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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. 980948-TL**  
**Waiver for Miami Palmetto 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

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**CERTIFICATE OF SERVICE  
WAIVER FOR MIAMI PALMETTO 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*  
\_\_\_\_\_  
Nancy B. White (BW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.:  
Inc. 's Petition for Waiver for the )  
Miami Palmetto 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 1996 Telecommunications Act (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").<sup>1</sup> Pursuant to this authority, BellSouth requests a exemption from the physical collocation requirements set forth in the Act and in the Order for the Miami Palmetto Central Office ("CO") located at 9056 N.W. 41st Street, Miami Florida 33166. BellSouth seeks this exemption on the grounds that it is unable to meet physical collocation requests<sup>2</sup> due to space limitations in the CO. BellSouth does not expect to construct an addition to the building in the foreseeable future.<sup>3</sup>

1. The Miami Palmetto CO houses a No. 5 ESS switch. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital

<sup>1</sup> 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.

<sup>2</sup> 770 square feet is currently being utilized for providing physical collocation.

<sup>3</sup> Pursuant to the FCC directive, BellSouth will consider collocation requirements in any future construction undertaken.

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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 Miami Palmetto CO is growing at the rate of over 5,000 lines per year and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 76,000 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 power equipment to abate the ampere drain (currently peaking at 4,656 amperes, on the plant which has been growing at 7% per year), and the addition of transmission equipment, video, fiber rings and miscellaneous circuits.

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 Miami Palmetto 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 24,398 square feet. A total of 19,971.5 square feet is occupied as follows:

<u>Square Feet</u>	<u>Description</u>
351	Air Conditioning Room
1,550	Restrooms and Storage
1,878	Administrative
4,957.5	Toll/Transmission Equipment
4,357	Switch
2,613	Power and Engine Rooms
3,465	Frame
800	Collocation Arrangements

A total of 133 square feet is considered unusable space which contains an air passage for air return to an Air Handling Unit and the space is too narrow for equipment.

7. The remaining 4,293.5 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 as well as space for virtual collocation. 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 Miami Palmetto CO as well as the areas designated for defined future use. (Exhibit 1).

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

Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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