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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF JAMES D. BLOOMER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NOS. 980946-TL, 980947-TL, 980948-TL, 981011-TL,
981012-TL, AND 981250-TL
MAY 7, 1999

Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. My name is James D. Bloomer. I am employed by BellSouth
Telecommunications, Inc. as a Manager – Facility Planning – Property
and Services Management. My business address is 10JJ1 – 301 W.
Bay Street, Jacksonville, Florida 32202.

Q. ARE YOU THE SAME JAMES D. BLOOMER WHO PROVIDED
DIRECT TESTIMONY IN THIS MATTER?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I will provide rebuttal testimony to the direct testimony of Covad
Communications Company (“Covad”) witness Thomas J. Regan, Supra
Telecommunications And Information Systems, Inc. (“Supra”) witness

1 David Nilson, ACI Corp. ("ACI") witness James D. Cuckler, WorldCom
2 Technologies, Inc. ("WorldCom") witness Ron Martinez, e.spire
3 Communications, Inc. ("e.spire") witness James C. Falvey, Sprint
4 Communications Company Limited Partnership ("Sprint") witnesses
5 Melissa L. Cloz and Michael D. West, Teleport Communications
6 Group Inc. ("TCG") witness Scott Stinson, and InterMedia
7 Communications Inc. ("Intermedia") witness Ronald W. Beasley ,
8 concerning the factors to be considered in determining if space is
9 available for physical collocation and the results of the walkthroughs at
10 each location.

11

12 Q. HAS THE COMMISSION ALREADY ADDRESSED FACTORS TO BE
13 CONSIDERED IN DETERMINING SPACE AVAILABILITY FOR
14 COLLOCATION?

15

16 A. Yes, the Florida Public Service Commission ruled in Order No. PSC-
17 99-0060-FOF-TOP, dated January 6, 1999, in Docket No. 980800-TP,
18 on the factors to be considered in determining space availability for
19 physical collocation. The factors include building configuration; current
20 space assignments and forecasted uses; and national, state and local
21 building codes.

22

23 Q. ARE THESE SAME FACTORS USED BY BILLSOUTH TODAY?

24

25

1 A. Yes, BellSouth uses these factors daily to review any building where
2 there is a need for space. In addition, BellSouth uses one other factor.
3 This factor is the equipment vendor's (manufacturer's) detailed design
4 instructions on where and how much space is necessary for a
5 particular family or group of equipment. This is consistent with
6 BellSouth's testimony in Docket No. 980800-TP and in direct testimony
7 filed in this proceeding. These requirements are further referenced in
8 Staff Audit reports on each central office in Disclosure #1, Item 4.

9

10 **GENERAL COMMENTS**

11

12 Q. THERE ARE TEN COLLOCATORS INTERVENING IN THIS DOCKET
13 WITH VARYING DEGREES OF INTEREST IN THESE BUILDINGS. IN
14 REVIEWING ALL OF THE TESTIMONY, CAN YOU GIVE A GENERAL
15 REBUTTAL TO SOME OF THEIR COMMON POINTS?

16

17 A. Yes.

18

19 1. The other parties, as a group, refuse to acknowledge the building
20 codes, zoning, and permitting officials as a legitimate factor in
21 reviewing space. They make no reference to the codes. They do
22 make continued references to using spaces that are too narrow to
23 safely house equipment, block fire aisles, or subvert code-required
24 storage areas. In an attempt to obtain BellSouth occupied space in
25 nearby administrative buildings, the collocators ignore the code-

1 required construction effort and the cost to upfit the administrative
2 space to meet safe equipment design standards.

3

4 2. The other parties do not acknowledge building codes, setbacks, or
5 additional retention areas necessary when adding structures
6 outside the central office on BellSouth property. Additional
7 rezoning, necessary to place structures outside the central office, is
8 also not discussed.

9

10 3. The other parties make continued and contradictory attempts to
11 attack BellSouth space reservations. Some, typified by Mr. Nilson
12 on page 6 of his testimony, and then repeated for each building,
13 would have BellSouth reserve space for only 18 - 24 months.
14 Others, like Ms. Cloz (page 12) and Mr. Stinson (page 11),
15 suggest a year is appropriate. Several parties claim that BellSouth
16 has ignored the effects of physical collocation on demand. All quote
17 the recent FCC order (FCC Order 99-48), saying BellSouth should
18 reserve no space for itself in time increments greater than that
19 given to any other carrier. The Staff Auditors, Ms. Welsh and Ms.
20 Young on pages 7 and 6, respectively, indicate that BellSouth's
21 forecasts are done reasonably and, in one case, are understated.
22 The Staff Auditors also note that BellSouth has included the effects
23 of physical collocation in its forecasts. No carrier suggests that it is
24 willing to submit to rigorous audit, as BellSouth has, to determine
25 how much space it is reserving for itself.

- 1 4. There is still a complete misunderstanding of what constitutes
2 administrative space. Administrative space is space that DOES
3 NOT directly support the installation, removal, repair, relocation of
4 telephone equipment and service. This space, by definition,
5 includes storage rooms, break rooms, conference rooms, and
6 training rooms. Administrative space DOES NOT include fixed
7 layout switch maintenance centers, Detailed Continuous Property
8 Records cards and circuit assignments (DCPRs), toll work areas,
9 Digital Access Cross connect Systems (DACs), and Digital Signal
10 Cross connect (DSX) control areas. These functions are
11 considered part of the equipment space since they directly support
12 the installation, removal, repair, and relocation of telephone
13 equipment and service. Administrative space does include groups
14 performing other work functions not related to the aforementioned
15 activities.
- 16
- 17 5. All carriers refuse to acknowledge that there are manufacturer
18 specified equipment layouts dictating equipment placement. These
19 must be followed or the equipment cannot serve customers
20 properly.
- 21
- 22 6. The carriers refuse to acknowledge the common industry-wide
23 distinct grounding requirements for segregating equipment. This
24 requirement was verified by the Audit reports for each building in
25 Audit Disclosure No. 1.

1 7. Nearly all carriers indicate that there are BellSouth subsidiaries in
2 the buildings. Some indicate a specific building, others indicate all
3 buildings. ALL OF THESE STATEMENTS ARE COMPLETELY
4 INCORRECT. There is no subsidiary space in any of these
5 buildings. There are no active requests for any subsidiary space in
6 any of these buildings.

7
8 8. All parties who assign a square foot allowance for central office
9 space fail to reach the same number, as evidenced in Mr. Stinson's
10 and Mr. Regan's testimony, among others. This happens, because
11 they do not agree on a common bay size. Some, like Mr. Stinson,
12 confuse square footage for new space allocations with reusing bay
13 spaces in existing lineups.

14
15 **REBUTTAL OF SPECIFIC CARRIER COMMENTS**

16
17 **REBUTTAL TO MR. REGAN (COVAD)**

18
19 Q. MR. REGAN, ON PAGE 3, LINES 14 - 17, ASSERTS THE STANDARD
20 BAY IS 23 INCHES WIDE AND APPROXIMATELY 12 INCHES DEEP
21 WITH AN ACTUAL FOOTPRINT OF 2 SQUARE FEET. IS THAT
22 TRUE?

23
24 A. No. Mr. Regan is the first party to make this type of statement. For the
25 record, there is no standard size that covers every equipment type.

1 There are too many types to delineate them all. Some of the most
2 common sizes follow:

3

4 Switching equipment like the existing LUCENT 5ESS equipment is 30
5 inches x 18 inches, whereas the new 5ESS equipment is 30 inches x
6 24 inches. The existing NORTEL DMS is 27 inches x 18 inches, but the
7 new NORTEL processors are 39 inches x 24 inches.

8

9 Toll equipment was commonly sized at 26 inches x 12 inches for older
10 transmission equipment. The new toll equipment, however, is starting
11 to look more like switching equipment in size and heat loads.

