed on pages 17-18 of the Report,¹⁹ were caused by incorrect adjustments to Ameritech Ohio equipment based on

¹⁸ Another method to test master circuits, which is preferred to the one apparently used by Ameritech Ohio and which was used to test circuits during early 1991, requires State Alarm to generate a tone in Boardman so that it can be used to test the line in Cleveland. A greater degree of coordinated effort is required to properly evaluate the service that is being provided to State Alarm.

¹⁹ The Report's special attention to the situation involving the 500 Line in early June is undoubtedly the result of a communication dated June 7, 1999 between counsel for State Alarm and Ameritech Ohio. Counsel for State Alarm wrote:

State Alarm is very concerned that it has experienced severe service problems on Ameritech's alarm circuits even during this period in which Ameritech is conducting its analysis of the service that it provides to State Alarm. Ameritech service on a main circuit that State Alarm

inaccurate measurements of the performance of the master circuit. An Ameritech Ohio technician made adjustments on the 500 Line at Terminal Tower on or around Friday, June 4, 1999. An Ameritech Ohio special service technician left instructions with Ameritech Ohio personnel that the circuit should not be touched without the technician's authorization, and he thereafter became unavailable to both State Alarm and Ameritech Ohio personnel. After a delay caused by the special instructions, Ameritech Ohio investigated the reported problems and told State Alarm on June 7 that the problem was resolved after one of its cards was adjusted. Problems continued, and were finally resolved late in the week following the Friday adjustments. The service was restored after an Ameritech Ohio technician adjusted the Ameritech Ohio equipment at the request of State Alarm.

State Alarm's equipment is properly adjusted, as stated above, and the Ameritech Ohio adjustments caused the problems that were not resolved for most or all of one week. Proper adjustment of Ameritech Ohio equipment, not "maladjustment" (see Report at 17), restored the alarm service. Ameritech Ohio would better understand this situation if State Alarm personnel had been involved in the investigation of the alarm circuits. Ameritech Ohio made its adjustments to the 500 Line master circuit without consultation with State Alarm, in clear violation of the commitment made by Ameritech Ohio. See Letter (April 9, 1999) (Attachment "A"; no adjustments without "State Alarm's direction.").

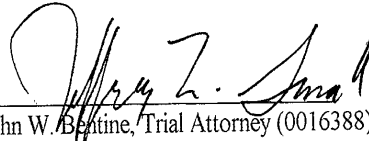
uses to serve clients in Cleveland and individual legs off that main circuit were plagued with service interruptions during June 5-7, 1999. The situation was worsened by Ameritech's inability to contact its supervisory personnel to resolve the problem. See Attachment E.

III. Conclusion

The message that the Report sends is that Ameritech Ohio will not make the effort to fairly check elements of its service to State Alarm, prepare a facilities evaluation and maintenance schedule, or address serious deficiencies in its technical support functions. Ameritech Ohio's report of "MAN HOURS" spent on its investigation is no doubt aimed at further arguing that Ameritech Ohio has extended an enormous effort in response to State Alarms complaints. As the foregoing memorandum points out, Ameritech Ohio has spent many of those "MAN HOURS" preparing materials for a confusing and inaccurate report. State Alarm is not satisfied that Ameritech Ohio has made any significant strides in its Report towards resolving problems with service to State Alarm.

Ameritech Ohio should be directed to correct the problems cited in these Comments by involving State Alarm in an evaluation of the service that Ameritech Ohio provides to State Alarm. More fundamentally, alarm circuit design changes should be ordered in agreement with the testimony and briefs submitted by State Alarm.

Respectfully submitted,

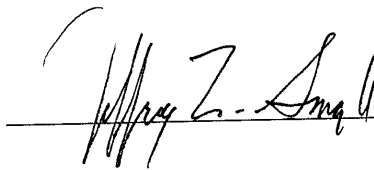
A handwritten signature in black ink, appearing to read "Jeffrey L. Small". The signature is written in a cursive, flowing style with a large initial "J".

