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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

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

RECORDS AND
REPORTING

October 1, 1998

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

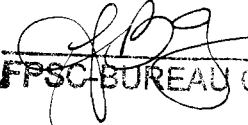
Re: **Docket No. 981250-TL**
Waiver Lake Mary Main Central Office

Dear Ms. Bayó:

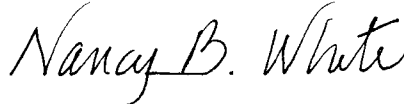
Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for Waiver, which we ask that you file in the captioned matter.

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.

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

Sincerely,



Nancy B. White (pwl)

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

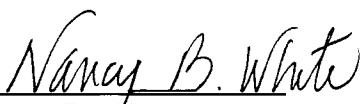
DOCUMENT NO.
10818-98
Oct 1

CERTIFICATE OF SERVICE
Waiver for the Lake Mary Main Central Office

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 1st day of October, 1998 to the following:

Beth Keating, Esq.
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 (A0)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.: _____
Inc.'s Petition for Waiver for the)
Lake Mary Main Central Office)
_____) Filed: October 1, 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 Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements as set forth in the Act and in the Order for the Lake Mary Main Central Office ("CO") located 365 International Drive, Lake Mary, Florida 32746². BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC")³ on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth does not expect to construct an addition to the building nor does BellSouth expect to retire equipment thus creating additional space within the CO in the foreseeable future.⁴

¹ 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.

² BellSouth filed a Petition for Waiver for exemption from providing physical collocation for this CO with the FCC on November 18, 1993. The Petition for Waiver was granted by FCC Memorandum Opinion and Order, Released February 14, 1994.

³ Pursuant to the requirements of the Act, the authority to grant petitions of waiver from collocation requests now lies with the FPSC.

⁴ Pursuant to the FCC directive, BellSouth will consider collocation requirements in any future construction undertaken.

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FPSC-RECORDS/REPORTING

1. The Lake Mary Main CO building houses DMS switches providing local dial tone. Circuit equipment also located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross-connect panels and provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Lake Mary Main CO is growing rapidly and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 18,000 in 1998. To meet the demands of the expanding customer base, BellSouth currently has on order from the manufacturer additional Toll/Circuit and Switching equipment.

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.

47 U.S. § 251(c)(b). 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 Lake Mary Main CO, BellSouth is unable to provide physical collocation. The space limitations faced by BellSouth are the result of the use of space by 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 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 5,195 square feet. A total of 4,121.5 square feet is occupied as follows:

<u>Sq. Ft.</u>	<u>DESCRIPTION</u>
86	Air Handling Unit
93	Air Handling Units
208	Vestibule
211	Administrative
892.5	Toll/Transmission Equipment
1,226	Switch
671	Frame
734	Power and Engine Rooms

7. The remaining 1,073.5 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 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. 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 Lake Mary Main CO, as well as the areas designated for defined future use. (Exhibit 1)

8. The Lake Mary Main CO presently contains no available space for physical collocation and for this reason should be excluded from the collocation

requirements. BellSouth will, of course, offer virtual collocation in the Lake Mary Main 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 Lake Mary Main CO.

Respectfully submitted this 1st day of October, 1998.

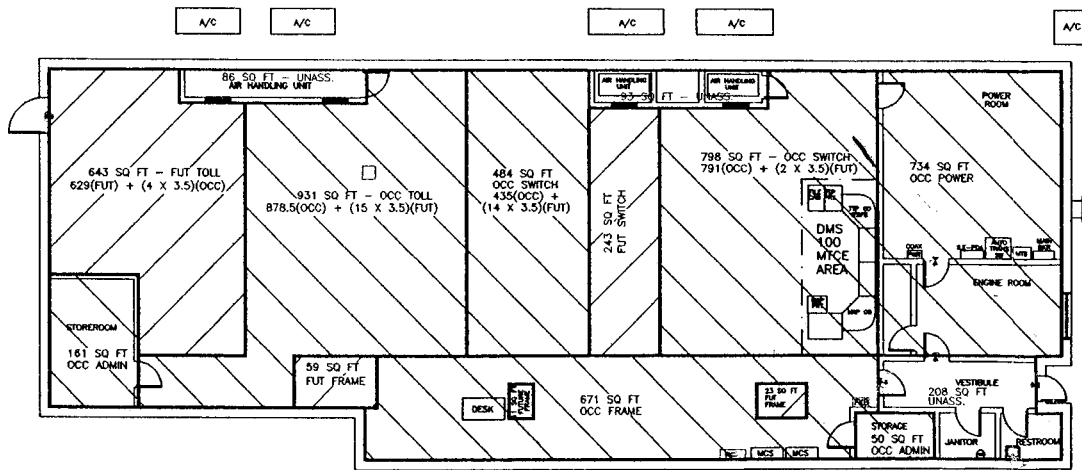
BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (BW)

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(404) 335-0711



39280 LAKE MARY FIRST FLOOR PLAN

A	TOTAL GROSS SQ FT	5195	
	AIR HANDLING UNIT	86	□
	AIR HANDLING UNITS	93	
	VESTIBULE JANITOR & RESTROOMS	208	
B	TOTAL UNASSIGNABLE SPACE	387	
	SWITCH	435 + 791 = 1226	▧
	TOLL	878.5 + (4 X 3.5) = 892.5	
	FRAME	671	
	POWER & ENGINE	734	▧
	ADMIN	161 + 50 = 211	
C	TOTAL OCCUPIED SPACE	3734.5	
	SWITCH	243 + (16 X 3.5) = 299	▧
	TOLL	629 + (15 X 3.5) = 681.5	
	FRAME	11 + 23 + 59 = 93	
D	TOTAL RESERVED SPACE	1073.5	

OCC - OCCUPIED
 FUT - FUTURE
 UNASS - UNASSIGNABLE