



Monica M. Barone
Attorney

3100 Cumberland Circle
Atlanta, GA 30339
Voice 404 649 6225
Fax 404 649 5174
monica.barone@mail.sprint.com

April 8, 1999

VIA FEDERAL EXPRESS

Ms. Blanca S. 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 Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL and
981250-TL

Dear Ms. Bayo

Enclosed for filing on behalf of Sprint Communications Company Limited Partnership
are an original and 15 copies of the Direct Testimony of Melissa L. Cloz.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Thank you for your assistance. Should you have any questions regarding this matter,
please contact me at 404-649-6225.

Sincerely,

Monica M. Barone

ACK _____
AFA 4
APP _____
CAF _____
CMU Favors
CTR _____
EAG _____
LEG 2 MMB/jr
LIN 5 Enclosures
OPC _____ cc: Parties of record
RCH _____
SEC 1
WAS _____
OTH 980946 only

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

ADMINISTRATION MAIL ROOM
APR 9 14 AM '99
RECEIVED

DOCUMENT NUMBER-DATE
04593 APR-99
FPSC-RECORDS/REPORTING

ORIGINAL

~~COPY~~

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP
DIRECT TESTIMONY
OF
MELISSA L. CLOSZ
DOCKETS 980946, 980947, 980948, 981011, 981012, AND 981250
April 9, 1999

DOCUMENT NUMBER-DATE

04593 APR-99

FPSC-RECORDS/REPORTING

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Melissa L. Closz. My business address is 555 Lake Border Drive,
3 Apopka, Florida 32703.

4

5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by Sprint as Director- Local Market Development.

7

8 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK
9 EXPERIENCE.

10

11 A. I have a Master of Business Administration degree from Georgia State University
12 in Atlanta, Georgia and a Bachelor of Business Administration degree from Texas
13 Christian University in Fort Worth, Texas. I have been employed by Sprint for
14 over eight years and have been in my current position since February, 1997. I
15 began my telecommunications career in 1983 when I joined AT&T Long Lines
16 progressing through various sales and sales management positions. In 1989, I
17 joined Sprint's Long Distance Division as Group Manager, Market Management
18 and Customer Support in Sprint's Intermediaries Marketing Group. In this
19 capacity, I was responsible for optimizing revenue growth from products and
20 promotions targeting association member benefit programs, sales agents and
21 resellers. I owned and operated a consumer marketing franchise in 1991 and 1992
22 before accepting the General Manager position for Sprint's Florida unit of United
23 Telephone Long Distance ("UTLD"). In this role, I directed marketing and sales,
24 operational support and customer service for this long distance resale operation.
25 In Sprint's Local Telecommunications Division, in 1993, I was charged with

1 establishing the Sales and Technical Support organization for Carrier and
2 Enhanced Service Markets. My team interfaced with interexchange carriers,
3 wireless companies and competitive access providers. After leading the business
4 plan development for Sprint Metropolitan Networks, Inc. ("SMNI"), I became
5 General Manager in 1995. In this capacity, I directed the business deployment
6 effort for Sprint's first alternative local exchange company ("ALEC") operation,
7 including its network infrastructure, marketing and product plans, sales
8 management and all aspects of operational and customer support.

9
10 Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?

11
12 A. My present responsibilities include representation of Sprint in interconnection
13 negotiations with BellSouth Telecommunications, Inc. ("BellSouth") and with
14 Bell Atlantic. In addition, I am responsible for coordinating Sprint's entry into
15 the local markets within BellSouth and Bell Atlantic states. I also interface with
16 the BellSouth and Bell Atlantic account teams supporting Sprint to communicate
17 service and operational issues and requirements.

18
19 Q. PLEASE DESCRIBE THE BUSINESS OF SPRINT AND ITS INTEREST IN
20 THIS PROCEEDING.

