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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: BellSouth Telecommunications, )
Inc.'s Petition for Waiver for the )
North Dade Golden Glades Central )
Office )

Docket No. 981012-TL

Filed: 10-26-98

RECORDS AND REPORTING

INTERMEDIA COMMUNICATIONS INC.'S
COMMENTS ON BELL SOUTH'S PETITION FOR WAIVER

Intermedia Communications Inc. (Intermedia) hereby submits in
the above-referenced matter its initial comments as requested by
the staff.

COMMENTS

Intermedia plans to serve discovery on BellSouth
Telecommunications, Inc. to more fully develop its position
regarding this matter. Intermedia's preliminary comments are set
forth below.

The Telecommunications Act of 1996 (Act) in Section 251(c)(6)
requires incumbent local exchange carriers (ILECs) to provide
physical collocation unless the carrier demonstrates to the state
commission that physical collocation is not practical for technical
reasons or because of space limitations. Moreover, the ILEC is
required to submit to the state commission detailed floor plans or

diagrams of any premises when the ILEC claims that physical
collocation is not practical because of space limitation. (47
U.S.C. §51.323)

Intermedia believes that it is essential to allow competing
providers that may seek physical collocation at BellSouth's
premises to tour the premises. Allowing competitors to "walk
through" BellSouth's premises would allow competitors, such as

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Intermedia, to identify space that could be used for providing physical collocation. Moreover, this Commission would be in a better position to evaluate BellSouth's petition if competitors viewed BellSouth's premises and present their positions to the Commission.

Intermedia respectfully requests that it be permitted to tour BellSouth's facility that is the subject matter of the above-referenced docket, and reserves the right to file additional comments after the walk-through and completion of discovery.

Respectfully submitted, this 26th day of October, 1998.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand delivery (\*) this 26th day of October, 1998, to the following:

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