

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Boca Raton/Boca Teeca Central Office, by BellSouth Telecommunications, Inc.

DOCKET NO.: 980947-TL
FILED: October 5, 1998

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INTERMEDIA COMMUNICATIONS INC.'S COMMENTS ON BELL SOUTH'S PETITION FOR WAIVER

Intermedia Communications Inc. (Intermedia) hereby submits in the above-referenced matter its initial comments as requested by the staff.

COMMENTS

Intermedia plans to serve discovery on BellSouth Telecommunications, Inc. to more fully develop its position regarding this matter. Intermedia's preliminary comments are set forth below.

The Telecommunications Act of 1996 (Act) in Section 251(c) (6) requires incumbent local exchange carriers (ILECs) to provide physical collocation unless the carrier demonstrates to the state commission that physical collocation is not practical for technical

reasons or because of space limitations. Moreover, the ILEC is required to submit to the state commission detailed floor plans or diagrams of any premises when the ILEC claims that physical collocation is not practical because of space limitation. (47

U.S.C. §51.323)

Intermedia believes that it is essential to allow competing providers that may seek physical collocation at BellSouth's premises to tour the premises. Allowing competitors to "walk

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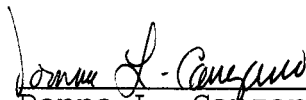
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through" BellSouth's premises would allow competitors, such as Intermedia, to identify space that could be used for providing physical collocation. Moreover, this Commission would be in a better position to evaluate BellSouth's petition if competitors viewed BellSouth's premises and present their positions to the Commission.

Intermedia respectfully requests that it be permitted to tour BellSouth's facility that is the subject matter of the above-referenced docket, and reserves the right to file additional comments after the walk-through and completion of discovery.

Respectfully submitted, this 5th day of October, 1998.



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Donna L. Canzano  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard (32303)  
Suite 200  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(850) 385-6007 Telephone  
(850) 385-6008 Facsimile

Counsel for Intermedia  
Communications Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand delivery (\*) this 5th day of October, 1998, to the following:

Beth Keating(\*)  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Kenneth Hoffman  
John R. Ellis  
Rutledge, Ecenia,  
Underwood, Purnell &  
Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32301

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

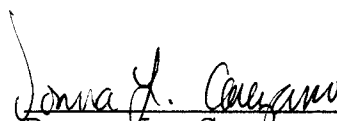
Floyd Self  
Norman H. Horton, Jr.  
Messer, Caparello & Self  
215 S. Monroe Street  
Suite 701  
Tallahassee, FL 32301-1876

Robert G. Beatty  
Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, #400  
Tallahassee, FL 32301

Monica Barone  
Sprint  
3100 Cumberland Circle  
#802  
Atlanta, GA 30339

Suzanne Fannon Summerlin  
1311-B Paul Russell Road  
#201  
Tallahassee, FL 32301

James C. Falvey  
e.spire™ Communications, Inc.  
133 National Business Parkway  
Suite 200  
Annapolis Junction, MD 20701

  
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Donna L. Canzano