John W. Bentine, Trial Attorney (0016388)
Jeffrey L. Small (0061488)
CHESTER, WILLCOX & SAXBE LLP
17 South High Street, Suite 900
Columbus, Ohio 43215-3413
(614) 221-4000

Attorneys for Complainant
State Alarm, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Comments of State Alarm Stating Dissatisfaction With Ameritech Ohio Report of Investigation* has been served upon C. Scott Rawlings, 2639 Wooster Road, Rocky River, Ohio 44116 via U.S. Mail, postage prepaid, this 3rd day of August, 1999.

A handwritten signature in black ink, appearing to read "Jeffrey Z. Small", is written over a horizontal line.



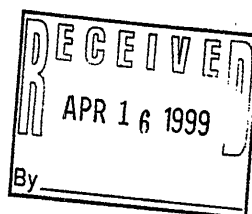
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Mark R. Ortlieb
Counsel

VIA FACSIMILE/US MAIL (614) 221-4012

April 9, 1999

Mr. John Bentine
Chester, Willcox & Saxbe
17 South High Street
Suite 900
Columbus, Ohio 43215-3413



Re: State Alarm v. Ameritech Ohio Case No. 95-1182-TP-CSS

Dear Mr. Bentine:

I am writing this letter in order to coordinate several matters between Ameritech Ohio and State Alarm arising out of the decision of the PUCO in State Alarm Inc v. Ameritech Ohio, Case No. 95-1182-TP-CSS entered March 25, 1999. As you know, Ameritech has been ordered by the PUCO to undertake an analysis of the multiplexed services provided by Ameritech to State Alarm. To that end, Ameritech will need cooperation from State Alarm on the items listed below.

1. For each multiplexed line provided to State Alarm by Ameritech, Ameritech will need to obtain from State Alarm a list which identifies:

Circuit Number
Billed Customer Name and Address
Customer Contact Telephone Number
Billing Number

The purpose of this information is, among other things, to ensure that Ameritech is testing each and every multiplexed circuit it is providing to State Alarm; that the Ameritech and State Alarm records match up; that Ameritech has the most up to date Customer Name in its records; and that Ameritech can identify the Customer when Ameritech is on the Customer's premises performing the required testing and analysis.

2. Ameritech also requests that State Alarm take this opportunity to notify its Customers that Ameritech technicians may be showing up at the Customer's location in order to conduct testing of the circuits and facilities.
3. Ameritech also requests that State Alarm designate a single point of contact in order to coordinate all issues with State Alarm regarding this network analysis. Coordination issues may include, but are not limited to, gaining access to State Alarm locations to conduct any necessary testing.

Page 2
John Bentine
April 9, 1999

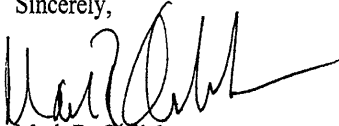
4. The Ameritech contact persons for purposes of this upcoming analysis will be Don Harr (216-858-5066) and Dale Metyk (216-858-5211).

5. Please be advised that Ameritech has made the decision that it will not, in the course of this network analysis, make any adjustments to circuits which are outside of established parameters (e.g., frequency response, tone level, etc.). Ameritech is concerned that such adjustments may disrupt the service which State Alarm is providing to its Customers. Ameritech will identify those circuits to the State Alarm contact which fall outside the established parameters. At State Alarm's direction, Ameritech will make the necessary corrections to bring the circuits into established parameters.

Ameritech anticipates that the network analysis will take several weeks to complete and therefore requests that the information identified above be provided to Ameritech no later than April 16, 1999. In order to minimize confusion, I propose that the information be provided directly to me. I in turn will disseminate it to the Ameritech personnel responsible for conducting the test.

Thank you for your cooperation in this matter and please call me at (312) 727-2860 with any questions about this matter.

