BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Physical Collocation Requirements Set Forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Boca Raton Boca Teeca Central Office, by BellSouth Telecommunications, Inc.	)	DOCKET NO. 980947-TL
In re: Petition for Waiver of Physical Collocation Requirements Set Forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Miami Palmetto Central Office, by BellSouth Telecommunications, Inc.	)	DOCKET NO. 980948-TL
In re: Petition for Waiver of Physical Collocation Requirements Set Forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the West Palm Beach Gardens Central Office by BellSouth Telecommunications, Inc.	)	DOCKET NO. 981011-TL
In re: Petition for Waiver of Physical Collocation Requirements Set Forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the North Dade Golden Glades Central Office by BellSouth Telecommunications, Inc.	)	DOCKET NO. 981012-TL
	)	Filed: April 9, 1999

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INTERMEDIA COMMUNICATIONS INC.'S

DIRECT TESTIMONY OF JULIA O. STROW

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Q: Please state your name, employer, position, and business address.

A: My name is Julia Strow. I am employed by Intermedia Communications Inc. ("Intermedia") as Assistant Vice President, Regulatory and External Affairs. My business address is 3625 Queen Palm Drive, Tampa, Florida 33619.

Q: What are your responsibilities in that position?

A: I am the primary interface between Intermedia and the incumbent local exchange carriers ("ILECs"). In that capacity, I am involved in interconnection negotiations and arbitrations between Intermedia and the ILECs. I am also primarily responsible for Intermedia's strategic planning and regulatory policy.

Q: Please briefly describe your educational background and professional experience.

A: I graduated from University of Texas in 1981 with a B.S. in Communications. I joined AT&T in 1983 as a Sales Account Executive responsible for major market accounts. I subsequently held several positions with BellSouth's Marketing Department, with responsibilities for Billing and Collection and Toll Fraud Services. In 1987, I was promoted to Product Manager for Billing Analysis Services, with responsibility for the development and management of BellSouth's toll fraud detection and deterrence products. In 1988, I was promoted into the BellSouth Federal Regulatory organization. During my tenure there, I had responsibility for regulatory policy development for various issues associated with Billing and Collection Services, Access Services, and

Interconnection. In 1991, due to a restructuring of the Federal Regulatory organization, my role was expanded to include the development of state and federal policy for the issues I mentioned above. During my last two years in that organization, I supported regulatory policy development for local competition, interconnection, unbundling, and resale issues for BellSouth. I joined Intermedia in April 1996 as Director of Strategic Planning and Regulatory Policy. In April, 1998, I became Vice President, Regulatory and External Affairs.

Q. What is the purpose of your testimony?

A. The purpose of my direct testimony in this proceeding is: (1) to discuss BellSouth's obligation under Section 251 (c)(6) of the Telecommunications Act of 1996 ("Act") to provide physical collocation and (2) to discuss the factors that the Florida Public Service Commission ("Commission") should consider in making its finding of whether space is available for physical collocation. Mr. Ron Beasley will discuss, specifically, in his direct testimony, BellSouth's ability to provide space for physical collocation in the Boca Raton Boca Teeca, Miami Palmetto, West Palm Beach Gardens, and North Dade Golden Glades central offices.

Intermedia's Collocation Need

Q. Why does Intermedia need to physically collocate in BellSouth's central offices?

A. Intermedia needs physical collocation for access to the end-user's local loop in order to provide a variety of competitive facilities-based telecommunications services.

Q. What types of services will Intermedia provide through the use of physical collocation?

A. As an integrated communications provider, Intermedia will provide customers such services as local exchange service, intraLATA and interLATA long distance services, frame relay, ATM, and Internet access.

Q. Will Intermedia be competitively harmed, if it is unable to physically collocate in BellSouth's central offices?

A. Yes. In order to provide facilities-based services, Intermedia must be able to physically collocate in some manner so that it may have access to the ILEC's unbundled network elements (UNEs). Without this access, Intermedia is essentially precluded from providing service to end-user customers and is thereby foreclosed from BellSouth's virtually monopolistic local markets.

BellSouth's Collocation Obligation

Q. What is BellSouth's obligation, under the Telecommunications Act of 1996 ("the Act"), to provide physical collocation?

A. The Act requires all ILECs 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. 47 U.S.C. Section

251(c)(6)

Under the plain language of the Act, ILECs have a duty to provide physical collocation unless and until "the local exchange carrier demonstrates to the State commission that physical collocation is not practical for technical reasons or because of space limitations."

