

**ORIGINAL**

1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   REBUTTAL TESTIMONY OF JAMES D. BLOOMER  
3                   BEFORE THE  
4                   FLORIDA PUBLIC SERVICE COMMISSION  
5                   DOCKET NO 980800-TP  
6                   SEPTEMBER 18, 1998

7  
8   Q.   PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION WITH  
9        BELLSOUTH TELECOMMUNICATIONS, INC.

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11   A.   My name is James D. Bloomer. My business address is Room 20C75, 675 West  
12        Peachtree Street, Atlanta, GA. My office is located in Room 10JJ1, 301 W. Bay  
13        St., Jacksonville, FL. I am employed by BellSouth Telecommunications, Inc.  
14        (hereinafter referred to as "BellSouth" or "the Company") in the Property and  
15        Services Management department as a Facility Planner in the Current Planning  
16        group.

17   Q.   ARE YOU THE SAME JAMES D. BLOOMER WHO PROVIDED DIRECT  
18        TESTIMONY IN THIS PROCEEDING?

19  
20   A.   Yes.

21  
22   Q.   WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?  
23

1 A. I will rebut the testimony of Messrs Ramos and Nilson on behalf of SUPRA  
2 concerning factors to be considered in determining if space is available for  
3 collocation.

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5 Q. SUPRA WITNESSES MAKE SEVERAL COMMENTS ABOUT THE FEDERAL  
6 COMMUNICATIONS COMMISSION WAIVERS. WERE YOU A PART OF THE  
7 FILING EFFORT FOR THE FCC REQUESTS?

8  
9 A. Yes, in 1993, I was a part of the FCC review team for North Florida Central  
10 Office locations.

11  
12 Q. MR. TILSON'S TESTIMONY ASSERTS BELLSOUTH'S POSITION DENYING  
13 SPACE AVAILABILITY FOR COLLOCATION AT WEST PALM BEACH  
14 GARDENS IS UNTENABLE BY COMPARING THE 1993 FCC FILING DATA  
15 WITH THE 1998 FLORIDA PUBLIC SERVICE COMMISSION FILING DATA. IS  
16 THIS A VALID COMPARISON?

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18 A. No. Supra asserts BellSouth's position is "untenable" because the forecasted  
19 usages and space assignments in the 1993 Federal Communications  
20 Commission (FCC) filing and in the 1998 Florida Public Service Commission  
21 (FPSC) filing are different. It is only to be expected that the numbers have  
22 changed. Equipment forecasts and the proposed space allocations derived from  
23 these forecasts are snapshots in time. This means that the forecast is good only  
24 until the next forecast is completed. Space planning allocations based on  
25 equipment forecasts are judgments based on the assumed service level needs

1 at a particular point in time. BellSouth's personnel took a great deal of effort in  
2 both the 1993 and the 1998 filings to provide up-to-date requirements in order to  
3 be as accurate and complete as possible. Pictures taken of a particular child 5  
4 years apart are different. Although you can tell it is the same child, the child  
5 does not look the same over time. In a similar manner, each space plan for a  
6 central office is a snapshot in time, based on the best information available.

7  
8 Q. MR. NILSON ASSERTS THAT THERE WAS NO VERIFICATION PROCESS  
9 FOR THE DATA USED IN THE 1993 FCC PETITIONS FOR WAIVER. DO YOU  
10 AGREE?

11  
12 A. No, I do not agree. Each study was subject to audit by the FCC. In addition, the  
13 filings were accompanied by an affidavit attesting to the accuracy of the data on  
14 that given date. BellSouth expected that each filing would be examined closely.  
15 BellSouth took the matter seriously then and continues to do so now. To  
16 address an accurate assessment of C.O. space, property personnel held region-  
17 wide conference calls to ensure BellSouth applied universal standards for  
18 classification of space, treatment of code-required aisle space, definition of  
19 "reserved space", and forecasting intervals.

