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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

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

RECORDS AND
REPORTING

July 27, 1998

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. 980946-TL**
Temp. Waiver Daytona Beach/Port Orange Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for Temporary Waiver, 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

Nancy B. White (BN)

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

DOCUMENT NUMBER-DATE

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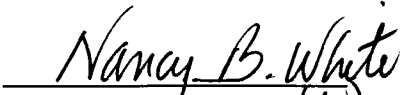
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**CERTIFICATE OF SERVICE
TEMPORARY WAIVER FOR DAYTONA BEACH/PORT ORANGE CENTRAL OFFICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 27th day of July, 1998 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375



Nancy B. White 

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
Inc. 's Petition for Temporary Waiver)
for Daytona Beach Port Orange)
Central Office)
_____) Filed: July 27, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Temporary Waiver in accordance with the 1996 Telecommunications Act (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests a temporary exemption from the physical collocation requirements set forth in the Act and in the Order for the Daytona Beach Port Orange Central Office ("CO") located at 829 Orange Avenue, Daytona Beach, FL 32119. BellSouth seeks this temporary exemption on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth seeks only a temporary waiver because BellSouth is enlarging the building to ease space constraints and provide additional space for physical collocation.

1. The Daytona Beach Port Orange CO building houses a DMS 100/200 switch and a Nortel Local Signal Transfer Point (LSTP) switch. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems,

¹ 1996 Telecommunications Act, Section 251(c)(6); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released August 8, 1996, Paragraphs 602-607.

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multiplexers, digital channel banks, subscriber carrier terminals, and digital cross connect panels. The circuit equipment provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Daytona Beach Port Orange CO is growing rapidly and the facility is under enormous space constraints. To meet the demands of the expanding customer base, BellSouth currently has orders placed for additional DMS 100 switching equipment, as well as fiber optic terminals, subscriber loop carrier, DSX-1 and DSX-3 cross connect bays, and D4 channel banks. Moreover, BellSouth is planning a building addition to the facility which is expected to complete some time during the year 2000. The addition, which is in the preliminary planning stages, will add sufficient square footage to the facility to accommodate additional physical collocation.²

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.

Act, 251(c)(6)

Thus, an ILEC is required to provide physical collocation unless it is "not practical...because of space limitations." Id. The term "space limitations" encompasses

² Pursuant to the FCC directive, BellSouth has considered, and will continue to consider, collocation requirements in any future construction undertaken.

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 Daytona Beach Port Orange CO, BellSouth is unable to provide physical collocation. The space limitations with which BellSouth is faced are the result of both the amount of existing BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers. BellSouth is submitting in conjunction with this Petition a floor plan evidencing both the current equipment and the areas set aside for defined future uses. (Exhibit 1).

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

1. BellSouth determined 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 physical collocation. The facility currently has 13,455 square feet. A total of 11,132 square feet is occupied as follows:

| <u>Square Feet</u> | <u>Description</u> |
|--------------------|---|
| 360 | Cable Vault |
| 1,426 | Mechanical Room, Plenum, Restrooms, Receiving Room, Electrical Closet, and Janitor Room |
| 1,136 | House Service Panel, Mechanical Room, and Plenum |
| 476 | Administrative |
| 1,743 | Toll/Transmission Equipment |
| 2,701 | Switch |
| 1,270 | Power and Engine Rooms |
| 2,020 | Frame |


7. Of the remaining 2,313 square feet in the facility is reserved for defined future use essential for BellSouth to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing switching system, power and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth has provided the Commission with a detailed floor plan indicating the space constraints under which BellSouth is currently operating at the Daytona Beach Port Orange CO, as well as the areas designated for defined future use. (Exhibit 1).

8. The Daytona Beach Port Orange CO presently contains no available space for physical collocation and for this reason should be temporarily excluded from the collocation requirements. The waiver should remain in effect until completion of the addition to the Daytona Beach Port Orange facility which is currently expected to complete in the year 2000. BellSouth will, of course, offer virtual collocation in the Daytona Beach Port Orange CO.

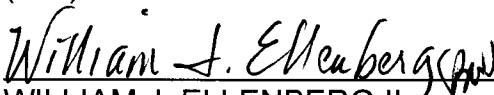
WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Temporary Waiver and temporarily exempt BellSouth from the obligation to offer physical collocation in the Daytona Beach Port Orange CO.

Respectfully submitted this 27th day of July, 1998.

