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November 19, 1999

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (P/W)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Competitive Carriers for Commission Action To Support Local Competition In BellSouth's Service Territory	)	)	Docket No. 981834-TP
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation	)	)	Docket No. 990321-TP
	)	)	Filed: November 19, 1999

**PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), in compliance with the Order Establishing Procedure (Order No. PSC-99-7144-PAA-TP), issued September 7, 1999, hereby submits its Prehearing Statement for the above-styled matter.

**A. Witnesses**

BellSouth proposes to call the following witnesses to offer testimony on the issues in this docket:

<b><u>Witness</u></b>	<b><u>Issue(s)</u></b>
Jerry D. Hendrix (Direct and Rebuttal)	1-2, 5-8, 13-15, 17-19, 21
W. Keith Milner (Direct and Rebuttal)	3-4, 9-12, 16, 20

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony, witnesses to address issues not presently designated that may be designated by the

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Prehearing Officer at the prehearing conference to be held on December 9, 1999. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

**B. Exhibits**

Jerry D. Hendrix	JDH-1: Generic Collocation Agreement
	JDH-2: Physical Expanded Interconnection Application Document and Instructions
W. Keith Milner	WKM-1: Building Code Excerpts Dade County Edition

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

**C. Statement of Basic Position**

BellSouth's position on the individually numbered issues in these dockets are consistent with the Act and the pertinent rulings of the Federal Communications Commission ("FCC") and this Commission. Each of BellSouth's positions should be sustained by this Commission.

#### **D. BellSouth's Position on the Issues**

**Issue 1: When should an ILEC be required to respond to a complete and correct application for collocation and what information should be included in that response?**

Position: BellSouth will inform an ALEC within 15 calendar days of receipt of an application whether the application is accepted or denied as a result of space availability. BellSouth will also advise the applicant whether the application is complete and correct and, if not, the changes that must be made.

**Issue 2: If the information included in the initial response is not sufficient to complete a firm order, when should the ILEC provide such information or should an alternative procedure be implemented?**

Position: BellSouth will provide an application response within 30 calendar days of receipt of the complete and correct application and application fee. The application response will include estimates of the various fees, the estimated date the space will be available, and the configuration of the space.

**Issue 3: To what does the term 'premises' apply, as it pertains to physical collocation and as it is used in the Act, the FCC's Orders, and FCC Rules?**

Position: The term "premises" applies to LEC central offices, serving wire centers and tandem offices, all buildings or similar structures owned or leased by the ILEC that house LEC network facilities, and any structures that house LEC network facilities on public rights-of-way.

**Issue 4: What obligations, if any, does an ILEC have to interconnect with ALEC physical collocation equipment “off-premises”?**

Position: A LEC has the obligation to accommodate ALEC requests for fiber optic facilities to be placed in BellSouth's entrance facilities.

**Issue 5: What terms and conditions should apply to converting virtual collocation to physical collocation?**

Position: The terms and conditions that should apply for converting virtual to physical collocation should be consistent with the terms and conditions of the assessment and provisioning of physical collocation. In addition, the terms should be negotiated between the carriers and formalized in a collocation agreement.

**Issue 6: What are the appropriate response and implementation intervals for ALEC requests for changes to existing collocation space?**

Position: The response interval for change to an ALEC's existing collocation space should not exceed 30 days and the implementation interval should not exceed 60 days for normal conditions or 90 days for conditions other than normal.

**Issue 7: What are the responsibilities of the ILEC and collocators when:**

- a) A collocator shares space with, or subleases space to, another collocator;
- b) A collocator cross-connects with another collocator.

Position 7(a): The appropriate terms and conditions regarding shared/subleased caged collocation are contained in Section 3.1. of Exhibit JDH-1;

Position 7(b): The appropriate terms and conditions for co-carrier cross connects are located in Section 5.6 of Exhibit JDH-1.

**Issue 8: What is the appropriate provisioning interval for cageless physical collocation?**

Position: The appropriate provisioning interval for cageless physical collocation should be 90 calendar days under normal conditions.

**Issue 9: What is the appropriate demarcation point between ILEC and ALEC facilities when the ALEC's equipment is connected directly to the ILEC's network without an intermediate point of interconnection?**

Position: BellSouth should designate the point of interconnection between the ALEC's network and/or equipment and BellSouth's network. For 2-wire and 4-wire connections to BellSouth's network, the demarcation point should be a common block on the BellSouth designated conventional distributing frame; for all other terminations, BellSouth should designate a demarcation point on a per arrangement basis.