20  
21 Q. MR. NILSON'S TESTIMONY ON PAGE 4, LINES 9-11 ASSERTS THAT  
22 BELL SOUTH HAD THE LATITUDE TO PROVIDE INFORMATION CONTAINED  
23 IN THE 1993 FILINGS WITHOUT REGARD TO ACCURACY. WAS THERE AN  
24 ESTABLISHED PROCESS IN PLACE TO CONTROL THE INPUTS  
25 PROVIDED?

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A. Yes. A space assessment worksheet requiring accountability for every square foot within a central office, whether assignable or unassignable, had to be completed and supported by a certified floor plan drawing. There were six specific steps for completing the worksheet which were rigorously followed by BellSouth employees.

Q. ARE THE SPACE ASSESSMENT FORMS USED TODAY THE SAME FORMS USED FOR THE 1993 FCC FILINGS?

A. Yes, the forms are basically the same. They have been modified to the extent that the format has been changed from a paper to an electronic spreadsheet format.

Q. MR. NILSON REFERENCES A PROPOSED WEST PALM BEACH GARDENS ADDITION WHICH WOULD CREATE MORE SPACE AT THIS LOCATION. WHAT IS THE STATUS OF THIS ADDITION?

A. Preliminary plans for a full second floor addition for this central office have been presented to the appropriate groups in BellSouth. I am awaiting news of the funding for this addition.

1 Q. IF THE ADDITION IS CONSTRUCTED, WILL IT CONTAIN SPACE FOR  
2 COLLOCATION?

3

4 A. Yes. The addition will take into account the demand for collocation space.  
5 Although BellSouth is not required to add or lease additional space specifically to  
6 accommodate collocation as discussed in Mr. Thierry's testimony, BellSouth  
7 does consider collocation space needs when adding additional space for its own  
8 purposes. Therefore, BellSouth would construct a collocation area in the  
9 addition, given the expressed demand for space in the West Palm Beach  
10 Gardens office.

11

12 Q. HOW WOULD BELLSOUTH DETERMINE THE COLLOCATION SPACE  
13 REQUIREMENTS FOR INCLUSION IN THE BUILDING ADDITION?

14

15 A. With consideration for the overall space allocations in the addition, BellSouth  
16 will poll all carriers who have been denied physical collocation at the West Palm  
17 Beach Gardens office, including existing virtual collocators and all carriers who  
18 requested physical collocation but did not select virtual collocation in lieu of  
19 physical collocation, to determine if they want physical collocation space in the  
20 new addition.

21

1 Q. SUPRA'S WITNESSES HAVE MADE NUMEROUS REPRESENTATIONS OF  
2 THE SQUARE FOOTAGE AMOUNTS AVAILABLE FOR PHYSICAL  
3 COLLOCATION IN EACH OFFICE. PLEASE RESPOND.  
4

5 A. First, BellSouth prepared Space Assessment Worksheets and supporting  
6 drawing(s) for each office. This documentation is attached to my direct  
7 testimony. These attachments are the factual report of the space allocation at  
8 the time of the walk-through with the Florida Public Service Commission staff on  
9 July 24, 1998. Secondly, drawing conclusions from 1998 forecasts as they relate  
10 to 1993 space allocations is inappropriate. What was allocated in 1993 is not  
11 germane to 1998 allocations. Telecommunications technology, customer needs,  
12 the regulatory environment, technical applications, and local building codes are  
13 just some of the variables that may change over time. Furthermore, minor  
14 construction activity takes place whenever necessary. Equipment relocations  
15 are made to consolidate service areas and maximize space usage. In summary,  
16 there is no way to draw accurate conclusions from mix and matched data from  
17 two different years, especially years that are so far apart.  
18

19 Q. MR. NILSON, IN HIS TESTIMONY ON PAGE 7 LINE 21 THROUGH PAGE 8  
20 LINE 5, ASSERTS THAT THE WEST PALM BEACH GARDEN DRAWINGS  
21 PROVIDED AT THE WALK THROUGH DID NOT DOCUMENT THE  
22 UNAVAILABLE SPACE. DO YOU AGREE?

