

ORIGINAL

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June 30, 2003

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

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Prehearing Statement of BellSouth Telecommunications, Inc., which we ask that you file in the captioned docket.

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,

J. Phillip Carver
J. Phillip Carver (KA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (#), First Class U.S. Mail and Electronic Mail this 30th day of June, 2003 to the following:

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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action To Support Local Competition In BellSouth's Service Territory))	Docket No. 981834-TP
))	..
))	
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation))	Docket No. 990321-TP
))	
))	Filed: June 30, 2003

**PREHEARING STATEMENT OF
BELLSOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby submits, in compliance with the Order Establishing Procedure (Order No. PSC-02-1513-PCO-TP), issued November 4, 2002, its Prehearing Statement.

A. Witnesses

BellSouth proposes to call the following witnesses to offer direct and rebuttal testimony on the issues in this matter:

<u>Witness</u>	<u>Issues</u>
A. Wayne Gray (Direct and Rebuttal)	1A, 1B, 1C, 2A, 2B, 2C, 2D and 3
W. Keith Milner (Direct and Rebuttal)	4, 5, 6A, 6B, 6C, 7 and 8

The above-identified witnesses present both facts and policy considerations that support BellSouth's positions on these issues. BellSouth has made a good-faith attempt to identify the issues to which these witnesses' testimony primarily relates. However, any given witness' testimony may also relate to other issues in this docket.

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the Prehearing Conference to be held on July 14, 2003.

B. Exhibits

The BellSouth witnesses identified above have no exhibits to their prefiled testimony. BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and the Rules of the Commission.

C. Statement of Position

The Commission should adopt each of the practices, terms and conditions regarding collocation that are described below in BellSouth's positions on the issues. BellSouth's positions are consistent with the FCC's Rules and Orders regarding collocation. These positions are both technically feasible and reasonable, and they will allow for collocation in a manner that is fair both to ILECs and ALECs.

D. BellSouth's Position on the Issues

Issue 1A: When should an ALEC be required to remit payment for non-recurring charges for collocation space?

Position: BellSouth currently assesses nonrecurring charges for application fees, bona fide firm orders, cable installation, cable records, security access administration, access card or key replacement, a space availability report, and security escort service. Payment of these charges should be rendered promptly after billing by the ILEC. ALECs should be billed for application fees when the ILEC provides an Application Response. Non-recurring fees associated with the bona fide firm order, cable installation, cable records, and security access administration should be billed at the time the ALEC submits its bona fide order. Billing for the replacement of a security access card or key, the provision of space availability reports and/or security escort service should occur after the ILEC has provided the requested product or service to the ALEC.

Issue 1B: When should billing of monthly recurring charges begin?

Position: If an ALEC conducts an acceptance walk-through of the collocation space within 15 days of the Space Ready Date, the billing of monthly recurring charges should begin on the date that the ALEC accepts the space. If an ALEC does not conduct an acceptance walk-through within a fifteen calendar day period, monthly recurring charges should begin on the Space Ready Date.

Issue 1C: What cancellation charges should apply if an ALEC cancels its request for collocation space?

Position: If an ALEC cancels its order after the Bona Fide Firm Order, but prior to the date monthly recurring charges commence, cancellation charges should apply for any non-recoverable cost incurred by the ILEC for the work

performed up to the date that the ALEC's written notice of cancellation is received and acknowledged by the ILEC.

Issue 2A: Should an ALEC be required to justify its space reservation needs to the ILEC when an ILEC is forced to consider a building addition to accommodate future space requirements?

Position: Yes. When a central office is at or near space exhaust, any ALEC collocated in that central office should be required to justify the need for any reserved, unused space, and to provide a timeline for occupation of the space. If the ALEC cannot provide justification, then the space should be returned to the ILECs' available space inventory.

Issue 2B: Under what conditions should an ILEC be allowed to reclaim unused collocation space?

Position: An ILEC should be allowed to reclaim reserved unused collocation space from an ALEC if at any time during the 18 month reservation period, the central office is at or near space exhaustion, and the ALEC cannot justify its plans for utilizing the space within the reservation period.

Issue 2C: What obligations, if any, should be placed on the ALEC that contracted for the space?

Position: When a central office is at or near exhaustion, ALECs should be required to justify the need for their space reservation by providing supporting documentation such as (but not limited to) demand forecasts that include supporting historical data and collocation equipment orders.

Issue 2D: What obligations, if any, should be placed on the ILEC?

Position: When reclaiming space from ALECs in a central office that is at or near exhaustion, the ILEC should be obligated to notify all of the ALECs collocated in the central office that they must justify their space reservations, and provide the circumstances that necessitate this action. The ILEC should review documentation submitted by each ALEC as justification for its reserved unused space. Any space that an ALEC is unable to justify should be reclaimed and returned to the ILEC's available space inventory for reassignment.

Issue 3: Should an ALEC have the option to transfer accepted collocation space to another ALEC? If so, what are the responsibilities of the ILEC and ALECs.