Intermedia's Collocation Requests

Q. In which central offices has Intermedia requested physical collocation from BellSouth?

A. Intermedia has applied for physical collocation at BellSouth's Boca Raton Boca Teeca, Miami Palmetto, West Palm Beach Gardens, and North Dade Golden Glades central offices.

Q. How much space has Intermedia requested at each central office?

A. Intermedia has requested 200 square feet in each of the four central offices I reference above. However, these requests were for traditional physical collocation. Intermedia may not need this much space if alternative forms of physical collocation, which I will discuss later, were available.

Q. What type of equipment does Intermedia wish to deploy in its physical collocation space?

A. Intermedia generally deploys Access Node equipment in its physical collocation. Access Node equipment enables Intermedia to convert/multiplex high capacity (DS1, DS3, OC-12, and OC-48) traffic carried over its interoffice

transport into DS0, or sometimes DS1, circuits that serve the end-user customer. This equipment will allow Intermedia to process both data and voice traffic through the collocation to the end-user. Intermedia also deploys optical carrier equipment in all of its physical collocations in order to have access to the high capacity interoffice transport.

Collocation Space Availability Factors

Q. What factors should the Commission consider in making a determination whether space for physical collocation is available in a central office?

A. The Commission should consider several factors in making its determination. The Federal Communications Commission ("FCC") has codified the minimum factors to be considered in 47 C.F.R 51.323 (f). I will discuss below the FCC's First Report and Order FCC 99-48, CC Docket No. 98-147, In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability, released March 31, 1999, concerning collocation requirements. Amongst these factors, ILECs must take into account in future renovation or expansion plans to existing facilities projected demand for collocation of equipment by alternative local exchange carriers ("ALECs"). Also, while ILECs may reserve a limited amount of floor space for their own specific future use, they may not do so on terms more favorable than those that apply to other carriers seeking to reserve collocation space for

future use. In addition, ILECs should be required to make plans for the rearrangement of equipment and the reclamation of space in central offices where there is an exhaust situation.

Alternative Collocation Arrangements

Q. What types of alternative physical collocation arrangements should be made available to Intermedia, if the Commission finds that these central offices lack the space for traditional physical collocation?

A. Where a central office lacks sufficient space for traditional physical collocation, i.e., central office, carrier-specific, environmentally-controlled, caged apartments, BellSouth should be required to offer the following alternative arrangements: (1) Common Cageless Collocation; (2) Shared Cage Collocation; (3) Adjacent Collocation; and (4) Enhanced Extended Link.

Common Cageless Collocation

Q. Please describe Common Cageless Collocation.

A. In Common Cageless Collocation, ALECs establish physical collocation arrangements in areas around the ILEC main distribution frame ("MDF"), so that their equipment may be commingled with ILEC equipment. In such an arrangement, an ALEC may install and maintain its own equipment, or may hire an ILEC-approved contractor to do so. To the extent that there are security concerns, they can be addressed by requiring ALECs to utilize logs, security card access, inexpensive video arrangements, and contractual indemnification

arrangements.

Q. What are the benefits of Common Cageless Collocation?

A. Requiring Common Cageless Collocation provides a more efficient use of ILEC central office space; thus, more ALECs will be able to provide facilities-based competitive services.

Shared Cage Collocation

Q. Please describe Shared Cage Collocation.

A. Under Shared Cage Collocation, an ALEC that has existing physical collocation may enter into arrangements with other ALECs to share its collocation space. The subleasing of such space is a very efficient use of space and is particularly valuable to facilities-based ALECs such as Intermedia.

Q. What are the benefits of Shared Cage Collocation?

A. The benefits include reduced collocation expenses and facilitation of cross-connection from one collocated ALEC to another, thereby increasing competitive service alternatives to end-users. This arrangement will also allow a greater number of carriers to share the burden of the infrastructure costs associated with preparing a central office for collocation. It will significantly reduce the cost of collocation for Intermedia and other ALECs.

In addition to being cost-effective, these shared cage arrangements help conserve the dwindling supply of space in ILEC central offices and allow greater numbers of ALECs to collocate in a give central office.

Adjacent Collocation

Q. Please describe Adjacent Collocation.

A. Under Adjacent Collocation an ILEC would provide interconnecting transmission facilities to an agreed upon point of interconnection external to the central office, e.g., a manhole or a vault, where the ALEC connects the ILEC-provided transmission facilities with its own. There are two types of Adjacent Collocation, Adjacent On-site and Adjacent Off-site.

