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

Re: Docket Nos. 980946, 980947, 980948, 981011, 981012 and 981250

Dear Ms. Bayo:

On May 21, 1999, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion for Continuance in Docket Nos. 980946, 980947, 980948, 981011, 981012, and 981250, seeking additional time for the express purpose of implementing the Federal Communications Commission's (FCC) physical collocation requirements set forth in FCC Order No. 99-48 (Advanced Services Order). The Commission granted BellSouth's Motion on June 3, 1999 and by notice dated June 18, 1999, set a status conference for July 26, 1999, and directed the parties to report in writing the status of their revised collocation applications by June 21, 1999. ACI Corp. (ACI) submits this letter in response to the Commission's order.

After BellSouth's Motion for Continuance was granted, ACI revised its collocation requests for BellSouth's Miami-Palmetto, Boca Raton Boca-Teeca and West Palm Beach Gardens central offices at BellSouth's request. This revised collocation application, submitted to BellSouth on June 2, 1999, requested caged collocation spaces in each of these central offices. BellSouth then responded that there was insufficient space in each office to provide caged collocation and suggested ACI seek cageless space. In response, ACI filed a second revision to its collocation application on June 14, 1999, this time requesting uncaged space in each of the three offices.

To date BellSouth has not responded to ACI's revised collocation application. ACI is therefore unclear whether BellSouth will claim that there is insufficient space at one or more of the offices and has no way of knowing when, if ever, it will be provided collocation space.

In its Motion for Continuance BellSouth agreed to complete reassessment and space assignment for all six central offices within six weeks of the Commission's June 3rd Order

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RECORDS AND REPORTING

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granting BellSouth's Motion for Continuance. This deadline of July 15th came and went with no response from BellSouth. It has now been nearly two months since ACI filed the latest version of its revised collocation application. Yet, BellSouth has not even indicated whether there is enough space available at any one of the offices, much less provided a full reassessment and space assignment. There is no valid reason BellSouth could not have met the response intervals that were indicated in its Motion.

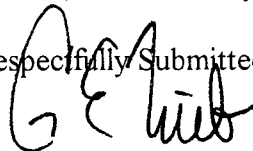
ACI and the other ALECs have waited long enough. The Commission should take timely action to require BellSouth to comply with the FCC's collocation mandates as set forth in the Advanced Services Order. Accordingly, the Commission should order BellSouth to take the following actions within seven days of the July 26, 1999, status conference:

1. Respond to each party to this proceeding on the status of its collocation application(s). This response should indicate BellSouth's position on whether there is sufficient space to provide the requested collocation.
2. Report to the Commission and parties on space availability at each of the six central offices addressed in this proceeding. This report should indicate which of these central offices will have exhausted available space after meeting some or all of the pending collocation requests. BellSouth should, of course, promptly withdraw its waiver petition for those offices that will not face space exhaustion.

Additionally, should BellSouth indicate that space will be exhausted at any of the central offices, the Commission should set a prehearing conference approximately two weeks after the status conference to discuss a timeline and procedures for hearings on BellSouth's remaining waiver petitions.

By taking these actions outlined above the Commission can insure that BellSouth provides the parties and the Commission with the information necessary to evaluate BellSouth's compliance with the Motion for Continuance. Moreover, these responses will clarify which central offices are still at issue and allow the parties to promptly proceed on those docket pertaining to offices where BellSouth claims space is, or will shortly be, exhausted.

Respectfully Submitted,



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