

NANCY B. WHITE  
GENERAL COUNSEL-FLORIDA

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

ORIGINAL

RECORDS AND REPORTING

NOV 30 PM 4:34

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November 30, 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 No. 991697-TP (Holly-Navarre Central Office)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Waiver of Physical Collocation Requirements in the Holly-Navarre Central Office, which we ask that you file in the captioned 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

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Favono
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

NBW/vf

cc: All parties of record  
Marshall M. Criser III  
R. Douglas Lackey

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

14608 NOV 30 99

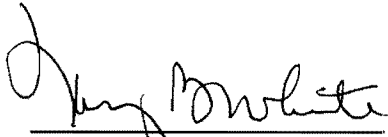
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 991697-TP (Holly-Navarre C.O.)**

I hereby certify that a true and correct copy of the foregoing  
has been served by U. S. mail this 30th day of November, 1999 to:

Tim Vaccaro  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

AOZ - American Metrocomm  
Attention: Sam Robinson  
1615 Poydras Street  
Suite 1050  
New Orleans, LA 70112

  
\_\_\_\_\_  
Nancy B. White

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.: 991697-TP  
Inc.'s Petition for Waiver of collocation )  
In the Holly-Navarre Central Office )  
\_\_\_\_\_ ) Filed: November 30, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Waiver in accordance with Order No. PSC-99-1744-PAA-TP, issued on September 7, 1999 ("PSC Order"), the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order"). Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements as set forth in the Act, in the Order and in the PSC Order for the Holly-Navarre Central Office ("CO") located at 1810 State Road 87, Navarre, Florida 32566. BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC") on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth expects to construct an addition to the building.

1. The Holly-Navarre CO building houses DMS switches providing local dial tone. Circuit equipment also located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross-connect panels and provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Holly-Navarre CO is growing rapidly and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 11,534 in 1999 and 13,835 by year end 2000. To meet the demands of the expanding

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FPSC-RECORDS/REPORTING

customer base, BellSouth currently has on order from the manufacturer additional Toll/Circuit and Switching equipment.

3. Under the Act, Incumbent Local Exchange Companies ("ILECs") have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

47 U.S. § 251( c )(b). Thus, an ILEC is required to provide physical collocation unless it is "not practical...because of space limitations." Id. The term "space limitations" encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to "retain a limited amount of floor space for defined future uses" (Order, Par. 604). Without the latter element, competitive entrants "could prevent incumbent LECs from serving their customers effectively." Id.

4. Due to space limitations in the Holly-Navarre CO, BellSouth is unable to provide physical collocation to additional ALECs. The collocation needs of the sole applicant for space, American MetroCom, have changed since their initial application and BellSouth will be able to fulfill the new request. There will be no room however for additional physical collocation until the addition is completed. The space limitations faced by BellSouth are the result of the use of space by the amount of existing

BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers.

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and
6. BellSouth determined available collocation space by subtracting Items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for additional physical collocation until the addition is completed. Attached hereto is the space assessment worksheet that details the procedure set forth above. (Exhibit 1). This exhibit also identifies the central office language identifier, the identity of the requesting ALEC and the amount of space sought, the total amount of space at the premises and floor loading requirements. Also attached hereto as Exhibit 2 are floor plans that contain the remaining information required by the PSC Order.

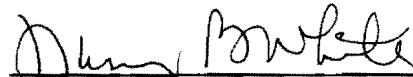
7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth currently has plans to build an addition to the facility.

8. The Holly-Navarre CO will contain no available space for physical collocation after American MetroCom's new request is fulfilled and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Holly-Navarre CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Holly-Navarre CO until such time as the building addition is completed.

Respectfully submitted this 30th day of November, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5555



R. DOUGLAS LACKEY  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0747

**SPACE ASSESSMENT WORK SHEET**

**PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS**

**11/8/99**

1	CENTRAL OFFICE CLLI:		<u>HLNVFLMA</u>	
2	COLLOCATOR AND AMOUNT OF SPACE			<u>          </u> sf
3.	TOTAL GROSS SQ. FT.			<u>4399</u> sf
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED			
a.	BST occupied equipment space		<u>3718</u>	sf
	Nonregulated services		<u>0</u>	sf
	Administrative offices - not related to installing, repairing, maintaining CO equipment		<u>365</u>	sf
b.	Retired equipment		<u>0</u>	sf
c.	Future BST space reservations		<u>119</u>	sf
	Switch	<u>31.5</u>		
	Circuit	<u>87.5</u>		
	Power	<u>          </u>		
	Frame	<u>          </u>		
d.	Collocation space		<u>0</u>	sf
e.	Other 3-d party space		<u>0</u>	sf
	What is the occupancy			
f.	Switch turnaround space			
	Service Yr <input type="text"/>		<u>0</u>	sf
g.	Remaining space		<u>197</u>	sf
	Unavailable space		<u>197</u>	
	Space available for Collocation		<u>0</u>	
h.	Central office growth plans.			
		Forecast completion		
		Yr            Cost		
	Addition	<input type="text"/> 2000	<u>3128</u>	sf
	Renovation	<input type="text"/>	<u>0</u>	sf
i.	Any other plans for relieving space exhaust			
5.	Floor loading	All space	150#sf	<u>4399</u> sf
		Power rooms only	350#sf	<u>0</u> sf

