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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:

Petition of ACI Corp. D/B/A Accelerated Connections, Inc. for Generic Investigation to Ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated Comply with Obligation to Provide Alternative Local Exchange Carriers with Flexible, Timely, and Cost-efficient Physical Collocation.	**Docket No. 990321-TP**
Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory.	**Docket No. 981834-TP**

REVISED DIRECT TESTIMONY OF JULIA O. STROW

ON BEHALF OF

INTERMEDIA COMMUNICATIONS INC.

January 13, 2000

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Q: Please state your name, employer, position and business address.

A: My name is Julia Strow. I am employed by Intermedia Communications Inc. ("Intermedia") as Assistant Vice President, Industry Policy. My business address is 3625 Queen Palm Drive, Tampa, Florida 33619.

Q: What are your responsibilities in that position?

A: I am a primary interface between Intermedia and the incumbent local exchange carriers ("ILECs"). I am responsible for the setting of Intermedia's state and federal regulatory policy. In that capacity, I testify on behalf of Intermedia in federal and state proceedings dealing with local competition issues. I am also responsible for interconnection negotiations with – and arbitrations against ILECs, and in rulemaking proceedings addressing unbundled network elements, interconnection, collocation, resale, and related matters

Q: Please briefly describe your educational background and professional experience.

A: I graduated from University of Texas in 1981 with a B.S. in Communications. I joined AT&T in 1983 as a Sales Account Executive responsible for major market accounts. I subsequently held several positions with BellSouth Telecommunications, Inc.'s ("BellSouth's") Marketing and Regulatory Departments. I joined Intermedia in April 1996 as Director of Strategic Planning and Industry Policy, and subsequently was promoted to my current position.

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Q: Please describe the nature of Intermedia's business.

A: Intermedia is one of the country's largest and fastest growing integrated communications providers (ICPs), providing a full range of local and long distance voice and data services to business and government end users, long distance carriers, information service providers, resellers and wireless carriers. Intermedia also provides Internet connectivity, web site management, and private network solutions on a nationwide basis through Digex, our national information service provider affiliate.

Intermedia has operated as a facilities-based communications service provider in Florida beginning in 1992 with data services and moving into voice services in 1996. Intermedia has five Nortel DMS 500 voice switches in the state of Florida. These switches are located in Jacksonville (1), Orlando (2), Tampa (1), and Miami (1). These voice switches provide a full range of local exchange services and long distance services. Intermedia also has forty-seven data switches in the state of Florida. Fifteen of the forty-seven data switches comprise the State of Florida frame relay network. This network is dedicated to the State of Florida for use by its agencies and no commercial traffic traverses this network. The commercial frame relay network in Florida is comprised of twenty-five switches throughout Florida located in Daytona Beach, Ft. Lauderdale, Gainesville, Jacksonville, Miami, Ocala, Orlando, Panama City, Pensacola, Tampa, Tallahassee, and West Palm Beach. Intermedia also has seven (7) ATM switches in Florida located in Jacksonville, Tallahassee, Orlando, Tampa, Ft. Lauderdale, and Miami. These advanced telecommunications switches use packet-switched or cell-based technology for the provision of many high-speed data services. At this time, Intermedia has approximately

33,000 customers in Florida for whom we provide local, long distance, data, private line, or Internet services.

Q: What is the purpose of your testimony?

A: The purpose of my direct testimony in this proceeding is to discuss the incumbent local exchange carrier's ("ILEC's") collocation obligations under the Federal Communications Commission's ("FCC's") First Report and Order FCC 99-48, CC Docket No. 98-147, In the matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability (or "FCC Collocation Order"), released March 31, 1999. I will also discuss what the Florida Public Service Commission ("Commission") should require of the ILECs beyond what was ordered by the FCC.

Q: What obligations, if any, does an ILEC have to interconnect with ALEC physical collocation equipment located "off-premises"?