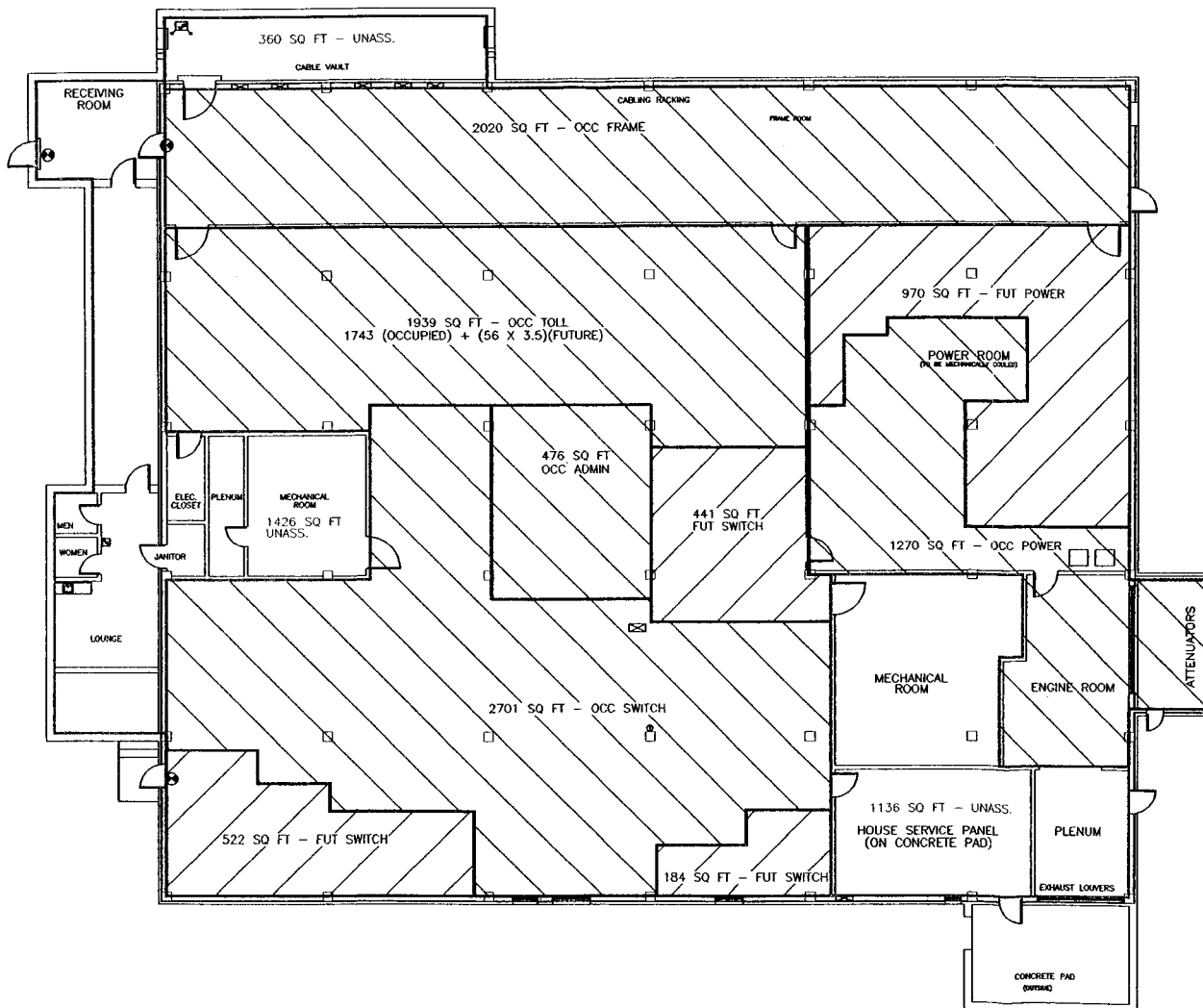
BELLSOUTH TELECOMMUNICATIONS, INC.



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



WILLIAM J. ELLENBERG II
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0711



BVS

NOTES & SYMBOLS

1. NO CHANGE IN OCCUPANCY OR DESIGN IS PERMITTED UNLESS APPROVED BY THE OPERATIONS MANAGER - BUILDING
2. ELEVATION OF FINISHED FLOOR: 12'-2" ANSL.
3. FLOOR LOADING TO BE 150 PSF UNLESS OTHERWISE NOTED.
4. 1" X 2" CABLE HOLE TO BE MOUNTED 9'-0" ABOVE FINISHED FLOOR PER NFIBED 1300-3.
5. PANEL E-LPA-32 CIRCUIT, 100 AMP, 120/208V, 3 PHASE FOR W.E.C.O. LIGHTING.
6. GENERATOR CONTROL PANEL E-GPA-12 CIRCUIT 100 AMP (NO FUSE) 120/208V, 3-PHASE (LESS BREAKERS) EXIST IN ENGINE ROOM.
7. EXIT LIGHT
8. MONITOR STRIKE PER NFIBED 08710-C
9. BATTERY POWERED LIGHTS
10. CENTRAL OFFICE GROUND BAR
11. FAN AND MOTOR ASSEMBLY
12. REMOTE ALARM CROSS-CONNECT CAB. PER NFIBED 16720-A
13. FIRE ALARM CONTROL PER NFIBED 16720-B
14. FIRE HOSE CABINET
15. CABLE PULLING EYE AND SLEEVE
16. PROVIDE POWER FEEDER 120/208V, 3-W, 3-PHASE, 100 AMP FROM HSP TO CABLE RACK JUNCTION BOX (3 FOR CONNECTION TO RECTIFIER SMO SUPPLY. LEAVE 10" OF SLACK AT JB W/TAPED ENDS.

| | | | |
|---|---------------------------------------|------------------------|--|
| A | TOTAL GROSS SQ FT | 13,445 | |
| | CABLE VAULT | 360 | |
| | RECEIVING, RESTROOMS, LOUNGE, JANITOR | | |
| | ELEC. CLOSET, MECH RM & PLENUM | 1426 | |
| | HOUSE SERVICE PANEL MECH RM & PLENUM | 1136 | |
| B | TOTAL UNASSIGNABLE SPACE | 2922 | |
| | SWITCH | 2701 | |
| | TOLL | 1743 | |
| | FRAME | 2020 | |
| | POWER AND ENGINE | 1270 | |
| | ADMIN | 476 | |
| C | TOTAL OCCUPIED SPACE | 8210 | |
| | SWITCH | 184 + 522 + 441 = 1147 | |
| | TOLL | 56 X 3.5 = 196 | |
| | POWER | 970 | |
| D | TOTAL RESERVED SPACE | 2313 | |

33850 DAYTONA BEACH - PORT ORANGE FIRST FLOOR PLAN