Sincerely,



Mark R. Orlieb

cc: Mike Mulcahy
Mike Karson

ATTACHMENT B

CUSTOMER SERVICE RECORD						
01/20/99 PRINTED	-16- BILLDT	NONE EXCH	MZE CS	801 CUST	216 R11-2458 TELNUM	3 PAGE
BL GRP	CODE & QNTY	DESCRIPTION		UNIT RATE	TOTAL	TAX FSCDXT
	1	11L3AJ /SCS RMTVL/REF 1A		13.25	13.25	NNNNNN
		CKL 33 SUBTOTAL			16.25	
	CKL	40-8414 [REDACTED] [REDACTED] /LSO 330 768				
	1	OPMBX /SCS RMTVL/REF 1A		3.00	3.00	NNNNNN
	1	11L3AJ /SCS RMTVL/REF 1A		13.25	13.25	NNNNNN
		/DES TERM ON CPE ALARM				
		CKL 40 SUBTOTAL			16.25	
	CKL	53-3715 [REDACTED] [REDACTED] /LSO 330 782				
	1	AEVSA /SCS RMTVL/REF 1A		0.00	0.00	NNNNNN
		CKL 53 SUBTOTAL			0.00	
	CKL	54-2555 [REDACTED] [REDACTED] /SN [REDACTED]				
	1	OPMBX /SCS RMTVL/REF 1A		3.00	3.00	NNNNNN
	1	11L3AJ /SCS RMTVL/REF 1A		13.25	13.25	NNNNNN
		/DES TRM ON CONN BLOCK				
		CKL 54 SUBTOTAL			16.25	
	CKL	168-975 [REDACTED] [REDACTED] /SN [REDACTED]				
		/LSO 330 798				
	1	OPMBX /SCS RMTVL/REF 1A		3.00	3.00	NNNNNN
	1	11L3AJ /SCS RMTVL/REF 1A/DES WW CPE		13.25	13.25	NNNNNN
		CKL 168 SUBTOTAL			16.25	
	CKL	169-890 [REDACTED] [REDACTED] /SN [REDACTED]				
		/LSO 330 743				
	1	OPMBX /SCS RMTVL/REF 1A		3.00	3.00	NNNNNN
	1	11L3AJ /SCS RMTVL/REF 1A/DES WW CPE		13.25	13.25	NNNNNN
		CKL 169 SUBTOTAL			16.25	
	CKL	173-101 [REDACTED] [REDACTED] /LSO 330 755				
	1	OPMBX /SCS RMTVL/REF 1A		3.00	3.00	NNNNNN
	1	11L3AJ /SCS RMTVL/REF 1A/DES WW CPE		13.25	13.25	NNNNNN
		CKL 173 SUBTOTAL			16.25	

No
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Ameritech

CUSTOMER SERVICE RECORD

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NONE
EXCH

MZB
CS

601
CUST

216 R11-2458
TELNUM

2
PAGE

BL	CODE & GRP	QNTY	DESCRIPTION	UNIT RATE	TOTAL	TAX FSCMT
			/LSO 330 758			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			CKL 5 SUBTOTAL		16.25	
			CKL 16-800 [REDACTED]			
			/SN [REDACTED]			
			/LSO 330 743			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			/DES LOC CHAN TRM CONN BLOCK			
			CKL 16 SUBTOTAL		16.25	
			CKL 17-3400 [REDACTED]			
			/SN [REDACTED]			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			CKL 17 SUBTOTAL		16.25	
			CKL 28-68 [REDACTED]			
			/SCS [REDACTED]			
			/SN [REDACTED]			
			/LSO 330 757			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			CKL 28 SUBTOTAL		16.25	
			CKL 29-120 [REDACTED]			
			/SCS [REDACTED]			
			/SN [REDACTED]			
			/LSO 330 757			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			CKL 29 SUBTOTAL		16.25	
			CKL 30-523 [REDACTED]			
			/LSO 330 758			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN
		1	1L3AJ /SCS RMTVL/REF 1A	13.25	13.25	NNNNNN
			CKL 30 SUBTOTAL		16.25	
			CKL 33-272 [REDACTED]			
			/LSO 330 782			
		1	OPMBX /SCS RMTVL/REF 1A	3.00	3.00	NNNNNN

