

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK & ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR

Public Service Commission

C O N F I D E N T I A L

DOCKET NO.: 980946 - TL

DOCUMENT NO.: 04619-99

DESCRIPTION: Sprint (Barone) -
(CONFIDENTIAL) Direct testimony of Michael D.
West with exhibit. (One CD-Rom filed) (x-ref DN
05119-99 and 05379-99) [RAR 5/12/99 note: Per DN
06056-99, only CD ROM exhibit is to remain
confidential, which was returned to source 9/8/99;
testimony is being placed in docket file.]



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April 9, 1999

VIA Hand Delivery

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

RECEIVED-FPSC
99 APR -9 PM 4:33
RECORDS AND REPORTING

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 Michael D. West. Sprint is also filing a CD containing pictures taken at each of the central offices at issue. This CD along with a printed copy of the pictures contained therein will serve as an exhibit to Mr. West's testimony. The printed copies of the pictures will be filed during the week of April 12, 1999.

The testimony and exhibit are being filed pursuant to the Notice of Intent to Request Confidential Classification filed by BellSouth Telecommunications, Inc. Copies of the Testimony have also been served on the parties of record that have entered into a Protective Agreement as indicated on the attached Certificate of Service.

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 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
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- WAS _____
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This Notice of Intent was filed with Confidential Document No. 04619-99. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

DOCUMENT NUMBER-DATE

04619 APR-99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the Direct Testimony of Michael D. West on behalf of Sprint Communications Company Limited Partnership, in Docket Nos. 980946, 980947, 980948, 981011, 981012, and 981250 via hand delivery(*) and United States First Class Mail, postage prepaid upon those parties that have entered into a Protective Agreement with BellSouth Telecommunications, Inc.(**)

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This 9th day of April, 1999.

for Barbara Strickland
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- RCH _____
- SEC _____
- WAS _____
- OTH _____

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FPSC-BUREAU OF RECORDS

5/12/99

MMB/jr
Enclosures

Document now public record (with exception of CD Rom exhibit) - see DN 06056-99

This Notice of Intent was filed with Confidential Document No. 04619-99. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

DOCUMENT NUMBER-DATE

04619 APR-99

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

DIRECT TESTIMONY

OF

MICHAEL D. WEST

DOCKETS 980946, 980947, 980948, 981011, 981012, AND 981250

April 9, 1999

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Michael D. West and my business address is 7301 College
3 Boulevard, Overland Park, Kansas 66210.

4

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

6 A. I am employed by Sprint Communications Company Limited Partnership
7 (“Sprint”) as Local Network Planning Manager, Access Strategy, and
8 Development. Sprint or its affiliates have employed me for over 30 years. I was
9 a central office foreman and then an installation supervisor for North Electric. I
10 worked as a central office foreman, then foreman of the network control center,
11 and a senior technical software-switching analyst for United Telephone Company
12 of Ohio. Also, for United Telephone I was regional manager of transmission and
13 special services, general manager of data/network sales & vertical markets. More
14 recently, I have been director of data/network/video and systems integration and
15 local network planning manager for technical contract/compliance negotiations
16 for competitive local exchange carrier (CLEC) access to the incumbent local
17 exchange (ILEC) network. My telecommunication experience has ranged from
18 installation of stored program/digital switches, switch maintenance and
19 engineering, network surveillance, analysis of switching software and
20 maintenance of complex network infrastructures, product and business case
21 development, network sales and engineering.

22

23 Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?

24 Following the adoption of the Telecommunications Act of 1996, I have been
25 responsible for the development and negotiation of technical requirements for

1 network interconnection and compliance and have represented the Sprint National
2 Integrated Services Business unit. Additionally, I have represented Sprint's Local
3 Division on technical issues and requirements relating to interconnection. I have
4 been responsible for development of network process/procedures, spectrum
5 management requirements and the development of performance measurements
6 pertaining to network elements, such as SS7, loops, trunking, switching,
7 collocation, and disaster recovery planning and the technical interpretation of
8 State and Federal rules and orders.

9

10 Q. PLEASE DESCRIBE WHAT YOUR EXPERIENCE HAS BEEN WITH
11 RESPECT TO PHYSICAL COLLOCATION IN OTHER STATES?

12 A. In California and Texas, the ILEC has provided detailed network engineering
13 floor plans, information on unused bays and reserved space and complete
14 forecasts showing historical trending and future growth requirements on an
15 annualized basis for the Central Offices (COs) in question.