A: As a result of the FCC's Collocation Order, it is clearly the obligation of the ILEC to provide collocation the FCC adopted rule 51.323(k)(3) requiring the ILECs to provide "off-premises" or "Adjacent Collocation" where space is legitimately exhausted in a particular ILEC central office and where it is technically feasible. The FCC's Collocation Order acknowledged that many state and local regulations such as zoning laws will most likely affect the ILECs ability to provide adjacent collocation. Therefore, it asked state commissions to address such issues.

Q: What terms and conditions should apply to converting virtual collocation to physical collocation?

A: The ILECs should be required, upon request, to convert any virtual collocation to a physical cageless collocation arrangement. Intermedia asserts that the FCC's Collocation Order and rules specifically provide for alternative local exchange companies ("ALECs") to remain commingled with the ILECs equipment, but under a physical cageless collocation arrangement. The FCC's Collocation Order specifies that:

> An incumbent LEC must give competitors the option of collocating equipment in any unused space within the incumbent's premises, to the extent, technically feasible, and may not require competitors to collocate in a room or isolated space separate from the incumbent's own equipment (¶ 42).

In addition, the FCC goes on to state that ILECs must make cageless available in single-bay increments, which means that an ALEC can purchase space small enough to collocate a single rack, or bay of equipment.

Q: Can the ILECs require ALECs to reconfigure or move existing virtual equipment to a separate space when converting from virtual to physical cageless collocation?

A: Absolutely not. The FCC Collocation Order was very clear on this issue. The ILEC cannot require such separation or rearrangement because it imposes unnecessary additional costs on competitors. The FCC makes this clear in its Collocation Order:

> The incumbent LEC may take reasonable steps to protect its own equipment, such as enclosing the equipment in its own cage, and other reasonable security measures...The incumbent LEC may not, however, require competitors to use separate rooms or floors, which only serves to increase the cost of collocation and decrease the amount of available collocation space. The incumbent LEC may not utilize unreasonable

segregation requirements to impose unnecessary additional costs on competitors (¶ 42).

Therefore, this Commission should require ILECs to convert, upon request by the ALEC, existing virtual collocation arrangements to physical cageless collocation without moving or rearranging the equipment and at no charge. The ALEC equipment must remain in its existing space and be subject to terms and conditions of physical cageless collocation.

Q: Is there a difference between provisioning collocation in a new space and provisioning changes to an existing collocation arrangement?

A: Yes. As a general rule, response and implementation intervals will be shorter when making changes to existing collocation arrangements. These intervals are shorter because the collocation arrangement is already established, and in most of the augmentations the ALEC is simply installing additional equipment. In these cases, the ALEC is doing most of the work so any work by the ILEC should not take long. Finally, most augmentation do not require additional space for the ALEC, therefore unlike new collocation arrangements, these response and implementation intervals are much shorter. ALEC access to its collocation arrangement was one of the factors that the FCC looked at when it developed its new rules. In order to give ALECs the ability to effectively compete, it is very important that they have the flexibility to make quick and efficient changes to its collocation arrangements.

Q: What are the appropriate response and implementation intervals for ALEC requests for changes to existing collocation space.

A: Although the FCC's Collocation Order does not provide for specific response and implementation intervals with respect to requests for changes to existing collocation space, it does require that the ILEC notify ALECs within ten (10) calendar days whether its collocation application for a new collocation arrangement is accepted or denied. Intermedia requests that this Commission prescribe implementation interval standards for changes to existing collocation space which are binding on the ILEC. In fact, the FCC encourages state commissions to implement specific time intervals in its Collocation Order.

Because changes to an existing collocation space generally require less work by the ILEC, response and implementation intervals must be less for new collocation arrangements. Therefore, Intermedia will first address appropriate ILEC *response intervals* to augment existing collocation spaces. To clarify, response intervals are the time frame that the ILEC must respond to the ALEC's augmentation application. Then I will discuss the *implementation intervals* that must be prescribed when ALECs need to make changes to their existing collocation space. Implementation intervals are the actual timeframe that the ILEC has to do the work required by the ALEC in its augmentation application.