**NAME OF PERSON FILLING OUT FORM:**

James D Bloomer - Manager - Facility Planning  
(PRINT NAME AND TITLE)

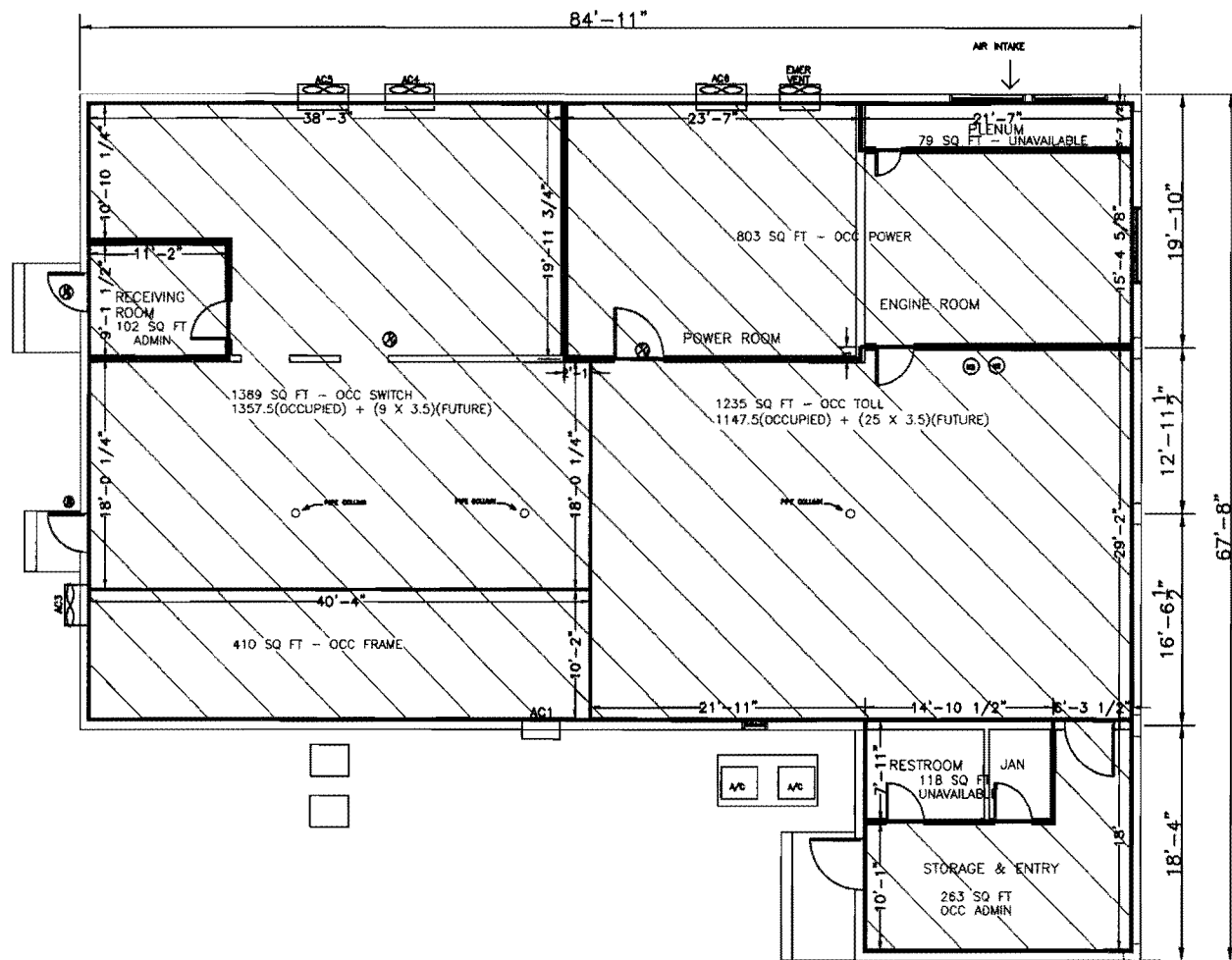
TEL. NO. 904-350-3428

AUTHORIZED BY: \_\_\_\_\_

Same \_\_\_\_\_

TEL. NO. Same

Exhibit 1



NOVEMBER 9, 1999

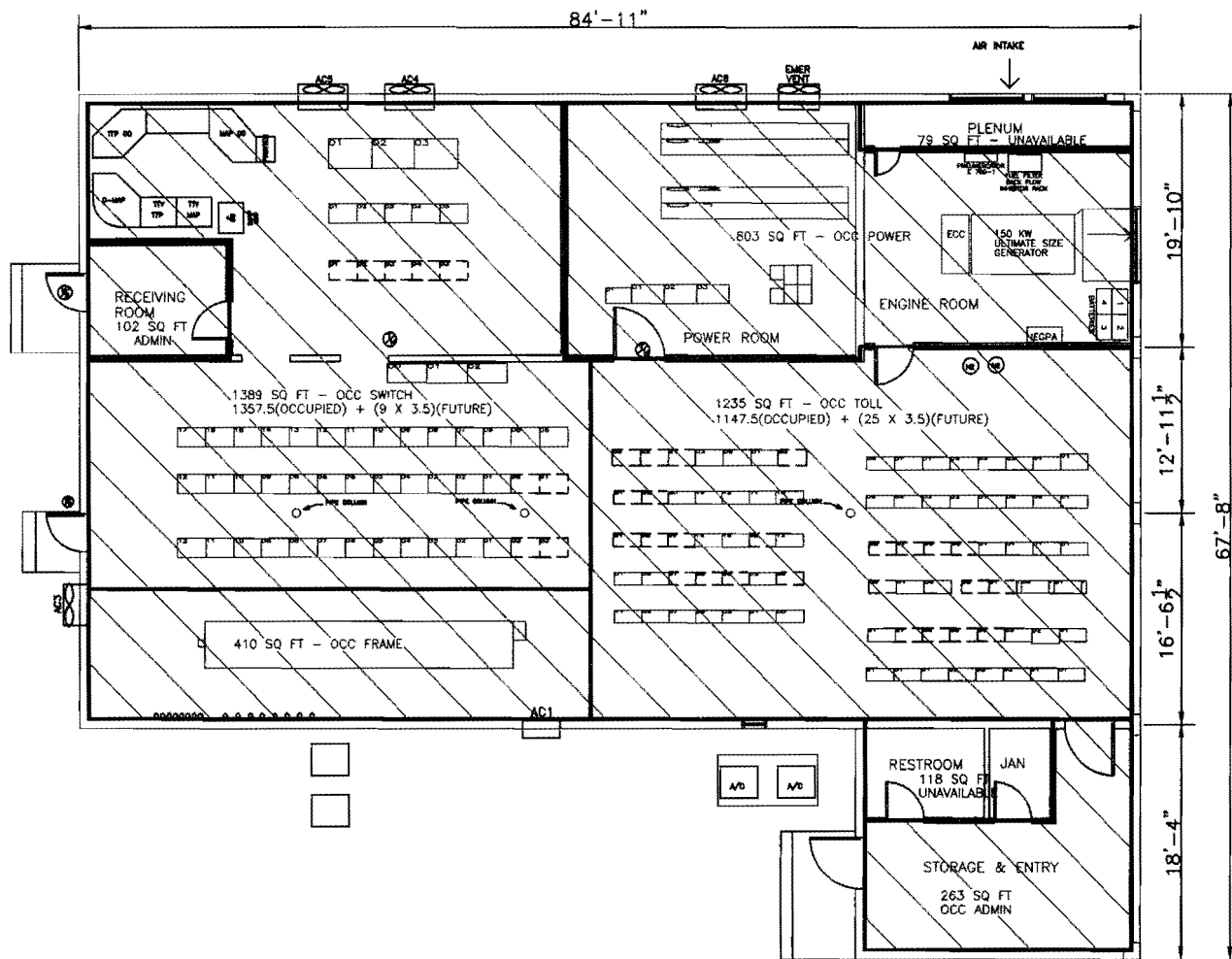
A	TOTAL GROSS SQ FT	4399
B	AIR PLENUM	79
	RESTROOM & JANITOR	118
	TOTAL UNAVAILABLE SPACE	197
C	SWITCH	1357.5
	TOLL	1147.5
	FRAME	410
	POWER & ENGINE	803
	ADMINISTRATIVE	102 + 263 = 365
	TOTAL OCCUPIED SPACE	4083
D	SWITCH	9 X 3.5 = 31.5
	TOLL	25 X 3.5 = 87.5
	TOTAL RESERVED SPACE	119