21
22 A. Sprint does business in Florida as an interexchange carrier ("IXC"), an alternative
23 local exchange carrier ("ALEC") and as an incumbent local exchange carrier
24 ("ILEC"). Accordingly, Sprint has multiple interests in the outcome of this
25 proceeding. Sprint's long distance subsidiary has recently announced its

1 revolutionary ION service, which will bring Sprint’s long-haul ATM network all
2 the way to a customer premises and will accommodate the entirety of a
3 customer’s communications needs, including voice, data and Internet access,
4 through a single broadband connection. Collocation will serve as a critical
5 component of the network infrastructure required to provision broadband services
6 to customer premises and to increase accessibility to ION for consumers. Sprint’s
7 facilities-based ALEC operating in the Metropolitan Orlando area currently
8 utilizes physical collocation from BellSouth. To the extent that the policies and
9 practices adopted by the Commission in this docket serve to expand physical
10 collocation opportunities for ALECs, Sprint and other ALECs will enjoy
11 increased flexibility with respect to network optimization and expansion. Finally,
12 Sprint’s local telephone division (“LTD”) is an incumbent local exchange carrier,
13 regulated by this Commission as a dominant carrier and fully subject to the ILEC
14 requirements in Section 251 (c) of the Communications Act of 1934, as amended
15 (“the Act”). Sprint expects that its LTD will be subject to the ground rules for
16 collocation that are developed in this proceeding.

17
18 Sprint must balance its multiple interests in developing regulatory policy on a
19 daily basis. Accordingly, Sprint’s perspectives in this docket represent what it
20 believes to be a balanced approach to space allocation issues associated with
21 ILEC central offices.

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

24 A. The purpose of my testimony is to provide input to the Florida Public Service
25 Commission (“Commission”) that is relevant to its consideration of the Petitions

1 for Waiver and Temporary Waiver of BellSouth's requirement to provide physical
2 collocation in the Daytona Beach Port Orange, Boca Raton Boca Teeca, Miami
3 Palmetto, West Palm Beach Gardens, North Dade Golden Glades and Lake Mary
4 central offices in Dockets 980946-TL, 980947-TL, 980948-TL, 981011-TL,
5 981012-TL and 981250-TL. My testimony will address BellSouth's general
6 obligation to provide physical collocation, the factors that should be considered
7 by the Commission in assessing collocation space availability and the process that
8 BellSouth should follow to process physical collocation requests when a waiver
9 request is denied. Sprint's Michael West will address specific technical and space
10 considerations in his testimony that are related to the BellSouth central offices
11 where waivers have been requested.

12

13 Q. WHY IS PHYSICAL COLLOCATION OF PARTICULAR INTEREST TO
14 SPRINT?

15

16 A. Sprint, like BellSouth, is very concerned about ensuring that its equipment is
17 secure in a central office ("CO"). It is for that reason Sprint prefers physical
18 collocation to any other ILEC central office-based form of collocation.
19 Furthermore, "adjacent" collocation, where an ALEC is faced with occupying
20 physical space outside the ILEC central office, is sub-optimal because it adds a
21 distance component to the circuit between the customer premise and ILEC central
22 office. Distance is a critical factor in the performance of broadband technologies.
23 Carriers that are collocated in the ILEC's central office have an advantage over
24 ALECs that may be forced to collocate in an adjacent location to connect to the

1 ILEC CO. Thus, Sprint believes that ILECs should exhaust all reasonable
2 possibilities before denying a request for physical collocation.

3

4 Q. WHICH ISSUES, AS IDENTIFIED IN THE COMMISSION'S REVISED LIST
5 OF ISSUES DATED MARCH 24, 1999, WILL YOUR TESTIMONY
6 ADDRESS?

7

8 A. My testimony will address Issues 1, 2 and 6 of the Revised List of Issues.

9

10 Q. PLEASE PROVIDE SPRINT'S PERSPECTIVE REGARDING COMMISSION
11 ISSUE 1, "WHAT OBLIGATION DOES BELLSOUTH HAVE TO MAKE
12 SPACE AVAILABLE AT THESE CENTRAL OFFICES TO PERMIT
13 PHYSICAL COLLOCATION PURSUANT TO THE ACT AND APPLICABLE
14 STATE AND FEDERAL REQUIREMENTS?"

15

16 A. Under Section 251 (c) (6) of the Act, Incumbent Local Exchange Companies
17 ("ILECs") have:

18 "The duty to provide, on rates, terms and conditions that are just, reasonable, and
19 nondiscriminatory, for physical collocation of equipment necessary for
20 interconnection or access to unbundled network elements at the premises of the
21 local exchange carrier, except that the carrier may provide for virtual collocation
22 if the local exchange carrier demonstrates to the State Commission that physical
23 collocation is not practical for technical reasons or because of space limitations."

24

1 Although I am not an attorney and am not here to offer a legal analysis, it is clear
2 that ILECs are obligated to make space in their central offices available for
3 physical collocation. Moreover, the ILEC is further obligated to demonstrate to
4 State Commissions that physical collocation is not practical due to technical or
5 space limitations should it determine that these conditions exist in a particular
6 central office.