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A. No, I do not agree. Although unassignable code-required aisle space was necessarily included in the designated equipment areas, the drawing provided in testimony and the walk-through clearly shows the following labels "Lobby," "Janitor," "Men," and "Women." This is considered to be unavailable space by BellSouth.

Q. IN MR. NILSON'S TESTIMONY ON PAGE 7 LINE 19 HE ASSERTS THAT ADDITIONAL MAIN FRAME SPACE IS VACANT AND THE FRAME CAN BE REMOVED. DO YOU AGREE?

A. No. Both the vertical and horizontal sides of the distributing frame section in question contain working terminations. Therefore, it can not be removed.

Q. MR. NILSON'S TESTIMONY, ON PAGE 6 LINES 20-21, ASSERTS THAT THE FLOOR PLANS FOR THE OFFICES IMPLY THERE IS LESS SPACE THAN WHAT APPEARED TO BE AVAILABLE ON THE WALKTHROUGH. DO YOU AGREE?

A. Yes. This is based on sound space planning principles, not a misrepresentation of data. The space allocations for occupied, reserved, and unavailable space as provided in the space assessment worksheets and floor plan drawings make no allowances for the building code-required entrances and exits to equipment

1 areas. These pathways are considered part of the equipment space allocation.  
2 Moreover, more space may appear available if one ignores the construction  
3 practicality of providing fire rated construction for the collocation space in a  
4 working equipment room with significant overhead obstructions. The physical  
5 difficulty of complying with building code-required construction for a collocation  
6 request in the equipment area may make some areas unusable. Finally the  
7 space configurations assigned for BellSouth equipment growth are not apparent  
8 on the walk through. These configurations make the space unusable for any  
9 other purpose. Therefore, while to the layman, there may appear to be available  
10 space, in reality there is none.

11  
12 Q. MR RAMOS ASSERTS ON PAGE 6 LINE 20 THROUGH PAGE 7 LINE 11 AND  
13 IN EXHIBIT OAR-8, THAT THE BUILDINGS ARE AT LEAST AT 82%  
14 CAPACITY, AND AS SUCH BELLSOUTH COULD GIVE UP 200 SQUARE  
15 FEET. DO YOU AGREE?

16  
17 A. No, I disagree with both the assertion and the conclusion. Mr. Ramos' charts  
18 and analysis are not a complete space allocation picture.

19  
20 Q. WHAT IS INCOMPLETE ABOUT THESE ASSERTIONS AND CONCLUSIONS?  
21

1 A. Reserved space is left out of both building summaries. This space is reserved  
2 properly for BellSouth growth. It creates a false sense of capacity to ignore this  
3 justifiable requirement allowed to BellSouth.

4

5 Q. WHAT PRINCIPLES DOES BELLSOUTH APPLY TO ITSELF WHEN  
6 RESERVING SPACE FOR BELLSOUTH GROWTH?

7

8 A. As discussed in Mr. Rubin's and Mr. Ream's rebuttal testimony, in general,  
9 BellSouth applies a two-year forecast cycle for the collocation space  
10 assessments.

11

12 Q. WHAT EFFECT DOES INCLUDING THE RESERVED SPACE HAVE ON MR.  
13 RAMOS'S CHART?

14

15 A. The corrected measurement indicates that both buildings are 98+% of available  
16 capacity.

	Gross	Unavailable	Available	Occupied	Reserved
17 Golden Glades	26255	2812	23443	18989	4035
18 % of building available space				81%	17%
19 Gardens	20314	2264	18050	14583	3197
20 % of building available space				81%	18%

22

1 Q. WHAT DOES A 98+% CAPACITY MEASUREMENT MEAN?

2

3 A. It means that BellSouth is quite literally out of space for equipment shipments  
4 that require contiguous space outside of those already reserved. The exceptions  
5 are single pieces of equipment that can be installed in scattered locations around  
6 the office, out of aisles and walk ways, in the appropriate ground plane and  
7 where cable rack capacity can reach them.

