

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Waiver of Collocation )  
Requirements in the Tallahassee- )  
Thomasville Road Central Office by Sprint- )  
Florida, Incorporated )  
\_\_\_\_\_ )

Docket No.: 001558 - TL

Filed: November 6, 2000

**SPRINT-FLORIDA, INCORPORATED'S  
PETITION FOR WAIVER**

Sprint-Florida, Incorporated (Sprint) files this Petition for Waiver in accordance with Order No. PSC-99-1744-PAA-TP, issued on September 7, 1999 ("PAA Order), and Order No. PSC-0941-FOF-TP, issued May 11, 2000 ("Generic Order"), the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "FCC Order"). Pursuant to this authority, Sprint requests an exemption from the physical collocation requirements set forth in the Act, in the FCC Order and in the PAA and Generic Orders for the Tallahassee-Thomasville Road Central Office ("CO") located at 5000 Thomasville Road, Tallahassee, FL 32302. Sprint 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. Sprint expects to construct an addition to the building in the second half of 2001.

1. The Tallahassee-Thomasville Road CO building houses a DMS-100 digital switch providing local dial tone. Circuit equipment also located in the CO consists of fiber optic terminals, multiplexers, digital channel banks, digital pair gain central office

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terminals, and digital cross-connect panels and provides connectivity to the other COs and local customers. Rectifiers and battery strings provide DC power to the above equipment.

2. The area served by the Tallahassee-Thomasville Road CO is growing rapidly and thus the facility is under enormous space constraints. This CO currently serves approximately 27,500 access lines and 4,100 T1 circuits.

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

The duty to provide, on rates, terms, and conditions that are reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled 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.C. § 251(c)(2)(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.* The Commission determined, as set forth in the Generic Order, that the appropriate time frame for reservation of space for future use is 18 months.

4. Due to space limitations in the Tallahassee-Thomasville Road CO, Sprint is unable to provide physical collocation to additional ALECs. There will be no space for additional physical collocation until the addition is completed in the second half of 2001. The

space limitations faced by Sprint are the result of the use of space by the amount of existing Sprint equipment, by space previously allocated to ALECs, and by the planned installation in the next 18 months of additional equipment essential to the effective service of Sprint customers.

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

- a. Sprint determined the total square footage within the facility;
- b. Sprint determined the unavailable space (i.e. restrooms, hallways, stairs, etc.);
- c. Sprint determined assigned space currently occupied by the Sprint switch, transmission, power, and other equipment, as well as necessary administrative space;
- d. Sprint determined the space reserved for future defined uses necessary to adequately serve Sprint customers in the next 18 months, including consideration given to Sprint's future switch growth plans;
- e. Sprint identified physical collocation space previously allocated to requesting ALECs;
- f. Sprint identified any unusable space (such as basements subject to flooding); and
- g. Sprint determined available collocation space by subtracting items 2-5 from item 1.

6. As previously stated, Sprint'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 central office identifier (CLLI code), the identity of the requesting ALECs and the amount of space sought, the total amount of space at the premises and the floor loading

requirements. Also attached hereto as Exhibit 2 are floor plans that contain the remaining information required by the PAA Order.

7. There is space reserved for defined future use for Sprint to meet the needs of its customers for the next 18 months. The projects include incremental additions to the existing switching system and transmission equipment. These projects will use the remaining space in the facility. As previously stated, Sprint currently has plans to build an addition to the facility in 2001.

8. The Tallahassee-Thomasville Road CO will contain no available space for physical collocation until the addition is completed and for this reason should be excluded from the collocation requirements. Sprint will, of course, offer virtual collocation in the Thomasville Road CO.

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

Respectfully submitted this 6<sup>th</sup> day of November, 2000.

SPRINT-FLORIDA, INCORPORATED



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## SPACE ASSESSMENT WORK SHEET

**PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS**

**11/06/00**

1. CENTRAL OFFICE CLLI: TLHSFLXF
  
2. COLLOCATORS AND AMOUNT OF SPACE: 
 (redacted available upon request)  
100 sf caged; revised to 8 – 24 sf cageless  
 (redacted available upon request)  
20 sf
  
3. TOTAL GROSS SQ. FT. 5655 sf
  
4. FLOOR PLANS – INCLUDING DIMENSIONS – ATTACHED
  - a. SFI occupied equipment space 2685.4 sf
    - Nonregulated services 0 sf
    - Administrative offices – not related to installing, repairing,  
maintaining CO equipment 695.5 sf
  - b. Retired equipment 0 sf
  - c. Future SFI space reservations 366 sf
    - Switch 126
    - Circuit 40
    - Power 200
    - Frame
  - d. Collocation space (already allocated) 84 sf
  - e. Other 3<sup>rd</sup> party space 0 sf
    - What is the occupancy \_\_\_\_\_
  - f. Switch turnaround space 0 sf
    - Service Yr \_\_\_\_\_
  - g. Remaining space 1824.1 sf
    - Unavailable space 1824.1 sf
    - Space available for collocation 0 sf
  - h. Central office growth plans
    - Forecast completion
    - Yr
    - Addition 2001 1385 sf
    - Renovation \_\_\_\_\_ 0 sf
  - i. Any other plans for relieving space exhaust
  
5. Floor loading
 

	All space	150#sf	<u>5655</u> sf
	Power rooms only	350#sf	<u>      </u> sf

NAME OF PERSON FILLING OUT FORM

Gardner C. Preedy – Senior Architecture Planner

TEL. NO. 407-889-6131

Exhibit 1

PRIVATE

THE INFORMATION CONTAINED HEREIN SHOULD NOT BE DISCLOSED TO UNAUTHORIZED PERSONS. IT IS MEANT SOLELY FOR USE BY AUTHORIZED SPRINT EMPLOYEES.



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October 23, 2000

Ms. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No. 1558-TL

Dear Ms. Bayo:

It has come to my attention that there was another applicant for space in the Tallahassee-Thomasville Road Central Office. Sprint, therefore, is forwarding by U.S. Mail a copy of the Notice of Intent to Request Waiver of Collocation Requirements in the Tallahassee-Thomasville Road Central Office to:

Eric Larsen  
Tallahassee Telephone Exchange  
1367 Mahan Drive  
P.O. Box 11042  
Tallahassee, FL 32302-3042

Sincerely,

Susan S. Masterton

Cc: Ms. Tamika Watts  
Mr. Tom Whitaker, Broadslate Networks Inc.  
Mr. Eric Larsen, Tallahassee Telephone Exchange

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