7

8 Q. WHAT TYPES OF PHYSICAL COLLOCATION DOES SPRINT BELIEVE
9 BELLSOUTH IS OBLIGATED TO PROVIDE?

10

11 A. Sprint believes that BellSouth has an obligation to provide requesting
12 telecommunications carriers with any technically feasible physical collocation
13 arrangements including, but not limited to, cageless physical collocation, CEV hut
14 collocation and shared cage collocation. In addition, in CC Docket No. 98-147,
15 First Report and Order, FCC 99-48, released March 31, 1999, rule 51.321(c)
16 provides that: "A previously successful method of obtaining interconnection or
17 access to unbundled network elements at a particular premises or point on any
18 incumbent LEC network is substantial evidence that such method is technically
19 feasible in the case of substantially similar network premises or points. A
20 requesting telecommunications carrier seeking a particular collocation
21 arrangement, either physical or virtual, is entitled to a presumption that such
22 arrangement is technically feasible if any LEC has deployed such collocation
23 arrangement in any incumbent LEC premises."¹

24

1 Q. WHY ARE THESE ALTERNATIVE FORMS OF PHYSICAL COLLOCATION
2 RELEVANT TO THE COMMISSION'S EVALUATION OF SPACE
3 AVAILABILITY IN BELLSOUTH CENTRAL OFFICES?

4

5 A. These alternative forms of physical collocation may require less space than
6 traditional caged physical collocation. Accordingly, an office that does not have
7 adequate space available for traditional caged physical collocation may in fact be
8 able to accommodate alternative physical collocation arrangements.

9

10 Q. PLEASE DESCRIBE "CAGELESS PHYSICAL COLLOCATION."

11

12 A. Cageless physical collocation is a form of physical collocation in which a
13 requesting telecommunications carrier has the ability to place its own equipment
14 in single bay increments within or upon already-conditioned floor space in an
15 incumbent LEC's premises. In this arrangement, a requesting carrier is entitled to
16 the use of a lockable cabinet. Another liberalized form of collocation is a variant
17 of virtual or cageless collocation, in which a requesting carrier can install and
18 maintain its own equipment, not in separate equipment bays, but commingled
19 with the ILEC and/or ALEC equipment. Sprint believes that this may be entirely
20 feasible and with adequate escort procedures, this should not present any unusual
21 security problems to the ILEC. These forms of cageless collocation represent
22 important options for both ILECs and ALECs because they should impose
23 substantially lower costs on ILECs than traditional caged collocation and the

¹ Rule 51.321(c) is not effective until thirty days after publication in the Federal Register.

1 charges for such collocation should be substantially lower than charges for caged
2 collocation.

3 Q. PLEASE DESCRIBE "CEV HUT COLLOCATION."

4

5 A. CEV hut collocation is a form of physical collocation in which a requesting
6 telecommunications carrier has the ability to place its own equipment in a
7 controlled environmental vault ("CEV") within or upon an incumbent LEC's
8 premises. The CEV hut may be designed or otherwise procured and installed by
9 the requesting telecommunications carrier. The incumbent LEC should provide
10 power, cabling and other physical collocation services and facilities to requesting
11 telecommunications carriers on nondiscriminatory terms, with costs borne by the
12 requesting carrier.

13

14 Q. PLEASE DESCRIBE "SHARED CAGE COLLOCATION."

15

16 A. Shared cage collocation is an arrangement in which a physical collocation space
17 occupied by a current collocator is shared with one or more requesting
18 telecommunications carriers pursuant to terms and conditions agreed to by those
19 carriers. Such sharing or subletting of physical collocation space should require
20 the approval of the incumbent LEC, however, the incumbent LEC should not
21 unreasonably withhold approval of these shared collocation arrangements.

22

23 Q. PLEASE ADDRESS COMMISSION ISSUE 2, "WHAT FACTORS SHOULD
24 BE CONSIDERED BY THE COMMISSION IN MAKING ITS
25 DETERMINATION ON BELL SOUTH'S PETITIONS FOR WAIVER AND

1 TEMPORARY WAIVER OF THE REQUIREMENT TO PROVIDE PHYSICAL
2 COLLOCATION FOR THE FOLLOWING CENTRAL OFFICES:

3 A) DAYTONA BEACH PORT ORANGE

4 B) BOCA RATON BOCA TEECA

5 C) MIAMI PALMETTO

6 D) WEST PALM BEACH GARDENS

7 E) NORTH DADE GOLDEN GLADES

8 F) LAKE MARY”

9 A. Sprint believes that the following factors should be considered:

10 1) Whether there is non-essential, unused, little used or retired equipment that
11 should be removed to provide space for collocation;

