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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION APR -9 PM 4: 35

RECORDS AND REPORTING

Petition for Temporary Waiver of Physical Collocation Requirements Set Forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Daytona Beach Port Orange Central Office, by BellSouth Telecommunications, Inc. )

Docket No. 980946-TL

Petition for Temporary 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

Petition for Temporary 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

Petition for Temporary 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

DOCUMENT NUMBER-DATE

04628 APR-98

FPSC-RECORDS/REPORTING

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Petition for Temporary 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

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Petition for Temporary Waiver of Physical )  
Collocation Requirements Set Forth in the )  
1996 Telecommunications Act and the FCC's )  
First Report and Order, for the Lake Mary )  
Main Central Office, by BellSouth )  
Telecommunications, Inc. )

Docket No. 981250-TL

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**Notice of Filing of Supra Telecommunications and Information Systems,  
Inc.'s Preliminary Testimony of David Nilson**

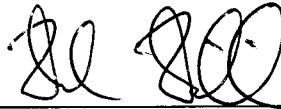
Notice is hereby given that on April 9<sup>th</sup>, 1999, Supra Telecommunications and Information Systems, Inc. filed its preliminary testimony of David Nilson in the above-captioned dockets.

DOCUMENT NUMBER-DATE

04628 APR-99

FPSC-RECORDS/REPORTING

Respectfully submitted this 9<sup>th</sup> day of April, 1999.

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

DAVID V. DIMLICH, ESQ.

Legal Counsel

Supra Telecommunications & Information Services, Inc.

2620 S.W. 27<sup>th</sup> Avenue

Miami, Florida 33133

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that Supra Telecommunications and Information Systems, Inc.'s notice of filing preliminary testimony of David Nilson has been sent via U.S. Mail this 9<sup>th</sup> of April, 1999 to:

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DAVID V. DIMLICH  
Supra Telecommunications and  
Information Systems, Inc.

1 SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.  
2 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
3 DIRECT TESTIMONY OF DAVID A. NILSON  
4 DOCKET NOS. 980946-TL, 980947-TL, 980948-TL, 981011-TL,  
5 981012-TL, AND 981250-TL  
6 APRIL 9, 1999

7 Q. PLEASE STATE YOUR NAME AND ADDRESS

8 A. My name is David A. Nilson. My address is 2620 SW 27th Avenue,  
9 Miami, Florida 33133.

10

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

12 A. I am the Vice President of Systems Design and Interconnection of  
13 Supra Telecommunications and Information Systems, Inc. ("Supra").

14

15 Q. PLEASE DESCRIBE YOUR BACKGROUND AND WORK  
16 EXPERIENCE

17 A. I have been an electrical engineer for the past 25 years, with the last  
18 21 years spent in management level positions in engineering and quality  
19 control departments. In 1976, after spending two years working in the  
20 microwave industry producing next generation switching equipment for  
21 end customers such as AT&T long Lines and ITT. I was part of a three-  
22 man design team that produced the work's first microwave integrated  
23 circuit. This job involved extensive work with various government  
24 agencies. At that time, our design was considered the "holy grail" of the  
25 microwave industry and was placed in production for AT&T within 30

1 days of its creation. This job also involved communications equipment  
2 design work with various government entities covered by US Department  
3 of Defense security restrictions. I spent several years in quality control  
4 management, monitoring and troubleshooting manufacturing process  
5 deviations, and serving as liaison and auditor to our regulatory affairs  
6 with the government. I spent 14 years in the aviation industry designing  
7 communications systems, both airborne and land based, for various  
8 airlines and airframe manufacturers worldwide. This included custom  
9 designed hardware originally designed for the Pan American Airlines call  
10 centers, and the HF long range communications system controllers used  
11 on Air Force One and Two and other government aircraft. In this job I  
12 was also responsible for validation and design testing, and FAA system  
13 conformance testing. Since 1992 I have been performing network and  
14 system design consulting for various industry and government agencies.  
15 I am the principal architect of Supra's ATM backbone network and our  
16 central office design. I am the certified technical contact of record  
17 between BellSouth and Supra for the fifteen central offices for which we  
18 placed firm orders, and for the eight other central offices currently under  
19 application for appeal.