Adjacent On-Site Collocation utilizes a controlled environmental vault or similar structure, within the premises of the central office, but outside of the central office building on the same property as the ILEC central office. The ALEC places its collocated equipment in this structure, which may be owned by either the ILEC or the ALEC, and interconnects with the ILEC or accesses UNEs by means of dedicated transport.

Adjacent Off-Site Collocation involves-establishing the ALEC's point of interconnection on property near the ILEC's central office. If the ALEC requests Adjacent Off-Site Collocation, the ILEC and the ALEC establish a mid-span meet point that connects the ALEC's equipment to the central office and the ILEC-provided UNEs or services therein. The mid-span meet point supports fiber or copper transmission facilities.

Q. What are the benefits of Adjacent Collocation?

A. This type of collocation eliminates the need for ALECs to use any of the space

in the ILEC central office, while at the same time providing the same function as traditional collocation.

Enhanced Extended Link

Q. Please describe Enhanced Extended Link ("EEL").

A. From a technical perspective, an EEL provides the facility between the end user and the ALEC premises. Typically, in an EEL configuration, the end-user's local loop would be connected to an aggregation device at an ILEC's central office, i.e., multiplexer, which in turn is connected to an interoffice dedicated transport facility that terminates in an ALEC collocation in a distant ILEC central office. In provisioning an EEL, the ILEC would provide the loop, multiplexing, interoffice facility and any associated cross connects. See Exhibit No. JOS-1.

Q. How is EEL an alternative to traditional physical collocation?

A. Requiring collocation in every central office limits an ALEC's ability to utilize modern network architecture, and forces ALECs to install facilities that mirror the ILEC's existing distributed network configuration. EELs alleviate this problem by allowing ALECs to collocate in one central office in an exchange and yet provide services to end-users served out of multiple neighboring central offices. This allows ALECs to efficiently utilize collocation space and to reach the maximum possible number of customers with a single collocation arrangement. As competition develops, the demand

for collocation space will increase. Requiring an ALEC to collocate in multiple central offices in order to establish a single transmission facility needlessly consumes large amounts of collocation space with little, if any, corresponding benefit to ILECs, ALECs, or consumers. EEL avoids this inefficient use of a scarce resource.

Q. What are some benefits of EEL?

A. EELs conserve and more efficiently use dwindling ILEC collocation space. For example, the central offices in these proceedings are located in areas with high demand and have allegedly reached the point of space exhaust. With EEL, exhaust situations would occur less frequently, if at all, because fewer physical collocations would be needed. Furthermore, if space were not available in a given office it would no longer be an issue since EEL would permit that office to still be served by an ALEC. In addition, EEL dramatically reduces the costs of providing service and expands the customer base reachable by ALECs, making facilities-based competitive services available to smaller users and users in less densely populated areas.

Q. Should EEL be made available only as an alternative to traditional collocation where space is exhausted or limited?

A. No. EELs provide ALECs with direct access to loop functionality. EELs should be considered to be a single UNE for purposes of loop access in modern telecommunications architectures. First, ILECs provide EELs to

themselves today and deliver them to centralized data switches. Therefore, such facilities are already put together by ILECs today. Second, ILECs can facilitate utilization of EELs by making them available as a single UNE from an ordering, provisioning, maintenance and repair standpoint.

FCC National Collocation Rules

Q. Has the FCC addressed any of the alternatives to traditional physical collocation discussed above?

A. Yes. The FCC recently adopted national rules for collocation in the order that I have cited above. The rules adopted by the FCC require ILECs to provide Shared Cage Collocation, Common Cageless Collocation, and, in situations where collocation space is exhausted, Adjacent Collocation.

Q. Were there other findings made by the FCC in the March 31, 1999, order that would affect the issues being addressed in this proceeding?

A. Yes. In addition to the alternative collocation arrangements mentioned above, the FCC found that a collocation method used by one ILEC or mandated by a state commission is presumed to be technically feasible for any other ILEC. The FCC's rules are meant to provide minimum standards and permit any state to adopt additional requirements.

The FCC also ruled that the ILEC cannot place restrictions on the type of equipment used for interconnection and access to unbundled network elements, even if it includes a switching or enhanced services function.

Finally, and most importantly with regard to issues in this proceeding, the FCC ruled also that ILECs must remove obsolete, unused equipment, in order to facilitate additional collocation space within a central office.

Other State Commissions' Approved Alternative Arrangements

Q. What alternatives to traditional physical collocation have been adopted by ILECs or ordered by state commissions in other jurisdictions?

A. In New York, the Public Service Commission has approved the following alternative forms of physical collocation for Bell Atlantic: Secured Collocation Open Physical Environment (SCOPE), Identified Space Collocation (ISC), and Collocation Line of Sight Escort (CLOSE). I will briefly discuss each of these alternatives below.

