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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Consideration of BellSouth)
Telecommunications, Inc. Entry Into)
InterLATA Services Pursuant to)
Section 271 of the Federal)
Telecommunications Act of 1996)

DOCKET NO. 960786-1

RECORDS AND
REPORTING

FILED: 7-17-98

INTERMEDIA COMMUNICATIONS INC.'S
RESPONSE TO STAFF'S DATA REQUEST

INTERMEDIA COMMUNICATIONS INC. (Intermedia) hereby files its responses to Staff's April 13, 1998 Data Request in anticipation of BellSouth Telecommunications, Inc. filing a request to provide interLATA services pursuant to Section 271(c)(1)(A) of the Telecommunications Act of 1996.

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RECORDS AND REPORTING

ORIGINAL

1. Is BellSouth currently providing you with access to UNES at any technically feasible point in accordance with the requirements of Section 251(c)(3) of the Telecommunications Act of 1996 and pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC and FPSC?

RESPONSE: Yes, BellSouth is offering access to UNES pursuant to Intermedia's Agreement.

a. If yes, please list the following information:

1. each element being provided by BellSouth;

RESPONSE: The list of unbundled network elements contained in BellSouth/Intermedia Agreement is enclosed as Attachment A.

2. the point of interconnection being provided for each element;

RESPONSE: Points of interconnection are not specified in the Agreement.

3. the rate being charged for each element;

RESPONSE: The list of unbundled network elements and rates contained in the BellSouth/Intermedia Agreement is enclosed as Attachment A.

4. the reason(s) why any element request from BellSouth was not provided; and

RESPONSE: See response to Question 1(a)(5).

5. the reason(s) why the point of interconnection requested from BellSouth was not provided.

RESPONSE:

Collocation

Under Section IV.(E) of the BellSouth/Intermedia Interconnection Agreement (Agreement), the parties agree that there are three appropriate methods of interconnecting facilities: (1) virtual collocation where physical collocation is not practical for technical reasons or because of space limitations; (2) physical collocation; and (3) interconnection via purchase of facilities from either party by the other party.

Physical Collocation

1) Since implementation of its Agreement, approximately

one and one-half years, Intermedia has asked that it may physically collocate with BellSouth through the use of non-enclosed space rather than a traditional enclosure arrangement (cageless collocation). This is consistent with the rates and charges set forth in Attachment C-13 of the Agreement. Specifically, the description regarding the space construction fee provides that it "covers materials and construction of optional cage in 100 square foot meters."

Moreover, it is Intermedia's understanding that Section 3.6 of Attachment K - Handbook for Collocation filed in other states in the BellSouth region means that BellSouth will offer physical collocation with and without an enclosure, as BellSouth's witness Mr. Varner testified in Tennessee, in Docket No. 97-00309, before the Tennessee Regulatory Authority, on May 6, 1998.

If this is BellSouth's interpretation, BellSouth should be required to provide this type of physical collocation immediately to Intermedia as requested.

2) Intermedia also understands BellSouth's position to be that ALECs are required to physically collocate at all locations where UNEs are to be combined, and that it is not required to provide recombinations. This interpretation, however, denies Intermedia meaningful access to UNEs. ALECs such as Intermedia can only justify the high cost of physical collocation of UNE combinations in end offices where the customer base generates substantial revenues. Moreover, such a requirement would require ALECs to mirror BellSouth's network architecture. Reducing the costs and time frames for implementation of physical collocation will better enable ALECs to develop more efficient network architectures and to serve smaller customers in less densely populated areas.

Extended Link

Intermedia is in the process of renegotiating its interconnection agreement with BellSouth, and continues to negotiate with BellSouth for better physical collocation. Specifically, Intermedia has proposed that BellSouth provide it with Extended Link under its Interconnection Agreement - a UNE that provides the functionality of a local loop, multiplexing in an ILEC end office, and interoffice transport that delivers traffic to a ALEC's collocated cage in another ILEC end office or to its point of presence outside of an end office. Extended Link would eliminate the need for ALECs to collocate in every end office, thus greatly expanding the ALECs' addressable customer base.

Virtual Collocation

In Tennessee, BellSouth recently proposed to offer a form of virtual collocation, which requires ALECs to collocate a "prewired" equipment frame for connections between line side and trunk side circuits. BellSouth then plugs unbundled local loops and interoffice trunks into preselected ports. This alternative assumes a static environment and is rendered useless to ALECs since they must predetermine customer locations on Intermedia's frame. Intermedia is asking for a more efficient and flexible means by which to provision customers' service through virtual collocation.

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- 1 2. Do you currently provide local exchange service in Florida
2 either exclusively with your facilities or with a combination
3 of your facilities and unbundled network elements that you
4 purchased from an incumbent local exchange company (ILEC) in
5 Florida? If yes:

6 **RESPONSE:** Yes. Although Intermedia primarily provides local
7 exchange service to its customers by resale of ILECs'
8 services, Intermedia also provides local exchange service in
9 Florida to some customers exclusively over its facilities.
10 Currently, Intermedia does not provide local exchange service
11 using UNEs purchased from an ILEC.

- 12 a. Is it being provided solely to business customers,
13 solely to residential customers, or both?

14 **RESPONSE:** The facilities-based local exchange service
15 described in response to Item 2 above, is provided to business
16 customers.

- 17 b. Through the use of your facilities and UNEs
18 purchased from an ILEC, please provide the
19 following:

- 20 1. the number of business subscribers you are
21 serving in Florida;

22 **RESPONSE:** Intermedia is currently serving approximately [REDACTED]
23 business subscribers over its facilities.

- 24 2. the number of business subscriber lines that
25 you service in Florida;

26 **RESPONSE:** As of May 28, 1998, Intermedia provides [REDACTED]
27 business subscriber lines over its facilities.

- 28 3. the number of residential subscribers you are
29 serving in Florida; and

30 **RESPONSE:** Zero.

- 31 4. the number of residential subscriber lines
32 that you service in Florida.

33 **RESPONSE:** Zero.

3. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to business customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from BST? If yes:

RESPONSE: Yes, Intermedia provides local exchange service in BellSouth's territory. Although Intermedia primarily provides local exchange service to its customers by resale of BellSouth's services, Intermedia also provides local exchange service to some customers over its facilities in BellSouth's territory. Currently, Intermedia does not provide local exchange service using UNEs purchased from BellSouth.

- a. Through the use of your facilities and UNE's purchased from BST, please provide the following:

1. the number of business subscribers you are serving in BellSouth's territory in Florida; and

RESPONSE: Intermedia retains the number of business subscribers served over its facilities on a statewide basis and does not further divide this information by ILEC territory. Moreover, Intermedia is not currently purchasing UNEs from BellSouth. Thus, the only readily available information is the statewide information provided in response to Item 2.

2. the number of business subscriber lines that you service in BellSouth's territory in Florida?

RESPONSE: Intermedia retains the number of business subscriber lines served over its facilities on a statewide basis and does not further divide this information by ILEC territory. Moreover, Intermedia is not currently purchasing UNEs from BellSouth. Thus, the only readily available information is the statewide information provided in response to Item 2.

4. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to residential customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from BST? If yes:

RESPONSE: No. Intermedia does not provide service to residential subscribers over its facilities or by UNEs.

- a. Through the use of your facilities and UNE's purchased from BST, please provide the following:

1. the number of residential subscribers you are serving in BellSouth's territory in Florida; and

RESPONSE: Not applicable.

2. the number of residential subscriber lines that you service in BellSouth's territory in Florida.

RESPONSE: Not applicable.