16

17 Q. Has BellSouth provided the same level of detail in this proceeding?

18 A. No.

19

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

21 A. The purpose of my testimony is to provide input to the Florida Public Service
22 Commission ("Commission") that is relevant to its consideration of the Petitions
23 for Waiver and Temporary Waiver of BellSouth's requirement to provide
24 physical collocation in the Lake Mary, Daytona Beach Port Orange, Miami
25 Palmetto, North Dade Golden Glades, Boca Raton Boca Teeca, and West Palm

1 Beach Gardens central offices in Dockets 980946-TL, 980947-TL, 980948-TL,
2 981011-TL, 981012-TL and 981250-TL. I will address specific technical and
3 space considerations in each of the central offices at issue based on the
4 information BellSouth has provided to date.
5

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

9 A. My testimony will address Issues 3,4 and 5 of the Revised List of Issues.
10

11 Q. HOW IS YOUR TESTIMONY ORGANIZED?

12 A. My testimony will build on the testimony of Melissa L. Closz. She has provided
13 the Commission with the general factors that Sprint believes the Commission
14 must consider in determining whether there is space available in each of the
15 central offices at issue. I will apply those factors to the central offices based on
16 my observations of each central office and the information provided by BellSouth
17 to date. I will first explain why physical collocation is of particular interest to
18 Sprint.
19

20 Q. Why is physical collocation of particular interest to Sprint?

21 A. As Melissa Closz stated in her testimony, Sprint, like BellSouth, is very
22 concerned about ensuring that its equipment is secure in a central office. It is for
23 that reason that Sprint prefers physical collocation, caged and cageless in that
24 order, to any other ILEC central office-based form of collocation. Also, physical
25 collocation is necessary for those technologies that are distance sensitive.

1 Distance is a critical factor in the performance of broadband technologies. Digital
2 Subscriber Line (DSL) is one such technology. A DSL is a copper loop
3 transmission technology that achieves broadband speeds over the most universal
4 network media in the world – ordinary copper telephone wire. A DSL consists of
5 several components. They are a DSLAM, the Loop and the subscriber
6 termination.

7

8 Q. DID YOU ATTEND THE CENTRAL OFFICE WALK-THROUGHS FOR
9 EACH OF THE CENTRAL OFFICES FOR WHICH BELL SOUTH HAS
10 REQUESTED WAIVERS IN THESE DOCKETS?

11 A. Yes, I did.

12

13 Q. Would you please describe your findings for each of the central offices?

14 A. Yes.

15

16 **LAKE MARY**

17 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
18 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
19 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
20 COLLOCATION?

21 A. Yes. We learned during the walk-through that during 1991, BellSouth
22 implemented a project for the purposes of a field trial to determine the technical
23 feasibility of fiber to the home. (Heathrow Project). During the walk-through,
24 excessive fiber was present on the outside plant frame and numerous Fiber Optics
25 Terminals (FOTs) were in place. BellSouth should be required to remove this

1 equipment since it was used in a trial unless it demonstrates to the Florida Public
2 Service Commission that it is currently being used or is essential. In the Federal
3 Communication Commission's (FCC) Order in CC Docket No. 98-147, released
4 on March 31, 1999, the FCC concludes that "in order to increase the amount of
5 space available for collocation, incumbent LECs must remove obsolete unused
6 equipment from their premises upon reasonable request by a competitor or upon
7 order of a state commission. *See* paragraph 60.

8

9 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
10 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
11 TO PROVIDE SPACE FOR COLLOCATION?

12 A. Yes, BellSouth has two areas. The first area is designated as a lounge and is
13 specified as future toll. This area consists of 643 square feet. *See* BellSouth
14 Petition filed on October 1, 1998; Exhibit_____. Approximately 100 square feet
15 is being used as storage for spare cards and miscellaneous storage.
16 Exhibit_____.

17

18 Q. Is this space sufficient for physical collocation?

19 A. Yes. I would estimate that 743 square feet could be made available. BellSouth
20 should, however, be required to provide detailed engineering floor plans so that
21 the Florida Public Service Commission can determine the exact amount of space
22 available.

23

1 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE ARE ANY
2 PARTIAL LINE-UPS OR UNFILLED BAYS THAT SHOULD BE
3 RECONFIGURED TO PROVIDE SPACE FOR COLLOCATION?