20

21 Q. HAVE YOU EVER PREVIOUSLY TESTIFIED BEFORE THIS  
22 COMMISSION?

23 A. Yes, I testified in Docket No. 980800-TP.

24

25 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

1 A. The purpose of my testimony is to address the issues identified in this  
2 proceeding

3

4 Q. HOW IS YOUR TESTIMONY STRUCTURED?

5 A. I will address the issues in this proceeding for each of the central  
6 offices for which BellSouth has filed a petition for waiver of the physical  
7 collocation requirements.

8

9 **ISSUE 1: WHAT OBLIGATION DOES BELLSOUTH HAVE TO MAKE**  
10 **SPACE AVAILABLE AT THESE CENTRAL OFFICES TO PERMIT**  
11 **PHYSICAL COLLOCATION PURSUANT TO THE ACT AND**  
12 **APPLICABLE STATE AND FEDERAL REQUIREMENTS?**

13

14 Q. ARE THERE ANY RULES OR REGULATIONS THAT REQUIRE  
15 BELLSOUTH TO PROVIDE PHYSICAL COLLOCATION?

16 A. Yes. Pursuant to Section 251(c)(6) of the Telecommunications Act,  
17 BellSouth is obligated to provide physical collocation to requesting  
18 carriers. Specifically, this subsection states:

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



1 In addition, the FCC's rule 51.323(a) states:

2

3 An incumbent LEC shall provide physical collocation and  
4 virtual collocation to requesting telecommunications  
5 carriers.

6

7 **ISSUE 2: WHAT FACTORS SHOULD BE CONSIDERED BY THE**  
8 **COMMISSION IN MAKING ITS DETERMINATION ON BELLSOUTH'S**  
9 **PETITIONS FOR WAIVER AND TEMPORARY WAIVER OF THE**  
10 **REQUIREMENT TO PROVIDE PHYSICALL COLLOCATION FOR THE**  
11 **CENTRAL OFFICES IN THIS PROCEEDING?**

12

13 Q. WHAT FACTORS SHOULD BE CONSIDERED IN DETERMINING IF  
14 THERE IS ADEQUATE SPACE FOR PHYSICAL COLLOCATION IN  
15 THE CENTRAL OFFICES IN THIS PROCEEDING?

16 A. The Commission used several factors to determine space adequate  
17 for physical collocation in Docket No. 980800-TP. Those factors used by  
18 the Commission are:

- 19 a. Existing building configuration and the process used to evaluate  
20 the facility
- 21 b. Use of existing space including administrative space
- 22 c. Building codes and local regulations
- 23 d. Space reserved for short-term future use
- 24 e. Space reserved for long-term future use
- 25 f. In-line collocation

- 1 g. Obsolete equipment
- 2 h. Inefficient use of space
- 3 i. Loss of customers to ALECs
- 4 j. Inability of BellSouth to predict its future needs

5

6 However, there are additional factors that I believe the Commission  
7 needs to consider in determining if space is adequate for collocation. It  
8 would be appropriate for the Commission to consider all space on  
9 BellSouth's premises and alternative forms of collocation. I will discuss  
10 each factor.

11

12 a. EXISTING BUILDING CONFIGURATION AND THE PROCESS  
13 USED TO EVALUATE THE FACILITY

14

15 In Docket No. 980800-TP, BellSouth listed the process it takes to  
16 evaluate space availability in each central office. Essentially, BellSouth  
17 started with the existing building configuration and subtracted space it  
18 considered as being unavailable. Then BellSouth subtracted space that  
19 is physically occupied by equipment. After that, BellSouth determined  
20 and subtracted space it had reserved for future use. Finally, BellSouth  
21 subtracted space it believed is not usable.

22

23 Q. DO YOU AGREE WITH BELL SOUTH'S SPACE EVALUTATION  
24 PROCESS?

1 A. I do not. However, at this point I can only assume that BellSouth will  
2 use the same process in this collocation waiver proceeding that it used in  
3 the Supra complaint proceeding.