12

13 Enhanced services equipment commonly measures 26 inches to 48
14 inches wide and 15 inches to 24 inches deep. Data Set cabinets
15 measure from 26 inches to 36 inches wide and 26 inches deep. Digital
16 Cross Connect System (DSX) frames measure 27 inches to 36 inches
17 wide and 12 inches deep (size is dependent upon transmission speed).
18 Digital Access Cross Connect Systems (Tellabs Titan 5500) are 36
19 inches x 24 inches deep.

20

21 Q. HOW DO BELLSOUTH AND VENDOR DETAILED ENGINEERS KEEP
22 ALL THESE SIZES STRAIGHT?

23

24 A. BellSouth tries to keep lineups reserved for equipment of the same
25 depth and type. This is the only way to manage some kind of order.

1 Mixing and matching equipment causes your equipment lineups to
2 zigzag across the floor. This plays havoc with the air-conditioning,
3 cable racking, and lighting which are bay location dependent.

4

5 Q. WHY IS THIS IMPORTANT?

6

7 A. Employee and vendor safety is the biggest concern. The National Fire
8 Protection Act and the Standard Building code set a minimum front
9 aisle clearance for telephone equipment exchanges at 36 inches (see
10 Exhibit JDB-27). Obviously, it is not very safe to have equipment fronts
11 sticking out into aisles blocking ladders, exit paths, cable racking and
12 lighting.

13

14 Q. WHAT OTHER CONCERNS OVER COMMINGLING DO MR. REGAN,
15 AS WELL AS THE OTHERS, IGNORE?

16

17 A. Generally, they ignore the reality of the existing overhead support
18 structure composed of the overhead racking, lighting, grounding, and
19 air-conditioning. The overhead racking system in an equipment area
20 supports lights and the cable rack. It is constructed to serve uniformly
21 sized equipment lineups. Inserting different equipment sizes exceeding
22 the original lineup design depth will interfere with the lights and cable
23 racking. Going back into the older section of a central office with
24 today's wider equipment, which releases more heat, poses special
25 problems. An older toll equipment layout would generally have

1 24-inch front aisles and 18-inch back aisles with 12-inch deep
2 equipment. These were the standard sizes for the older types of
3 equipment under the older building codes. Today's equipment would
4 block both front and back aisles, creating safety hazards that are not
5 code compliant. Today's equipment also strains the existing overhead
6 cable racking system. These systems were not sized ten, twenty or
7 thirty years ago to serve the digital equipment capacities of today. The
8 air conditioning duct that runs above the racking has the same
9 limitations. This is demonstrated in Exhibits JDB-14 through JDB-19 at
10 the end of each presentation.

11

12 In addition to the code required front aisles, there are minimum back
13 aisles allowing for safe passage and use of test gear. Today BellSouth
14 uses a standard dimension of 24 inches to 30 inches, which allows for
15 greater test equipment size, larger cabling density, and higher heat
16 release.

17

18 Q. DO YOU AGREE WITH MR. REGAN'S ASSERTION ON PAGE 3,
19 LINES 20 – 22, THAT 18 SQUARE FEET IS NECESSARY TO
20 INSTALL ONE BAY?

21

22 A. No, based on my experience as a space planner. Mr. Reagan does not
23 include his calculation methodology so I can not properly review it.
24 However, his number conflicts with Mr. Stinson's (TCG) standard

25

1 allocation provided in his direct testimony that I will rebut later in this
2 testimony.

3

4 Q. IS MR REGAN'S ASSERTION ON PAGE 3, LINES 15 - 17,
5 CONCERNING THE DECREASING BULK OF CENTRAL OFFICE
6 EQUIPMENT TRUE?

7

8 A. No, but an inexperienced planner would think so. As detailed above,
9 equipment sizes are getting bigger, releasing more heat, and requiring
10 more cable racking to serve them. The equipment is serving more
11 customers, but the equipment takes up more space and requires more
12 building support.

13

14 Q. MR. REGAN CONTENDS ON PAGE 4, LINES 7 - 15, THAT ILECS
15 GENERALLY REQUIRE COLLOCATORS TO LOCATE IN A
16 SEGREGATED COLLOCATION ROOM OR AREA AND THAT SUCH
17 CONSTRUCTION KEEPS ALECS FROM COLLOCATING FOR
18 SPACE REASONS. DO YOU WISH TO COMMENT?

19

20 A. Yes. Mr. Regan was the first of many witnesses to ignore building
21 codes in his statement. BellSouth is allowed to provide security for its
22 equipment by the FCC, as detailed in Mr. Milner's testimony. Local
23 building code officials determine what kind of separation is appropriate
24 in terms of fire rated rooms, hallways etc. BellSouth does not have a
25 choice in this matter.

1 Q. DO YOU ASSIGN SPACE ON AN AD HOC BASIS FOR EQUIPMENT
2 GROWTH PER MR. REGAN'S COMMENTS ON PAGE 7, LINE 10-15?

3

4 A. I do not know what he means by ad hoc. Experienced space planners
5 who deal with more than a 100 square foot block of space, know the
6 quickly changing face of a central office. They allocate blocks of space
7 for types of equipment and then subdivide those blocks for families of
8 equipment. The challenge is to allow both growth and replacements to
9 occur without wasting valuable space. It may appear chaotic at times
10 to someone not used to this level of complexity.

11

12 Q. MR. REGAN CLAIMS ON PAGE 8, LINE 15 TO PAGE 9, LINE 13, THE
13 FOLLOWING: 1) THAT THE BOCA RATON BOCA TEECA SECOND
14 FLOOR HAS ALL THE ACCOMMODATIONS FOR CENTRAL OFFICE
15 EQUIPMENT, 2) THAT BELLSOUTH'S ENGINEERING GROUP CAN
16 BE MOVED INCREMENTALLY, AND 3) THAT OTHER SPACE
17 EXISTS ON THE FIRST FLOOR SUITABLE FOR PHYSICAL
18 COLLOCATION. PLEASE COMMENT.

19

20 A. He is in error. First, the second floor has only the floor loading and
21 height necessary for central office equipment. It has never been used
22 for such and therefore, has neither the electrical, air conditioning, cable
23 racking, nor appropriate floor or wall finishes for equipment space.

24

25

1 Second, the engineering group is a self-contained unit with all sections
2 located at the Boca Raton Boca Teeca central office. They are
3 necessary for the office to function effectively. The various teams at
4 this site support each other in meeting customer service needs.
5 Therefore, dividing the group would impair the group's ability to meet
6 customer service order needs efficiently.

7
8 Third, the areas mentioned on the first floor are discussed in the Staff
9 Audit Report and in my direct testimony. Mr. Regan can only claim the
10 spaces are usable if he completely ignores the building codes and
11 ground separation requirements of the equipment.

12

13 Q. WHAT ABOUT MR. REGAN'S BARELY "SUPPRESSED OUTRAGE"
14 OVER BELLSOUTH'S USE OF THE SECOND FLOOR FOR
15 ADMINISTRATIVE SPACE (PAGE 10, LINES 9 - 19)?

16

17 A. Over ten years ago, it became apparent that there was no immediate
18 need for a second floor equipment space due to technology changes.
19 The space has never been used for central office equipment. I believe
20 the Florida Public Service Commission, ratepayers, and BellSouth's
21 stockholders would expect BellSouth's equipment and office planners
22 to make full use of this investment by using it for administrative
23 purposes. This avoids unnecessary investment in the rate base or
24 unnecessary rent expense elsewhere. The validity of the decision is
25 self-evident. Now that BellSouth's own requirements indicate a need

1 for more equipment space, BellSouth is restudying the use of this
2 space. BellSouth will make an informed decision on this matter in a
3 timely fashion to ensure that all its customers are served in the best
4 way possible.

5

6 **REBUTTAL TO MR. NILSON (SUPRA)**

7

8 Q. DO YOU AGREE WITH MR. NILSON'S RECITATION OF THE
9 FACTORS THE FLORIDA PUBLIC SERVICE COMMISSION (FPSC)
10 USED IN DOCKET NO. 980800-TP TO ANALYZE SPACE
11 AVAILABILITY FOR COLLOCATION?