8

9 Q. IS THE RESERVED SPACE AVAILABLE FOR EQUIPMENT GROWTH?

10

11 A. No, by definition, and as previously referenced in direct testimony, the reserved  
12 number also includes the code required aisles necessary to serve the future  
13 equipment area as well as the future equipment footprint.

14

15 Q. DO CODE REQUIRED AISLES MATERIALLY AFFECT THE RESERVED  
16 FLOOR SPACE?

17 A. Yes, I have attached the EXHIBITS JDB-6 and 7 to illustrate the point.

18 West Palm Beach Gardens 3197 square feet reserved

19 Current code required aisles minus 1169

20 Actual Future Equipment space equals 2028

21 BST equipment forecast minus 1151

22 Remaining reserved space available equals 877

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Golden Glades	4035 square feet reserved
Current code required aisles	minus 851
Actual Future Equipment area and aisles	equals 3184
BST equipment forecast	minus 2073
Remaining reserved space available	equals 1111

Q. WHAT AND WHERE IS THIS REMAINING RESERVED SQUARE FOOTAGE LOCATED IN THESE OFFICES?

A. This square footage is all the vacant space, regardless of dimensions, configurations, or locations in the total equipment area. It is not all in one place. The space is scattered among all switch, toll, and power equipment areas and currently serves as work space for vendors and BellSouth personnel. These reserved spaces will be used for future equipment if the ground plane is appropriate. Some of the space is located in front of return air grilles and must be kept clear to provide proper cooling. Thus, the space is left in configurations that cannot be used for collocation.

Q. MR. RAMOS ASSERTS THAT SUPRA ONLY REQUIRES 200 SQUARE FEET TO FULFILL HIS REQUEST. DO YOU AGREE?

A. No. The collocation floor space requirement is not just the collocater's dedicated space allocation. There must also be a adequate space for POTS bays, DC power bays, and other termination bay requirements needed to support the

1 collocator's request. These network infrastructure components are most  
2 commonly located in space referred to as the collocation common area.  
3 Common area allocations are supposed to serve all the collocators in that  
4 building area. Providing code-required aisles and walls in and around this area,  
5 in addition to the collocator space, makes the single collocator space  
6 requirements much larger than claimed by Mr. Ramos.

7  
8 Q. MR. RAMOS ASSERTS, ON PAGE 15 LINES 5-15, THAT BELLSOUTH  
9 REQUESTED AND THEN DROPPED A POWER WAIVER AT NORTH DADE  
10 GOLDEN GLADES TO DELAY THE PROCESS. DO YOU AGREE?

11  
12 A. No. There was no waiver filed for power at this location so there was no attempt  
13 to delay the process. The real issue is engine capacity to support all  
14 requirements at this location. BellSouth noticed the possibility of a short term  
15 engine capacity shortage. BellSouth did not want to mislead any requesting  
16 collocators as to the engine capacity until the long-term solution was  
17 implemented. In an attempt to be proactive regarding North Dade Golden  
18 Glades, a temporary capacity fix was developed and will be implemented as  
19 necessary. Again, no waiver was filed and no delay was instituted.

20  
21 Q. HAS BELLSOUTH DUPLICATED THE ADMINISTRATIVE WORK AREAS TO  
22 CROWD THE CENTRAL OFFICE SPACE?

23  
24 A. No. There was no attempt to deliberately fill the space with unneeded work area.  
25 as pointed out to the Commission staff and Supra during the walk through, some

1 work areas partially block code-required aisles. This reinforces the fact that  
2 there is no space.

3  
4 Q. MR. RAMOS ASSERTS BELLSOUTH ACTED IN BAD FAITH BECAUSE  
5 DRAWING CHANGES WERE NECESSARY AT THE WALKTHROUGH. DO  
6 YOU AGREE?