4

5 b. USE OF EXISTING SPACE INCLUDING ADMINISTRATIVE  
6 SPACE

7 The Commission should determine whether or not BellSouth is  
8 using space in the most efficient manner as to maximize the opportunity  
9 for physical collocation by other telecommunications service providers.  
10 The use of outdated workstations and disorganized placement of file  
11 cabinets, supply cabinets, and shelving by BellSouth should not be  
12 permitted. In Docket No. 980800-TP, the Commission agreed with  
13 Supra concerning the inefficient use of administrative space by  
14 BellSouth. The Commission stated:

15

16 Upon consideration of the evidence and arguments  
17 presented, we agree with Supra that the administrative  
18 space in both central offices is used inefficiently. We also  
19 believe that the evidence supports Supra witness Graham's  
20 assertion that the technology is available to allow BellSouth  
21 to set up computer workstations that can monitor numerous  
22 switches, *instead of requiring a separate workstation for*  
23 *each switch.*

24 Space suitable for collocation is a precious, finite resource that should  
25 not be wasted by inefficiency. If carriers did not have a right to access

1 space for collocation, then BellSouth's inefficiency would not be a matter  
2 of concern.

3

4 c. BUILDING CODE AND LOCAL REGULATIONS

5 In Docket No. 980800-TP, the Commission determined that collocators  
6 must adhere to all building codes and regulations of local authorities. It  
7 was BellSouth's position that construction of fire rated walls was required  
8 by the building code. In that Docket, the Commission stated that it would  
9 not be appropriate for it to make a decision concerning the specific  
10 requirement of fire rated wall construction (Order No. PSC-99-0060-FOF-  
11 TP at 12). The FCC in its March 31, 1999 First Report and Order in  
12 Docket No. 98-147, requires ILECs to provide in-line collocation. A cage  
13 traditionally surrounds a physical collocation space. An in-line  
14 collocation space would therefore mean that no physical structure is  
15 constructed to separate the ALEC's equipment from other ALEC or ILEC  
16 equipment.

17

18 d. SPACE RESERVED FOR SHORT-TERM FUTURE USE

19 e. SPACE RESERVED FOR LONG-TERM FUTURE USE

20 One of the last steps in BellSouth's process to determine available space  
21 for collocation, is to subtract all space that it has reserved for future use.  
22 It is important to keep in mind that the Act places the burden of proof  
23 squarely on the incumbent carrier requesting the waiver. Therefore, any  
24 claim by BellSouth that it will place equipment in a vacant space within  
25 the next few years must be substantiated by accurate forecasts, an

1 accurate assessment of current capacity, and verified documentation,  
2 such as budgeting records or work orders, which prove that steps are  
3 being taken to actually place needed equipment.

4

5 f. IN-LINE COLLOCATION

6 The Commission should not permit BellSouth to require  
7 unnecessary procedures and processes for the implementation of a  
8 collocation request. BellSouth's position, which it has demonstrated in  
9 Dockets 971140-TP and 980800-TP, that collocation in a central office is  
10 possible only if the area is large enough for multiple collocators and a  
11 common space for cross connect bays. If space sufficient for collocation  
12 is not centralized, but is scattered throughout a central office, then  
13 ALECs should be able to collocate wherever space is available. In fact,  
14 the FCC has just recently determined in CC Docket No. 98-147 that  
15 incumbent LECs (ILECs) must make available to requesting carriers  
16 shared cage and cageless collocation arrangements. Further, the FCC  
17 states that when space is exhausted for these types of collocation, then  
18 the ILEC is to grant the use of space in environmentally controlled vaults  
19 or other structures where technically feasible. Therefore, the  
20 Commission's evaluation of each central office is not complete until it has  
21 investigated these additional areas.

22 g. OBSOLETE EQUIPMENT

23 In each of the central offices at issue in these dockets, there is  
24 obsolete equipment that should be removed and/or modified in order to  
25 maximize the efficient use of space in these central offices.