12

13 A. No. As I read the Commission's Order No. PSC-99-0060-FOF-TP on
14 Issue 2 of that proceeding, the Commission utilized the following
15 factors:

- 16 1. building configuration,
- 17 2. current space usage including administrative space,
- 18 3. future space reservations, and
- 19 4. applicable building codes and local regulations.

20

21 The Commission did not adopt the other factors Mr. Nilson asserts they
22 did in his testimony.

23

24

25

1 Q. MR. NILSON ALLEGES NUMEROUS EXAMPLES OF INEFFICIENT
2 SPACE USAGE IN EACH CENTRAL OFFICE (PAGE 9, LINES 2-6).
3 DO YOU AGREE?
4

5 A. No. BellSouth, in its space assessment, accounts for every square foot
6 of the equipment room as occupied, reserved or unusable. Efficient
7 space use can be described as how often one must move things to
8 clear space and how many things one can get into the space. It is not
9 what one moves to make the space available. BellSouth is not opposed
10 to relocating almost anything in the equipment room, other than actual
11 working telephone equipment (which includes the appropriate fixed
12 layout maintenance centers), as necessary to meet equipment
13 installation, repair, or service demands.
14

15 Q. THROUGHOUT HIS TESTIMONY, MR. NILSON REFERS TO
16 BELLSOUTH'S SPACE RESERVATIONS FOR ALL SIX CENTRAL
17 OFFICES AS BEING GREATER THAN 18-24 MONTHS. IS THIS
18 TRUE?
19

20 A. No. Equipment vendors recommend that some types of equipment be
21 allocated space for the final full-sized configuration. If this is not done,
22 equipment limitations, such as cabling distances from one piece of
23 equipment to another, will exceed the ability of the equipment to
24 properly handle customer calls. This type of equipment will be used to
25 handle ALEC, as well as BellSouth, customer calls. Therefore,

1 BellSouth believes it is critical to follow the manufacturer's layouts.
2 These specific types of equipment include Digital Access Cross
3 Connect Systems, Digital Signal Cross Connect Systems, certain
4 subscriber carrier systems, and elements of telephone switches and
5 processors. BellSouth must allocate space to the ultimate layout or
6 neither the ALEC's nor BellSouth's customers will get the service they
7 desire.

8

9 Q. PLEASE PROVIDE SPECIFIC COMMENTS TO MR. NILSON'S
10 REVIEW OF ALL SIX CENTRAL OFFICES?

11

12 A. For this rebuttal and all subsequent rebuttals where collocator pictures
13 are involved, I will reference the page and line number followed by the
14 appropriate picture reference.

15

16 **DAYTONA BEACH PORT ORANGE**

17

18 1. Page 10, lines 18 to Page 11, line 2 – supra-daytona-01. In just
19 this one example, many of the generalized statements concerning
20 efficient space usage are proven to be incorrect. First, the file
21 cabinets are in future toll/virtual collocation space. When equipment
22 orders are received, the cabinets will be relocated. Second, there is
23 a code-required fire aisle running in the space between the files
24 and the table. Mr. Nilson wishes to rotate the table to block the
25 aisle. This aisle is evident on Exhibit JDB-17, page 13 of 28. Third,

1 if the cabinets open into a main aisle, they must not block the aisle
2 when opened. This means the code-required aisle must be
3 measured in front of a fully opened cabinet. He also implies that
4 the aisle, plus the open width of the cabinet, would consume more
5 space if the alignment was changed, not less.

6

7 2. Page 12, lines 11 - 16 – supra-daytona-08 and supra-daytona-18.
8 Picture supra-daytona-18 was not included in the pictures provided
9 with Mr. Nilson's testimony. I do not know what the picture shows.
10 Picture supra-daytona-08 shows a fixed configuration maintenance
11 center as provided by the vendor. The vendor designs and lays out
12 these workstations. BellSouth does not control the makeup or size
13 of these components. **Additionally, this office has a full**
14 **processor change-out underway as discussed on the**
15 **walkthrough.**

16

17 3. Page 12, lines 17 – 22 – supra-daytona-11. The covered objects
18 are the equipment storage for the large processor change out
19 referred to above. The space is allocated for BellSouth future
20 growth. It is depicted in Exhibit JDB-17, page 17 and as Audit
21 Report Area No. 9. It is rated inappropriate for physical collocation.

22

23 4. Page 12, line 23 to Page 13, line 7 – supra-daytona-20. Exhibit
24 JDB-17, page 14, shows a more complete picture of this area. The
25 file cabinets actually face a fire aisle making efficient use of space

1 between the back of the maintenance area and the aisle. (See
2 Exhibit JDB-17, page 16). The Nortel equipment box is associated
3 with the large processor change-out referred to earlier.

4

5 5. Page 13, lines 15 - 17 – supra-daytona-26. BellSouth did not
6 receive a copy of this picture. I assume that it reflects the family of
7 SLC equipment seen in Exhibit JDB-17, page 28. This is a vendor
8 detailed design layout. BellSouth must accept the equipment in this
9 configuration, as cabling limits inside the equipment dictate its
10 growth.

11

12 6. Page 13, lines 19 – 22. This statement concerns the subsidiary
13 space issue. I have addressed this issue previously in the General
14 Comments section (Page 6, lines 1 - 6).

15

16 **BOCA TEECA**

17

18 1. Page 13, line 25 to Page 14, line 5. I have previously addressed
19 the space reservations issue in the general comments section of
20 this testimony (Page 4, lines 10 - 25).

21

22 2. Page 14, line 6 to Page 15, line 5 – supra-boca-05. This is a
23 picture of Audit Area No. 9 at the West Palm Beach Gardens
24 central office, not the Boca Raton Boca Teeca central office. This
25 picture claims “large areas” of space suitable for physical

1 collocation in the Boca Raton Boca Teeca central office. The Staff
2 Audit Report for the Boca Raton Boca Teeca central office reviewed
3 all of the first floor areas and found them insufficient. Some of the
4 areas are pictured in my Exhibit JDB-18, pages 6 - 9. Mr. Nilson
5 continues to try to make the point that some of these areas could be
6 made available regardless of code, inappropriate size or other
7 general errors. The mainframe (Picture supra-boca-06) clearly has
8 working central office equipment of the new variety terminated in
9 plain sight.

10 Supra-boca-18 is ACTUALLY Audit Area No. 11 at the West Palm
11 Beach Gardens central office. Picture P1010025 is the same as
12 Exhibit JDB-18, pages 6 and 7, and Audit Area No. 4. Please
13 notice the changes from the walkthrough pictures to the BellSouth
14 pictures. The cable reels are gone. They have been replaced with
15 large piles of engineered cables for the new switching equipment
16 being installed.

17

18 3. Picture P1010028 is identical to Exhibit JDB-18, pages 8 and 9.
19 BellSouth's pictures clearly delineate the work and exit aisles
20 required in this space and the efficient use of approximately 5 ½
21 feet of space in between to serve the maintenance center. The
22 Staff's Audit Report clearly delineates why this space is not suitable
23 for physical collocation.

24

25

1 4. Page 15, lines 1 - 5 concern administrative issues that I have
2 previously addressed in this testimony (page 5, lines 1 - 15). The
3 current study, as reported in my direct testimony, clearly shows that
4 there has been and continues to be significant cost savings to the
5 company, the ratepayers, and BellSouth's stockholders, in the
6 current use of the second floor.

7

8 **MIAMI PALMETTO**

9

10 1. Page 15, lines 7 to 22. The forecast and subsidiary reservation
11 concerns have already been addressed in my testimony in the
12 General Comments section (Page 4, lines 10 – 25 and Page 6,
13 lines 1 – 6).

14

15 2. Page 15, line 23 to Page 16, line 11. Pictures 99-2Y-19, 99-2Y-20,
16 99-2Z-05, 99-2Z-11, and 99-2Z-12 correspond to Audit Report Area
17 Nos. 7, 8, and 9 and to Exhibit JDB-19, pages 20 - 25. Clearly, the
18 Staff Audit Report and BellSouth photographs depict the
19 actualization of the BellSouth forecasts. Note on Exhibit JDB-19,
20 pages 20 and 21, the more realistic picture of the large amounts of
21 workspace necessary to support the office. Exhibit JDB-19, page
22 22, corresponds directly to Picture 99-2Y-20, only it shows the
23 initial shipment of equipment being installed in this area right NOW.