No
19

Ameritech

ATTACHMENT C

GKL/SEGMENT
CONVERSION CHART

1 TO 499

1	A	40	AR	80	CH	120	DZ	160	FR	200	MH	240	JZ	280	LR	320	NH	360	PZ	400	RR	440	TH	480	UZ
2	B	41	AS	81	CI	121	EA	161	FS	201	HI	241	KA	281	LS	321	NI	361	QA	401	RS	441	TI	481	VA
3	C	42	AT	82	CK	122	EB	162	FT	202	HK	242	KB	282	LY	322	NK	362	OB	402	RT	442	YJ	482	VB
4	D	43	AU	83	CL	123	EC	163	FU	203	IL	243	LC	283	MU	323	OL	363	OC	403	ST	443	YK	483	VC
5	E	44	AV	84	CM	124	ED	164	FV	204	HM	244	MD	284	NV	324	OM	364	OD	404	TV	444	YL	484	VD
6	F	45	AW	85	CN	125	EE	165	FW	205	IN	245	ME	285	OW	325	ON	365	OE	405	UW	445	YM	485	VE
7	G	46	AX	86	CP	126	EF	166	FX	206	HO	246	KG	286	OX	326	NO	366	OF	406	UX	446	YN	486	VF
8	H	47	AY	87	CQ	127	EG	167	FY	207	IO	247	KH	287	PY	327	NP	367	OG	407	UY	447	YO	487	VG
9	I	48	AZ	88	CR	128	EH	168	FZ	208	JA	248	KI	288	QZ	328	NR	368	OH	408	VZ	448	YP	488	VH
10	J	49	BA	89	CS	129	EJ	169	GA	209	KB	249	KJ	289	MA	329	NS	369	OJ	409	SA	449	YQ	489	VI
11	K	50	BB	90	CV	130	EK	170	GB	210	LC	250	KL	290	MB	330	NT	370	OK	410	SB	450	YT	490	VK
12	L	51	BC	91	CW	131	EL	171	GC	211	MD	251	KN	291	MC	331	NU	371	OL	411	SC	451	YU	491	VL
13	M	52	BD	92	CX	132	EM	172	GD	212	NE	252	KM	292	ND	332	NV	372	OM	412	SD	452	YV	492	VM
14	N	53	BE	93	CA	133	EN	173	GE	213	OF	253	KN	293	ME	333	NW	373	ON	413	SE	453	YW	493	VN
15	O	54	BF	94	CB	134	EO	174	GF	214	OG	254	KP	294	MF	334	NX	374	OP	414	SF	454	YX	494	VO
16	P	55	BG	95	CC	135	EP	175	GG	215	PH	255	KQ	295	MG	335	NY	375	OO	415	SG	455	YY	495	VP
17	Q	56	BH	96	CD	136	EQ	176	GH	216	PJ	256	KR	296	MH	336	NZ	376	OR	416	SH	456	YZ	496	VR
18	R	57	BI	97	CE	137	ER	177	GI	217	QK	257	KS	297	MI	337	PA	377	OS	417	SI	457	ZA	497	VS
19	S	58	BK	98	CF	138	ET	178	GJ	218	QL	258	KT	298	MJ	338	PB	378	OT	418	SK	458	ZB	498	VT
20	T	59	BL	99	CG	139	EU	179	GK	219	RM	259	KV	299	NL	339	PC	379	OU	419	SL	459	ZC	499	VU
21	U	60	BM	100	CH	140	EV	180	GL	220	SN	260	KW	300	MM	340	PD	380	OV	420	SM	460	UD		
22	V	61	BN	101	CI	141	EW	181	GN	221	TO	261	KX	301	NN	341	PE	381	OW	421	SN	461	UE		
23	W	62	BO	102	CK	142	EX	182	GP	222	UP	262	KY	302	MO	342	PF	382	OX	422	SP	462	UF		
24	X	63	BQ	103	CL	143	EY	183	GQ	223	VQ	263	KZ	303	MQ	343	PG	383	OY	423	SQ	463	UG		
25	Y	64	BR	104	CM	144	EZ	184	GR	224	WR	264	LA	304	MR	344	PH	384	QZ	424	SR	464	UH		
26	Z	65	BS	105	CO	145	FA	185	GS	225	XA	265	LB	305	MS	345	PJ	385	RA	425	SS	465	UI		
27	AA	66	BT	106	CP	146	FB	186	GT	226	YB	266	LC	306	MT	346	PK	386	RB	426	ST	466	UJ		
28	AB	67	BU	107	DD	147	FC	187	HU	227	YC	267	LD	307	MU	347	PL	387	RC	427	SU	467	UK		
29	AC	68	BV	108	DE	148	FD	188	HV	228	ZE	268	LE	308	MV	348	PM	388	RD	428	SV	468	UL		
30	AD	69	BW	109	DF	149	FE	189	GU	229	AF	269	LF	309	NN	349	PN	389	RE	429	SW	469	UN		
31	AE	70	BX	110	EG	150	FF	190	GV	230	AG	270	LG	310	MX	350	PO	390	RF	430	SX	470	UP		
32	AF	71	BY	111	EH	151	FG	191	HW	231	AH	271	LH	311	NY	351	PP	391	RG	431	SY	471	UQ		
33	AG	72	BZ	112	FI	152	FH	192	IX	232	AI	272	LI	312	MZ	352	PS	392	RH	432	SZ	472	UR		
34	AH	73	CA	113	FJ	153	FI	193	JA	233	BJ	273	LJ	313	NA	353	PT	393	RI	433	TA	473	US		
35	AI	74	CB	114	FK	154	FJ	194	KB	234	AK	274	LK	314	NB	354	PU	394	RJ	434	TB	474	UT		
36	AJ	75	CC	115	FL	155	FK	195	LC	235	BL	275	LL	315	NC	355	PV	395	RL	435	TC	475	UU		
37	AK	76	CD	116	FM	156	FL	196	MD	236	CM	276	LM	316	ND	356	PW	396	RM	436	TD	476	UV		
38	AL	77	CE	117	FN	157	FM	197	HE	237	DN	277	LN	317	NE	357	PX	397	RN	437	TE	477	UX		
39	AM	78	CF	118	FO	158	FN	198	IF	238	EO	278	LO	318	NF	358	PY	398	RO	438	TF	478	UY		
40	AN	79	CG	119	GP	159	FO	199	IG	239	FV	279	LP	319	NG	359	PZ	399	RQ	439	TG	479	UZ		