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h. INEFFICIENT USE OF SPACE

In each of the central offices at issue in these dockets, there are numerous examples of inefficient use of space. BellSouth must take the necessary steps to minimize these inefficiencies in an effort to maximize the efficient use of space in these central offices.

i. LOSS OF CUSTOMERS TO ALECS

BellSouth's estimates of their own future need for space are incorrect because they do not take into account the projected loss of customers due to increased competition from companies like Supra.

j. INABILITY OF BELLSOUTH TO PREDICT ITS FUTURE NEEDS

Although BellSouth has stated a need to reserve space in these central offices for future needs, previous such requests for reserved space for future needs have proved inaccurate and a poor benchmark for what their actual needs are. Mere speculation or unsubstantiated planning is not an adequate indicator of what their future needs are for these central offices.

**ISSUE 3: BASED ON THE FACTORS IDENTIFIED IN ISSUE 2, HOW MUCH SPACE SHOULD BE CONSIDERED AVAILABLE IN THE CENTRAL OFFICES ADDRESSED IN THIS PROCEEDING?**

1 Q. HOW MUCH SPACE SHOULD BE CONSIDERED AVAILABLE IN  
2 THE CENTRAL OFFICES ADDRESSED IN THIS PROCEEDING?

3 A. I will address space availability for each central office based on the  
4 factors I described above.

5 DAYTONA BEACH PORT ORANGE:

6 It appears as if BellSouth has permitted a subsidiary to place  
7 equipment in this central office. BellSouth should make similar space  
8 available to collocators. This leads me to question what other equipment  
9 of subsidiaries BellSouth has permitted in this central office and others.  
10 It also appears that BellSouth is making use of certain obsolete  
11 equipment that, if removed or updated, would provide additional space  
12 that could add to the space available for collocators. It is also my opinion  
13 that BellSouth has attempted to reserve future space in this central office  
14 for periods of time greater than 18 months or 2 years; BellSouth should  
15 not be permitted to make such future reservations without offering such  
16 space to collocators who will make use of that space within those 18  
17 months or 2 years.

18 In the Daytona Beach Port Orange central office, BellSouth again  
19 appears to have haphazardly utilized their technical and administrative  
20 space. For example, the attached picture labeled supra-daytona-01  
21 (attachment D.N. 1) reveals how BellSouth has lined a row of filing  
22 cabinets perpendicular to what appears to be a storage table, effectively  
23 eliminating the use of the additional space in that area. If BellSouth had  
24 thought to remove the storage table from against the wall and place it  
25 parallel to the filing cabinets, rather than perpendicular to them, the

1 entire area against the wall would be available for, and suitable to,  
2 collocation.

3           The area depicted in the photo labeled supra-daytona-03  
4 (attachment D.N. 2) indicates another example of inefficient use of  
5 space. You will notice the cluttered appearance, unplugged wires, and  
6 general disarray of this workspace. It is obvious that this piece of cable  
7 repair equipment is being used as a storage table for other pieces of  
8 equipment and has not been used for its intended purpose for a period of  
9 time. Would it not be possible to make more effective use of this space  
10 by placing necessary equipment or manuals on top of this workstation,  
11 rather than unused bookends, unused file dividers, and discarded wire?

12           The large group of boxes shown in pictures labeled supra-  
13 daytona-05 (attachment D.N. 4) and supra-daytona-10 (attachment D.N.  
14 7) clearly indicate that BellSouth is trying to cover up as much open  
15 space as possible. The space shown in this area is several times the  
16 space requested by Supra for collocation in this central office. If these  
17 boxes are already stacked in twos, how much extra space would be  
18 available if they were stacked in threes? Or in fours? Has BellSouth  
19 considered this possibility? In addition, why are these boxes in this  
20 central location, when they can very easily be transported from one  
21 location to another with a small dolly? In addition, it is my belief that the  
22 equipment frames on the right of the picture contain equipment  
23 belonging to subsidiaries of BellSouth. Similar space should be made  
24 available to collocators.



1           Picture supra-daytona-06 (attachment D.N. 5) again reveals an  
2 inefficient use of space. Here, the three beige filing cabinets pictured are  
3 clearly in the wrong place if the goal is maximum utilization of space.  
4 Does anyone in the central office access these filing cabinets from the  
5 side? Of course not, however they have been placed in such a manner  
6 that the side of the cabinets is open to all. These cabinets should be  
7 placed so that their backs are against the wall, bordered on their lateral  
8 sides by other equipment, or desks. In addition, the tops of these  
9 cabinets are appropriate for placing items that are stored loosely  
10 elsewhere, taking up other space that should be available for collocation.