4 A. Yes, BellSouth has recently installed transmission and digital cross-connect
5 equipment within the area reserved for future toll. Exhibit_____.
6 This space could have been reserved for collocation, and could still be utilized for
7 physical collocation by either relocating the new bays into other existing partial
8 line-ups to free up space or moving the new bays to the end of existing line-ups to
9 free up additional space. Exhibit_____.

10

11 Q. Based on your observations is their sufficient space in the Lake Mary Central
12 Office for physical collocation?

13 A. Yes. As indicated in my testimony above, there is space available. BellSouth
14 should, however, be required to provide detailed engineering floor plans and
15 growth forecasts that include historical trending to ensure that all space that is
16 available is realized. BellSouth has several hundred square feet of space reserved
17 for its growth. During the site visits I was not provided detailed floor plans, or a
18 growth forecast to include historical trending to legitimize the space
19 requirements/reservation.

20

21 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
22 Waiver for Lake Mary?

23 A. No. BellSouth's Petition should be denied because BellSouth has failed to
24 demonstrate to the Florida Public Service Commission that physical collocation is
25 not available due to space limitations.

1 DAYTONA BEACH PORT ORANGE

2 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
3 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
4 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
5 COLLOCATION?

6 A. Yes, currently BellSouth has an estimated 600 square feet specified as the
7 maintenance area. *See* BellSouth Petition filed July 27, 1998. The three MAP
8 (Maintenance and Administration) positions on the first floor are not fully staffed.
9 Moreover, during the walk-throughs, BellSouth revealed that it has a centralized
10 workforce that remotely monitors the switch and that local personnel handle day-
11 to-day work activities. In addition, there are duplicate positions on the second
12 floor. Exhibit _____. Since there is equipment on both floors that is able to
13 perform all of the necessary functions for both floors and the MAP positions are
14 not fully staffed, space can be made available by removing those additional MAP
15 positions.

16
17 Q. Is this space sufficient for physical collocation?

18 A. Yes. BellSouth should, however, be required to provide detailed network
19 engineering floor plans to assist the Commission in determining the exact amount
20 of space that is available.

21
22 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
23 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
24 TO PROVIDE SPACE FOR COLLOCATION?

1 A. Yes, 238 square feet currently identified as a lounge area and other office space
2 should be made available for collocation. See Staff Audit Control No. 98-334-4-1
3 dated March 24, 1999. There are also file cabinets and a Maintenance
4 Administrative Position (MAP) that should be removed, consolidated or
5 rearranged. The total estimated space recovered is 400 square feet.

6

7 Q. How much space is available based on this factor?

8 A. Approximately 600 square feet is available. BellSouth should, however, be
9 required to provide detailed forecast information and detailed engineering
10 documentation for further analysis.

11

12 Q. Is this space sufficient for physical collocation?

13 A. Yes.

14

15 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE ARE ANY
16 PARTIAL LINE-UPS OR UNFILLED BAYS THAT SHOULD BE
17 RECONFIGURED TO PROVIDE SPACE FOR COLLOCATION?

18 A. Yes, there is open space within the toll area that should be used before starting a
19 new line-up of equipment.

20

21 Q. Is this space sufficient for physical collocation?

22 A. Yes, based upon the physical inspections, although, further review of forecast
23 information and detailed engineering documentation is necessary.

24

1 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
2 Waiver for the Daytona Beach Port Orange Central Office?

3 A. No. BellSouth's Petition should be denied because BellSouth has failed to
4 demonstrate to the Florida Public Service Commission that physical collocation is
5 not available due to space limitations.

6

7 **MIAMI PALMETTO**

8 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
9 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
10 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
11 COLLOCATION?

12 A. Yes. As far as non-essential equipment, numerous Design Layout Record (DLR)
13 storage tubs occupying 600-800 hundred square feet of floor space could be
14 removed or rearranged to recover floor space. Exhibit _____. During the walk-
15 throughs, BellSouth indicated that its DLR card information was also digitized
16 although their technicians still liked to use the hard cards for trouble shooting.

17

18 Q. Is this space sufficient for physical collocation?

19 A. Yes.

20

21 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
22 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
23 TO PROVIDE SPACE FOR COLLOCATION?

