

NANCY B. WHITE
Assistant General Counsel-Florida

98 JUL 27 PM 4:40

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. 980947-TL
Waiver for Boca Raton/Boca Teeca Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for 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 (BW)

Enclosures

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

DOCUMENT NUMBER-DATE

07912 JUL 27 98

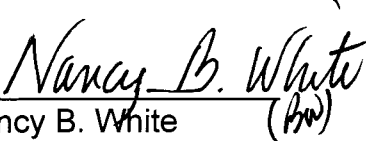
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
WAIVER FOR BOCA RATON/BOCA TEECA 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 (HW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
Inc. 's Petition for Waiver for the)
Boca Raton Boca Teeca Central)
Office)
_____) Filed: July 27, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Waiver in accordance with the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements set forth in the Act and in the Order for the Boca Raton Boca Teeca Central Office ("CO") located at 5140 Congress Avenue, Boca Raton, FL 33487. BellSouth seeks this exemption on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth does not expect to construct an addition to the building in the foreseeable future.²

1. The Boca Raton Boca Teeca CO building houses DMS-100, E911, and Rockwell Collins ACD equipment. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks,

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.

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

DOCUMENT NUMBER-DATE

07912 JUL 27 88

FPSC-RECORDS/REPORTING

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 Boca Raton Boca Teeca CO is growing rapidly and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 39,324 in 1998. To meet the demands of the expanding customer base, BellSouth currently has on order an addition to the local switch, as well as additional transmission equipment, such as fiber optic terminals, sonet multiplexers, including 8 DMS-100 cabinets, and a future E911 Rockwell Collins ACD.

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 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 Boca Raton Boca Teeca 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 in 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 14,572 square feet on each of two floors for a total of 29,144 square feet. A total of 27,017.5 square feet is occupied as follows:

<u>Square Feet</u> <u>First Floor:</u>	<u>Description</u>
393	Stairwell
412	Air Handling Unit Room
261	House Service Panel
929	Stairwell, Lobby, Restroom, House Service Room and Air Handling Unit Room
886	Administrative
3,666	Toll/Transmission Equipment
2200.5	Switch
1,234	Power and Engine Room
2,464	Frame
<u>Square Feet</u> <u>Second Floor:</u>	<u>Description</u>
286	Stairwell, Electrical and Telephone Rooms
637	Restrooms and Janitor Room
260	Stairwell
443	Air Handling Unit Room
12,946	Administrative

7. The remaining 2126.5 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 Boca Raton Boca Teeca CO, as well as the areas designated for defined future use. (Exhibit 1).

8. The Boca Raton Boca Teeca CO presently contains no available space for physical collocation and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Boca Raton Boca Teeca CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Boca Raton Boca Teeca CO.

Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5555

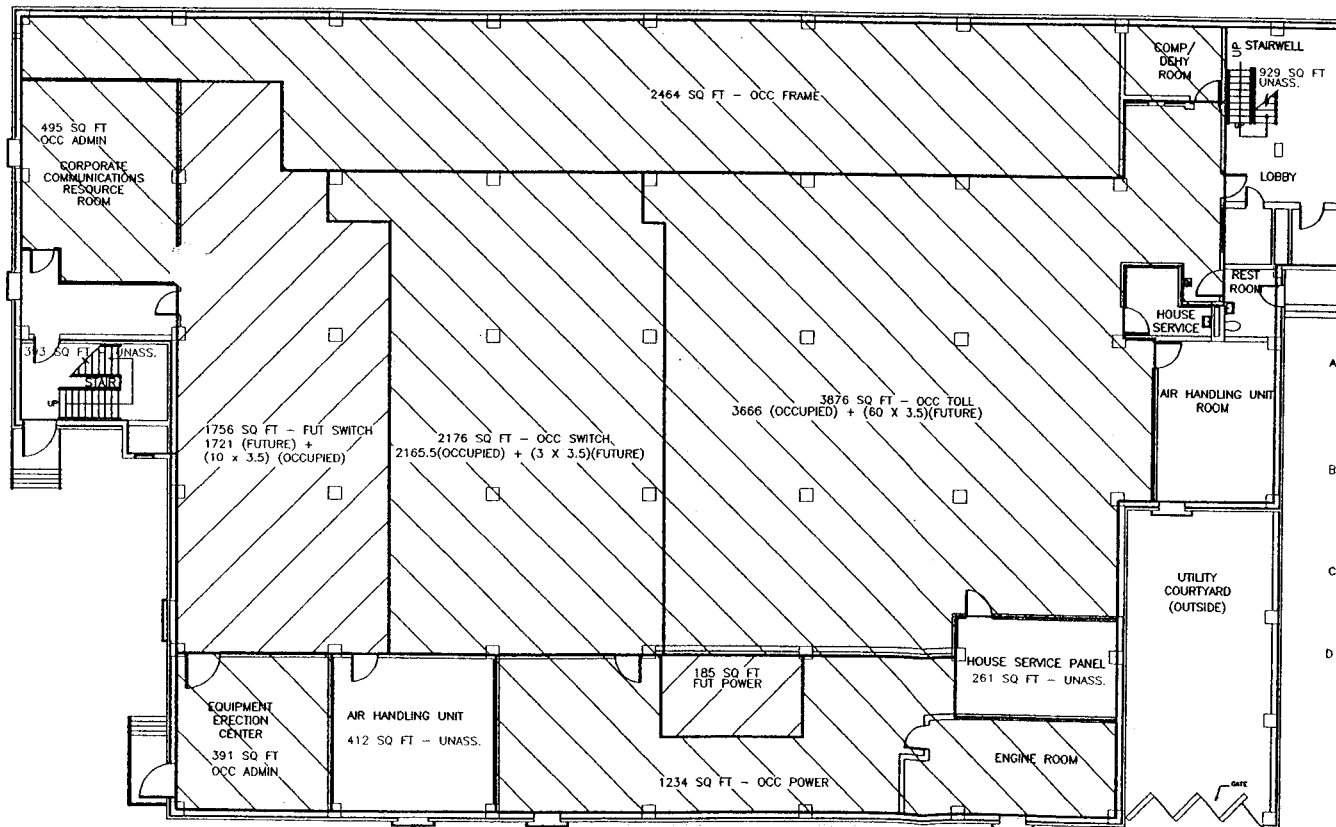
William J. Ellenberg II

WILLIAM J. ELLENBERG II

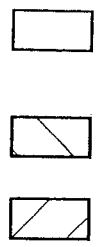
675 West Peachtree Street, #4300

Atlanta, Georgia 30375

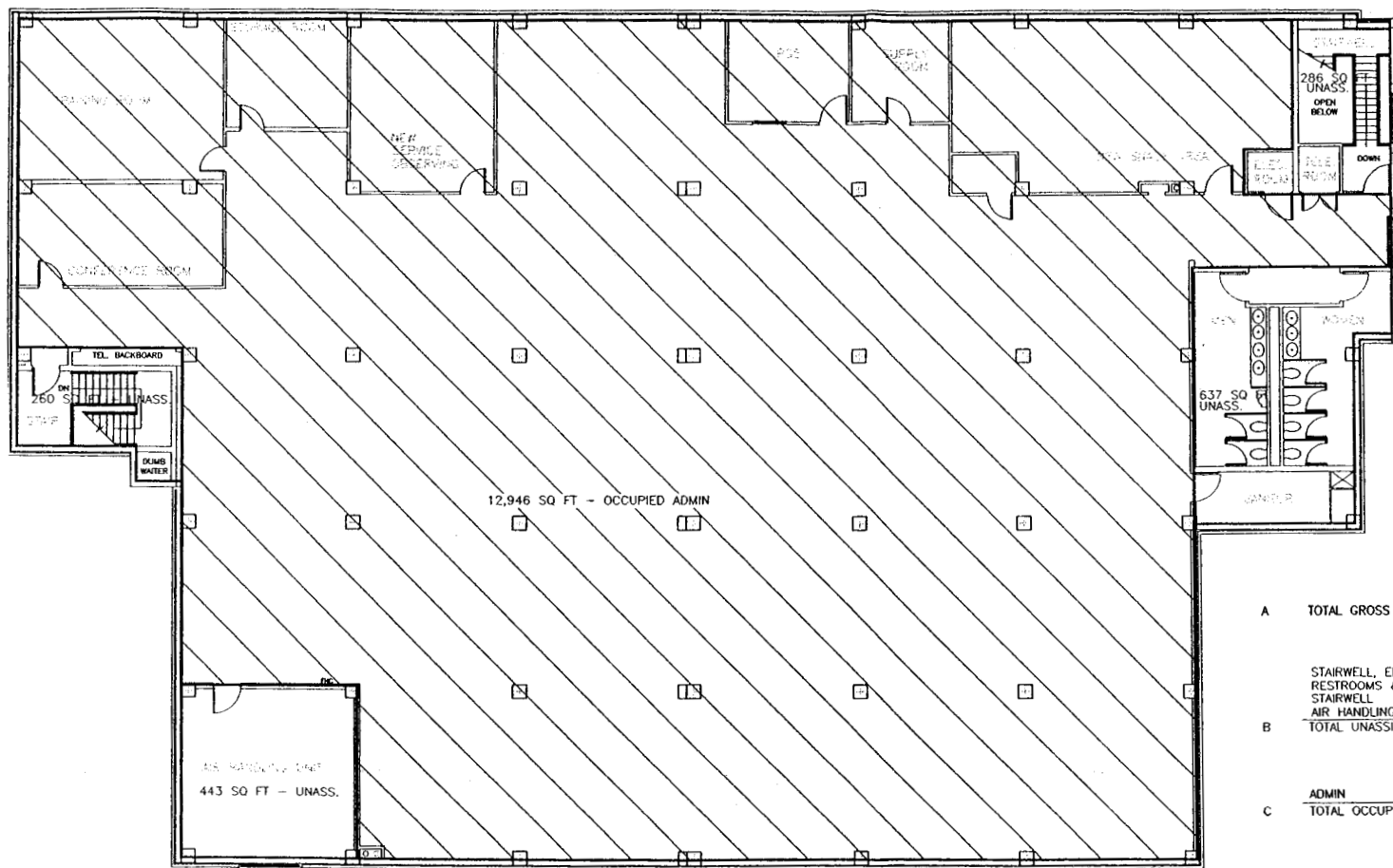
(404) 335-0711



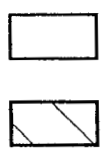
A	TOTAL GROSS SQ FT	14,572
	STAIRWELL	393
	AIR HANDLING UNIT	412
	HOUSE SERVICE PANEL	261
	STAIRWELL, RESTROOMS, LOBBY	929
	HOUSE SERVICE RM & AIR HANDLING UNIT	1929
B	TOTAL UNASSIGNABLE SPACE	1995
	SWITCH	2165.5 + (10 X 3.5) = 2200.5
	TOLL	3666
	FRAME	2464
	POWER AND ENGINE	1234
	ADMIN	495 + 391 = 886
C	TOTAL OCCUPIED SPACE	10,450.5
	SWITCH	1721 + (3 X 3.5) = 1731.5
	TOLL	60 X 3.5 = 210
	POWER	185
D	TOTAL RESERVED SPACE	2126.5



E8181 BOCA RATON - BOCA TEECA FIRST FLOOR PLAN



A	TOTAL GROSS SQ FT	14,572
	STAIRWELL, ELEC & TELE ROOMS	286
	RESTROOMS & JANITOR	637
	STAIRWELL	260
	AIR HANDLING UNIT	443
B	TOTAL UNASSIGNABLE SPACE	1626
	ADMIN	12,946
C	TOTAL OCCUPIED SPACE	12,946



E8181 BOCA RATON - BOCA TEECA SECOND FLOOR PLAN