12 2) Whether there is administrative space that should be converted to provide
13 space for collocation;

14 3) Whether there are partial line-ups or unfilled bays that should be reconfigured
15 to provide space for collocation;

16 4) For what length of time BellSouth should be permitted to reserve space for its
17 future use;

18 5) What security arrangements are reasonable to impose upon carriers requesting
19 physical collocation;

20 6) Whether security concerns should be permitted to provide the sole basis for
21 denial of a physical collocation request;

22 7) Whether BellSouth should permit subleasing or sharing of collocation space;

23 8) What minimum space requirements BellSouth should be able to impose upon
24 carriers requesting collocation.

25

1 Q. PLEASE DISCUSS THE FIRST FACTOR THAT SHOULD BE CONSIDERED
2 BY THE COMMISSION IN ITS EVALUATION OF BELL SOUTH'S WAIVER
3 REQUESTS, "WHETHER THERE IS NON-ESSENTIAL, UNUSED, LITTLE
4 USED OR RETIRED EQUIPMENT THAT SHOULD BE REMOVED TO
5 PROVIDE SPACE FOR COLLOCATION."

6
7 A. Sprint believes that if BellSouth has insufficient space available in central offices
8 to meet the demand for collocation, it should be required to take reasonable steps
9 to free up additional space. With respect to equipment, if requested by a
10 requesting telecommunications carrier, BellSouth should remove non-essential,
11 i.e., not directly related to the function of that particular central office or remote
12 location, unused, little used or retired equipment within or upon its premises. In
13 CC Docket, No. 98-147, First Report and Order, FCC 99-48, released March 31,
14 1999, rule 51.321(I) provides: "An incumbent LEC must, upon request, remove
15 obsolete unused equipment from their premises to increase the amount of space
16 available for collocation."² Moreover, there may be cases where there is
17 equipment that is in minimal use such that there is other operational equipment
18 that could accommodate the customers utilizing the older equipment. In such
19 cases, it is reasonable to require the ILEC to warehouse that equipment at another
20 location. Technological advances have tended to dramatically reduce the size of
21 equipment necessary to perform a given function over time, but as long as the
22 ILEC continues to actively use older equipment in its network, there can be no
23 hard-and-fast rule requiring it to remove that equipment from active service
24 merely to free up additional space. However, if a requesting carrier is willing to

1 fund replacement of such equipment in order to free up additional space, the ILEC
2 should agree to do so.

3

4 Q. PLEASE DESCRIBE THE SECOND FACTOR THAT SHOULD BE
5 CONSIDERED BY THE COMMISSION IN ITS EVALUATION OF
6 BELLSOUTH'S WAIVER REQUESTS, "WHETHER THERE IS
7 ADMINISTRATIVE SPACE THAT SHOULD BE CONVERTED TO
8 PROVIDE SPACE FOR COLLOCATION."

9

10 A. Many ILEC central office locations that are "full" (thus precluding physical
11 collocation) may house administrative offices that could easily be sited at other
12 locations. In these cases, relocating the administrative offices may impose net
13 costs on the ILEC, such as the cost of moving and a differential in the cost of
14 leased space as between the existing location and other commercial space. If the
15 requesting carrier is willing to fully compensate the ILEC for these costs, the
16 ILEC should agree to move these administrative offices unless it can show valid
17 business reasons why these administrative offices need to remain where they are.
18 Space freed up in this manner may be usable by more than one carrier. To the
19 extent other carriers later choose to collocate in this central office, they should
20 bear their share of these costs, and the carrier that initially financed these
21 relocations or removals should be given an appropriate refund.

22

23 Q. PLEASE DESCRIBE THE THIRD FACTOR THAT SHOULD BE
24 CONSIDERED BY THE COMMISSION IN ITS EVALUATION OF

² Rule 51.321(I) is not effective until thirty days after publication in the Federal Register.

1 BELLSOUTH'S WAIVER REQUESTS, "WHETHER THERE ARE PARTIAL
2 LINE-UPS OR UNFILLED BAYS THAT SHOULD BE RECONFIGURED TO
3 PROVIDE SPACE FOR COLLOCATION."