COMPARISON CHART
AMERITECH'S BEFORE AND AFTER
STATE ALARM AFTER READINGS ON ALL ACTIVE SYSTEMS

	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	NOTES -
1							
2	16	15	-18	51			
3	13	14	**NO	52			
4				53	17	-19	**NO = NO SYSTEM AT THIS LOCATION
5				54	15	-18	**NOT LISTED
6	18	16	-19	55			
7				56			
8	17	15	-19	57	17	-19	The correct way to display the number is in the negative
9	12	18	-20	58	NIL		
10				59			
11				60			
12				61	20	-22	The ideal level is -16
13	16	14	-17	62			
14	16	12	-16	63			
15				64			
16				65			
17	18	17	-20	66	18	-20	
18				67	15	-19	
19				68	15	-18	
20	18	17	-19	69	17	-23	
21	17	17	-19	70			
22				71	9	-19	
23				72	15		
24				73	14	-18	
25				74	17		
26				75			
27	15	**NIL		76	18	-21	
28				77	14	-17	
29				78			
30				79			
31				80			
32				81			
33	9	15	-18	82	24	-26	
34	12	14	-16	83			
35	15	15	-18	84			
36				85			
37				86			
38				87			
39				88			
40				89			
41	18	18	-19	90	17	NO	
42				91	14	-17	
43				92			
44				93			
45				94			
46	15	15	-18	95			
47	4	15	-18	96			
48				97			
49				98			
50				99			
				100			