24

25

- 1 3. Page 16, lines 6 – 11 - Picture 99-2Z-05 allegedly indicates
2 BellSouth reservation of space beyond the time allocated. This
3 space is detailed in the Audit write-up of Audit Area No. 9a - 9d.
4 The Staff Auditors noted that BellSouth was running ahead of
5 forecast, BellSouth could likely use the space earlier, and any
6 physical collocation space, excluding code-required aisles and
7 walls, would be unusable.
8
- 9 4. Page 16, line 12 - Picture 99-2X-08. This is one of the few
10 storerooms in the front of the building. The space lacks the depth
11 for fire aisles necessary to safely convert the space into physical
12 collocation space.
13
- 14 5. Page 16, lines 14 – 17 – Picture 99-2X-12. This is the fixed layout
15 maintenance center for the 5ESS switch. This area controls all
16 software and trunking changes in the 5ESS switch. Its size was
17 based on vendor engineering recommendations when it was
18 installed. Currently, BellSouth plans to consolidate the space and
19 create the last possible 5ESS switch growth space. Other uses are
20 discussed in my direct testimony on pages 57 and 58.
21
- 22 6. Page 15, lines 17 - 18 and Page 16, lines 21 - 22 – Pictures
23 99-2Y-01 and 99-2Y-09. These are actually duplicates of the same
24 area. However, they are described as if they are different spaces
25 to reinforce a negative image of BellSouth's operations.

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7. Page 16, lines 18 – 21 – Picture 99-2Y-02. This picture purports to show a file area, but it is actually Audit Area No. 4. This is an unenclosed code-violating storage area created by the enclosed physical collocation space already provided. The Staff Auditors received verification of the code requirement for enclosing this area for storage. It is shown in Exhibit JDB-19, page 10.

8. Page 16, line 22 – Picture 99-2Y-10. This picture shows a trash pile of older technology collected for a company-wide equipment roundup. The equipment will be removed on a one-time basis by BellSouth Internal Communications vendors per a set schedule.

9. Page 17, lines 1 - 2 – Picture 99-2Y-14. This picture purports to show another wasted area when it is the same area covered in TWO previous pictures (99-2Y-19 and 99-2Y-20). This duplication tries to paint a far worse picture than actually exists. This area is actually Audit Area No. 8 and is covered in the Staff Audit Report and Exhibit JDB-19, page 22. It is now serving nine initial Titan 5500 frames.

10. Page 17, lines 2 – 4 – Pictures 99-2Z-11 and 99-2Z-12. These pictures show a small two-man carrier/trunk group workstation in the middle of future equipment space. Please note the wall that is necessary to separate the integrated grounding plane from the

1 5ESS switch and the very small space dimensions. Code-required
2 fire rated walls and aisles to access BellSouth equipment would
3 make any enclosed space too small for physical collocation. This
4 area is discussed in my direct testimony on page 60, line 19 and in
5 Exhibit JDB-19, page 29.

6

7 11. Page 17, lines 4 - 7 – Picture 99-2Z-17. This picture purports to
8 show empty bay space available for physical collocation. These
9 bays are currently being installed. The job is not finished and that
10 is why they are not full. This is a full family of DSX equipment. It
11 corroborates the BellSouth position that equipment is shipped in
12 fixed layouts that are already wired together to provide service.

13

14 12. Page 17, lines 8 - 13 – Not pictured by Supra. This a duplicate
15 entry of the area discussed on Page 16, line 18, already discussed
16 above. The space offered to Supra is actually discussed in Audit
17 Report Area No. 14 and cannot be expanded as stated by Supra.
18 The Audit Report Area No. 4 is the area Supra wants for expansion.
19 It currently serves as a Plug-In Control System (PICS) storage area,
20 which must be enclosed to meet code. This area is also detailed in
21 my direct testimony on page 57 and Exhibit JDB-19, page 10.

22

23 **WEST PALM BEACH GARDENS**

24

25

- 1 1. Page 17, lines 15 – 22. The forecast and space reservation
2 concerns have already been addressed in my testimony in the
3 General Comments section (Page 4, line 10 to Page 5, line 15).
4
- 5 2. Page 17, line 23 to Page 18, line 1– Picture MVC-003S. This
6 picture purports to show wasted space. This is actually the
7 shipping/receiving room. It is part of the code-required exits for the
8 building. The placement of permanent and combustible material
9 storage or working telephone equipment in this area is a building
10 code violation. This is where materials are placed before shipping.
11 It may be full one day and empty the next. Please note in Mr.
12 Nilson’s picture that BellSouth employees have double-decked the
13 room to make full use of the space. This area is discussed in my
14 testimony on page 27 and in Exhibit JDB-15, page 3.
15
- 16 3. Page 18, line 2 - 6 – Pictures MVC-004S, MVC-007S and MVC-
17 009S. These pictures allegedly show several large areas of
18 available space. Pictures MVC-004S and MVC-007S show the
19 same space from two different views. This duplication attempts to
20 paint a worse situation than actually exists. This is Audit Area No.
21 11 in the Staff Audit Report and is covered in my direct testimony
22 on page 47, line 11 and is accurately pictured in Exhibit JDB-15,
23 pages 4 - 6. These spaces will be too small for safe physical
24 collocation equipment installation once code-required aisles are left
25 for BellSouth areas and inside the collocation space. In addition, if

1 Commission Order No. PSC-99-0060-FOF-TP is upheld on appeal,
2 the shipping/receiving room must be recreated in this area to keep
3 the building code compliant. Thus, there would be no space for
4 physical collocation. Picture MVC-009S is the tandem switch room
5 growth area detailed in Audit Report Area No. 4 and in my direct
6 testimony on page 49 and in Exhibit JDB-15, page 18. Removing
7 the code required exit from this room leaves an area too small to
8 accommodate the code-required walls and aisles to safely exit
9 BellSouth space and install collocation equipment.
10
11 4. Page 18, line 6 – 9 – Picture MVC-014S. This picture shows a little
12 corner of the power area large enough for one battery string,
13 including the code-required exit aisle. The Staff Audit Report finds
14 this area inappropriate for physical collocation. It is detailed in my
15 testimony on page 49 and in Exhibit JDB-15, page 23. (Note the
16 large air intake grille on the left of Exhibit JDB-15, page 23.)
17
18 5. Page 18, lines 6 – 9 – Picture MVC-017S. This picture alleges to
19 show further open space for physical collocation. The Staff Audit
20 Report identifies this as Audit Area No. 9 and unsuitable for
21 physical collocation. The area is plainly too narrow for code-
22 required walls and fire aisles necessary to safely install equipment.
23 Please note that the space is too narrow for ground plane
24 separation. This space is currently reserved for a Customer Service
25

1 Node (packet switch) type installation. It is detailed in my direct
2 testimony on page 49 and in Exhibit JDB-15,00 page 9.

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6. Page 18, lines 9 - 13 – Pictures MVC-020S through MVC-023S.
Picture MVC-020S is the supervisor's temporary cubicle in future
toll equipment space. Picture MVC-021S is a photograph of the
frame maintenance area adjacent to the cable vault. This
maintenance area was created by removing vacated frame
verticals. The space previously occupied by the maintenance area
is Audit Area No. 8, now occupied by DSX equipment. There is no
other space to locate this maintenance area. This area is too
narrow for the code-required walls and aisles for both BellSouth's
and any collocator's space to safely install equipment. MVC-022S
identifies Audit Report Area No. 2 as detailed in my direct testimony
on page 48, line 7 and in Exhibit JDB-15, pages 7 to 8. This area is
simply too narrow to construct code-required walls and aisles to
safely install collocation equipment. The space is also too narrow
for ground plane separation between the switch and any collocation
equipment. Please be advised that the area is subject to the
creation of a common area if Commission Order PSC-99-0060-
FOF-TP is upheld on appeal. Picture MVC-023S is actually Audit
Area No. 3 and is accurately depicted in my direct testimony on
page 49 and in Exhibit JDB-15, pages 15-17. BellSouth is using
code-required aisles and ground plane separation space to create a

1 work area. It was found inappropriate for physical collocation for the
2 same reasons noted above for Picture MVC-022S.