SCOPE

This form of collocation has the benefits of traditional physical collocation, yet requires less space to implement. SCOPE allows ALECs to collocate in a secured, but separate part of the ILEC central office. Under SCOPE, there is no cage enclosure around an individual ALEC's equipment; rather, different ALECs maintain their equipment in standard equipment racks that are lined up side-by-side. ALECs are responsible for the installation and maintenance of their own equipment, and at their option, may place a security door over the portion of the equipment racks that they occupy. SCOPE also involves a point of termination (POT) bay that may be shared by ALECs. See Exhibit

No. JOS-2.

ISC

ISC is a form of virtual collocation that allows ALECs to "visit" its collocation site. ISC involves the placement of an ALEC's equipment commingled with the ILEC's equipment. The ALEC is responsible for installation and maintenance of its equipment. The ILEC assigns specific racks for each ALEC in order to identify equipment. Security is handled by having an ILEC escort when the ALEC is accessing its equipment.

CLOSE

CLOSE is a form of virtual collocation that requires ALECs to use third-party vendors for installation of the collocation equipment. Bell Atlantic provides a security escort for these third-party personnel, at the ALEC's expense. Although, this form is not preferred as much as physical collocation, it is much better than traditional virtual collocation. See Exhibit No. JOS-3.

Q. Has any other state commission taken similar action with regard to collocation issues?

A. Yes. In its December 1998 staff recommendation in the Southwestern Bell 271 case, the Texas Public Utilities Commission (TPUC) endorsed cageless collocation and EEL as alternatives to traditional physical collocation arrangements. Additionally, Southwestern Bell has already made shared space collocation available to ALECs in central offices located in their

serving areas.

Virtual Collocation Unacceptable Alternative

Q. Is virtual collocation an acceptable alternative to traditional physical collocation?

A. No. Under traditional virtual collocation, the ALEC sells its equipment to the ILEC for a nominal fee and the equipment is placed in the "line-up," along with the ILEC's equipment in the central office. Virtual collocation is not an acceptable method of collocation because ALECs do not have access to their own equipment for all necessary intents and purposes. For example, if ALECs are not given access to their equipment and are forced to rely on the ILEC or unaffiliated third-party technicians who may not be familiar with the types of equipment, ALECs cannot be sure the equipment will be properly repaired or maintained. Thus, the ALECs cannot give their end-users the level of service demanded and promised.

In fact, the California Public Utilities Commission ("CPUC") recently found that virtual collocation is an inferior alternative to physical collocation. CPUC Decision 98-12-068, December 17, 1998. This decision was based on the fact that ALECs that are dependent on virtual collocation may be unable to provide equipment and services that are superior to the ILECs, thus limiting the ALEC's ability to offer a competitive edge. The CPUC further stated that ALECs who have access to physical collocation "are able to offer

services which are not bound by the ILEC's standards."

Q. Should Intermedia be allowed to convert existing virtual collocations to a form of physical collocation?

A. Yes. If there is a space exhaust situation in a central office that limits the availability of traditional physical collocation and an ALEC already has virtual collocation, then the ILEC should allow the virtual collocation to be converted to some form of alternative physical collocation. With these conversions, the ALEC's technicians would have access to the equipment in order to install, maintain and repair it at the standards set by itself, not by the ILEC. This would be akin to ISC, approved by the New York Public Service Commission.

Space Assignment

Q. Should the Commission develop a procedure for the assignment of new collocation space as it becomes available in a central office?

A. Yes. The Commission should develop such procedures in order to assign space that becomes available through creation, conversion or reclamation of space by the ILEC or by the implementation of the collocation alternatives discussed earlier in my testimony. The Commission should require ILECs to maintain on file, for five years, all applications for physical collocation. When space becomes available or when an ILEC knows that space will become available in the near future, it should immediately provide written

notification to the ALECs who had originally requested space and were denied. BellSouth should make space available in the order in which the ALECs originally applied (first-come first-served).

ALECs that receive notification should be required to respond in writing to the ILEC within three business days, or be deemed to forfeit the space. If more ALECs respond than for which there is space available, then the available space should be allocated to the requesting ALECs on a first-come first-served basis.

If the amount of space that becomes available is less than the ALEC originally requested, the ALEC should have the right of first refusal for the space. For example, if the first ALEC had originally requested 100 square feet on August 1, 1998, and the second ALEC had originally requested 75 square feet on October 1, 1998, and only 75 square feet became available, then the first ALEC should be able to choose the space or to pass.