11           The workstations pictured in photos supra-daytona-08  
12 (attachment D.N. 6) and supra-daytona-18 (attachment D.N. 9) are  
13 outdated, inefficient uses of space that should not be permitted in light of  
14 BellSouth's responsibility to collocate. Surely a more efficient  
15 arrangement will open up space that will assist BellSouth in its efforts to  
16 maximize space for collocation.

17           In picture supra-daytona-11(attachment D.N. 8), there is what  
18 appears to be a covered object. What is this object? Is it refuse or  
19 recycling material? Is it a fire hazard? Is it useful or necessary for the  
20 central office, and is it currently being utilized? This unknown object  
21 must be identified and moved to a more appropriate location to provide  
22 additional collocation space.

23           Two items in picture supra-daytona-20 (attachment D.N. 10)  
24 deserve mention. First, there is a box labeled "NORTEL" that should be  
25 placed elsewhere to permit more room for collocation. Next, the desk

1 and file cabinets against the far partition are in the middle of the  
2 configuration, rather than against an outer wall. The space in the middle  
3 of the central office is extremely valuable, and should not be allocated for  
4 administrative space such as this desk, which has much less  
5 access/availability requirements than collocation space. In other words,  
6 one need only access the desk from the front, while certain equipment  
7 should be accessible from at least one side.

8           The racks shown in the picture labeled supra-daytona-04  
9 (attachment D.N. 3) reveal large banks of space that are more than  
10 necessary for BellSouth's planned 2-year expansion, and should be  
11 available to collocators. It appears as if BellSouth intentionally tried to  
12 space this equipment to provide the appearance of maximum utilization.  
13 Regardless, collocators can make use of the space shown in this picture,  
14 and should be provided the opportunity to do so.

15           The large bank of equipment in picture supra-daytona-26  
16 (attachment D.N. 12) contains equipment that in my opinion can be  
17 rearranged or removed to provide greater space for collocation.

18 BOCA RATON BOCA TEECA

19           It appears as if BellSouth has permitted a subsidiary to place  
20 equipment in this central office. BellSouth should make similar space  
21 available to collocators. This leads me to question what other equipment  
22 of subsidiaries BellSouth has permitted in this central office and others.  
23 It also appears that BellSouth is making use of certain obsolete  
24 equipment that, if removed or updated, would provide additional space  
25 that could add to the space available for collocators. It is also my opinion

1 that BellSouth has attempted to reserve future space in this central office  
2 for periods of time greater than 18 months or 2 years; BellSouth should  
3 not be permitted to make such future reservations without offering such  
4 space to collocators who will make use of that space within those 18  
5 months or 2 years.

6       There are large areas of space available for collocation in the  
7 Boca Raton Boca Teeca central office. Picture supra-boca-05  
8 (attachment D.N. 13) reveals a long, wide area available for collocation.  
9 Huge banks of empty main distribution frame available for collocation are  
10 pictured in supra-boca-06 (attachment D.N. 14). If this office is truly full,  
11 it is obvious that there is a tremendous surplus of main distribution frame  
12 capacity. If not, then why did they build a central office too small to  
13 service these many lines. Once again, this central office utilizes  
14 administrative space very inefficiently, as pictured in supra-boca-18  
15 (attachment D.N. 15). Is all that space necessary for what appears to be  
16 one workstation? Surely the notebooks and single computer can be  
17 rearranged in a more efficient manner so as to permit additional space  
18 for collocation. The availability of space in the photo labeled sprint-  
19 P1010025 (attachment D.N. 16) is beyond dispute. In that picture,  
20 commission staff member Will Cox is standing or posing next to large  
21 spools of wire that should be cleared away to make room for collocation.  
22 Another example of inefficient administrative use of space, as well as  
23 empty racks in the background, are pictured in photo sprint-P1010028  
24 (attachment D.N. 17).