3

4 7. Page 18, lines 3 - 21. Picture MVC-027S is part of Audit Report
5 Area No. 3 discussed above. It is covered in my direct testimony on
6 page 49 and accurately pictured in Exhibit JDB-15, page 15. Based
7 on over 21 years of experience in space planning, the use of any
8 vertical storage area still requires ease of access for multiple
9 technicians at one time with appropriate aisles, work area, and
10 chair space for reviewing information and working on the files. The
11 alleged space savings are minimal and arguable at best.

12

13 **NORTH DADE GOLDEN GLADES**

14

15 1. Page 18, line 23 to Page 19, line 5. I have previously addressed
16 the forecast and space reservation concerns in the General
17 Comments section of this testimony (Page 4, line 10 to Page 5, line
18 15).

19

20 2. Page 19, lines 6 - 7 – Pictures P1010012 and P1010014. Picture
21 P1010014 is a picture of a fixed layout maintenance center, shipped
22 as is from the vendor, located immediately adjacent to the
23 equipment it serves. **IT IS NOT ADMINISTRATIVE SPACE** . It
24 corresponds to Audit Area No. 8, which was determined to be
25 unsuitable for physical collocation. It is detailed further in my direct

1 testimony on page 46 and in Exhibit JDB-14, page 15. Picture
2 P1010012 is of the DACS4 workstation directly related to the DACS
3 family of equipment in a fixed layout plainly seen in the background.
4 This space is narrow and located in a reserved equipment growth
5 space within a two-year period, so it does not qualify for
6 consideration under both code and forecast considerations.

7 3. Page 19, lines 7 - 11 – Picture supra-ndgg-25. This picture is of the
8 shipping/receiving room where unpacking and temporary storage is
9 allowed. Installing permanent storage and/or working telephone
10 equipment violates both fire and building codes. The room is not
11 wide enough for the code-required walls and aisles necessary to
12 maintain an exit and provide safe working space for collocation
13 equipment.

14
15 4. Page 19, lines 11 - 14 – Pictures MVC-005S and MVC-008S.
16 Picture MVC-005S shows a space 2 ½ feet wide by approximately
17 20 feet long. It is reserved for the growth of a DSX family of
18 equipment within the next two years. It is, therefore, not available.
19 MVC-008S shows the toll maintenance area and end of the frame.
20 The space is barely six feet wide and, even if cleared of the
21 BellSouth work area, it is too narrow for the safe installation of
22 code-required walls and aisles for safe collocation equipment
23 placement. It is detailed in Audit Report Area No. 6 and in my direct
24 testimony on page 46. Pictures are included in Exhibit JDB-14,
25 pages 12 and 13.

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5. Page 19, lines 11 –14 – Picture MVC-011S. This is Audit Area No. 3 that is being converted into a code-required PICS storage area. The reason enclosed storage is needed was explained earlier in the Miami Palmetto section of this rebuttal testimony. This area is detailed in my direct testimony on pages 44 - 46 and in Exhibit JDB-14, page 7.
6. Page 19, lines 14 – 17 – Pictures MVC-013S, espire-ndgg-14a, and espire-ndgg-20a. Picture MVC-013S is Audit Report Area No. 10 and is detailed in my direct testimony on page 46 and in Exhibit JDB-14, page 19. This is all that remains of the power room growth area. There is room for one more high capacity string of batteries to serve all ALEC and BellSouth equipment. There is no room to expand this area. There is insufficient space to build code-required walls and aisles for safe equipment placement. The Audit Staff found this area inappropriate for physical collocation. Picture espire-ndgg-14a depicts space properly reserved for two-year BellSouth growth and, therefore, is unavailable. Picture espire-ndgg-20a depicts the unavailable area for grounding separation clearly noted on the BellSouth waiver and Exhibits JDB-2 and JDB-3. The ground plane separation requirement was verified by the Audit Staff.

1 7. Page 19, lines 17 – 20 – Picture espire-ndgg-7a. This picture
2 replicates an earlier picture of this area, Picture MVC-011S. This
3 type of duplication tries to paint a worse scenario than actually
4 exists.

5

6 8. Page 19, lines 17 – 20 – Picture espire-ndgg-8a. This picture
7 shows part of Audit Area No. 4. It shows the previous PICS area
8 that has been moved to Audit Area No.3 to comply with building
9 codes. The vacated space where PICS was located is being
10 converted into virtual collocation space as of April 19, 1999. It is,
11 therefore, not available for physical collocation.

12

13 **LAKE MARY**

14

15 1. Page 19, line 22 to Page 20, line 8. This addresses the same
16 subsidiary, forecasting, and space reservation concerns that I have
17 already addressed in this testimony (Page 4, line 10 to Page 5, line
18 15 and Page 6, lines 1 – 6).

19

20 2. Page 20, lines 10 - 15 – Picture 99-2A-01. This corresponds to
21 Audit Area No. 1 as detailed in my direct testimony on page 50 and
22 in Exhibit JDB-16, pages 3 - 4, which depicts the vendor
23 workstation and adjacent switch maintenance area. This is the
24 same fixed configuration maintenance area ordered from the vendor

25

1 and installed in their recommended area immediately adjacent to
2 the processor. It is inappropriate for physical collocation.

3

4 3. Page 20, line 15 to Page 21, line 2 – Picture 99-2A-24. BellSouth
5 was not provided a copy of this picture, however, the area
6 corresponds to Audit Report Area No. 3. This area is detailed in my
7 direct testimony on page 50 and in Exhibit JDB-16, page 6. This
8 more accurate representation shows a very narrow area, once
9 code-required aisles are removed. The Audit Staff finds this area to
10 be unsuitable for physical collocation. His further comments
11 concerning future air conditioning are evident from Exhibit JDB-8,
12 page 1. The space is less than 3 feet deep, so there is no room for
13 any telephone equipment. Working across the picture is 36 inches
14 of exit aisle and then the effective remaining space is the break
15 room. BellSouth has no plans in the next two years for air
16 conditioning growth, so I have not officially reserved the space.
17 Given the building configuration, there are not many other
18 legitimate uses for these little alcoves on the east side of the
19 building.

20

21 4. Page 21, lines 3 – 8 – Pictures 99-2A-09, 99-2A-12, 99-2B-15, and
22 99-2B-20. These pictures are all the same area from several
23 different views. Picture 99-2A-09 depicts a virtual collocation
24 installation. BellSouth installs the equipment chosen by the
25 collocater. Picture 99-2A-12 depicts BellSouth equipment ordered

1 for this year, which is in the process of being installed. Picture 99-
2 2B-15 depicts the future equipment area forecasted inside the two-
3 year window. Picture 99-2B-20 repeats the entire area included
4 above.

5

6 5. Page 21, lines 9 - 19 – Pictures 99-2A-16 and 99-2A-18. This is a
7 joint use room for the code-required fire-rated PICS storage area
8 and the shipping/receiving room. This little room will always have
9 some items piled on the floor. There is no other possible location
10 for this storage. This area was not identified by the Staff Auditors as
11 available for physical collocation. The little janitor closet is simply
12 too small for safe equipment installation.

13

14 6. Page 21, lines 20 – 24 – Pictures 99-2A-05 and 99-2B-04. This
15 space is identified as Audit Report Area No. 2 and then further
16 identified in my direct testimony on page 50 and in Exhibit JDB-16,
17 page 5. This space is located in the middle of the isolated ground
18 plane. Physical separation requirements, with or without a wall,
19 make the space unusable for safe equipment installation and exit
20 aisles. The Staff Auditors identified the space as unavailable for
21 physical collocation.

22

23 **REBUTTAL TO MR CUCKLER (ACI)**

24

25

1 Q. DOES MR. CUCKLER'S IDEA OF A STANDARD BAY (PAGE 4, LINES
2 13 - 20) CORRESPOND TO ANY BELLSOUTH STANDARD BAY
3 SIZE?