7  
8 A. No. As previously testified, space forecasts and space allocations are dynamic.  
9 The equipment location and/or replacement activity is very high in both buildings.  
10 As previously testified, equipment forecasts and subsequent space allocations  
11 are a snapshot in time. Changes had been made in the building space allocation  
12 just one week from the time the drawing was verified to the date of the inspection  
13 with staff. BellSouth marked the changes for clarification at the request of the  
14 Commission staff and Supra. In addition, there were other changes made at the  
15 request of the Commission staff and Supra.

16  
17 Q. MR. RAMOS ASSERTS ON PAGE 18 THAT THERE IS OVER 2000 SQUARE  
18 FEET EARMARKED FOR ADMINISTRATIVE STAFF. DO YOU AGREE?

19  
20 A. No. That number appears on no document filed with the Commission.  
21 Administrative space is defined on the Space Assessment Worksheet, filed in  
22 direct testimony as JDB-1, as Space assigned for Administrative use, service  
23 center(s), or non-wire functions. EXHIBITS JDB-2 and 4 accurately note the  
24 space allocations. BellSouth made a particular point to report administrative  
25 space at these locations and classify them as such on the EXHIBITS JDB-2 and

1 4. BellSouth even noted disagreement with classifying shipping/receiving rooms  
2 as administrative space as they directly support the wire center.

3  
4 Q. WHY ARE DESKS, WORK STATIONS, AND TABLES LOCATED IN THE  
5 RESERVED EQUIPMENT AREAS?

6  
7 A. There are three reasons:

- 8 1. Network and Property Service Management vendors and all BellSouth  
9 personnel assigned to the building full-time or by project need a place to  
10 work.
- 11 2. BellSouth's vendor contracts require work space be provided during any  
12 vendor job.
- 13 3. Work space is necessary to meet service demand levels set by our  
14 customers, the Federal Communications Commission, and/or the Florida  
15 Public Service Commission. Today's equipment requires electronic testing  
16 apparatus, with detailed installation, repair, and reference materials. It is  
17 appropriate to provide a place to use and store such apparatuses and  
18 references materials.

19  
20 Q. MR. RAMOS ASSERTS THAT STORAGE AREAS WITH OLD EQUIPMENT  
21 WERE DISCOVERED AND THEN REASSIGNED AS FUTURE SPACE. DO  
22 YOU AGREE?

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24 A. No. All storage rooms were shown as Admin usage – occupied as stated in  
25 direct testimony.

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Q. DID BELLSOUTH SYSTEMATICALLY EXCLUDE ALL BUILDINGS WITH TANDEM OFFICES IN FLORIDA FROM COLLOCATION AS ASSERTED BY SUPRA?

