

LAW OFFICES  
**MESSER, CAPARELLO & SELF**  
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (850) 222-0720  
TELECOPIERS: (850) 224-4359; (850) 425-1942

**ORIGINAL**  
RECEIVED-FPSC  
90 OCT -5 PM 3:30  
RECEIVED AND  
REPORTING

October 5, 1998

**BY HAND DELIVERY**

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No 980948-TL

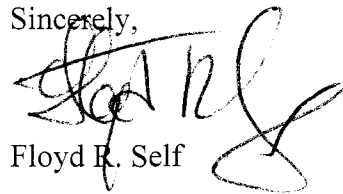
Dear Ms. Bayo:

Enclosed for filing in the above captioned docket are an original and fifteen copies of Comments by WorldCom Technologies, Inc.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Floyd R. Self

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1 \_\_\_\_\_  
LIN \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

FBS/amb  
Enclosures

cc: Mr. Brian Sulmonetti  
Parties of Record

DOCUMENT NUMBER-DATE

10901 OCT -5 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, Inc.'s )  
Petition for temporary waiver of physical )  
collocation requirement set forth in the 1996 )  
Telecommunications Act and the FCC's First )  
Report and Order, for the Miami Palmetto )  
Central Office )  
\_\_\_\_\_ )

Docket No. 980948-TL  
Filed: October 5, 1998

COMMENTS BY WORLDCOM TECHNOLOGIES, INC.

Worldcom Technologies, Inc. (Worldcom) herewith submits comments on BellSouth's Petition for Waivers filed in the captioned dockets and for its comments states:

1. On or about July 27, 1998 BellSouth filed Petitions for waiver of the requirement to provide physical collocation space in three separate central offices, Daytona Beach Port Orange, Boca Raton Boca Teeca, and Miami Palmetto. Thereafter, the Commission published notice of the petitions in the September 4, 1998 edition of the Florida Administrative Weekly. On August 24, 1998, Worldcom was granted intervention in Docket No. 980948-TL.

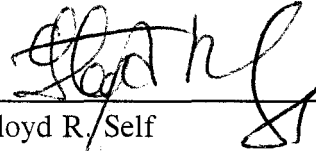
2. In this docket, BellSouth requests that the Commission grant an exception from the requirement to provide physical collocation, asserting that there is no available space in this office. These assertions and the relief requested should be fully and carefully analyzed by the Commission.

3. Worldcom requested physical collocation at BellSouth's Miami Palmetto Central Office and was denied. Since intervening, Worldcom has propounded discovery on BellSouth, and

is awaiting a response from them. Worldcom reserves the right to challenge BellSouth on its waiver once discovery has taken place and more relevant information is obtained.

Respectfully submitted,

**MESSER, CAPARELLO & SELF, P.A.**

A handwritten signature in black ink, appearing to read 'F. Self', written over a horizontal line.

Floyd R. Self  
Thomas A. Suter  
215 S. Monroe Street, Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720

Attorneys for Worldcom Technologies, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Comments by WorldCom Technologies, Inc. in Docket No. 980948-TL has been furnished by Hand Delivery (\*) and/or U.S. Mail to the following parties of record this 5th day of October, 1998:

Beth Keating, Esq.\*  
Division of Legal Services  
Room 370, Gunter Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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

Donna L. Canzano, Esq.  
Patrick Wiggins, Esq.  
P.O. Drawer 1657  
Tallahassee, FL 32302

Mr. Steve Brown  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-1309

Suzanne F. Summerlin, Esq.  
Supra Telecommunications and Information Systems, Inc.  
1311-B Paul Russell Road, Suite 201  
Tallahassee, FL 32301

Kenneth A. Hoffman, Esq.  
John R. Ellis, Esq.  
Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302

James C. Falvey  
e.spire Communications, Inc.  
133 National Business Parkway, Suite 200  
Annapolis Junction, MD 20701

  
\_\_\_\_\_  
Floyd R. Self