1           In addition, there is approximately 16,000 sq. ft. of space being  
2 inappropriately used on the second floor of this central office as office  
3 space. Is this the most efficient use of valuable central office space?  
4 Certainly this cannot be the most cost-effective method of allocating this  
5 space.

6 MIAMI PALMETTO

7           It appears as if BellSouth has permitted a subsidiary to place  
8 equipment in this central office. 300 square feet of valuable telephone  
9 central office space has been allocated to a BellSouth Subsidiary for the  
10 purpose of pay-per-view movie distribution. Two full lineups of video  
11 distribution equipment and the associated frame relay equipment in  
12 another lineup makes one question why this type of equipment should be  
13 allowed preferential collocation over an ALEC who wishes to provision  
14 basic telephony services. BellSouth should make similar space available  
15 to collocators. It also appears that BellSouth is making use of certain  
16 obsolete equipment that, if removed or updated, would provide additional  
17 space that could add to the space available for collocators. It is also my  
18 opinion that BellSouth has attempted to reserve future space in this  
19 central office for periods of time greater than 18 months or 2 years;  
20 BellSouth should not be permitted to make such future reservations  
21 without offering such space to collocators who will make use of that  
22 space within those 18 months or 2 years.

23           Again, copious quantities of space for collocation are available in  
24 the Miami Palmetto office. Picture 99-2Y-19 (attachment D.N. 18)  
25 reveals a huge area of open space, and this space can even be

1 supplemented by more efficient use of the large shelving units at the  
2 right of this picture. It does not take a careful inspection of picture 99-  
3 2Y-20 (attachment D.N. 19) to reach the conclusion that this space is  
4 currently nothing more than a junkpile for BellSouth. With little cost,  
5 BellSouth can clear this area and make it available for collocation.  
6 Picture 99-2Z-05 (attachment D.N. 20) shows a "caution" yellow ribbon  
7 that has the words "3 years growth" written on it. Other tags in the area  
8 indicate "5ESS – 4<sup>th</sup> year" These time intervals are more preferential  
9 terms than what BellSouth allows Supra to reserve for its future growth,  
10 and this space should be added to the space available to collocators in  
11 this central office. Any other action is in violation to the  
12 Telecommunications Act of 1996. Picture 99-2X-08 (attachment D.N. 21)  
13 exposes another instance of BellSouth's cluttered, inefficient use of  
14 space. The administrative space pictured in photo 99-2X-12 (attachment  
15 D.N. 22) is spread out over too large an area to be considered an  
16 efficient use of space, and should be modified to maximize available  
17 space for collocators. Another example of inefficient clutter is pictured  
18 in photo 99-2Y-01 (attachment D.N. 23). As revealed in photo 99-2Y-02  
19 (attachment D.N. 24), files spread out over large filing areas that can be  
20 condensed in a smaller area should be rearranged to provide the most  
21 efficient use of space for collocators. Poorly utilized administrative space  
22 is shown in picture 99-2Y-09 (attachment D.N. 25). Picture 99-2Y-10  
23 (attachment D.N. 26) is a perfect example of BellSouth's "clutter  
24 mentality". This is not the way to run a central office, and I am surprised  
25 at BellSouth's evidenced inability to organize and make efficient use of

1 valuable central office space. More clutter, as well as a large, open area  
2 , are depicted in photo 99-2Y-14 (attachment D.N. 27). Pictures 99-2Z-  
3 11 (attachment D.N. 28) and 99-2Z-12 (attachment D.N. 29) reveal an  
4 inefficient use of administrative space, while picture 99-2Z-17  
5 (attachment D.N. 30) reveals how BellSouth has empty racks for  
6 equipment, as well as open spaces that can be made available through  
7 the simple, inexpensive method of rearranging tables, chairs, etc.

8 Another item worth mentioning is the 100 sq. ft. of office space  
9 previously offered to Supra in this central office. This space could have  
10 been extended to the outside wall of the central office, because what is  
11 stacked in the corner that would provide this extension can be stacked  
12 elsewhere outside of the collocation space, providing the 200 sq. ft. of  
13 requested space, and additional space for other collectors in the area.