31488 HOLLY-NAVARRE FLOOR PLAN  
PAGE 1 - PSC WAIVER ITEM 4 A-F

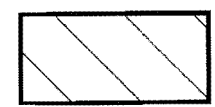
Exhibit 2 Page 1 of 3



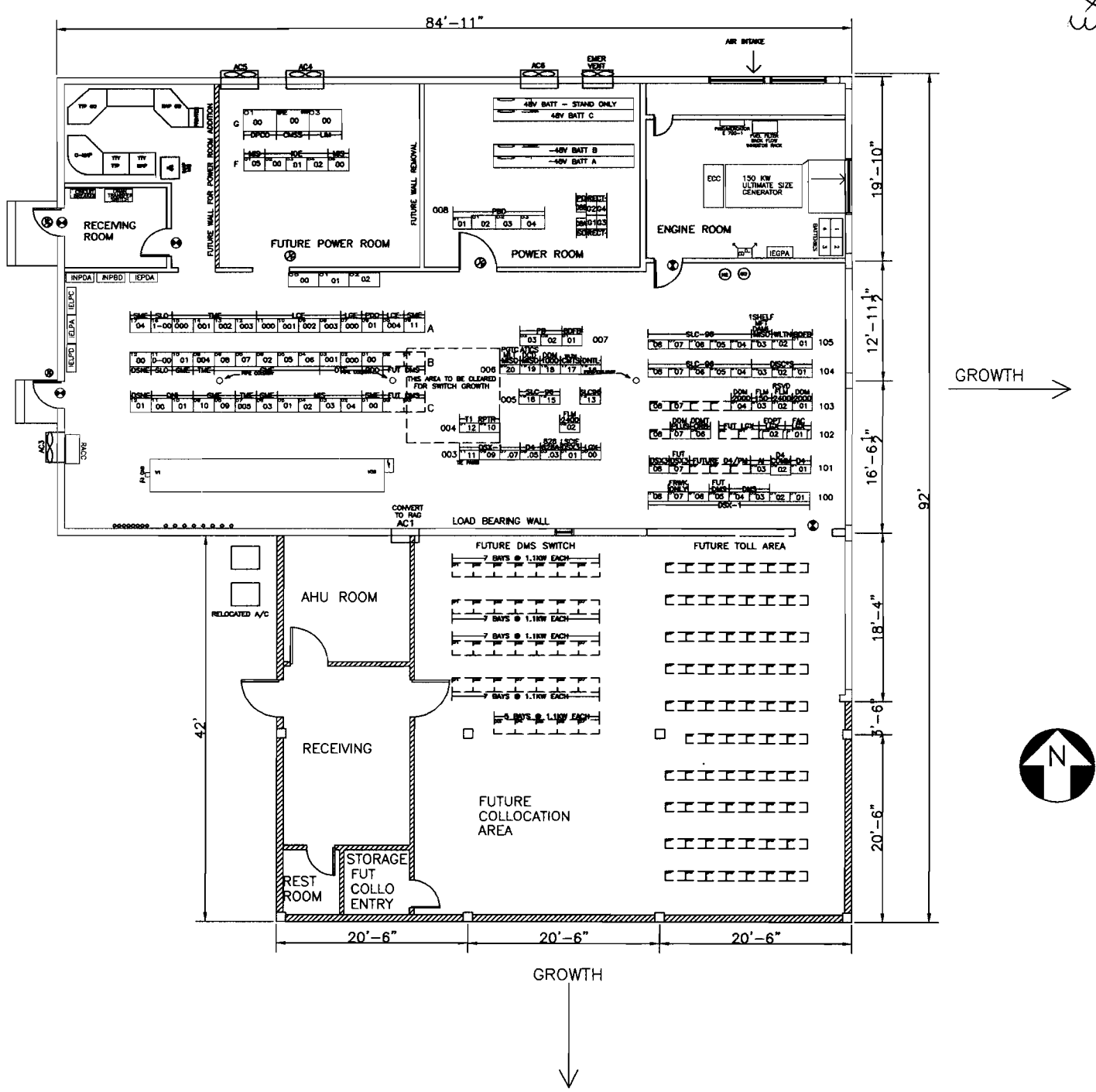


NOVEMBER 9, 1999

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31488 HOLLY-NAVARRE FLOOR PLAN  
PAGE 2 - PSC WAIVER ITEM 4 A-F



31488 HOLLY-NAVARRE FLOOR PLAN  
 YEAR 2000 BUILDING ADDITION  
 PSC WAIVER ITEM 4 G-H