4 A. In the event that equipment line-ups are partially filled or there are unfilled
5 equipment bays either standing alone or co-mingled with BellSouth's own
6 equipment, BellSouth should be required to relocate its equipment to create
7 contiguous space or otherwise prepare additional floor space in response to a
8 particular request for physical collocation. This may result in BellSouth requiring
9 more time to prepare the space for collocation, but in no case should the time
10 exceed 180 calendar days from the date of application. Further, BellSouth should
11 only be permitted to charge the requesting telecommunications carrier for
12 relocation, conditioning and/or space preparation costs associated with the amount
13 of space requested.

14
15 Q. PLEASE DESCRIBE THE FOURTH FACTOR THAT THE COMMISSION
16 SHOULD CONSIDER IN ITS EVALUATION OF BELLSOUTH'S WAIVER
17 REQUESTS, "FOR WHAT LENGTH OF TIME BELLSOUTH SHOULD BE
18 PERMITTED TO RESERVE SPACE FOR ITS FUTURE USE."

19
20 A. Both BellSouth and other carriers should be prohibited from warehousing central
21 office space. In order to ensure that sufficient space for collocators exists,
22 BellSouth should not be able to reserve any space for administrative offices or
23 other non-network purposes. With respect to use of space for network needs,
24 BellSouth should be able to reserve space needed for its network within the next
25 year (on a rolling basis), but if such space is not earmarked for such use, it should

1 be available for collocation. By the same token, requesting carriers should be
2 required to make use of their collocation space (i.e., install equipment connected
3 to BellSouth's network) within six months after the space is ready for occupancy.
4 If they fail to do so, and there is insufficient other space in the office to allow
5 collocation by other requesting carriers, they should have to vacate their space.

6
7 Q. PLEASE DESCRIBE THE FIFTH FACTOR THAT THE COMMISSION
8 SHOULD CONSIDER IN ITS EVALUTION OF BELLSOUTH'S WAIVER
9 REQUESTS, "WHAT SECURITY ARRANGEMENTS ARE REASONABLE
10 TO IMPOSE UPON CARRIERS REQUESTING PHYSICAL
11 COLLOCATION."

12
13 A. With regard to all forms of physical collocation, BellSouth should be able to
14 require reasonable and nondiscriminatory security arrangements provided that
15 they do not subject the requesting telecommunications carrier to any delay in
16 obtaining collocation space. Reasonable security arrangements may include
17 security escorts, background checks, key card entry systems, video surveillance
18 systems, equipment cabinets or lockers and alarms. In addition, BellSouth should
19 be allowed to require requesting telecommunications carriers to install, maintain
20 or repair equipment collocated pursuant to cageless physical collocation pursuant
21 to nondiscriminatory "safe-time" work policies if BellSouth utilizes the same
22 policies for installation, maintenance or repair of its own telecommunications
23 equipment. However, in no event should BellSouth's security arrangements or
24 other security policies unduly restrict or hinder the ability of a requesting
25 telecommunications carrier to maintain a high level of customer service. This

1 includes, but is not limited to, security arrangements that unduly limit, restrict or
2 effectively prohibit the ability of a requesting telecommunications carrier to repair
3 collocated telecommunications equipment at any time to correct as soon as
4 possible a service outage or service impairment.

5
6 Q. PLEASE DESCRIBE THE SIXTH FACTOR THAT THE COMMISSION
7 SHOULD CONSIDER IN ITS EVALUTION OF BELLSOUTH'S WAIVER
8 REQUESTS, "WHETHER SECURITY CONCERNS SHOULD BE
9 PERMITTED TO PROVIDE THE SOLE BASIS FOR DENIAL OF A
10 PHYSICAL COLLOCATION REQUEST."

11
12 A. Sprint believes that in no event should an incumbent LEC be permitted to refuse
13 to provide or delay the provision of any form of physical collocation based solely
14 on security concerns.

15
16 Q. PLEASE DESCRIBE THE SEVENTH FACTOR THAT THE COMMISSION
17 SHOULD CONSIDER IN ITS EVALUTION OF BELLSOUTH'S WAIVER
18 REQUESTS, "WHETHER BELLSOUTH SHOULD PERMIT SUBLEASING
19 OR SHARING OF COLLOCATION SPACE."

20
21 A. Sprint believes that there should be a general requirement that prohibits sharing or
22 subletting of space without the approval of BellSouth, with the proviso that
23 BellSouth's approval should not be unreasonably withheld.