100 SYSTEMS

COMPARISON CHART
AMERITECH'S BEFORE AND AFTER
STATE ALARM AFTER READINGS ON ALL ACTIVE SYSTEMS

	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	NOTES
1				51	17	19	
2				52	15	23	
3				53	14	20	
4				54	15	16	
5				55	16	18	
6				56			
7				57	15	13	
8				58			
9				59			
10				60			
11				61	22	18	
12				62	17	NL	
13				63		NO	
14				64			
15				65			
16				66			
17				67			
18				68			
19				69			
20				70	18	20	
21				71			
22				72	18	18	
23				73	18	22	
24				74			
25				75			
26				76			
27				77			
28				78	14	16	
29				79	11	18	
30				80	14	18	
31				81	15	NO	
32				82			
33				83			
34				84			
35				85			
36				86			
37				87	9	18	
38				88	15	NO	
39				89			
40				90			
41				91	12	15	
42				92	16	18	
43				93	12	17	
44				94	12	16	
45				95	12	NO	
46				96			
47				97	16	17	
48				98			
49				99			
50				100			

200 SYSTEMS

COMPARISON CHART
AMERITECH'S BEFORE AND AFTER
STATE ALARM AFTER READINGS ON ALL ACTIVE SYSTEMS

AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	NOTES
1			61	21	-16'	*NO = NO SYSTEM AT THIS LOCATION
2	22	-15	62	23		**NOT LISTED
3			63			
4	24	NO	64	21	-13	The correct way to display the number is in the negative
5	N/L		65			
6			66	26	-19	The Ideal level is -15
7	21	-13	67	26		
8			68	19	NO	
9			69	N/L		
10	20	-12	70	25	-18	
11			71			
12	24	-17	72			
13	24	-13	73			
14	22		74	23	-16'	
15	18	-12	75			
16	25	-18	76			
17			77			
18			78			
19	22	-16	79	23	-17	
20			80			
21			81			
22			82			
23	20	NO	83	22	-16'	
24			84	N/L	NO	
25			85			
26			86			
27			87			
28	25	-19	88			
29	27	-20	89	21	NO	
30	23	-18	90	25	NO	
31	25	-18	91			
32			92	24	-17	
33			93			
34			94			
35	19	-16	95			
36			96			
37			97			
38			98			
39			99			
40			100			
41	30	-17				
42						
43						
44						
45						
46	23	-16				
47						
48						
49	23	-18				
50	22	-17				

300 SYSTEMS

COMPARISON CHART
AMERITECH'S BEFORE AND AFTER
STATE ALARM AFTER READINGS ON ALL ACTIVE SYSTEMS

AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	AMERITECH BEFORE	AMERITECH AFTER	STATE ALARM AFTER	NOTES
0			51			
1			52			
2			53			
3			54			
4			55			
5			56			
6			57			
7			58			
8			59			
9			60			
10			61			
11			62			
12			63			
13			64			
14			65			
15			66			
16			67			
17			68			
18			69			
19			70			
20			71			
21			72			
22			73			
23			74			
24			75			
25			76			
26			77			
27			78			
28			79			
29			80			
30			81			
31			82			
32			83			
33			84			
34			85			
35			86			
36			87			
37			88			
38			89			
39			90			
40			91			
41			92			
42			93			
43			94			
44			95			
45			96			
46			97			
47			98			
48			99			
49			100			
50						