Space Provisioning Intervals

Q. Should the Commission adopt provisioning interval standards in these proceedings?

A. Yes. In these proceedings, Intermedia seeks a Commission ruling that physical collocation space is indeed available in the BellSouth central offices and that Intermedia be permitted to collocate in that space by whatever physical collocation arrangement is consistent with the space available,

Intermedia's business interests and the law. The Commission would stop short of fully and effectively addressing the competitive obstacles ALECs face in attempting to collocate in BellSouth's central offices, if it were not to prescribe provisioning interval standards binding on BellSouth.

The FCC has elected not to adopt provisioning intervals at this time. Nevertheless, timely provisioning is important. ALECs suffer substantial competitive harm when collocation arrangements are unnecessarily delayed.

Q. Have State commissions prescribed collocation provisioning intervals?

A. Yes. On March 9, 1999, the Public Utility Commission of Texas issued an order approving Southwestern Bell's physical collocation tariff. The tariff requires Southwestern Bell to complete construction of all active central office switchroom space requests within three months of the collocator's acceptance of Southwestern Bell's quotation.

On September 30, 1996, and again on March 2, 1998, the New York Public Service Commission affirmed an interval of 76 business days or 15 weeks from customer application to the final completion of a collocation site.

Q. What physical collocation provisioning interval standards does Intermedia propose the Commission should adopt in these proceedings?

A. Upon a finding of space availability in these proceedings, the Commission should require BellSouth, following the allocation procedures Intermedia proposes above, to provision the space occupation-ready within 90 days of

the Commission's determination, if the space is within the central office. Similarly, the Commission should require BellSouth to provision transport facilities in a state of readiness to Intermedia's point of interconnection within 45 days of the Commission's determination, if the space is outside of the central office.

Q. Is the Commission authorized to prescribe physical collocation provisioning interval standards in these proceedings?

A. Yes. Counsel for Intermedia advises me that the Commission's authority is found in Section 120.80(13)(d), Florida Statutes, which provides that, notwithstanding the provisions of Chapter 120, Florida Statutes, when implementing the Act, the Commission is authorized to employ procedures consistent with the Act and, accordingly, in the Commission's responsibility pursuant to 47 U.S.C. 251(c)(3) to ensure that ILECs provide interconnection on rates, terms, and conditions that are just, fair, and nondiscriminatory.

Previous FPSC Space Availability Determinations

Q. Has the Commission previously addressed the issue whether physical collocation space is available in BellSouth's West Palm Beach Gardens central office?

A. Yes. In Order No. PSC-99-0060-FOF-TP, issued January 6, 1999, in Docket No. 980800-TP, with BellSouth's August 7, 1998, petition for waiver in Docket No. 981011-TL pending, the Commission found that:

> there is adequate space to permit physical

> collocation by Supra in the West Palm Beach Gardens central office. The evidence demonstrates that BellSouth has space available in this central office to accommodate up to five years of growth for some of its equipment. The evidence also demonstrates that there is an addition scheduled for this central office and that BellSouth will not exhaust all of the available space prior to the completion of this addition.
>
> In particular, it appears that the administrative space used by BellSouth as its uncrating area and its equipment staging area is suitable for collocation. As Exhibit 31 demonstrates, the uncrating room contains 454 square feet. Order at 25.

Q. What ruling did the Commission make upon this finding?

A. The Commission required BellSouth to allocate 200 square feet of space to Supra for collocation in the West Palm Beach Gardens central office, as well as space for POT bays and other necessary interconnection infrastructure. The Commission further ordered BellSouth to provision the space within three months. The Commission rejected BellSouth's motion for reconsideration in Order No. PSC-99-0582-FOF-TP, issued March 29, 1999.

Q. Has the Commission previously addressed the issue whether physical collocation space is available in BellSouth's North Dade Golden Glades central office?

A. Yes. Also in Order No. PSC-99-0060-FOF-TP, with BellSouth's August 7, 1998, petition for waiver in Docket No. 981012-TL pending, the Commission found that:

> there is adequate space to permit physical

collocation by Supra in the Golden Glades CO. BellSouth has at least one area that it is reserving for what appears to be an excessively long period of time. This space is the 987 square feet for the O3T and O4T tandem switches and the STP.

* * *

We shall not require BellSouth to provide Supra physical collocation in a specific room or area discussed herein. Order at 20.