24

1 Q. PLEASE DESCRIBE THE EIGHTH FACTOR THAT THE COMMISSION
2 SHOULD CONSIDER IN ITS EVALUATION OF BELLSOUTH'S WAIVER
3 REQUESTS, "WHAT MINIMUM SPACE REQUIREMENTS BELLSOUTH
4 SHOULD BE ABLE TO IMPOSE UPON CARRIERS REQUESTING
5 COLLOCATION."

6
7 A. There is no justification for requiring carriers to order at least 100 square feet of
8 space for physical collocation as BellSouth does today. At the same time, Sprint
9 believes it may go too far to disallow any minimum space requirement for caged
10 collocation. Obviously there needs to be sufficient room to allow an equipment
11 rack to be placed in the cage and to give technicians "elbow room" to service the
12 equipment. Sprint believes that as a practical matter, fifty square feet is a
13 reasonable minimum size for caged collocation, and BellSouth should not be
14 allowed to impose a minimum space requirement for caged collocation larger than
15 50 square feet. However, if it is feasible to allow even smaller minimum-sized
16 cages, then that space should be made available. Moreover, for cageless
17 collocation, Sprint believes that BellSouth should make single-bay increments of
18 space available within or upon its premises to requesting telecommunications
19 carriers. This physical collocation option may serve to alleviate those instances
20 where demand for traditional caged physical collocation space in an ILEC CO
21 exceeds available space.

22
23 Q. PLEASE ADDRESS COMMISSION ISSUE 6, "IF THE COMMISSION
24 DETERMINES THAT A WAIVER REQUEST SHOULD BE DENIED, HOW
25 SHOULD BELLSOUTH EFFECTUATE FCC RULE 47 C.F.R. SECTION

1 51.323 (F) (1) IN PROCESSING REQUESTS FOR PHYSICAL
2 COLLOCATION IN THOSE CENTRAL OFFICES?"

3

4 A. Sprint believes that requests for physical collocation in such central offices should
5 be processed on a "first come, first served" basis. In other words, the first
6 collocater that was denied physical collocation in such central office should be
7 offered the opportunity to obtain physical collocation space that subsequently
8 becomes available, with other physical collocation applications being
9 subsequently considered in the order that they were received.

10

11 Q. DID YOU ATTEND THE CENTRAL OFFICE WALK-THROUGHS FOR
12 EACH OF THE CENTRAL OFFICES FOR WHICH BELL SOUTH HAS
13 REQUESTED WAIVERS IN THIS DOCKET?

14

15 A. Yes, I did.

16

17 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THAT THERE IS
18 PHYSICAL COLLOCATION SPACE AVAILABLE IN EACH OF THESE
19 CENTRAL OFFICES?

20

21 A. Yes. Michael West will discuss Sprint's detailed findings for each of the central
22 offices in his testimony.

23

24 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

25

1 A. Yes, it does.

2

3

4

5

6

7

8

9

10

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the Direct Testimony of Melissa L. Closz on behalf of Sprint Communications Company Limited Partnership, in Docket Nos. 980946, 980947, 980948, 981011, 981012, and 981250 via Federal Express (*) and United States First Class Mail, postage prepaid upon the following:

BellSouth Telecommunications, Inc. (*)
Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Charles A. Hudak, Esq.
Jeremy D. Marcus, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

David V. Dimlich, Esq.
Supra Telecommunications
2620 South West 27th Avenue
Miami, Florida 33133

Wiggins Law Firm
Patrick Wiggins
P.O. Drawer 1657
Tallahassee, FL 32302

e.spire Communications, Inc.
Mr. James C. Falvey, Esq.
133 National Business Parkway, #200
Annapolis Junction, Maryland 20701

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551

Messer Law Firm
Floyd Self
Norman Horton
P.O. Box 551
Tallahassee, FL 32302

Blumenfeld & Cohen
Elise Kiely/Jeffrey Blumenfeld
1615 M. Street, NW, Suite 700
Washington, DC 20036

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
123 South Calhoun street
Post Office Box 6526
Tallahassee, Florida 32314

Covad Communications Company
James D. Earl
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore,
Wilkinson & Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302

Beth Keating, Esq.
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Brambleton Court
Franklin, Tennessee 37069

Charles J. Pellegrini
Wiggins & Villacorta, P. A.
2145 Delta Boulevard, Suite 200
P.O. Drawer 1657
Tallahassee, Florida 32302

This 9 day of APRIL, 1999.



Joe Ramsey III
Sprint Communications Company, L.P.