COMPARISON CHART

500 SYSTEMS

ATTACHMENT E

CHESTER WILLCOX & SAXBE LLP
Attorneys and Counselors at Law

JOHN W. BENTINE

Direct Dial (614) 334-6121

June 7, 1999

VIA TELECOPIER 312-845-8871 – Mail Copy to Follow
Mark Ortlieb Esq.
Ameritech
225 West Randolph Street, Floor 27B
Chicago, Illinois 60606

Re: In the Matter of the Complaint of State Alarm, Inc.,
PUCO Case No. 95-1182-TP-CSS

Dear Mark:

This letter provides State Alarm's response to your letter dated May 6, 1999 that concerned the Commission's March 25, 1999 Order in the above captioned case.

Your rejection of State Alarm's previous proposal is based on the rejection of State Alarm's treatment of late charges, payments to escrow, and the length of time that repayment would take place. As far as the late payment charges, it is particularly disheartening that your letter appears to insist upon payment of "late charges" on sums that the Commission stated are not due Ameritech. Your position retreats from your recognition in our April 23, 1999 teleconference that the payment of these sums is not required in light of the Commission's March 25, 1999 Order.

The March 25, 1999 Order did not address the dispute concerning service that was not the subject of testimony – *i.e.* service rendered after the July 28, 1997 start of the hearing. However, pages 38 and 39 of the Order recognize the inability of Ameritech to discontinue service under circumstances involving a bona fide dispute, and states that it is reasonable under such circumstances to have payments placed in escrow. This is exactly the procedure that State Alarm proposes to follow concerning service rendered after July 28, 1997.

In order to address your concerns over the length of time over which State Alarm would

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Mark Ortlieb, Esq.

June 7, 1999

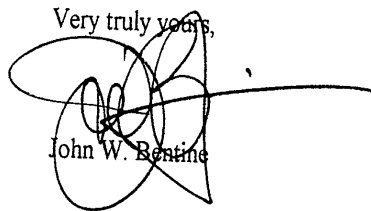
Page 2 of 2

make its payments, State Alarm is willing to increase the payments for the period following July 1997 concerning the data circuits to \$3,400 and make half of the payments that it designated in its previous proposal for the escrow account directly to Ameritech in payment of past due amounts on the alarm circuits, provided that Ameritech does not object to the level of payments being placed in escrow that are subject to bona fide dispute. Payments into escrow at less than one hundred percent of billed amounts is consistent with a likely determination of inadequate service concerning the multiplexed circuits after July 28, 1997. State Alarm would also consider increasing its payments to Ameritech once the service problems with the multiplexed circuits are resolved and Scan Alert service again becomes available to State Alarm. Such improvements will improve State Alarm's ability to make payments.

This proposal incorporates the same understandings as are contained in State Alarm's first proposal. I disagree with your apparent conclusion that the Commission's Order resolved billing disputes between State Alarm and Ameritech. Ameritech presented spreadsheets as evidence in its "self complaint" case, a case in which the Commission denied Ameritech any remedy. Finally, Ms. Dull's dealings with Ameritech's regular billing personnel has been very unsatisfactory. As one example, she has been attempting to resolve a double billing problem for the multiplex circuits (Westlake Terrace on Circuit 7PA3321) for years. Your designation of a responsible billing representative to work with Ms. Dull would help to expedite the resolution of disputes between the parties so that they can concentrate on more productive matters.

Finally, State Alarm is very concerned that it has experienced severe service problems on Ameritech's alarm circuits even during this period in which Ameritech is conducting its analysis of the service that it provides to State Alarm. Ameritech service on a main circuit that State Alarm uses to serve clients in Cleveland and individual legs off that main circuit were plagued with service interruptions during June 5-7, 1999. The situation was worsened by Ameritech's inability to contact its supervisory personnel to resolve the problem. This recent incident will be featured in State Alarm's complaint concerning Ameritech service on the alarm circuits from July 28, 1997 onward.

Very truly yours,



John W. Bentine

cc: Don Shury
C. Scott Rawlings