Q. What ruling did the Commission make upon this finding?

A. The Commission required BellSouth to allocate 200 square feet of space to Supra for collocation in the North Dade Golden Glades central office, as well as space for POT bays and other necessary interconnection infrastructure. The Commission further ordered BellSouth to provision the space within three months. The Commission rejected BellSouth's motion for reconsideration in Order No. PSC-99-0582-FOF-TP.

Summary

Q. Can you please summarize your testimony?

A. Yes. BellSouth's obligation to provide physical collocation under the Act is clear. This obligation can only be avoided by a clear demonstration on the part of BellSouth that space is not available. In evaluating the space limitations in any given central office, this Commission must consider future renovation and expansion plans, projected future demand and whether BellSouth has reserved space for itself on terms more favorable than what it

provides an ALEC.

Intermedia takes exception to BellSouth's contention that space is not available because BellSouth has refused to provide alternatives to traditional collocation. In light of the FCC's recent order, this Commission must determine whether, by using any of the alternative arrangements the FCC or another state commission has required, or that any other ILEC has made available, physical collocation is feasible in the offices at issue in this proceeding. If the Commission does find that space is not available in a given central office, then adjacent collocation must be made available under the FCC's requirements. If an ALEC has a virtual collocation in a central office where the Commission finds that no space for physical collocation exists, the ALEC should be permitted to convert to a physical collocation arrangement when space becomes available. Last, in addition to adjacent collocation, Intermedia strongly urges the Commission to require BellSouth to provide EEL at a minimum when space is not available and as an alternative to physical collocation to avoid the issue of space exhaust in the future.