#### 14 WEST PALM BEACH GARDENS

15 It appears that BellSouth is making use of certain obsolete  
16 equipment that, if removed or updated, would provide additional space  
17 that could add to the space available for collocators. It is also my opinion  
18 that BellSouth has attempted to reserve future space in this central office  
19 for periods of time greater than 18 months or 2 years; BellSouth should  
20 not be permitted to make such future reservations without offering such  
21 space to collocators who will make use of that space within those 18  
22 months or 2 years.

23 Picture MVC-003S (attachment D.N. 31) shows another instance  
24 where BellSouth has apparently thrown or discarded items and  
25 equipment into a back corner. If this material is more efficiently stored

1 and organized, there would be additional space available to collocators.  
2 Pictures MVC-004S (attachment D.N. 32), MVC-007S (attachment D.N.  
3 33) and MVC-009S (attachment D.N. 34) all reveal large areas of space  
4 currently used in an inefficient manner for administrative and lounge use;  
5 this space should be rearranged in order to maximize available space for  
6 collocation. Pictures MVC-014S (attachment D.N.35) and MVC-017S  
7 (attachment D.N. 36) show that there is open space between currently  
8 active rows of equipment, and this space appears large enough to permit  
9 collocation. The next four pictures, MVC-020S through MVC-023S  
10 (attachments D.N. 37, 38, 39 and 40) all show large, administrative areas  
11 that can be reduced to smaller sizes in order to maximize efficient usage  
12 of valuable space, without sacrificing BellSouth's need for space for  
13 administrative purposes. The last picture of this central office, MVC-  
14 027S (attachment D.N. 41) shows a horizontal filing system. Has  
15 BellSouth explored the possibility of transforming this horizontal system  
16 into a vertical filing system? Theoretically at least, these files can be  
17 stored in a vertical manner so as to provide greater floor space for  
18 collocation. These horizontal files appear at many of the central offices  
19 at issue, and I believe BellSouth should investigate and take action to  
20 transform these files into vertical storage in an effort to make efficient  
21 use of this valuable central office space.

## 22 NORTH DADE GOLDEN GLADES

23 It appears that BellSouth is making use of certain obsolete  
24 equipment that, if removed or updated, would provide additional space  
25 that could add to the space available for collocators. It is also my opinion

1 that BellSouth has attempted to reserve future space in this central office  
2 for periods of time greater than 18 months or 2 years; BellSouth should  
3 not be permitted to make such future reservations without offering such  
4 space to collocators who will make use of that space within those 18  
5 months or 2 years.

6 Inefficient use of administrative space is revealed in pictures  
7 P1010012 (attachment D.N. 42) and P1010014 (attachment D.N. 43). A  
8 large room, perfect for collocation, appears to be used by BellSouth as a  
9 clutter garage, pictured in Ndgg-25 (attachment D.N. 44). If BellSouth  
10 claims that they use this space for an "unpacking area", then why do they  
11 keep so many boxes and other apparent refuse in that area? In pictures  
12 MVC-005S (attachment D.N. 45), MVC-008S (attachment D.N. 46) and  
13 MVC-011S (attachment D.N. 47), additional examples of inefficient use  
14 of administrative areas are evident. There is a large open space for  
15 collocation available in this central office as depicted in pictures MVC-  
16 013S (attachment D.N. 48), espire-ndgg-14a (attachment D.N. 49),  
17 espire-ndg-20a (attachment D.N. 50). Pictures espire-ndgg-7a  
18 (attachment D.N. 51) and espire-ndgg-8a (attachment D.N. 52) also  
19 provide examples of administrative space that can be rearranged to  
20 provide additional space for collocators.

#### 21 LAKE MARY

22 It appears as if BellSouth has permitted a subsidiary to place  
23 equipment in this central office. BellSouth should make similar space  
24 available to collocators. This leads me to question what other equipment  
25 of subsidiaries BellSouth has permitted in this central office and others.



1 It also appears that BellSouth is making use of certain obsolete  
2 equipment that, if removed or updated, would provide additional space  
3 that could add to the space available for collocators. It is also my opinion  
4 that BellSouth has attempted to reserve future space in this central office  
5 for periods of time greater than 18 months or 2 years; BellSouth should  
6 not be permitted to make such future reservations without offering such  
7 space to collocators who will make use of that space within those 18  
8 months or 2 years.