4
5 A. No. Twenty-two inch bays are not standard in any BellSouth type of
6 equipment.

7
8 Q. DOES BELLSOUTH RESERVE FLOOR SPACE FOR MORE THAN
9 TWO YEARS?

10
11 A. BellSouth's policy is to reserve space whenever the need is identified.
12 However, the space cannot be held from physical collocation for
13 forecast reasons if the SHIP date of the equipment is greater than two
14 years of the space review.

15
16 Q. WHAT STRUCTURAL REQUIREMENTS ARE MR. CUCKLER
17 REFERING TO ON PAGE 8, LINES 22 - 24?

18
19 A. Mr. Cuckler does not acknowledge the code requirements for fire-rated
20 separation of BellSouth and tenant space. He pointedly calls them
21 BellSouth requirements throughout his testimony. As BellSouth has
22 testified and the Commission has ordered, local and national building
23 codes are factors to be used in allocating space for physical
24 collocation.

25

1 Q. WHAT ELSE DOES MR. CUCKLER MISS IN HIS TESTIMONY ON
2 PAGE 9, LINES 11 – 19?

3

4 A. Mr. Cuckler alleges that BellSouth could locate the North Dade Golden
5 Glades computer training room (93 square feet) anywhere. He ignores
6 the facts that the training is for equipment in the central office. It is
7 used for hands-on exercises with the central office equipment. It is for
8 employees, contractors and vendors who are working at the central
9 office. There is no nearby BellSouth structure to provide any such
10 space. He further alleges that there is no technological reason for the
11 administrative engineering offices to be located in the Boca Raton
12 Boca Teeca central office. There is no technological reason the
13 administrative space should not be there. BellSouth equipment
14 requirements have not shown a need to occupy the second floor at this
15 time. Regulatory oversight and prudent financial management dictate
16 the maximization of assets.

17

18 Q. DID YOU PARTICIPATE IN THE DIVESTITURE OF SPACE
19 BETWEEN BELLSOUTH AND AT&T?

20

21 A. Yes. I was assigned to that effort.

22

23 Q. DOES BELLSOUTH GO AGAINST ANY LONG TERM PRACTICES,
24 AS MR. CUCKLER SUGGESTS ON PAGE 11, LINES 9 – 16?

25

1 A. Absolutely not. BellSouth and AT&T had large equipment and floor
2 space investments in many buildings. In some cases, neither company
3 could afford to move their equipment out of the other company's area.
4 In those situations, the building floors were split with an 8-foot high wall
5 constructed on AT&T 's floor space allocation at AT&T's expense.
6 BellSouth did not use Mr. Cuckler's red/green tape process to divide
7 the space.

8
9 Q. CAN THE COMMISSION ELIMINATE WALLS SEGREGATING
10 COLLOCATION SPACES BETWEEN ALEC'S OR BELLSOUTH'S
11 SPACE PER MR. CUCKLER (PAGE 12, LINES 8 - 25)?

12
13 A. The Commission has already ruled in Order No. PSC-99-0060-FOF-TP
14 that it will not dictate such matters, but will properly leave them to the
15 local code officials.

16
17 Q. DOES THIS RULING AFFECT MR CUCKLER'S IDEA FOR COMMON
18 COLLOCATION ON PAGE 13, LINE 22 TO PAGE 14, LINE 7?

19
20 A. Yes it does. As long as code officials interpret physical collocation as a
21 multiple tenant situation, they will require fire-rated walls to separate
22 each tenant. Regardless of the size or number of bays, a tenant is a
23 tenant according the code.

24
25

1 Q. HOW CAN MR. CUCKLER'S IDEA OF COMMON COLLOCATION
2 MAKE USE OF AUDIT AREA NO. 4 IN THE MIAMI PALMETTO
3 CENTRAL OFFICE, AS HE STATES ON PAGE 14, LINES 19-22?

4

5 A. It cannot change the Staff Audit Report or Mr. Cuckler's continued
6 refusal to acknowledge building codes. The area described as Audit
7 Area No. 4 was detailed in my rebuttal to Mr. Nilson, with appropriate
8 references to my testimony and exhibits. This area is required to be
9 enclosed for PICS storage. It is not available for physical collocation.

10 Q. MR. CUCKLER MAKES MANY ALLEGATIONS (PAGE 19, LINE 18 TO
11 PAGE 20, LINE 10) CONCERNING THE MIAMI PALMETTO SERVICE
12 CENTER LOCATED NEXT TO THE MIAMI PALMETTO CENTRAL
13 OFFICE. DO YOU HAVE ANY COMMENTS?

14

15 A. Yes.

16

17 First, BellSouth witness Milner has addressed why BellSouth
18 administrative buildings are not subject to the FCC order. As a
19 practical matter, the adjacent building was put there by BellSouth in the
20 1970's to serve this area with installation/repair employees, engineers,
21 and coin collection personnel. They were there because customers
22 were there. The forces at this location are growing again because
23 customers are still there and the service needs are growing.
24 Technology has nothing to do with this. Servicing customers, most
25 efficiently, does.

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Second, the building is built to administrative office standards, not central office standards. The floors are not as strong, the ceiling and roof structures are lower and designed for lighter loads, and the air conditioning and power supplies are nowhere near central office (CO) design standards.

Finally, relocating all of these labor forces to another site and conditioning the building for CO standards would be prohibitively expensive.

REBUTTAL TO MR. MARTINEZ (WORLDCOM)

Q. MR. MARTINEZ ATTEMPTS TO WORK THROUGH THE BELLSOUTH SPACE REVIEW ON PAGE 10, LINE 19 TO PAGE 11, LINE 3. DID HE DO SO CORRECTLY?

A. No. Mr. Martinez errs in two steps that I use. First, on line 1, page 11, BellSouth does not insist on an enclosure. Unenclosed physical collocation is an option for the collocator. BellSouth is processing multiple physical collocation requests for all sizes of unenclosed space. Second, BellSouth insists on 100 square feet only for enclosed areas. It is the carrier's responsibility to ensure their equipment layout conforms to all applicable codes. Finally, the code officials, not

1 BellSouth, determine what kind of wall is necessary to protect all
2 occupants and equipment.

3

4 Q. DO YOU AGREE WITH MR. MARTINEZ' ASSESSMENT OF THE
5 LAKE MARY AND MIAMI PALMETTO OFFICE ON PAGE 19, LINES
6 10 - 15?

7

8 A No. Mr. Martinez admits he did not attend the walkthroughs and is
9 relying on comments from other collocators who may or may not have
10 been there. The Staff Auditors only found one slightly possible area in
11 the Lake Mary central office, not several as he states. The staff
12 auditors did visualize collocation in two possible sites at the Miami
13 Palmetto central office, but there are reasonable doubts that the space
14 could be fully utilized as the Staff Auditors envision.

15

16 Q. MR. MARTINEZ STATES ON PAGE 21, LINES 6 - 10, THAT HE
17 BELIEVES SEMINOLE COUNTY DOES NOT REQUIRE FIRE RATED
18 WALLS BETWEEN BELLSOUTH AND ALECS OR BETWEEN ALECS.
19 IS THIS TRUE?

20

21 A. Currently, BellSouth must provide two-hour fire-rated walls separating
22 the single ALEC area from the BellSouth occupancy on the second
23 floor of the Sanford Main Central Office located in Seminole County.
24 BellSouth must also supply a fire-rated exit corridor connecting both

25

1 exits from the second floor. Code officials will decide if a fire-rated wall
2 is necessary to separate the collocator's equipment.

3

4 Q IS MR. MARTINEZ CORRECT TO STATE BELLSOUTH IS WASTING
5 FLOOR SPACE TRYING TO SOLVE AIR CONDITIONING
6 PROBLEMS BY USING LESS THAN EFFICIENT OR LESS
7 POWERFUL AIR CONDITIONING SYSTEMS (PAGE 21, LINE 19 TO
8 PAGE 22, LINE 7)?