Q. Does this conclude your testimony?

A. Yes.

Enhanced Extended Link "EEL"
Exhibit E

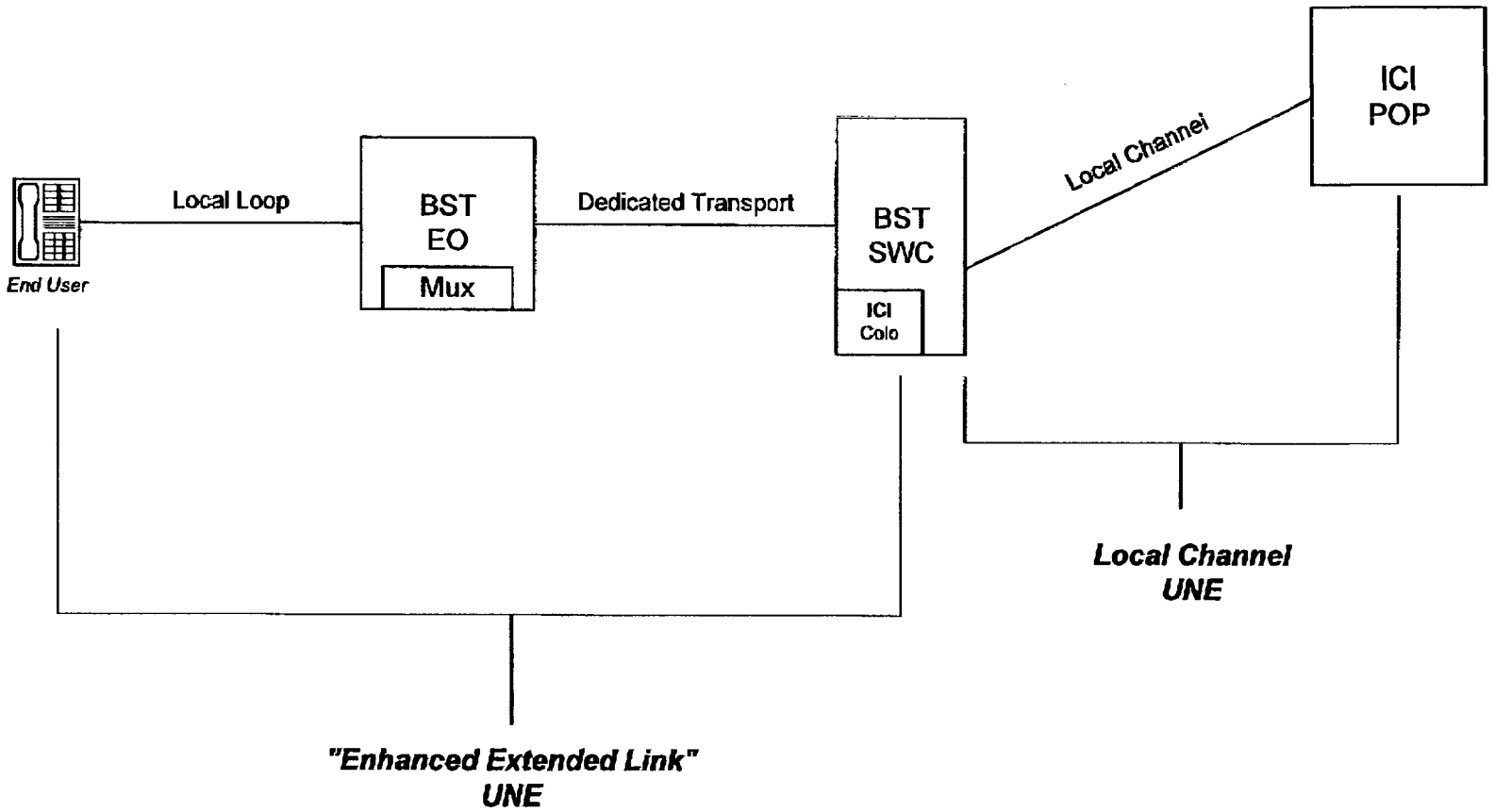

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EXHIBIT NO. JOS-1

Bell Atlantic

Secured Collocation Open Physical Environment (SCOPE)

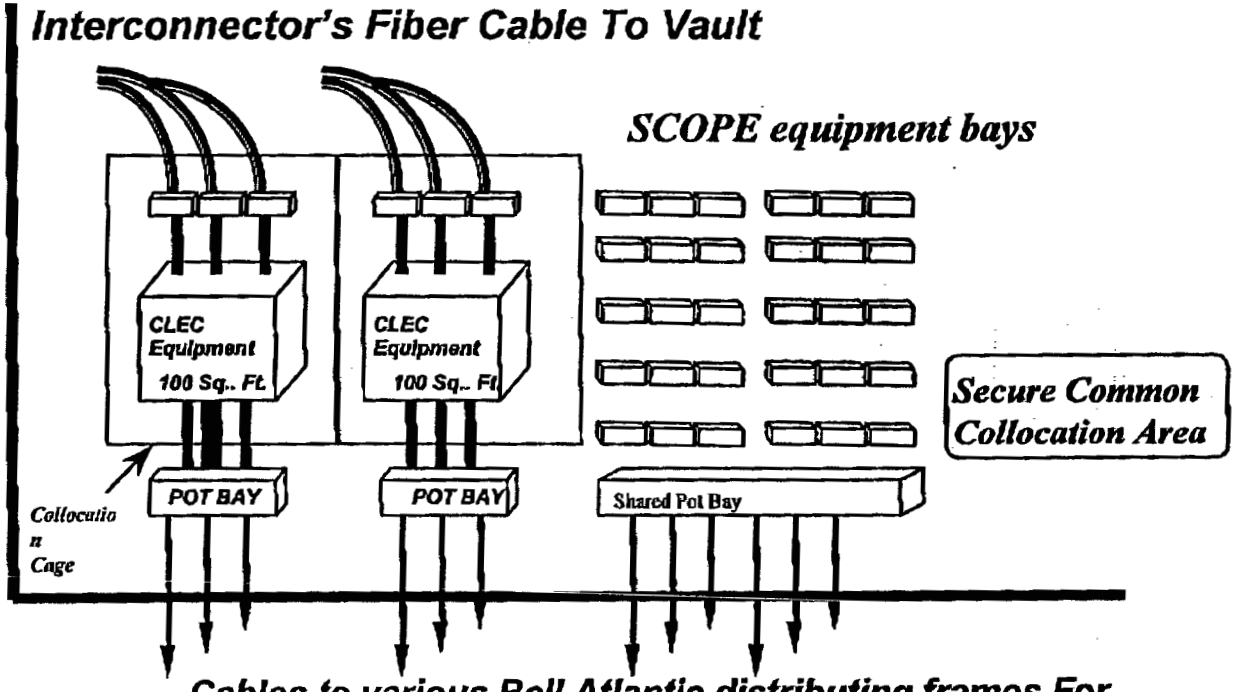

EXHIBIT NO. JOS-2

Collocation Line of Sight Escort (CLOSE)