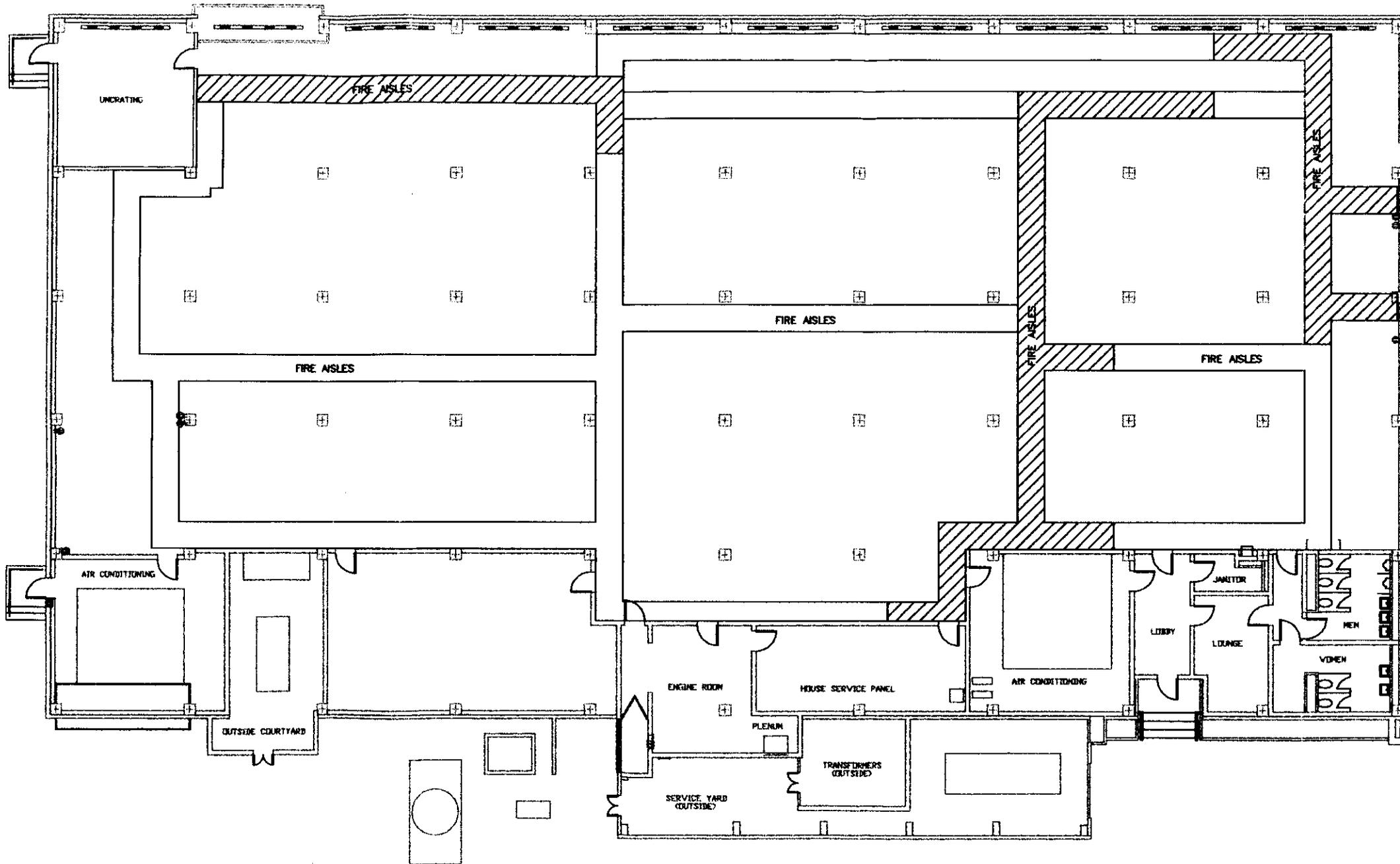
A. No. BellSouth uses the same process to determine whether space is available for physical collocation regardless of the type of office being reviewed. Presently, physical collocation is in place in one tandem office. Firm orders are in place for two others.

Q. MR. RAMOS ASSERTS BELLSOUTH SHOULD GATHER ALL THE DESKS, TABLES, AND CHAIRS AND GIVE SUPRA THE SPACE. WHAT IS YOUR RESPONSE?

A. The desks, chairs, and tables are scattered throughout both central office spaces. Displacing any of them does not gather enough properly configured space to make a collocator space meet code or grounding separation specified in direct testimony. Previously, I have testified some of these items already partially block code-required aisles.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