24 A. Yes, the following areas are currently classified as administrative space: 1)
25 storage area 200 square feet 2) conference room and central office foreman office

1 200 square feet. 3) lounge 150 square feet 4) maintenance center 760 square feet
2 5) maintenance area 200 square feet 6) administration and storage 600 square feet.
3 Exhibits_____. There also appeared to be adjacent space that could be made
4 available, although I was not permitted to walk through the space.

5

6 Q. Based on this factor, how much space is available?

7 A. 2110 square feet.

8

9 Q. Is this space sufficient for physical collocation?

10 A. Yes.

11

12 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE ARE ANY
13 PARTIAL LINE-UPS OR UNFILLED BAYS THAT SHOULD BE
14 RECONFIGURED TO PROVIDE SPACE FOR COLLOCATION?

15 A. Yes, BellSouth has already begun placing 5ESS line modules and peripherals
16 within the new area now specified as Future 5ESS growth area while it appears
17 BellSouth still has space reserved within the existing line-ups. Exhibits_____.
18 BellSouth has also space reserved for the 5ESS equipment, which is
19 approximately 400 sq. ft. BellSouth has determined that approximately 268 sq.
20 feet within this area is unusable, grounding aisle.

21

22 Q. Is this space sufficient for physical collocation?

23 A. Yes. In fact physical collocation already exists within this area. BellSouth
24 should, however, be required to provide forecast information and detailed

1 engineering documentation as described in my earlier testimony so the
2 Commission will have the information available in its analysis of this office.

3

4 Q. ARE THERE ANY OTHER PARTIAL LINE-UPS OR UNFILLED BAYS
5 THAT SHOULD BE RECONFIGURED TO PROVIDE SPACE FOR
6 COLLOCATION?

7 A. Yes, scattered among the existing bays, within the same technology family, the
8 following bays were earmarked as future. There are 74 Circuit (CKT) Bays
9 reserved for future use. They are specifically reserved for D4, FOT's, DSX, LGX
10 (Transmission equipment). In addition, BellSouth has reserved 19 CKT Bays
11 Labeled Circuit Order Storage for future use. A space labeled 51 Future CKT
12 Bays is earmarked as future circuits and future DSX-3s. BellSouth not only has
13 the above mentioned space reserved, but it also has 59 bays reserved for (59
14 Future CKT BAYS) future FOT bays.

15

16 Q. How much space is available based on this factor?

17 A. BellSouth should be required to fill in partial line-ups before reserving additional
18 space. This would meet its short and long term growth requirements without the
19 additional reservation of several hundred square feet of space. Thus, space would
20 be available in the existing bays. There may be more space depending upon the
21 expected annualized growth rate. Therefore, BellSouth should be required to
22 provide its annualized growth rate.

23

1 Q. Is this space sufficient for physical collocation?

2 A. Yes. BellSouth should, however, provide forecast information to determine the
3 exact amount of space available.

4

5 Q. Based upon the above review of bays currently available and reserves for future
6 transmission equipment within the current equipment family, could BellSouth free
7 up the 59 Future CKT Bays and the 19 Future CKT Bays and reallocate the space
8 for collocation?

9 A. Yes. By placing equipment in areas previously designed for future growth,
10 approximately 1000 square feet of space would be available for physical
11 collocation.

12

13 Q. BASED ON YOUR OBSERVATIONS, HOW MUCH SPACE DO YOU
14 BELIEVE BELL SOUTH IS RESERVING FOR ITS FUTURE USE?

15 A. Within this space, BellSouth has reserved approximately 1600 square feet for at
16 least 5 years of line growth. Staff's audit revealed the following space is reserved
17 for future use: 1) 1999, 8 cabinets reserved, 2) 2000, 8 cabinets reserved, 3) 2001,
18 6 cabinets reserved, 4) 2001, 2 cabinets reserved and 4) 2002, 8 cabinets reserved.
19 See Audit Control No. 98-334-4-3 and Exhibit_____. There are also 7 bays of
20 Titan model 5500 DSX technology currently being installed. During the walk-
21 through, BellSouth indicated that this is a 1999 job, and is not certain when the
22 job will exhaust. Traditionally, 1999 growth jobs are engineered to meet 2, 5 or
23 10 years forecasted demands before exhaust.

24

25 Q. How much space is available based on this factor?

1 A. 1600 square feet are reserved. As indicated in Melissa Cloz's testimony,
2 BellSouth should not be permitted to reserve space for longer than one year.
3 Space that is reserved for greater than 1 year should be made available for
4 physical collocation. Moreover, BellSouth should be required to provide an
5 annualized forecast of growth as described previously in my testimony.