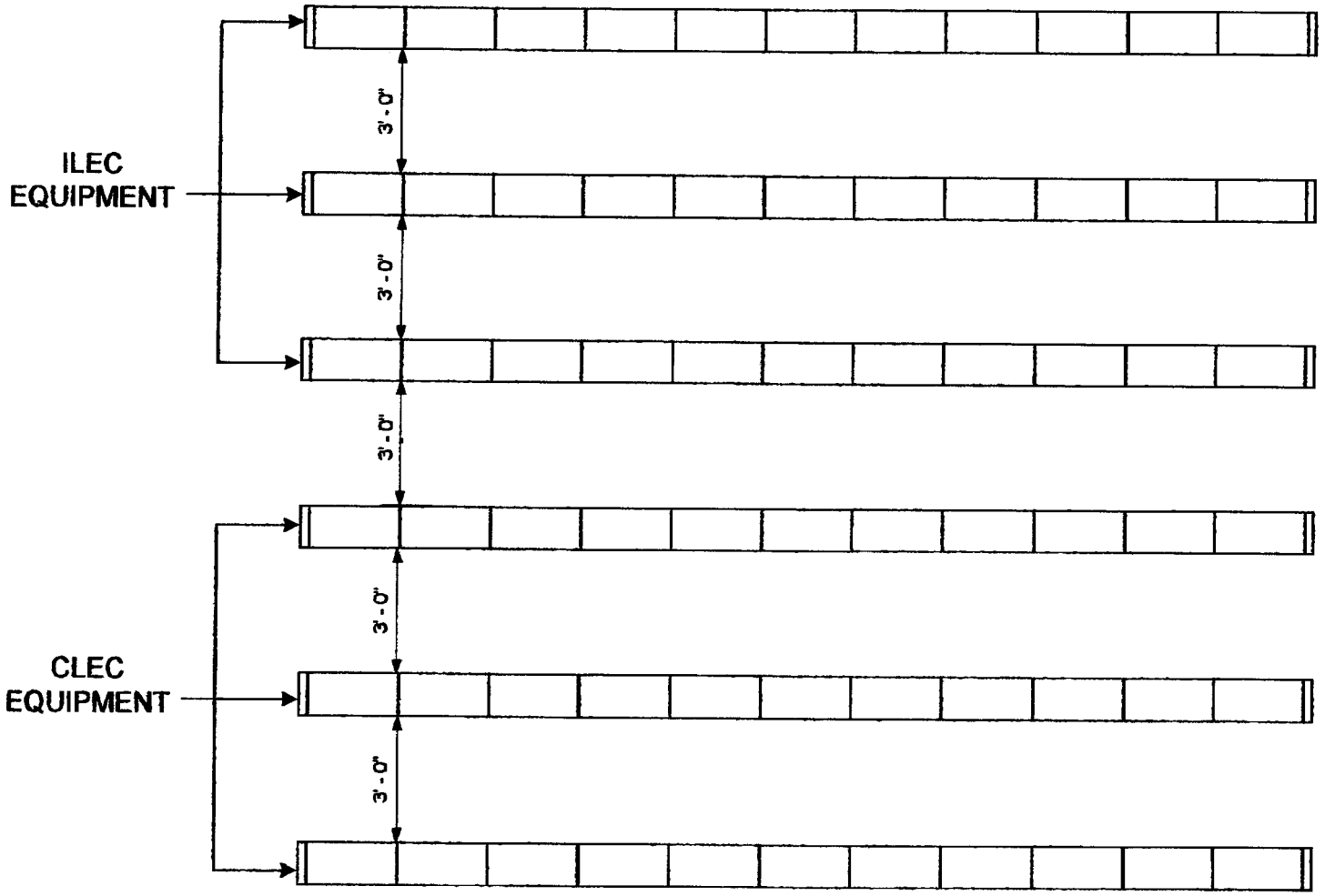

EXHIBIT NO. JOS-3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail this 9th day of April, 1999, to the following:

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

John R. Ellis
Rutledge, Ecenia,
Underwood, Purnell &
Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32301

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, GA 30375

Floyd Self
Norman H. Horton, Jr.
Messer, Caparello & Self
215 S. Monroe Street
Suite 701
Tallahassee, FL32301-1876

Robert G. Beatty
Nancy B. White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, #400
Tallahassee, FL 32301

Monica Barone
Sprint
3100 Cumberland Circle
#802
Atlanta, GA 30339

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

Brian Sulmonetti
WorldCom Technologies
1515 S Federal Hwy, #400
Boca Raton, FL 33432-7404

David V. Dimlich
Supra Telecommunications &
Information Systems, Inc.
2620 SW 27th Avenue
Miami, FL 33133

Charles A. Hudak
Jeremy D. Marcus
Gerry, Friend & Sapronov
Three Ravinia Dr Ste 1450
Atlanta, GA 30346-2131

Jeffrey Blemenfeld
Elise P.W. Kiely
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, D.C. 20036

Barbara D. Auger
Pennington, Moore
Wilkinson & Dunbar
Post Office Box 10095
Tallahassee, FL32302-2095

Charles J. Pellegrini