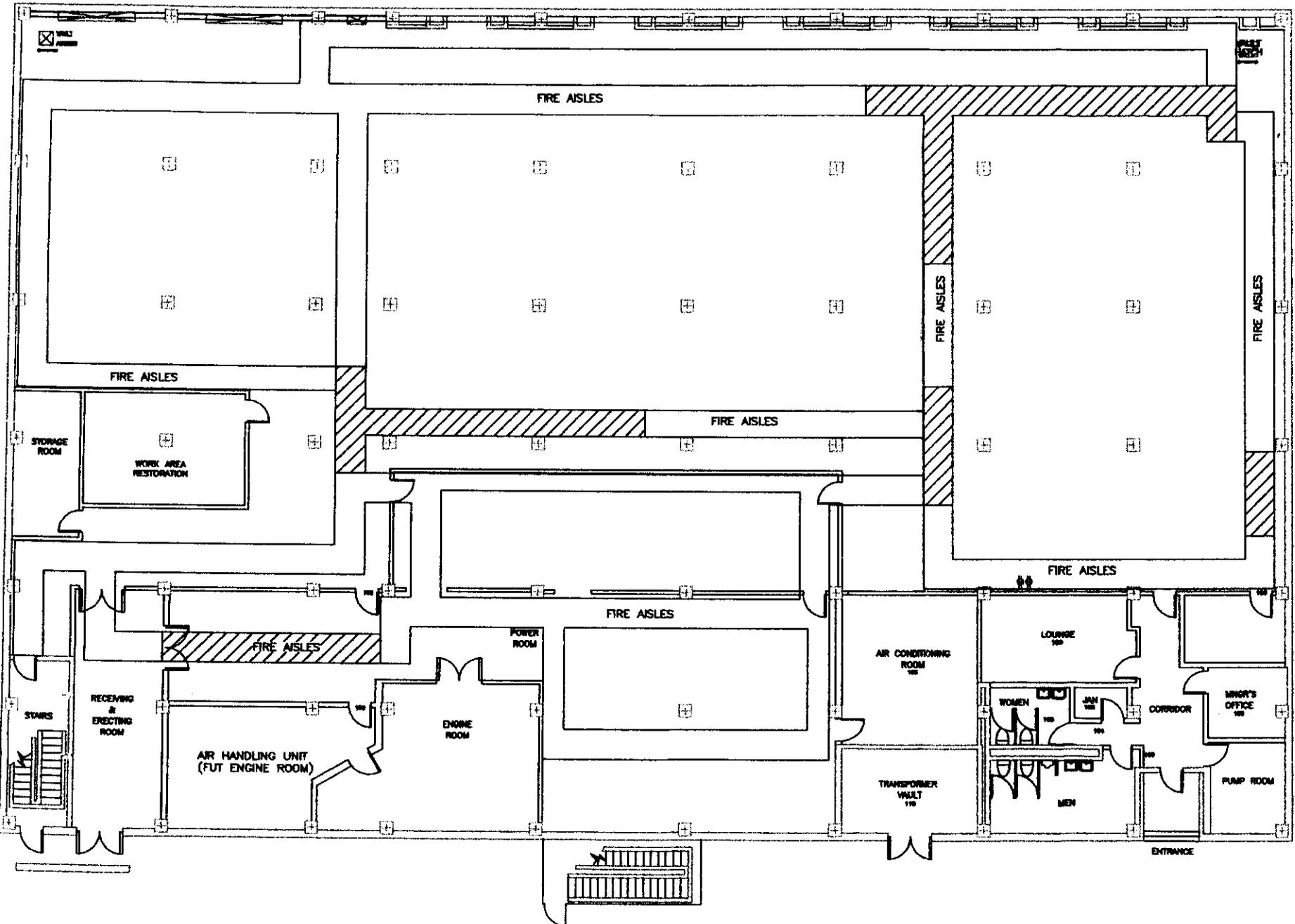
A. Yes.