Position: An ALEC should be allowed to transfer collocation space to a second ALEC if the central office is not in space exhaust and the transfer of the collocation space is in conjunction with the ALECs' sale of in place collocation equipment to this second ALEC. If the central office is in space exhaust, an ALEC should only be allowed to transfer collocation space if the transfer is part of transfer of all (or substantially all) of the transferring ALECs' assets, and the Commission has approved the transfer in the space exhausted central office. This requirement is necessary to prevent ALECs from avoiding the space allocation procedures that would otherwise apply in a space exhaustion situation.

Issue 4: Should the ILEC be required to provide copper entrance facilities within the context of a collocation inside the central office?

Position: Generally, no. Consistent with the FCC's Rules in CC Dockets 96-98 and 91-141, ILECs are not required to accommodate requests for non-fiber optic facilities to be placed in the ILECs' entrance facilities unless the Commission determines in a particular case that this placement is necessary.

Issue 5: Should an ILEC be required to offer, at a minimum, power in standardized increments? If so, what should the standardized power increments be?

Position: Yes, an ILEC should be required to offer power in standardized increments. BellSouth proposes three options under which an ALEC may order power for its collocation space from BellSouth. First, an ALEC may request power from BellSouth's Battery Distribution Fuse Board ("BDFB") in all available power increments, which range from as low as 10 amps up to 100 amps. Second, the ALEC may install its own BDFB inside its collocation space in order to order power directly from BellSouth's main power board. A standard 225 amp power feed is required to connect the ALECs' BDFB to BellSouth's main power board. Third, the ALEC may install its own BDFB in its collocation space and request power from BellSouth's BDFB, again, in available power increments that range from 10 amps to 100 amps.

Issue 6A: Should an ILEC's per ampere (amp) rate for the provisioning of DC power to an ALEC's collocation space apply to amps used or fused capacity?

Position: The per amp charge should apply to the fused capacity of the equipment an ALEC installs in its collocation space. BellSouth charges for DC power capacity based on the power requirements of the telecommunications equipment being served. Fuse type protection devices are sized at 1.5 times the anticipated drain to ensure that the equipment can be operated at its full capacity without operating the protection device, while allowing the protection device to safely clear any false conditions that might occur. For purposes of billing, the recurring power rate assessed by BellSouth includes a 0.67 multiplier to reflect the fact that the ALEC would not normally use the full capacity of the protection device.

Issue 6B: If power is charged on a per-amp-used basis or on a fused capacity basis, how should the charge be calculated and applied?

Position: The rate for DC power should be calculated and applied on a per-amp basis. The calculation of the charge by BellSouth should reflect the difference between fused capacity and rated capacity by using an adjustment factor of .67. This factor reflects the 1/1.5 relationship of fused capacity to rated capacity.

Issue 6C: When should an ILEC be allowed to begin billing an ALEC for power?

Position: Since DC power is assessed by BellSouth in recurring monthly charges, billing should begin as stated previously in response to Issue 1B. Specifically, if an ALEC conducts an acceptance walk-through of the collocation space within 15 calendar days of the Space Ready Date, monthly recurring

charges should begin on the date the ALEC accepts the space. If the ALEC fails to conduct an acceptance walk-through within the 15 day period, then charges should begin on the Space Ready Date.

Issue 7: Should an ALEC have the option of an AC power feed to its collocation space?

Position: Yes, the ALEC should have the option of obtaining an AC power source in accordance with the requirements of the National Electric Code in those instances in which a local authority having jurisdiction permits this arrangement.

Issue 8: What are the responsibilities of the ILEC, if any, when an ALEC requests collocation space at a remote terminal where space is not available or space is nearing exhaustion?

Position: The ILEC should permit the collocation of any type of equipment necessary for interconnection to its network or for access to unbundled network elements in the provision of telecommunications services. If sufficient space exists within the DLC remote terminal, the ALEC should be allowed to collocate its equipment (including Digital Subscriber Line Access Multiplexer (“DSLAM”)) regardless of whether the ILEC has installed its own equipment at that remote terminal location. If sufficient space does not exist, and the ILEC has not installed its own DSLAM equipment at the DLC remote terminal location, then the ILEC should be allowed to deny the request and file a collocation waiver request with the Commission. If sufficient space does not exist within the DLC and the ILEC has installed its DSLAM equipment at that DLC remote terminal location, then the ILEC should take necessary action to augment the space so that the

ALEC can install its own equipment, including a DSLAM, at the DLC remote terminal.

E. Stipulations

The parties have entered into no stipulations at this time.

F. Pending Motions

Various Requests for Confidential Classification are pending. Also, the Joint Motion of Verizon Florida, Inc. and Sprint-Florida, Inc. to Strike the Revised Rebuttal Testimony of Stephen E. Turner and the Surrebuttal Testimony of Jeffrey A. King is pending.

G. Other Requirements

BellSouth knows of no requirements set forth in any Prehearing Order with which it cannot comply.

Respectfully submitted this 30th day of June, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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