9 A. No. He speaks from a lack of correct information. The air conditioning
10 unit in question would serve both collocators and BellSouth, so this
11 may affect his comments. Had he been at the walkthrough, the air
12 conditioning load at this building would have been evident. BellSouth
13 already has the largest air handling units available running at full
14 capacity. When overheating became apparent, BellSouth developed a
15 two-pronged attack. BellSouth's engineering people reviewed all the
16 existing components and BellSouth planners reviewed all available
17 space for additional air handling unit rooms. In less than eight hours,
18 BellSouth had solutions for both a capacity problem and a system
19 operation problem. This was a system operation problem. The heat
20 problem was not caused by capacity, but by faulty dampers. BellSouth
21 corrected the problem and maintained service. BellSouth also has a
22 space solution when the capacity is exhausted. This solution is
23 detailed in my direct testimony, pages 57 and 58. Additional unit space
24 is necessary since there are no air handler units large enough to

25

1 replace the existing units. Further, the additional units are so large they
2 cannot fit in the adjacent break rooms or nearby storage rooms.

3

4 **REBUTTAL TO MR FALVEY (e.spire)**

5

6 Q. IN RESPONSE TO MR FALVEY'S TESTIMONY ON PAGE 10, LINES
7 10 - 23, DOES BELLSOUTH OFFER CAGELESS COLLOCATION?

8

9 A. Yes. BellSouth already offers cageless (unenclosed) collocation in the
10 collocation suite for any that wish it, subject to code approval.

11

12 Q. DOES MR. FALVEY INTRODUCE ANY NEW INFORMATION IN HIS
13 TESTIMONY ON PAGE 11, LINE 23 TO PAGE 12, LINE 7?

14

15 A. No. Mr. Falvey only toured two offices, but makes unsupported remarks
16 about administrative space at "all four central offices" under review. He
17 makes no reference to which four he is referring to, or which are
18 satisfactory to his company. He references some pictures without
19 saying how many or in which building they belong or what they show.

20

21 **REBUTTAL OF MS. CLOSZ (SPRINT)**

22

23 Q. WHAT DOES MS CLOSZ BELIEVE ARE FACTORS TO BE
24 CONSIDERED IN DETERMINING IF SPACE IS AVAILABLE FOR
25 COLLOCATION (PAGE 9, LINE 9 - 23)?

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A. Ms.Closz lists factors in her testimony similar to other witnesses. The first four are already contained in the BellSouth analysis of any building and are detailed on the space assessment form introduced as Exhibit JDB-1.

Item 5 (what security arrangements are reasonable) and Item 6 (whether security concerns could be the sole grounds for denial) are not relevant to any discussion of space availability. These items are strictly implementation issues.

Item 7 (whether BellSouth should permit subleasing or sharing of space) is both policy-related and code-related. I will address the code issue. Building code officials may view subleasing as a further joint-tenant arrangement requiring full walls with properly dimensioned space to protect the occupants, equipment, and neighbors. This would be entirely consistent with the multi-tenant approach some officials are taking.

Item 8 (minimum requirement) is not an issue. BellSouth currently accepts single bay requests, unless codes dictate the approved size of any required enclosure.

1 Q. DOES MS. CLOSZ REPEAT THE ERRONEOUS ASSUMPTION THAT
2 ALL SIZES OF EQUIPMENT HAVE REDUCED OVER TIME ON PAGE
3 10, LINES 20-24?

4
5 A. Indeed, she does. As answered earlier in the general comment section,
6 individual frames are not smaller in any of the building support issues.
7 They are bigger, release more heat, and require more cable, air
8 conditioning and floor space to serve each bay.

9
10 Q. MS CLOSZ MAKES A PROPOSAL FOR RELOCATING
11 ADMINISTRATIVE SPACE FROM A CENTRAL OFFICE TO CLEAR
12 SPACE FOR COLLOCATION ON PAGE 11, LINES 10 - 21. WHAT IS
13 YOUR OPINION?

14
15 A. Ms. Closz' proposal has several flaws. The largest flaw is a question of
16 what happens to the ILEC's ongoing costs for the space previously
17 utilized, now vacant, at the central office. This would be the case at the
18 Boca Raton Boca Teeca central office where the vacated floor space is
19 MUCH greater than the sum of the collocation area and BellSouth's
20 forecasted need. In her example, BellSouth ratepayers must support
21 the new administrative building and the central office space left
22 unused. This is particularly applicable to the Boca Raton Boca Teeca
23 central office situation. The engineering group at the Boca Raton Boca
24 Teeca central office contains several interrelated groups who must be

25

1 on the same site to work together. This group is currently at the center
2 of their work area.

3

4 The second major problem is Ms. Cloz's accounting process for
5 reimbursing the original collocator for expenses generated in moving
6 the existing occupants elsewhere. The costs are significant, as pointed
7 out in my direct testimony on page 36, line 9 through page 37, line 2.
8 This amount of money may not sit well with the actual collocator who
9 wants 100 square feet. How long does the original collocator wait
10 before seeking the uncollected portion of his costs? To whom does he
11 go?

12

13 Finally, I see unmitigated disaster with a collocator funding
14 construction to BellSouth standards at a new site for BellSouth
15 personnel. There could be a very difficult resolution process involved in
16 reconciling differing ideas of what is needed in the building addition.

17

18 **REBUTTAL FOR MR.WEST (SPRINT)**

19

20 Q. WHAT IS WRONG WITH MR. WEST'S STATEMENT ON SPACE
21 AVAILABILITY AT LAKE MARY ON PAGE 5, LINES 12 - 16.

22

23 A. There is a lot of misinformation in this section. The 643 square feet is
24 actually the entire future circuit area as clearly marked on Exhibit JDB-
25 6. The temporary break room is less than 200 square feet, as clearly

1 identified in the Staff Audit Report as Area No.3. This area is pictured
2 on Exhibit JDB-16, page 6. There is a 165 square foot code-required
3 PICS storeroom as described earlier in this testimony, but no 100
4 square foot storeroom in this office.

5

6 Q. WHERE ARE THE DUPLICATE POSITIONS ON THE SECOND
7 FLOOR OF THE DAYTONA BEACH PORT ORANGE CENTRAL
8 OFFICE DESCRIBED BY MR. WEST ON PAGE 7, LINES 6 - 15?

9

10 A. The Daytona Beach Port Orange central office has only one floor as
11 detailed in Exhibits JDB-8, JDB-9, and JDB-17, pages 1 and 2. I do
12 not see a second floor anywhere.

13

14 Q. WHY IS BELLSOUTH ADDING NEW 5ESS FRAMES TO AUDIT
15 AREA NO. 9 IN THE MIAMI PALMETTO CENTRAL OFFICE, PER MR.
16 WEST ON PAGE 10, LINES 15-20, WHILE THERE ARE VACANT
17 SPOTS IN THE ORIGINAL 5ESS AREA?

18

19 A. The new 5ESS framework is deeper than the original bays, as pointed
20 out earlier in this rebuttal testimony. Therefore, the new 5ESS bays do
21 not fit in the existing lineups. The existing 5ESS area is pictured in
22 Exhibit JDB-19, pages 6-8.

23

24 Q. MR.WEST ATTEMPTS TO DESCRIBE THE 2ND FLOOR BOCA
25 RATON BOCA TEECA CENTRAL OFFICE OCCUPANCY ON PAGE

1 16, LINE 21 TO PAGE 17, LINE 4. IS HIS DESCRIPTION CORRECT,
2 AS WELL AS THE SQUARE FOOTAGE (PAGE 17, LINE 7)?

3

4 A. No. My Exhibits JDB-10 and JDB-11 clearly depict the current
5 occupancy of each floor and the total square footage. There is neither
6 a second floor corporate communications resource room for computer
7 based training, nor a shipping/ receiving room. The total gross square
8 footage for this floor is 12,946, not 13,337 gross square feet as stated
9 by Mr. West.