Response Intervals

For changes to existing collocation arrangements requiring no additional space, the Commission should require ILECs to respond to such applications within five (5) calendar days. For changes to existing collocation arrangements that require additional

space, the ILEC should be held to the 10-day interval prescribed by the FCC in its Collocation Order.

Implementation Intervals

Intermedia is recommending three different implementation intervals for changes to existing collocation spaces – (1) augmentations requiring no ILEC work; (2) augmentations requiring ILEC work; and (3) augmentations requiring additional space.

First, if the augmentation of the collocation arrangement requires no work by the ILEC, then ALECs should be able to begin work on the arrangement as soon as the application is accepted. For example, if the existing collocation arrangement already has a POT bay and the only change the ALEC is making is adding a piece of equipment, then there is no work for the ILEC to perform. As a result the ALEC should be able to begin installing the equipment as soon as the application is accepted by the ILEC. Second, when work is required by the ILEC on the collocation arrangement, such as the addition of facilities (DS1s or DS3s) or engineering additional power to the collocation arrangement, the Commission should require ILECs to implement such changes within 45 calendar days. These types of changes take longer because the ILEC must review, engineer, and prepare the space and then install and test the facilities. Third, when the ALEC submits an application for changing existing collocation space that requires additional space, the Commission should require the ILECs to implement such changes within 60 calendar days. The only difference between this situation and last augment discussed is that the ILEC must prepare the space; the rest of the work is identical. Therefore, Intermedia

asserts that an additional 15 calendar days is sufficient time for the ILEC to accomplish all changes.

Q: What is the appropriate provisioning interval for cageless physical collocation?

A: Again, the FCC's Collocation Order does not provide for specific provisioning intervals with respect to cageless physical collocation. However, it has emphasized the importance of timely provisioning and asked the state commission to implement such intervals so that ALECs are able to compete. For cageless physical collocation, Intermedia requests the Commission to prescribe the ten (10) day response interval as prescribed by the FCC Collocation Order which is the interval the ILEC has for determining if space is available. Assuming space is available, then the implementation interval for provisioning the cageless physical collocation, should be no more than fifty (50) calendar days. Therefore, the total interval for "occupancy-readiness" should be at most sixty (60) calendar days. Generally, cageless physical collocation intervals should be shorter than traditional caged physical collocation since the ILEC is not required to build a cage in a separate designated area of the central office.

Q: What are the responsibilities of the ILEC and collocators when a collocator shares space with, or subleases space to, another collocator?

A: Again, the FCC's Collocation is very clear in this matter. In ¶ 41 of the Order, the FCC requires that ALECs sharing space with, or subleasing space to another collocator, be able to negotiate the collocation arrangement subject to the rates, terms and conditions that the two or more ALECs agree upon. Therefore, the ALECs are responsible for setting the terms and conditions of the shared space and not the ILEC.

The Order also states that the ILECs cannot increase the cost of site preparation beyond what is charged to a single collocator and additionally must also prorate the charge for site conditioning and preparation regardless of how many collocators there are in the cage.

Finally, the FCC also made it clear in its Collocation Order that, "if two or more competitive LECs who have interconnection agreements with the incumbent LEC utilize a shared collocation arrangement, the incumbent LEC must permit each competitive LEC to order UNEs to and provision service from that shared collocation space, regardless of which competitive LEC was the original collocator" (¶ 41).

Q: What are the responsibilities of the ILEC and collocators when a collocator cross-connects with another collocator?

A: It is the responsibility of the ILEC to require such cross connections without any additional costs or any restrictive terms and conditions. The FCC's Collocation Order, ¶ 33, states that if a collocator cross-connects with another collocator, the collocators can construct their own cross connect facilities subject to the same safety requirements the ILEC imposes on itself. This scenario would also apply even if the collocator's equipment were located in the same room as the ILEC. The ILEC cannot require the ALEC to purchase any equipment or cross connect capability solely from the ILEC at tariffed rates. Therefore, it is the ALECs responsibility to work with the other collocator and the ILEC when making such cross connections between collocators.

Q: What are the reasonable parameters for reserving space for future LEC and ALEC use?

A: ILECs should follow a procedure that contains at least a three-year planning horizon. For this three-year period, ILECs should forecast the need for future space for both its internal growth and for projected collocation growth. ALECs should work with ILECs to provide accurate forecast for future collocation needs. A minimum amount of space for ILEC growth and ALEC collocation should be available at each central office. If the space falls below this threshold, the ILEC should have to begin to create plans for expansion of the central office space. The FCC contemplated such planning procedures in its Collocation Order, ¶ 58, when it required ILECs to submit a report to a requesting carrier that specifies measures that the ILEC is taking to make additional space available for collocation.

Q: Do you have a recommendation for the threshold of minimum amount of space that ILECs should reserve for their own growth and for ALEC collocation?

A: No. Intermedia does not know how much space within each central office the ILECs will need for their own growth. However, the ILECs should be required to have enough space for at least two collocators in a specific central office. When space falls below the amount necessary for two collocators, the ILEC should first be required to give up the space it has reserved for growth if an ALEC or ALEC requests the space. Next, the ILEC should then begin to create plans for expansion of the central office.

Q: 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?

A: Yes. The Commission should develop such procedures in order to assign space that becomes available through creation, conversion or reclamation of any space, including administrative space, by the ILEC or by the implementation of the collocation alternatives as discussed in the FCC's Collocation Order. The Commission should require the ILECs to maintain on file, for five years, all applications for physical collocation. When space becomes available or when an ILEC knows that space will become available in the near future, it should immediately provide written notification to the ALECs who had originally requested space and were denied. ILECs should make space available in the order in which the ALECs originally applied (first-come first-served).

Q: 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?

A: Priority should be given to the ALEC based on the order in which the ALEC's originally applied for collocation in that specific central office --- first-come first-served. ALECs that receive notification should be required to respond in writing to the ILEC within three calendar days, or be deemed to forfeit the space. If more ALECs respond than for which there is space available, then the available space should be allocated to the requesting ALECs on a first-come first-served basis.

If the amount of space that becomes available is less than the ALEC originally requested, the ALEC should have the right of first refusal for the space. For example, if the first ALEC had originally requested 100 square feet on August 1, 1998, and the second ALEC had originally requested 75 square feet on October 1, 1998, and 75 square feet became available, then the first ALEC should be able to choose the space or to pass.

ALECs that receive notification should be required to respond in writing to the ILEC within three calendar days, or be deemed to forfeit the space. If more ALECs respond than for which there is space available, then the available space should be allocated to the requesting ALECs on a first-come first-served basis.

If the amount of space that becomes available is less than the ALEC originally requested, the ALEC should have the right of first refusal for the space. For example, if the first ALEC had originally requested 100 square feet on August 1, 1999, and the second ALEC had originally requested 75 square feet on October 1, 1999, and 75 square feet became available, then the first ALEC should be able to choose the space or to pass.

Q: What equipment is the ILEC obligated to allow in a physical collocation arrangement?

A: Section 251(c)(6) of the Communications Act requires ILECs to allow collocation of "equipment necessary for interconnection or access to unbundled network elements…..". FCC Rule 51.323(b) provides that equipment used for interconnection and access to UNEs includes, but is not limited to:

(1) Transmission equipment including, but not limited to, optical terminating equipment and multiplexers.

(2) Equipment being collocated to terminate basic transmission facilities.

(3) Digital subscriber line access multiplexers, routers, asynchronous transfer mode multiplexers, and remote switching modules.

The FCC concluded in its Collocation Order that ILECs should not be permitted to impede competing carriers from offering advanced services by imposing unnecessary restrictions on the type of equipment that competing carriers may collocate, including equipment which provides switching functionality, enhanced services capabilities or other functionalities. As a result, ILECs can no longer prohibit the types of equipment collocated by ALECs as long as it is used for interconnection or access to unbundled network elements. Given the trend in manufacturing to integrate multiple functions into telecommunications equipment, Intermedia wants to make sure that ILECs do not place any restrictions on these new types of equipment as long as the equipment is used for interconnection or access to UNEs. This Commission should require all types of equipment used or useful for interconnection to be allowed, and that it is the ILECs responsibility to prove that such equipment does not meet the requirements of the FCC's rules.

Q: 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: Yes. Not only should the ILEC provide the ALEC with a price quote for the space, but they should also provide a detailed explanation of the quote, justifying the amount charged. A break out of the costs is required initially for review by the ALEC, and the

ultimate billing should reflect this same breakdown so that the bills can be verified and reconciled. The ALEC needs to see exactly what the ILEC is proposing to do and how much it is going to charge when it prepares the space for the ALEC. Otherwise, there is no way for an ALEC to justify that it has received a correct billing statement for the space. Today, Intermedia only receives one flat price back from the ILEC after submitting the application. Intermedia must know how the ILEC arrived at the price.

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

A: The ILEC should provide price quotes to the ALEC within thirty (30) calendar days from the date of the application. This time frame is reasonable and must be met because the ALEC must know if the price quoted by the ILEC is justified before the work on the space has begun.

Q: 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?

A: Yes. As I have stated earlier, there is no way for the ALEC to justify reasonable costs without the ILEC providing a detailed and itemized explanation for the cost(s).

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

A: Yes. However, an ALEC should not be *required* to hire ILEC certified contractors. Intermedia asserts that functions such as space preparation, racking and cabling, and

power should be performed by the ILEC. All of these types of functions are the ultimate responsibility of the ILECs. ALECs should not have to assume the responsibility for performing these functions.

Q: Should ALEC vendors be allowed to install and work on their own equipment within their collocation arrangement?

A: Absolutely. As required by the FCC's Collocation Order, ALECs "must have access to their collocated equipment 24 hours a day, seven days a week"(¶ 49). The FCC also requires this access without requiring a security escort of any kind. ILECs should not be allowed to require use of their own certified vendors. Presently, ALECs in Florida are "forced" to hire a certified contractor from the ILEC's supplied vendor list under the ILEC's terms and conditions. Such vendor lists are inadequate due to the short supply of vendors who have been certified under the strict certification guidelines of the ILEC. For example, in order to be certified as vendor by most ILECs, you must also be an equipment vendor. This requirement alone eliminates most ALECs from the possibility of becoming a vendor. As a result of these requirements, ALECs must operate under the vendor's schedule and must submit a RFQ (Request for Quote) to the limited number of certified vendors and are forced to pay higher rates for service due to the limited number of available contractors. Intermedia asserts that this process is inadequate and monopolistic and that Intermedia should be able to install and work on its own equipment.

In addition, ILECs should not be allowed to place more stringent requirements on ALEC vendors than they place on their own vendors. Any such restriction by the ILEC severely limits an ALEC's ability to compete.

Q: Has Intermedia experienced a situation where an ILEC has placed more stringent requirements on Intermedia than itself?

A: Yes. BellSouth required Intermedia to use the industry standard for cable size when extending the ground window to its collocation arrangement. A ground window is the extension of the main central office ground. However, during the work on this extension Intermedia discovered that BellSouth was not following the industry standards on its own ground window extensions.

Q: 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?

A: Consistent with the FCC's Collocation Order, at the very least, ILECs should allocate space preparation, security measures and other collocation charges on a pro-rated basis so the first collocator in a particular incumbent premises will not be responsible for the entire cost of site preparation.

Further, the FCC states that this allocation recommendation will serve as a minimum standard and that states should determine the proper pricing methodology to ensure that ILECs properly allocate site preparation costs.

Q: Can you please summarize your testimony?

A: Yes. The Commission must require the ILECs to fully comply with the FCC's Collocation Order and Rules regarding collocation. In addition, where the FCC did not set specific standards for installation and provisioning intervals, the Commission must do so in this proceeding. Specific installation and provisioning intervals are vital for ALECs if they are to provide competitive choices for telecommunication consumers in the state of Florida.

Q: Does this conclude your testimony?

A: Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S.

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