6

7 Q. Is this space sufficient for physical collocation?

8 A. Yes.

9

10 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
11 Waiver for the Miami Palmetto Central Office?

12 A. No. BellSouth's Petition should be denied because BellSouth has failed to
13 demonstrate to the Florida Public Service Commission that physical collocation is
14 not available due to space limitations.

15

16 **NORTH DADE GOLDEN GLADES**

17 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
18 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
19 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
20 COLLOCATION?

21 A. Currently there are 6 MAP positions in place to support 1 or 2 on-site
22 maintenance personnel. Since initial installation of the DMS equipment the
23 number of on-site maintenance personnel has been reduced, centralized
24 maintenance to monitor the switch is in place and the documentation for the
25 switch is now on compact disks, reducing the space that the old documentation

1 occupies. BellSouth should reduce the number of MAP positions to 1 per floor
2 and consolidate the terminals into the remaining positions. This could free up
3 approximately 600 square feet. Exhibit _____. Also, storage tubs for DLR
4 cards should be eliminated or consolidated into a more space savings device since
5 the DLR records are digitized. Exhibit_____.

6

7 Q. Is this space sufficient for physical collocation?

8 A. Yes.

9

10 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
11 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
12 TO PROVIDE SPACE FOR COLLOCATION?

13 A. Yes, BellSouth has allocated 398 square feet of space as its receiving and erecting
14 room, 341 square feet are reserved for OCC administrative space, 259 square feet
15 are utilized as a lounge, 100 square feet are for a Manager, and 241 square feet are
16 for OCC administration. *See BellSouth Petition, Exhibit 1, filed August 7, 1998.*

17

18 Q. How much space is available based on this factor?

19 A. 1098 square feet.

20

21 Q. Is this space sufficient for physical collocation?

22 A. Yes.

23

1 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE ARE ANY
2 PARTIAL LINE-UPS OR UNFILLED BAYS THAT SHOULD BE
3 RECONFIGURED TO PROVIDE SPACE FOR COLLOCATION?

4 A. Yes, during the walk-through I noted that several partially filled line-ups existed.
5 Also, on the second floor within the OIT section, 38 bays were reserved for future
6 growth. Exhibit _____.

7

8 Q. BASED ON YOUR OBSERVATIONS, HOW MUCH SPACE DO YOU
9 BELIEVE BELL SOUTH IS RESERVING FOR ITS FUTURE USE?

10 A. On the first floor BellSouth has reserved 970 square feet for future toll, 795
11 square feet for future switch (3 years forecasted growth), 143 square feet future
12 O4T switch growth, and 337 square feet future toll and virtual collocation space
13 and 2901 sq. ft. reserved for power. On the second floor, BellSouth has reserved
14 661 square feet for future switch growth. *See* BellSouth Petition, Exhibit 1, filed
15 August 7, 1998.

16

17 Q. Is this space sufficient for physical collocation?

18 A. Yes. BellSouth should, however, be required to provide forecast information to
19 support its contention that space is not available.

20

21 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
22 Waiver for the North Dade Golden Glades Central Office?

23 A. No. BellSouth's Petition should be denied because BellSouth has failed to
24 demonstrate to the Florida Public Service Commission that physical collocation is
25 not available due to space limitations.

1 **BOCA RATON BOCA TEECA**

2 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
3 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
4 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
5 COLLOCATION?

6 A. Yes, throughout the building desks, tables and outdated equipment manuals were
7 seen that should be removed to recover space. Also a nonfunctional frame should
8 be removed in-order to recover floor space. Exhibits _____.

9
10 Q. How much space is available based on this factor?

11 A. Several hundred square feet are available. BellSouth should, however, be
12 required to provide detailed engineering floor plans so the Florida Public Service
13 Commission will have the detail necessary for its determination.

14
15 Q. Is this space sufficient for physical collocation?

16 A. Yes.

17
18 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
19 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
20 TO PROVIDE SPACE FOR PHYSICAL COLLOCATION?

21 A. Yes. During the walkthroughs, BellSouth indicated that it has outside plant
22 engineers not assigned to the district (e.g., not essential to the central office)
23 located on the second floor of this central office that is structurally built to support
24 central office equipment. The second floor contains 12,946 square feet of space.
25 The second floor contains cubicles to house the BellSouth employees, 1

1 conference room, an empty office, 1 occupied office, 1 file room, and a copy
2 room with 1 printer located within the space. BellSouth also has 391 square feet
3 as a shipping and receiving room and a Corporate Communications Resource
4 Room for computer- based training.

