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RECORDS AND  
REPORTING

February 4, 2000

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. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Include Issues In Issues List, 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,

*E. Earl Edenfield Jr.*  
E. Earl Edenfield, Jr.

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
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- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
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- OPC \_\_\_\_\_
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cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into )  
 pricing of unbundled network )  
 elements )  
 \_\_\_\_\_ )

Docket No. 990649-TP

Filed: February 4, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**MOTION TO INCLUDE ISSUES IN ISSUES LIST**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests that the Pre-Hearing Officer include collocation pricing issues in this docket. By way of background, an Issue ID meeting was held on January 31, 2000, to determine which issues should be addressed in this docket. At that meeting, BellSouth proposed that the Florida Public Service Commission ("Commission") consider collocation pricing issues. The Commission Staff disagreed, indicating that collocation pricing issues would be addressed in the context of a separate docket. For the reasons set forth below, the Commission should consider collocation pricing issues in this docket.

As the Commission is well aware, a hearing was held in the generic collocation docket (990321-TP/991834-TP) on January 12-14, 2000. At that hearing, alternative local exchange carriers ("ALECs") presented testimony that in order to compete in Florida said ALECs need: (1) assembly point collocation<sup>1</sup>; (2) adjacent collocation; and (3) DSLAM collocation at the remote terminal. In addition, the ALECs requested fixed space preparation charges to replace the individual case basis ("ICB") prices previously approved by the Commission. Finally, the

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<sup>1</sup> Assembly point is an alternative form of collocation wherein an ALEC may have UNEs delivered directly to a distribution frame for combining. The ALEC can combine the UNEs either at the time the UNEs are delivered, or the ALEC can pre-wire the distribution frame in advance.

Commission needs a cost-based rate for security access to enable ALECs access to the BellSouth premises housing the ALECs collocated equipment. Assuming the Commission agrees with the ALECs, there needs to be a pricing structure in place to enable the incumbent local exchange carriers ("ILECs") to begin promptly provisioning ALEC collocation requests. Establishing a separate generic docket to consider pricing for these five collocation elements will unnecessarily delay their availability -- a result that benefits no one, particularly Florida consumers. While interim rates already established by the Commission for other collocation elements will suffice, BellSouth does not have that luxury as to the five collocation elements referenced above.

Complicating matters further, it appears from the Federal Communications Commission ("FCC") Order on Bell Atlantic's §271 Application<sup>2</sup> that the collocation elements referenced above may be required for §271 relief. At a minimum, the FCC requires that each collocation element have cost-based rates.<sup>3</sup> Waiting for a separate generic collocation pricing docket could result in a delay in BellSouth obtaining long distance authority in Florida. This result is patently unfair to BellSouth, especially given the fact that adding these five collocation elements, which are clearly UNEs, will not result in hardship to any party, nor will it in any way affect the currently scheduled hearing date in July 2000.

WHEREFORE, BellSouth respectfully requests that the Pre-Hearing Officer allow the pricing of assembly point collocation, adjacent collocation, DSLAM collocation at the remote terminal, security access, and fixed space preparation charges to replace ICB prices to be considered in this docket.

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<sup>2</sup> Memorandum Opinion and Order, *In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295 (Rel. December 22, 1999).

Respectfully submitted this 4<sup>th</sup> day of February 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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<sup>3</sup> Memorandum Opinion and Order, *In the Matter of Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121 (Rel. October 13, 1998), at ¶ 73.

**CERTIFICATE OF SERVICE  
Docket No. 990649-TP**

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

U.S. Mail this 4th day of February, 2000 to the following:

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