10 Q. WHERE IS THE WEST PALM BEACH PORT ORANGE BUILDING
11 REFERRED TO ON PAGE 18, LINE 12 TO PAGE 20, LINE 14?

12

13 Q. I do not know. The towns of West Palm Beach and Daytona Beach Port
14 Orange are a distance of at least four hours away and 150 miles apart
15 along I-95. I am not aware of a single central office that is serving both
16 towns.

17

18 **REBUTTAL FOR MR. STINSON (TCG)**

19

20 Q. IS MR STINSON'S FACTOR 7, USING THE OFFICE DRAWINGS
21 DETAILING BAY CAPACITY, ALREADY INCLUDED IN YOUR
22 ANALYSIS OF SPACE AVAILABLE FOR PHYSICAL COLLOCATION
23 (PAGE 11, LINE 21 TO PAGE 12, LINE 6)?

24

25

1 A. Yes. Between BellSouth's capacity managers and myself, BellSouth
2 uses all of the data referenced in Mr. Stinson's comments

3

4 Q MR STINSON MAKES VARIOUS SPACE AVAILABILITY
5 OBSERVATIONS FOR PHYSICAL COLLOCATION AT NORTH DADE
6 GOLDEN GLADES STARTING WITH PAGE 12, LINE 14, PAGE 12 TO
7 PAGE 17, LINE 17. PLEASE COMMENT.

8

9 A. BellSouth is glad Mr. Stinson would leave us the bathrooms and a door
10 to get out of the office in the case of a fire.

11 Q. MR. STINSON STATES THAT THERE ARE 1,100 SQUARE FEET
12 AVAILABLE IMMEDIATELY FOR ENCLOSED PHYSICAL
13 COLLOCATION SPACE IN THE NORTH DADE GOLDEN GLADES
14 CENTRAL OFFICE. WHAT IS YOUR RESPONSE?

15

16 A. My comments include the following:

17

18 1. Mr. Stinson makes an attempt to deny BellSouth any and all space,
19 such as for storerooms, offices, break rooms, or for any other use
20 outside that of equipment lineups. He refuses to acknowledge any
21 building code limitations on the size and spacing of aisles when
22 turning these spaces into equipment areas. He also makes no
23 attempt to allow BellSouth any reserved space in any part of the
24 office, as the FCC allows. The spaces he delineates have all been

25

1 rebutted earlier in this testimony, but his examples are so distorted,
2 they deserved special mention.

3

4 2. Page 13, lines 11 - 14 - Generally, Mr. Stinson must have been
5 distracted when questions were being answered on how to read the
6 BellSouth exhibits in terms of what is occupied and what is reserved
7 and how each is calculated. His comments, which allege that
8 BellSouth is providing misleading information, reflects his complete
9 misunderstanding.

10

11

12 3. Page 13, lines 19 - 23 (Space 1) talk about an elevator permit. A
13 permit for future construction of an outside elevator shaft will
14 require at least two variances/exceptions for site coverage,
15 driveway relocation, and water retention. None of these items are
16 automatically granted in Dade County.

16

17

18 4. Page 13, line 24 to Page 14, line 4 (Space 2) refers to the
19 manager's office relocation. This office can only relocate to another
20 fire-rated enclosed room currently occupied for other uses. Mr.
21 Stinson absorbs all those rooms in the rest of his testimony.

21

22

23 5. Page 14, lines 5 – 10 (Space 3) annexes the break room. The break
24 room must be located in fire-rated construction per the National Fire
25 Protection Act. There is no other fire-rated construction in the office

25

1 in which to relocate the break room, as Mr. Stinson has absorbed
2 all of them.

3

4 6. Page 14, lines 11 – 15 (Space 4) seizes the storeroom. The
5 storeroom in question and the restoration area (Space 5) are being
6 turned into code-required PICS storage, as discussed earlier in my
7 rebuttal testimony.

8

9 7. Page 14, line 23 – Page 15, line 2 (Space 6) mentions the
10 computer based training room. There are computer-based training
11 areas in every central office that was toured. This computer-based
12 training room is for the technicians at this site, for the equipment
13 installed at this site, and requires hands-on exercises on the
14 equipment as part of the training. The location directly reflects
15 experience at other sites where this equipment sits in open
16 equipment rooms, shared conference areas, or supervisory offices.

17

18 Q. MR. STINSON ALLEGES THERE ARE 1,475 SQUARE FEET
19 READILY AVAILABLE FOR CAGELESS COLLOCATION AT THE
20 NORTH DADE GOLDEN GLADES CENTRAL OFFICE (PAGE 15,
21 LINE 6 – PAGE 17, LINE 5). PLEASE COMMENT.

22

23 1. Mr. Stinson ignores all building code issues in this section.

24

25

- 1 2. Page, 15, lines 6 – 13 (Space 7). This space, in the
2 shipping/receiving room, is 5 feet deep. This area is not code
3 compliant for even unenclosed physical collocation of 12 inch-deep
4 equipment. A code-required access aisle of 36 inches, plus 12 inch-
5 deep equipment, plus a minimal 24 inch back aisle, equals 6 feet.
6 The space is in the exit path through the receiving room. This
7 means it requires fire-rated walls and doors to maintain safe exiting
8 for everyone else in the structure.
9
- 10 3. Page 15, lines 14 – 21 concern Space 8 of 389 square feet. Using
11 the same math as above, plus 8 inches minimum for code-required
12 walls, means Mr. Stinson's area is still not wide enough for safe
13 physical collocation space. In addition, this area is subject to
14 Commission Order No. PSC-99-0060-FOF-TP on appeal, making it
15 unavailable for any one else.
16
- 17 4. Page 15, lines 22 - 24 mention space adjacent to the PICS
18 storeroom. It is now occupied by virtual collocation equipment. It is
19 no longer available.
20
- 21 5. Page 16, lines 1 - 11 concern the open PICS storage. This area
22 does not conform to building codes requiring the storage to be in
23 fire-rated rooms. In addition, the largest part of the space is the
24 code required exit aisle for the building. This area has already been
25 rebutted above and delineated in Audit Report Area Nos. 3 and No.

1 5. BellSouth must relocate these storage shelves into an enclosed
2 fire-rated room.

3

4 Q. MR. STINSON'S THIRD ALLEGATION STATES 1,500 SQUARE FEET
5 OF EQUIVALENT SPACE IS READILY AVAILABLE FOR CAGELESS
6 COLLOCATION (ON PAGE 17, LINES 9 - 17) IN THE NORTH DADE
7 GOLDEN GLADES CENTRAL OFFICE. HOW DOES HE ARRIVE AT
8 THIS FIGURE?

9

10 A. First, Mr. Stinson makes up a term called equivalent square footage.
11 This term is not defined anywhere. He then generates a number of 106
12 empty and reserved bays that can be used for cageless collocation. He
13 then tries to equate this number of bays to a mythical amount of
14 physical collocation space by using some kind of common multiplier.
15 His calculation is not accurate for the following reasons:

16

17 1. Where are the 106 reserved and empty bays in occupied space?

18 The drawing only totals 77 toll bays (Exhibits JDB-2 and JDB-3) and
19 19 switch bays for a grand total of 96 bays. These are located in
20 two different ground planes on two different floors.

21

22 2. Mr. Stinson's apparent multiplier of 7.28 square foot per bay might
23 be somewhat correct if one was creating new space (assuming a
24 standard bay of 2'2" wide by 12" deep, thus 14 bays would fit in 200
25 square feet, if you don't count the access aisles to get to the block

1 of space), as it includes the bay footprint AND half the front and
2 rear aisle. However, experienced planners do not use this number
3 in existing equipment rooms. This type of calculation in existing
4 lineups is faulty, as the aisles already exist, serving working
5 equipment on all sides of the scattered vacant bay spaces. The
6 correct multiplier is 3.5 square foot per bay (assuming a standard
7 2'2" bay times a nominal depth of 1'). This gives a true picture of the
8 available space of 336 square feet for scattered growth bays of ALL
9 types. Mr. Stinson is mistaken by about 1,164 square feet.

10

11 3. Mr. Stinson ignores the ground plane separation by attempting to
12 put integrated equipment into isolated ground planes.

13 4. