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April 12, 1999

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Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL and
9801250-TL

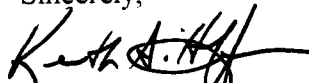
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc./TCG South Florida are the original and one copy of the Direct Testimony of Scott Stinson.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Kenneth A. Hoffman

KAH/rl

Enclosures

cc: All Parties of Record

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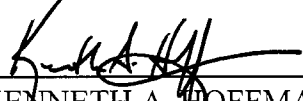
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Sincerely,

Kenneth A. Hoffman
Kenneth A. Hoffman

KAH/rl

Enclosures

cc: All Parties of Record

Trib.3

per DN 06056-99

DOCUMENT NUMBER-DATE

04580 APR 12 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 980946-TL
Daytona Beach/Port Orange Central Office)
_____)

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 980947-TL
Boca Raton Boca Teece Central Office)
_____)

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 980948-TL
Miami Palmetto Central Office)
_____)

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 981011-TL
West Palm Beach Gardens Central Office)
_____)

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 981012-TL
North Dade Golden Glades Central Office)
_____)

In re: BellSouth Telecommunications,)
Inc.'s Petition for Temporary Waiver for) Docket No. 981250-TL
Lake Mary Main Central Office)
_____)

DIRECT TESTIMONY

OF

SCOTT STINSON

ON

BEHALF OF

TELEPORT COMMUNICATIONS GROUP INC.

AND

TCG SOUTH FLORIDA

APRIL 12, 1999

DOCUMENT NUMBER-DATE

04680 APR 12 88

FPSC-RECORDS/REPORTING

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**
2 A. My name is Scott Stinson. My business address is 1200 Peachtree Street,
3 NE, Atlanta, Georgia 30309-3579.
4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**
5 A. I am employed by AT&T as a District Manager in Law & Government
6 Affairs, serving as a regulatory witness to support initiatives such as opening
7 the local telephone markets to competition.
8 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**
9 A. I am testifying on behalf of Teleport Communications Group and its Florida
10 affiliate, TCG South Florida ("TCG"). TCG was acquired by AT&T in July
11 of 1998.
12 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND**
13 **PROFESSIONAL BACKGROUND AND EXPERIENCE.**
14 A. I have worked for AT&T and for its former affiliate Bell Laboratories since
15 1985, holding various positions in Research and Design (R&D), Central
16 Office Operations, Sales, Customer Service, and Engineering. I have a
17 Bachelor of Science in Electrical Engineering from the Georgia Institute of
18 Technology and a Masters in Business Administration from Kennesaw State
19 University.
20 With Bell Laboratories, I performed R&D from 1985-1989. I
21 interfaced Transmission Impairment Measuring Sets used to test Digital Loop
22 Carrier lines from Subscriber Loop Carrier systems using the IEEE 488
23 standard interface bus specifications. I wrote phase-lock-loop engineering
24 software for synchronization circuitry on satellite transponders. I wrote
25 controlling software and designed the PC-to-robot interfaces for an

1 automation line of Seiko XY-3000 robots used to build micro-controllers. I
2 converted software protocols and designed PC interfaces for the Fiber Optic
3 Ribbon Test bench in the Bell Laboratories Fiber Testing Plant.

4 With AT&T from 1989-1991, I served in operations as a line
5 supervisor. I led a team to develop the process and tools used nationally
6 across AT&T for overhead Central Office restoration. I also led the state of
7 Georgia AT&T Operations Quality Council and had responsibility for two
8 central offices. Later, after leaving and then returning to operations in 1996,
9 I led the national operations production planning district where we developed
10 and utilized production models to increase operational efficiency in the
11 approximately 5000 member central office work force. As Network
12 Provisioning District Manager, in 1998, I led the data reporting and all
13 performance improvement initiatives for AT&T's network provisioning from
14 design centers through to the central offices. This included personally
15 leading initiatives such as the reduction of T1 impairments due to network
16 mismatches between AMI and B8ZS T1 line coding.

17 As a sales manager, in 1991-1992, I led technical sales efforts to
18 affiliates for transmission and packet based products.

19 As customer service manager from 1992- 1993, I led the interface
20 between customers and the three lines of product delivery in Network
21 Systems: Engineering, Manufacturing and Installation.

22 As engineering manager from 1994-1995, my technical district
23 designed the cabling and racking infrastructure, the transmission line-up and
24 the power requirements for central office telephony.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
2 **PROCEEDING?**

3 A. First, I will address BellSouth’s obligation to provide physical collocation
4 under the federal law and FCC orders, and the factors the Commission should
5 consider in determining whether there is space available for physical
6 collocation at BellSouth’s North Dade Golden Glades Central Office
7 (“Golden Glades”) specifically and at the other five BellSouth central offices
8 involved in these consolidated dockets generally. I will then describe my
9 observations and explain my conclusion that space is available for physical
10 collocation at Golden Glades.

11 **Q. COULD YOU SUMMARIZE YOUR CONCLUSIONS?**

12 A. I have concluded that 4,075 square feet of space is available for physical
13 collocation in Golden Glades. Specifically: immediately available enclosed
14 inside space equals 1,100 square feet; readily available cageless collocation
15 space equals 1,475 square feet; and the equivalent of an additional 1,500
16 square feet is readily available as the sum of empty reserved bay locations
17 identified by BellSouth in Exhibit _ (SS-1).

18 This available space does not include the 228 square feet of virtual
19 collocation space planned by BellSouth, which may be partially converted to
20 physical collocation space depending on needs of collocators. It also does
21 not include contiguous space such as external controlled environmental vaults
22 adjacent to the building, or remote collocations.

23 Additionally, space generally is available in all of the central offices
24 in this docket. Tours and floor plans revealed empty bay line-ups,
25 administrative offices, excess space reservation by BellSouth, and inefficient

1 arrangements of workstations in areas identified by BellSouth as occupied
2 by equipment, that could be used for physical collocation.

3 **Q. WHAT IS PHYSICAL COLLOCATION AND WHAT IS ITS**
4 **IMPORTANCE TO OPENING LOCAL TELEPHONE MARKETS TO**
5 **COMPETITION?**

6 A. Physical collocation is an important method of establishing interconnection
7 and accessing unbundled network elements (“UNEs”) for the successful
8 development of facilities-based competition. Physical collocation enables a
9 competitive local carrier to locate its own equipment within the Incumbent
10 Local Exchange Carrier’s (“ILEC’s”) central offices. If physical collocation
11 is improperly denied or is not provided in an efficient and timely manner, no
12 carrier can have a fair opportunity to offer service competitive to that offered
13 by the ILEC.

14 The importance of physical collocation is reflected in the
15 Telecommunications Act of 1996 (“the Act”), which identifies “the duty to
16 provide physical collocation” as a specific ILEC obligation, along with such
17 essential elements of competition as interconnection and access to unbundled
18 elements. 47 U.S.C. §251(c). As the FCC has stated, “It is clear that the
19 success of efficient competitive entry through interconnection depends on the
20 interconnectors’ ability to obtain access to LECs’ transmission facilities at
21 rates that reflect costs and under terms and conditions that are just and
22 reasonable.” Second Report and Order, *In re: Local Exchange Carriers’*
23 *Rates, Terms and Conditions for Expanded Interconnection Through*
24 *Physical Collocation for Special Access and Switched Transport (“Expanded*
25 *Interconnection”)*, CC Docket No. 93-162, FCC 97-208 (June 13, 1997).

1 Collocation is essential to the ability of interconnectors to obtain access to
2 BellSouth's facilities.

3 Physical collocation allows an Alternative LEC ("ALEC") to own,
4 install and maintain its own equipment without interference from the ILEC.
5 Importantly, this allows an ALEC to have much greater control over the
6 quality of service it provides, thereby ensuring high quality, which is
7 essential for a new entrant to be successful in the telecommunications
8 marketplace.

9 **Q. PLEASE EXPLAIN YOUR REFERENCE TO EQUIVALENT SPACE.**

10 A. Equivalent space is the amount of space that ALECs would have needed
11 before the FCC's recent Advanced Services Rules required ILECs to provide
12 cageless collocation. Equivalent space involves a comparison between the
13 amount of space requested in this docket under BellSouth's rule that all
14 physical collocation space had to be enclosed, and the amount of space
15 available under the new "cageless" rules. For example, if an ALEC requested
16 200 square feet to collocate 14 bays under the earlier rule, that ALEC may
17 now request 14 cageless bays within BellSouth's equipment line-ups.
18 According to BellSouth floor plans, each reserved bay within BellSouth's
19 equipment line-up is reserved for three and one-half square feet. So the
20 request for 14 bays would no longer require 200 square feet, but rather
21 would require 14 x 3.5 or 49 square feet.

22 **Q. IS VIRTUAL COLLOCATION AN ADEQUATE SUBSTITUTE FOR**
23 **PHYSICAL COLLOCATION?**

24 A. No. Virtual collocation imposes two major burdens on interconnectors,
25 which act as competitive handicaps. First, BellSouth has a policy requiring

1 that competing carriers turn over ownership of virtually collocated equipment
2 for the nominal sum of \$1.00, in the form of a lease. Under this arrangement,
3 an ALEC is unable to access the equipment for provisioning or maintenance.
4 Instead, BellSouth insists on performing these functions. Removing the
5 ALEC's ability to administer these services removes the ALEC's ability to
6 control customer service. Further, once the ALEC has turned over control
7 of the "virtually collocated" equipment, the parties must develop elaborate,
8 and often unsatisfactory, procedures for the ILEC to perform these services,
9 increasing ALEC costs and decreasing efficiency.

10 This is not the only adverse effect of BellSouth's policy. The
11 introduction of each new type, or even brand, of equipment requires the
12 ALEC to train ILEC personnel in its use because BellSouth insists upon
13 performing maintenance and repair services on virtually collocated
14 equipment. This training expense issue may effectively limit an ALEC to
15 using the same equipment used by the ILEC, even if such equipment would
16 otherwise not be optimal for the ALEC. This is not only a slow and costly
17 process, but it also eliminates much of the incentive for ALECs to innovate.
18 The inefficiency and inconvenience are compounded by the fact that the
19 ILEC charges the interconnecting ALEC for these "services." Virtual
20 collocation thus not only prevents ALECs from providing as high a quality
21 of service as that proved by the ILEC, but also prevents them from rapidly
22 introducing new technology into their networks.

23 **Q. WHAT IS BELLSOUTH'S OBLIGATION TO MAKE PHYSICAL**
24 **COLLOCATION SPACE AVAILABLE?**

1 A. BellSouth's obligation is described by the Act, the FCC's Local Competition
2 Order issued August 1, 1996 (*"Local Competition Order"*), and the FCC's
3 recent Advanced Services Rules released March 31, 1999. I will discuss each
4 of them.

5 The Act and the Local Competition Order

6 Among the obligations that the Act establishes for ILECs is the duty to
7 provide physical collocation to competitors. Specifically, Section 251(c)(6)
8 of the Act imposes:

9 The duty to provide, on rates, terms, and conditions that are just,
10 reasonable, and nondiscriminatory, physical collocation of equipment
11 necessary for interconnection or access to unbundled network
12 elements at the premises of the local exchange carrier, except that the
13 carrier may provide for virtual collocation if the local exchange
14 carrier demonstrates to the State commission that physical collocation
15 is not practical for technical reasons or because of space limitations.
16 47 U.S.C. §251(c)(6).

17
18 The Act and the Local Competition Order thus require BellSouth to provide
19 physical collocation unless it can "demonstrate" to the Commission that the
20 requested physical collocation is "not practical . . .because of space
21 limitations." The Act also requires BellSouth to provide interconnection that
22 is "at least equal in quality to that provided by the local exchange carrier to
23 itself," and access to unbundled network elements at any technically feasible
24 point "on rates, terms, and conditions that are just, reasonable, and
25 nondiscriminatory in accordance with the terms and conditions of the
26 agreement and requirements of [section 251] and section 252. 47 U.S.C.
27 §§251(c)(2)(C), 251(c)(3); *Local Competition Order*, ¶¶602, 603. Therefore,
28 BellSouth is required to demonstrate a lack of available, usable space in the
29 central office based on a series of factors which I will explain in my
30 testimony. BellSouth also must provide physical collocation and

1 interconnection at parity to that it provides itself or its affiliates and on a
2 nondiscriminatory basis.

3 The FCC expanded on the "space limitations" exception to the
4 collocation obligation in its Local Competition Order, cautioning that
5 "incumbent LECs have the incentive and capability to impede competitive
6 entry by minimizing the amount of space that is available for collocation by
7 competitors." *Local Competition Order*, ¶585. Accordingly, the FCC
8 adopted filing requirements and suggested guidelines for state commission
9 review to ensure that ILECs cannot use the "space limitations" exception to
10 impede competitive entry:

11 [W]e require that incumbent LECs provide the state
12 commission with detailed floor plans or diagrams of any
13 premises where the incumbent alleges that there are space
14 constraints. Submission of floor plans will enable state
15 commissions to evaluate whether a refusal to allow physical
16 collocation on the grounds of space constraints is justified.
17 We also find that the approach detailed by AT&T in its July
18 12 *Ex Parte* submission to be useful and believe that state
19 commissions find it a valuable guide. *Id.* ¶602; *accord* 47
20 C.F.R. §51.321(f).

21
22 The AT&T submission referenced by the FCC would
23 require the specific identification of the space on
24 ILEC premises that is used for various purposes, and
25 specific plans for rearrangement/expansion and
26 identification of steps taken to avoid exhaustion.

27
28 In the Local Competition Order, the FCC elaborated on the ILECs'
29 duty to provide physical collocation as specified in the Act:

30 1) an incumbent ILEC shall make space available within or on its
31 premises to requesting telecommunications carriers on a first-come,
32 first-served basis, provided, however, that the incumbent LEC shall
33 not be required to lease or construct additional space to provide for
34 physical collocation when existing space has been exhausted;

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36 (2) to the extent possible, an incumbent LEC shall make contiguous
37 space available to requesting telecommunications carriers that seek
38 to expand their existing collocation space;

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(3) when planning renovations of existing facilities or constructing or leasing new facilities, an incumbent LEC shall take into account projected demand for collocation of equipment;

(4) an incumbent LEC may retain a limited amount of floor space for its own specific future uses, provided, however, that the incumbent LEC may not reserve space for future use on terms more favorable than those that apply to other telecommunications carriers seeking to reserve collocation space for their own use.
47 C.F.R. §51.323(f)(1)-(4).

These specific requirements clearly limit the reliance an ILEC may place upon the “space limitations” exception to its physical collocation obligation.

FCC Advanced Services Rules

On March, 18, 1999, the FCC adopted rules intended to “strengthen collocation requirements and reduce the costs and delays associated with collocation.” FCC News Release, “FCC Adopts Rules to Promote the Deployment of Advanced Telecommunications Services, ” CC Docket No. 98-147, page 1. These rules further explain an ILECs’ obligation to provide physical collocation to ALECs:

Incumbent LECs must make available to requesting competitive LECs shared cage and cageless collocation arrangements. Moreover, when collocation is exhausted at a particular LEC location, incumbent LECs must permit collocation in adjacent controlled environmental vaults or similar structures to the extent technically feasible.

A collocation method used by one incumbent LEC or mandated by a state commission is presumptively technically feasible for any other incumbent LEC.

Incumbent LECs may adopt reasonable security measures to protect their central office equipment.

Incumbent LECs may not require competitive LEC equipment to meet more stringent safety requirements than those the incumbent LEC imposes on its own equipment.

Incumbent LECs must permit competitors to collocate all equipment used for interconnection and/or access to unbundled network elements (UNEs), even if it includes a “switching” or enhanced

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services function, and incumbent LECs cannot require that the switching or enhanced services functionality of equipment be disengaged.

Incumbent LECs must permit a competitive LEC to tour the entire central office in which that competitive LEC has been denied collocation space. Incumbent LECs must provide a list of all offices in which there is no more space. Incumbent LECs must remove obsolete, unused equipment, in order to facilitate the creation of additional collocation space within a central office.

The collocation rules set forth in the Order serve as minimum standards, and permit any state to adopt additional requirements.

First Report and Order and Further Notice of Proposed Rulemaking, *In re: Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147 (rel. March 31, 1999), ¶ 8 ("Advanced Services Rules").

Clearly, the FCC intends to limit ILECs' ability to escape, on the grounds of space limitations, their obligation to provide physical collocation.

Q. WHAT FACTORS SHOULD THIS COMMISSION CONSIDER TO DETERMINE IF SPACE IS AVAILABLE FOR PHYSICAL COLLOCATION IN BELL SOUTH CENTRAL OFFICES?

- A. This Commission should examine:
- 1) The amount and arrangement of space occupied or planned for BellSouth affiliates. The Commission should not allow BellSouth to reserve for its affiliate more than 25% of the total collocation space, or 400 square feet, whichever is less.
 - 2) Whether there is non-essential administrative and recreational space that could be reclaimed. Reclaiming this space for collocation is consistent with the FCC's Advanced Services Rules, which require ILECs to remove obsolete or unused equipment to "facilitate the creation of additional collocation space within a central office". Advanced Services Rules, at ¶60.

- 1 3) The terms under which BellSouth reserves space for its own future use.
2 The Commission should ensure that BellSouth may not reserve space for
3 future use on terms more favorable than those that apply to ALECs seeking
4 to reserve collocation space for their own use. If there is demand for
5 collocation space from ALECs, the Commission should limit BellSouth's
6 self-reservation of space to no more than one year before it will be used.
- 7 4) The expected use of reserved space, to ensure compliance with the FCC's
8 rules and orders. Further, the Commission should not allow BellSouth to
9 reserve any space in central offices for future interLATA equipment, since
10 it has no current legal right to offer such services, and thus should disallow
11 the request for 5,000 square feet requested in Golden Glades on behalf of
12 BellSouth Long Distance.
- 13 5) The number of existing bays that BellSouth plans to remove or retire, as
14 well as the cumulative affect on floor and aisle spaces after BellSouth
15 removes all obsolete and unused equipment from the premises and
16 reconfigures equipment to accommodate additional collocation requests.
- 17 6) The history of growth/reduction by equipment categories (e.g. number of
18 switching bays added the past three years, number of toll bays removed or
19 retired in place past three years and resulting space implications) to ensure
20 that BellSouth's projected space needs are reasonable.
- 21 7) A floor plan that includes (a) size of areas, location of bays, foot print
22 dimensions drawn, specific equipment names labeled, and percent utilization
23 of each bay – e.g. a transmission bay with 25% utilization either due to empty
24 shelves or low utilization of a fully equipped bay would show 25% on the
25 floor plan in the bay's location; (b) the locations, size and use of all

1 administrative, storage or other areas not containing network equipment; (c)
 2 the locations, size and projected use of all areas reserved for future growth
 3 and the planned date for use of that space; (d) the locations and size of areas
 4 occupied by equipment which will be retired – including retired in place; and
 5 (e) any other space in the building not described under (a), (b), (c), or (d) to
 6 provide adequate means to audit BellSouth’s claims of space exhaust.
 7 8) Plans and dates for building arrangements, additions, or other
 8 improvements which will add space to determine if future BellSouth plans
 9 will alleviate any of the claimed exhaust; and
 10 9) Results of a Central Office tour in which ALECs have participated,
 11 including ALEC testimony and Commission Staff audit reports.

12 **Q. UTILIZING THE ABOVE FACTORS, HOW MUCH SPACE IS**
 13 **AVAILABLE IN GOLDEN GLADES?**

14 A. There is a total of 4,075 square feet available in Golden Glades. This total
 15 is approximately twice as much as the total amount requested by ALECs,
 16 excluding the request for 5,000 square feet by BellSouth Long Distance. The
 17 spaces referenced below are shown in Exhibit __ (SS-1), BellSouth’s floor
 18 plan for the two existing floors in Golden Glades. The 4,075 square feet of
 19 available space is broken down as follows:

20	space 1	1 st floor pump room (future elevator)	120 square feet
21	space 2	1 st floor manager’s office	100 square feet
22	space 3	1 st floor lounge	259 square feet
23	space 4	1 st floor storage room	186 square feet
24	space 5	1 st floor restoration work area	341 square feet
25	space 6	2 nd floor CBT training	93 square feet

1	space 7	1 st floor receiving and expecting room	398 square feet
2	space 8	1 st floor unusable	389 square feet
3	space 9	1 st floor plug-ins in open space	450 square feet
4	space 10	1 st floor near cable vault in "occupied" toll	550 square feet
5	space 11	1 st floor STP monitoring & admin	120 square feet
6	space 12	1 st floor switch and toll monitor & admin	330 square feet
7	space 13	reserved future switch (both floors)	all identified spaces
8	space 14	reserved future toll (both floors)	all identified spaces
9	space 15	106 empty bays in occupied space	1,500 equivalent square
10			feet

11 Floor plans alone can be deceiving. BellSouth's floor plans, for example,
 12 show space is "occupied" ("OCC") with equipment such as OCC Toll or OCC
 13 Switch; however, I found this space to also include desks, tub files, or a
 14 technician with a terminal.

15 **Q. HOW MUCH OF THE 4,075 SQUARE FEET OF SPACE IS**
 16 **IMMEDIATELY AVAILABLE ENCLOSED (CAGED OR WALLED)**
 17 **INSIDE SPACE?**

18 A. There is 1,100 square feet of space immediately available for enclosed (caged
 19 or walled) physical collocation as described in spaces 1-6 above. Space 1 is
 20 not occupied, although floor plans show a future elevator in this area. Even
 21 if a third floor was to be built, BellSouth could plan and gain permits for an
 22 external elevator at the same time it plans and permits construction of new
 23 floors.

24 Space 2, the manager's office, can be relocated to an empty space
 25 within the central office floor plan in "occupied" space which as stated before

1 often is inefficiently occupied by desks, tub files, or other non-equipment
2 uses. Alternatively, the manager's office now located in space 2 could be
3 moved to a nearby central office used by the manager or to another nearby
4 BellSouth building.

5 The lounge need not be located in Space 3. Any of the free spaces
6 within the central office can be utilized for a lounging area, freeing this
7 enclosed space for physical collocators who will still desire enclosed
8 collocation in lieu of cageless collocation. Partitions could even be added in
9 empty areas within the open space in "occupied space" to enclose a lounge
10 area, if necessary.

11 Space 4, the storage room, is sparsely used. Empty boxes were on
12 some shelves. Some shelves had a few reams of paper occupying the entire
13 shelf. Approximately 1/5 of this space is needed for the amount of space
14 actually occupied for useful storage and can be found in numerous open
15 spaces in the building.

16 Space 5, the restoration work area, is unique to this central office. No
17 similar restoration area was observed in other central offices. This space
18 therefore is immediately available. In fact, BellSouth stated in the tour that
19 this space would be used to store plug-ins in the future and would no longer
20 be used for restoration. However, the plug-ins can be stored in spaces along
21 the open central office walls, freeing this spaced for enclosed physical
22 collocation.

23 Space 6, an area for computer based training, also was not observed
24 in other offices and is immediately available for collocation. BellSouth does

1 not house this function in other central offices, and has not shown that it
2 requires this space in Golden Glades.

3 **Q. HOW MUCH OF THE 4,075 SQUARE FEET OF SPACE**
4 **REPRESENTS PHYSICAL SPACE READILY AVAILABLE FOR**
5 **CAGELESS PHYSICAL COLLOCATION?**

6 A. There is 1,475 square feet of physical space readily available for cageless
7 physical collocation. In space 7, the receiving and expecting room, five feet
8 by 21 feet, or approximately 100 square feet, are available to build cageless
9 physical collocation space within the receiving and expecting room. Per
10 space 7 as shown in Exhibit __ (SS-1), this five foot by 21 foot space can be
11 carved out of the receiving room. An aisle the size of the outside door
12 opening would be available to move equipment and a receiving room would
13 still exist consistent with the size of the receiving room on the second floor.

14 Space 8 consists of 389 square feet that BellSouth labels 'unusable'.
15 The BellSouth employee who guided the parties' tour through the Golden
16 Glades central office stated that the nearby fire exit requires a four foot aisle
17 and that the space also must be left open for air handling purposes. However,
18 the space is ten and one-half feet. If four feet are used for the aisle, and no
19 air blocking wall is used, then six and one-half feet by nineteen and one-half
20 feet -- more than 125 square feet -- are available for cageless collocation, as
21 shown on Exhibit __ (SS-1).

22 Space 9 is adjacent to Space 8 and consists of 450 square feet sparsely
23 used for plug-in storage and administration. This space is shown as
24 "occupied" equipment space, but is readily usable for collocation. Sparsely
25 used, large and open areas like this should be made available for collocation

1 when space is available elsewhere in smaller spaces, as it is in this office.
2 This space is more appropriate for cageless or non-wall caged collocation
3 than walled collocation due to proximity to the air handling unit and the need
4 for air circulation. The entire plug-in operation can be moved to free spaces
5 within the building. Indeed, only minimal space along the building's walls
6 or in other open space within the "occupied" or reserved areas would be
7 required to house the plug-in storage and administration. Plug-in storage,
8 which is simply fire proof cabinets which house extra circuit packs and a PC
9 or the like for an inventory system, is easy to move since no central office
10 wires or circuits would be disrupted. This is evidenced by the fact that,
11 according to the tour guide, the plug-in storage would be moved shortly.

12 Space 10 houses technician work space. This space is occupied by six
13 or seven older terminals which easily could be replaced by an up to date, off-
14 the-shelf terminal emulator running on one or two computers. One computer
15 could emulate all the terminals, but the office may desire to have two
16 technicians working simultaneously. The one computer running a terminal
17 emulator program can fit in another space along the wall or within the
18 equipment line-up, and the various papers and binders can be stored in the
19 same manner along the walls of the central office near this area. This space
20 then can offer 350 square feet for collocation leaving 200 feet for access to
21 the cable vault shown in Exhibit __ (SS-1).

22 Space 11, STP 120 square feet, is enclosed and is utilized for remote
23 administration of the Signal Transfer Point ("STP"). This space can be
24 moved within the "occupied" switch area or along the wall or in a portion of
25 the space reserved for future, or consolidated with the other STP

1 administrative area. Likewise, on the second floor, in space 12, 330 square
2 feet can be consolidated into the work area just below space 12, freeing all
3 330 square feet. Again, all that is needed is an off-the-shelf terminal
4 emulator running on a PC, to replace the functionality of the terminals in the
5 other stations.

6 **Q. HOW MUCH OF THE 4,075 SQUARE FEET OF SPACE IS**
7 **ADDITIONAL EQUIVALENT SPACE READILY AVAILABLE FOR**
8 **CAGELESS PHYSICAL COLLOCATION?**

9 A. There is approximately 1,500 square feet of equivalent space readily available
10 for cageless physical collocation. The 106 empty and reserved bays
11 identified on the floor plan can be used for cageless collocation and would
12 equate to requests of equivalently 1,500 square feet of enclosed physical
13 collocation as follows: 14 bays will fit in 200 square feet of enclosed space;
14 therefore the 106 bays divided by 14 bays multiplied by 200 square feet
15 equals approximately 1,500 square feet. In fact, approximately 75% of the
16 2000 square feet requested by collocators could be satisfied solely with this
17 1,500 square feet if all collocators used cageless collocation.

18 **Q. HAVE YOU INCLUDED OUTSIDE ADJACENT COLLOCATION**
19 **SPACE IN YOUR ANALYSIS?**

20 A. No. Outside adjacent collocation space is defined as space outside the
21 exterior walls of the central office along the perimeter of the building.
22 Outside adjacent collocation space would be limited to space along the
23 perimeter of the building not blocked by ordinances, codes, easements or
24 other lawful restrictions, I have not included outside adjacent collocation
25 space in the above calculations.

1 **Q. WHAT FACTORS SHOULD THIS COMMISSION CONSIDER IN ITS**
2 **PROCESS TO ALLOCATE SPACE AVAILABLE FOR PHYSICAL**
3 **COLLOCATION?**

4 A. In any BellSouth location where BellSouth has denied a request for physical
5 collocation within the preceding three years (a period where a requestor may
6 still be interested in the space), any newly available collocation shall first be
7 offered to the carriers whose request for physical collocation were denied,
8 beginning with the first such denial.

9 Only reasonable space requests should be honored. The 5000 square
10 feet requested in Golden Glades by the first requestor should be limited to
11 400 square feet, to be in line with other requestors.

12 BellSouth must scan all offices by September 18, 1999, six months
13 after the Advanced Services Rules adopted March 18, 1999 which require the
14 scan. The report of the scan would be list all offices for which BellSouth
15 wants to request a waiver. The scan must be updated 10 days after space
16 becomes available in any office. This scan would allow potential collocators
17 to plan their collocations based upon some advance knowledge of
18 availability, in contrast to the current process which is a shot in the dark for
19 the first collocator to any BellSouth central office.

20 BellSouth must not require ALECS to reapply for space that becomes
21 available. Reapplication would allow BellSouth to start the clock over and
22 wait another 30 days, per its Collocation Handbook, before offering physical
23 collocation space. Instead, BellSouth should respond to applicants
24 immediately after space becomes available to offer them the new space.

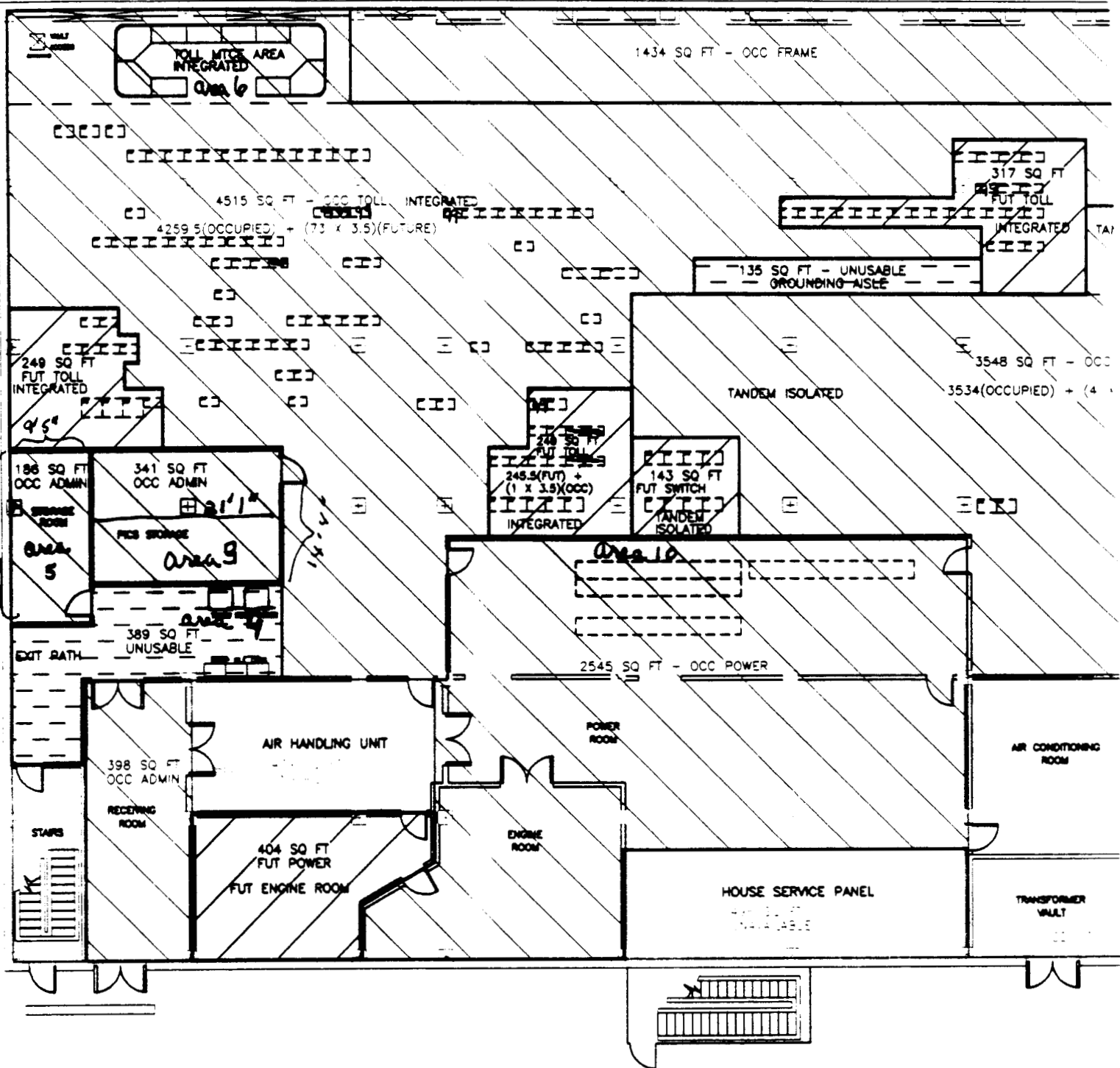
1 If BellSouth improperly denied a request for physical collocation in
2 a central office where the Commission determines space is available,
3 BellSouth should be responsible for all of the costs associated with migrating
4 a virtual collocation arrangement to a physical collocation arrangement and
5 any additional costs related to BellSouth's initial improper denial. Such a
6 policy would put an ALEC near the same position it would have been in had
7 BellSouth initially and justly offered space and would incent BellSouth to
8 offer space to ALECs when the space is actually available.

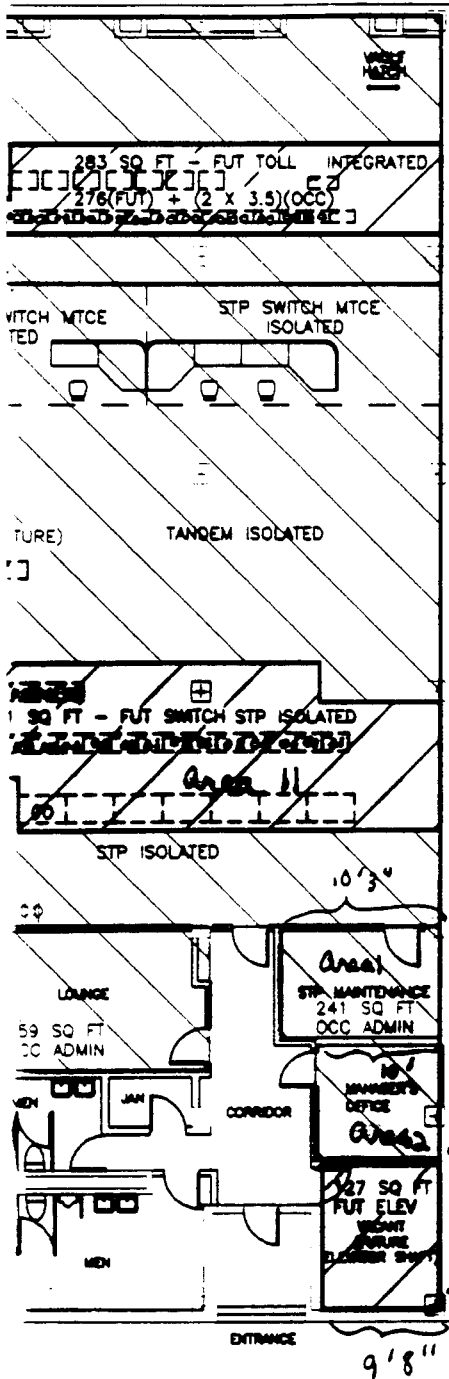
9 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

10 A. The equivalent of 4,075 square feet of physical collocation space is available
11 in BellSouth's Golden Glades central office. BellSouth is obligated to
12 provide this space to TCG and other parties who have requested space.
13 Administrative spaces and the inefficient use of space hide square footage
14 that otherwise would be available for physical collocation and which should
15 be utilized to provide ALECs the ability to gain access to interconnection or
16 unbundled network elements.





17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A. Yes.



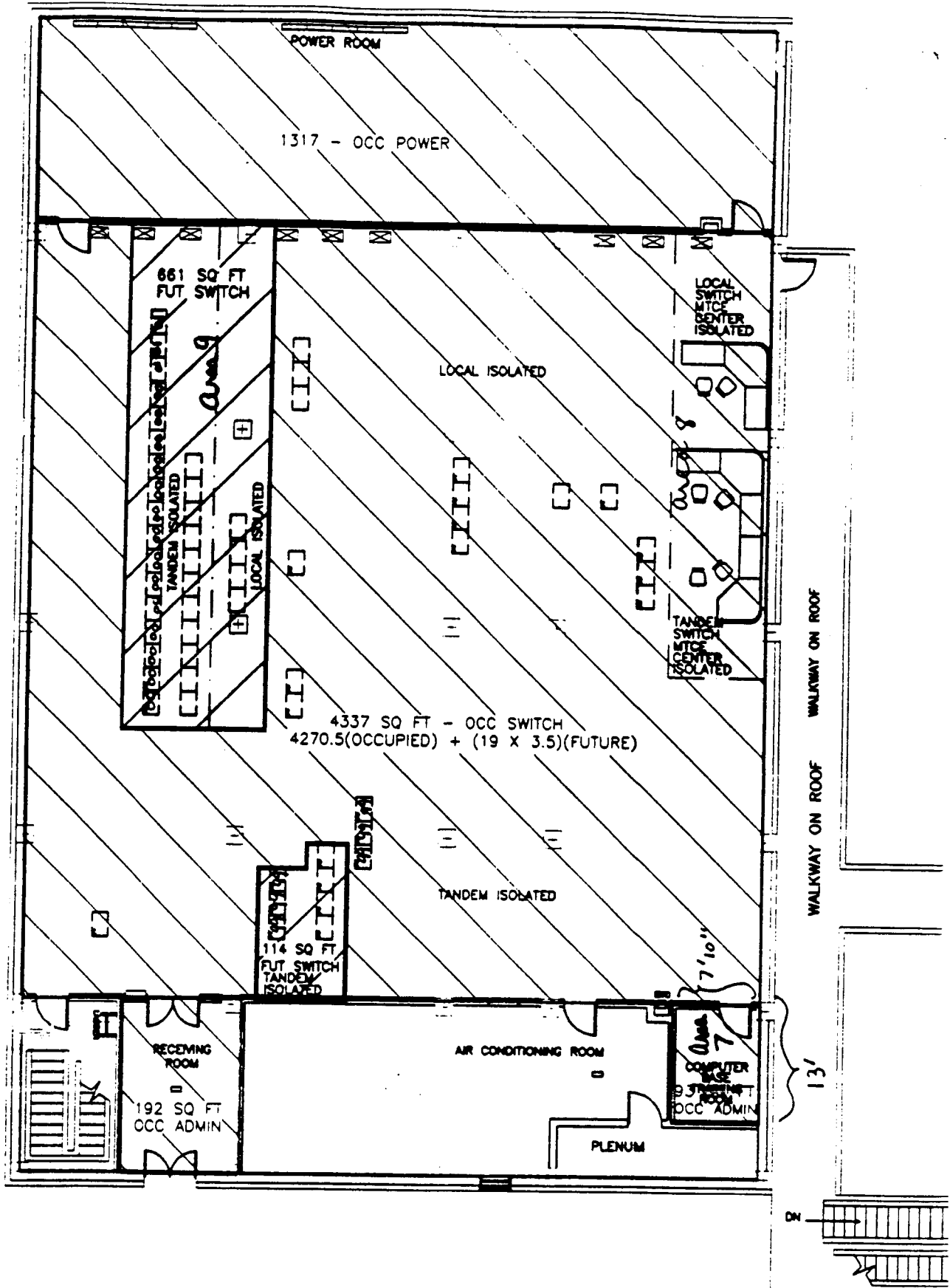


MARCH 2, 1999

A	TOTAL GROSS SQ FT	20,185	
B	TOTAL UNAVAILABLE SPACE	1897	
C	TOTAL OCCUPIED SPACE	13,208	
D	TOTAL RESERVED SPACE	2582	
E	TOTAL UNUSABLE SPACE	524	

ISOLATED - ISOLATED GROUND PLANE
 INTEGRATED - INTEGRATED GROUND PLANE
 OCC - OCCUPIED
 FUT - FUTURE
 UNAVAIL - UNAVAILABLE
 STP - SIGNAL TRANSFER POINT
 - BUILDING COLUMN

OR PLAN



MARCH 2, 1999

TOTAL GROSS SQ FT 7577

SWITCH		4270.5
POWER		1317
ADMIN	192 + 93 =	285
<hr/>		
TOTAL OCCUPIED SPACE		5872.5

SWITCH	661 + 114 + (19 X 3.5) =	841.5
<hr/>		
TOTAL RESERVED SPACE		841.5



- ISOLATED - ISOLATED GROUND PLANE
- INTEGRATED - INTEGRATED GROUND PLANE
- OCC - OCCUPIED
- FUT - FUTURE
- UNAVAIL - UNAVAILABLE
- BUILDING COLUMN

LOOR PLAN