9           There are a number of areas in the Lake Mary central office where  
10 space is inefficiently used. First, the area depicted in attached picture  
11 labeled Lake Mary 99-2A-01 (attachment D.N. 53) is an administrative  
12 area where computers and notebooks are spread horizontally rather than  
13 vertically; vertical stacking is a reasonable method of space allocation  
14 that would be much more efficient and provide much more space for  
15 collocation. Another inefficiently used area is a lounge area, depicted in  
16 picture labeled Lake Mary 99-2A-24 (attachment D.N. 61) that is  
17 inefficient because it is too large for its intended use. This expansive  
18 area is adjacent to two tables that are next to the 86 sq. ft. air handling  
19 unit; one of these tables is apparently used for filing, however the other  
20 table (approximately 4' x 6') is merely cluttered with junk and apparently  
21 serves no purpose. When asked what the table space is used for,  
22 BellSouth employee Bloomer stated "I don't know, but future air  
23 conditioning will be placed in this space." This contradicts BellSouth's  
24 space assessment worksheet for the Lake Mary office, as that worksheet

1 does not indicate any reservation of future space for air conditioning  
2 units.

3           Directly across from these tables, adjacent to the lounge area, are  
4 empty racks of equipment and empty space that can be utilized more  
5 efficiently, and as well contain more space than BellSouth will need in  
6 the next two years for expansion, as depicted in photos labeled Lake  
7 Mary 99-2A-09 (attachment D.N.55), 99-2A-12 (attachment D.N. 56), 99-  
8 2B-15 (attachment D.N. 57), and 99-2B-20 (attachment D.N. 64).

9           Adjacent to the 161 sq. ft. storeroom is an administrative desk that  
10 can be placed elsewhere in the central office to maximize efficiency. The  
11 161 sq. ft. storeroom itself is poorly organized (see attached pictures  
12 labeled Lake Mary 99-2A-15 through 18 (attachment D.N. 57-60)). Are  
13 all these items necessary for the Lake Mary office? Perhaps this space  
14 could be more efficiently utilized by storing these items elsewhere in the  
15 central office, or offsite, allowing collocators to stack equipment in the  
16 storeroom.

17           In addition, the 50 sq. ft. "occ. admin." storage room next to the  
18 janitor's closet is poorly organized, and should be considered available  
19 for collocation.

20           In the middle area consisting of 243 sq. ft. reserved for a future  
21 switch, the pictures of that area (labeled Lake Mary 99-2A-05  
22 (attachment D.N. 54) and 99-2B-04 (attachment D.N. 62)) indicate that  
23 much more space is available than BellSouth will need in the next two  
24 years for switch expansion.

1 Adjacent to the lounge area are two tables that are next to the 86  
2 sq. ft. air handling unit; one of these tables is apparently used for filing,  
3 however the other table (approximately 4' x 6') is merely cluttered with  
4 junk and apparently serves no purpose. When asked what the table  
5 space is used for, BellSouth employee Bloomer stated "I don't know, but  
6 future air conditioning will be placed in this space." This contradicts  
7 BellSouth's space assessment for the Lake Mary office, as their  
8 assessment does not indicate any reservation of future space for air  
9 conditioning units.

10

11 **ISSUE 4: IF SPACE IS CONSIDERED AVAILABLE IN ANY OF**  
12 **THESE CENTRAL OFFICES, IS THE SPACE SUFFICIENT FOR**  
13 **PHYSICAL COLLOCATION?**

14 Yes, if space is considered available in any of these central  
15 offices, I am confident that we can make use of that space for physical  
16 collocation.

17

18 **ISSUE 5: SHOULD BELLSOUTH'S PETITIONS FOR WAIVER AND**  
19 **TEMPORARY WAIVER OF THE REQUIRMENT TO PROVIDE**  
20 **PHYSICAL COLLOCATION IN THE FOLOWING CENTRAL OFFICES**  
21 **BE GRANTED?**

22 For the reasons discussed in this testimony, BellSouth's petitions  
23 for waiver and temporary waiver of the requirement to provide physical  
24 collocation should not be granted.