5

6 Q. How much space is available based on this factor?

7 A. 13,337 square feet.

8

9 Q. Is this space sufficient for physical collocation?

10 A. Yes.

11

12 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE ARE ANY
13 PARTIAL LINE-UPS OR UNFILLED BAYS THAT SHOULD BE
14 RECONFIGURED TO PROVIDE SPACE FOR COLLOCATION?

15 A. Yes, there are several line-ups with space between the existing bays reserved for
16 growth that should be utilized before large areas of space are allocated for future
17 growth.

18

19 Q. How much space is available based on this factor?

20 A. There is space available; however, BellSouth should be required to provide the
21 detailed network engineering floor plans to determine the exact amount of space
22 that is available.

1 Q. Is this space sufficient for physical collocation?

2 A. It appears so; however, a review of forecast information and detailed engineering
3 floor plans will provide the necessary detail to determine the specific amount of
4 space available. BellSouth should be required to provide such information.

5

6 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
7 Waiver for the Boca Raton Boca Teeca Central Office?

8 A. BellSouth's Petition should be denied because BellSouth has failed to
9 demonstrate to the Florida Public Service Commission that physical collocation is
10 not available due to space limitations.

11

12 **WEST PALM BEACH PORT ORANGE**

13 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
14 NON-ESSENTIAL, UNUSED, LITTLE USED OR RETIRED EQUIPMENT
15 THAT SHOULD BE REMOVED TO PROVIDE SPACE FOR
16 COLLOCATION?

17 A. Yes, unused/outdated equipment manuals, DLR tubs, several desks and other
18 office furniture should be removed to make space available. Exhibits_____.

19

20 Q. How much space is available based on this factor?

21 A. All of the space occupied by this material is available. BellSouth should be
22 required to provide the detailed network engineering floor plans to determine the
23 precise amount of space.

24

25 Q. Is this space sufficient for physical collocation?

1 A. Yes.

2

3 Q. BASED ON YOUR OBSERVATIONS, DO YOU BELIEVE THERE IS ANY
4 ADMINISTRATIVE SPACE IDENTIFIED THAT SHOULD BE CONVERTED
5 TO PROVIDE SPACE FOR COLLOCATION?

6 A. Yes, during the walk-through we learned that there are three MAP positions in
7 this central office, but that they are not fully staffed during the course of a
8 business day. There is only one person on duty. BellSouth should eliminate two
9 of the MAP positions and reclaim that space for physical collocation.

10

11 Q. How much space is available based on this factor?

12 A. The space occupied by the two extra MAP positions is available. BellSouth
13 should be required to provide the network engineering floor plans necessary to
14 determine the specific amount of space available.

15

16 Q. Is this space sufficient for physical collocation?

17 A. Yes.

18

19 Q. BASED ON YOUR OBSERVATIONS, HOW MUCH SPACE DO YOU
20 BELIEVE BELL SOUTH IS RESERVING FOR ITS FUTURE USE?

21 A. BellSouth currently has 143 square feet of floor space reserved for future toll, 712
22 square feet reserved for future tandem, 526 square feet reserved for future switch
23 and 329 square feet reserved for future. *See* BellSouth Petition, Exhibit 1, filed
24 August 7, 1998. It appears that BellSouth has reserved space based on a three
25 year forecast. During the walk-through, BellSouth indicated that it was in the

1 process of installing 8 bays of DMS line bays. Each rack can serve up to 640
2 lines per bay. 640 multiplied by 8 bays of equipment equals 5,040 lines based
3 upon a 1999 growth project.

4

5 Q. How much space is available based on this factor?

6 A. 1710 square feet may be available depending on the annualized growth rate.

7 BellSouth should be required to provide the detailed forecast information and
8 network engineering floor plans to make this determination.

9

10 Q. Should the Florida Public Service Commission grant BellSouth's Petition for
11 Waiver for the West Palm Beach Central Office?

12 A. No. BellSouth's Petition should be denied because BellSouth has failed to
13 demonstrate to the Florida Public Service Commission that physical collocation is
14 not available due to space limitations.

15

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17 A. Yes, it does.