E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN

FIRE AISLES - OCCUPIED EQUIPMENT AREA: 2478 SQ FT

 FIRE AISLES - FUTURE EQUIPMENT AREA: 1169 SQ FT

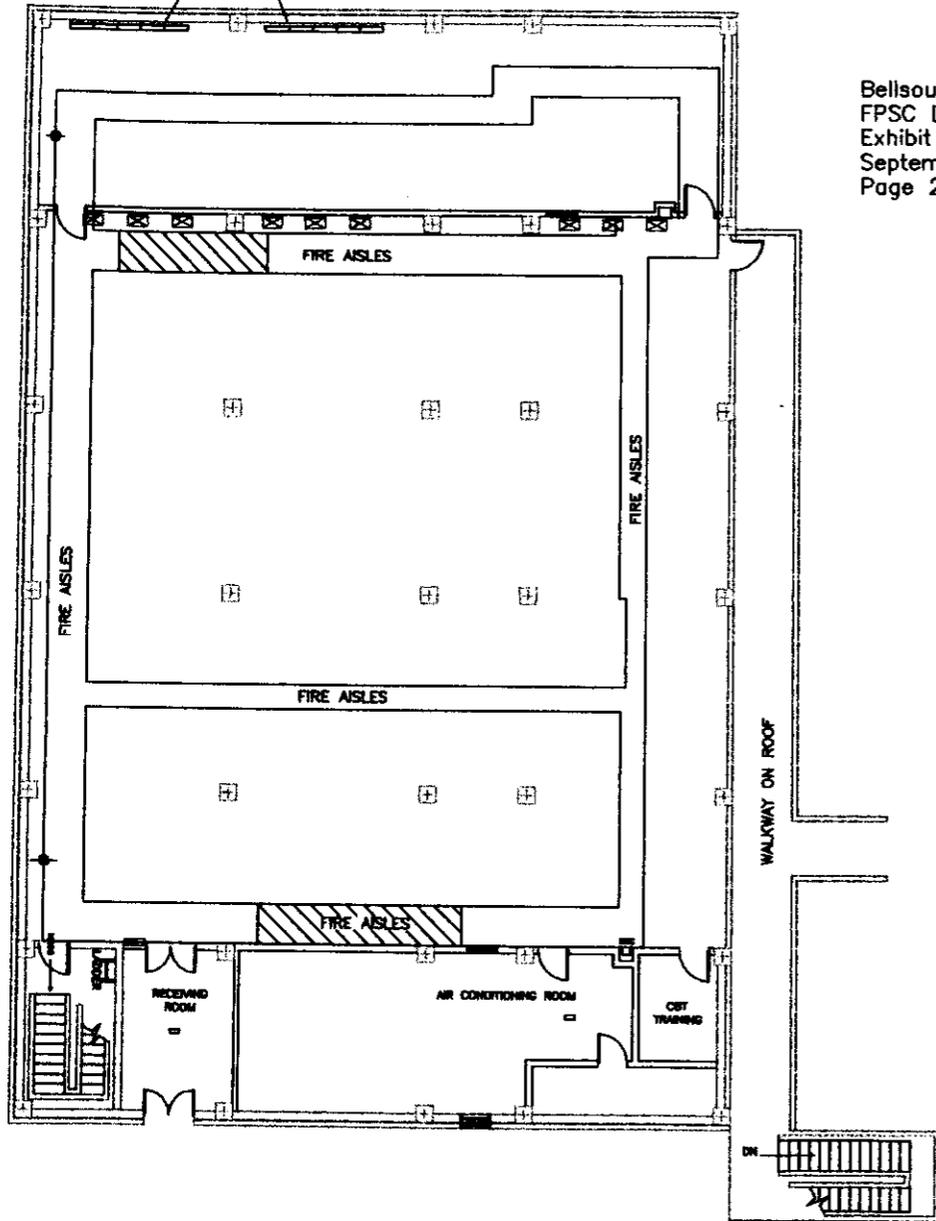


### M6506 NORTH DADE GOLDEN GLADES FIRST FLOOR PLAN

FIRE AISLES - OCCUPIED EQUIPMENT AREA: 3129 SQ FT

 FIRE AISLES - FUTURE EQUIPMENT AREA: 711 SQ FT

ICA OPNS. IN SLAB



Bellsouth Telecommunications, Inc.  
 FPSC Docket No. 980800-TP  
 Exhibit JDB-7  
 September 18, 1998  
 Page 2 of 2

M6506 NORTH DADE GOLDEN GLADES SECOND FLOOR PLAN

FIRE AISLES - OCCUPIED EQUIPMENT AREA: 1218 SQ FT  
 FIRE AISLES - FUTURE EQUIPMENT AREA: 140 SQ FT