**Issue 10: What are reasonable parameters for reserving space for future LEC and ALEC use?**

Position: BellSouth and ALECs should be allowed to reserve space for two-year forecast. If it is apparent the space will not be used and BellSouth or an

ALEC has a need for the space following the expiration of the two-year period, the ALEC must forfeit the use of that space. Likewise, BellSouth will forfeit any of its reserved space that will not be used within the two-year window if needed by an ALEC.

**Issue 11: Can generic parameters be established for the use of administrative space by an ILEC, when the ILEC maintains that there is insufficient space for physical collocation? If so, what are they?**

Position: Administrative space should be defined as any space not directly supporting the installation or repair of both telephone equipment and customer service. Generic parameters cannot be established because there are space, equipment, building code, manpower and other requirements unique to each central office.

**Issue 12: What types of equipment are the ILECs obligated to allow in a physical collocation arrangement?**

Position: Equipment that can be used to provide telecommunications service, such as Digital Subscriber Line Access Multiplexers (DSLAMS), routes, Asynchronous Transfer Mode (ATM) multiplexers, Remote Switching Modules (RSMs), and stand-alone switching equipment should be allowed in a physical collocation arrangement. Equipment used solely to provide enhanced services should not be allowed in a physical collocation arrangement.

**Issue 13: If space is available, should the ILEC be required to provide price quotes to an ALEC prior to receiving a firm order for space in a central office (CO)?**

**a) If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from the ALEC, when should the quote be provided?**

**b) If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from that ALEC, should the quote provide detailed costs?**

Position: An ILEC should be required to provide price quotes to an ALEC prior to receiving a firm order. BellSouth provides price estimates (subject to true-up) to an ALEC within 30 days of receipt of a complete and accurate application and application fee.

**Issue 14: Should an ALEC have the option to participate in the development of the ILEC's price quote, and if so, what time frames should apply?**

Position: No. The ILEC's price estimate is an estimate of the cost of the work that will be done by the ILEC. The ALEC's participation in this estimate should be limited to providing detailed and accurate information regarding the collocation arrangement it is requesting.

**Issue 15: Should an ALEC be permitted to hire an ILEC certified contractor to perform space preparation, racking and cabling, and power work?**

Position: An ALEC should be allowed to use a certified contractor to perform work on the ALEC's dedicated collocation space. An ALEC should not be allowed to hire a certified contractor to perform site readiness work for collocation.



**Issue 16: For what reasons, if any, should the provisioning interval be extended without the need for an agreement by the applicant ALEC or filing by the ILEC of a request for an extension of time?**

**Position:** There are three situations where provisioning intervals should be extended. They are: 1) provisioning of collocation arrangements encountering extraordinary conditions; 2) provisioning of collocation arrangements encountering delays in the permitting process; and 3) provisioning collocation arrangements associated with central office building additions.

**Issue 17: How should the costs of security arrangements, site preparation, collocation space reports, and other costs necessary to the provisioning of collocation space, be allocated between multiple carriers?**

**Position:** The recovery of volume insensitive costs associated with security arrangements, site preparation, and collocation space reports will be allocated among all parties that benefit and in an equitable manner.

**Issue 18: If insufficient space is available to satisfy the collocation request, should the ILEC be required to advise the ALEC as to what space is available?**

**Position:** Yes. BellSouth will notify the applicant what space is available if insufficient space is available to satisfy the collocation request.

**Issue 19: If an ILEC has been granted a waiver from the physical collocation requirements for a particular CO, and the ILEC later makes modifications that create space that would be appropriate for collocation, when should the ILEC be required to inform the Commission and any requesting ALECs of the availability of space in that office.**

Position: BellSouth will maintain a waiting list of all ALECs that have submitted an application and when space becomes available in a previously exhausted central office, BellSouth will notify the ALECs that can be accommodated a maximum of 60 days prior to the space availability date. BellSouth will inform the Commission on the space availability date that space for physical collocation has been made available by filing with the Commission to remove the waiver from that central office.

**Issue 20: What process, if any, should be established for forecasting collocation demand for CO additions or expansions?**

Position: The Commission should encourage ALECs to provide forecasts periodically for a planning horizon of two years such that BellSouth can take ALEC forecasts into account as one factor when planning for central office additions, expansions, or replacements.

**Issue 21: Applying the FCC's "first-come, first-served" rule, if space becomes available in a central office because a waiver is denied or a modification is made, who should be given priority?**

Position: BellSouth will maintain a waiting list of ALECs and the amount of space each requested in the order of BellSouth's receipt of each collocation application. When space becomes available, space will be offered in a "first-come, first right of refusal" manner.

**E. Stipulations**

None

**F. Pending Motions**

None

**G. Other Requirements**

None

Respectfully submitted this 19th day of November, 1999.

BELLSOUTH  
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**CERTIFICATE OF SERVICE**  
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