

ORIGINAL

Legal Department

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

December 18, 2003

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED FPSC  
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DEC 18 PM 4:33

Re: **Docket No.:** 031114-TR  
**BellSouth Telecommunications, Inc.'s Request for  
Permission to Change Demarcation Point Specified  
in Rule 25-4.0345(1)(b)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Permission to Change Demarcation Point Specified in Rule 25-4.0345(1)(b), which we ask that you file in the captioned new 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.

RECEIVED & FILED

Jh  
FPSC-BUREAU OF RECORDS

Sincerely,  
Nancy B. White  
Nancy B. White (WA)

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

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

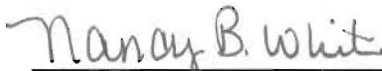
**CERTIFICATE OF SERVICE  
BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST  
FOR PERMISSION TO CHANGE DEMARCATION POINT SPECIFIED  
IN RULE 25-4.0345(1)(b)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 18th day of December, 2003 to the following:

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

Chuck Bennett  
Department of the Navy  
Commanding Officer – NCTS  
Code N21  
Naval Air Station Jacksonville  
Jacksonville, FL 32212-0111

  
\_\_\_\_\_  
Nancy B. White (GA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request by BellSouth Tele-	)	Docket No.: _____
communications, Inc., Requesting	)	
Permission to Change Demarcation	)	
Point Specified in 25-4.0345(1)(b),	)	
Florida Administrative Code	)	Filed: December 18, 2003
_____	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST  
FOR PERMISSION TO CHANGE DEMARCATION POINT SPECIFIED  
IN RULE 25-4.0345(1)(b)**

BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") hereby requests that the Florida Public Service Commission grant permission for BellSouth to change the demarcation point specified in Rule 25-4.0345(1)(b), Florida Administrative Code, for basic local service to non-residential customers at Mayport Naval Station, Jacksonville, Florida (the "Naval Station"), as further described below. Specifically, BellSouth seeks the following:

1. BellSouth is a local exchange company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. BellSouth's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130. Pleadings and process may be served upon:

Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301

3. Pleadings and process for the Navy may be served upon:

Chuck Bennett  
Department of the Navy  
Commanding Officer - NCTS  
Code N21  
Naval Air Station Jacksonville  
Jacksonville, FL 32212-0111

4. Rule 25-4.0345(1)(b), Florida Administrative Code (the "Rule") sets forth the required location, unless otherwise ordered by the Commission for good cause shown, for the point of physical interconnection between the telephone network and the customer's premises wiring, or the demarcation point. Rule 25-4.0345(1)(b)(2) requires that the demarcation point for a single line/multi-customer building be located within the customer's premises at a point easily accessed by the customer.

5. The Department of the Navy (the "Navy") owns and operates the Naval Station. The Navy has advised BellSouth that it desires to establish a single point of demarcation for BellSouth services to non-residential subscribers at the Naval Station. Coincident with the establishment of a single point of demarcation, the Navy has asked to purchase certain of BellSouth's existing cable and outside plant facilities.

6. The Navy has advised that it desires to establish a single point of demarcation so that it may solicit competitive offers to install and maintain outside plant cables and equipment resulting in saving critical operations and maintenance dollars.

7. If the single point of demarcation is established, BellSouth will be unable to locate its demarcation point within the customer's premises, as set forth in Rule 25-4.0345(1)(b)(2).

8. BellSouth plans to sell, and the Navy plans to purchase, such existing cable and outside plant facilities and effect the change to the single point of demarcation as aforesaid, subject to any necessary approvals from this Commission. BellSouth and the Navy would advise affected customers of the change and its ramifications by letter sent at least 30 days in advance of the change. The letter would advise that BellSouth services will terminate at the new single point of demarcation (to be located at Building #50 at the Naval Station) and that customers will need to work with the Navy or its designees to extend service or repair service from the single point of demarcation to their premises.

9. Thus, to the extent BellSouth needs the permission of the Commission to effect the change to the single demarcation point for basic local service to non-residential subscribers at the Naval Station, this Petition requests such permission for "good cause shown" under the Rule.

10. BellSouth's request for permission to change the demarcation point for good cause shown request meets the "good cause shown" standard. BellSouth fully supports the existing Rule but is requesting the waiver for good cause -- in order to provide service given the changes that the property owner, the Navy, has requested.

WHEREFORE, BellSouth requests that, having demonstrated good cause for its request, the Commission grant its Petition.

Respectfully submitted this 18<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

Nancy B. White (KA)

Sharon R. Liebman

c/o Nancy H. Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

Tel. No. (305) 347-5558

*R. Douglas Lackey*

R. Douglas Lackey (KA)

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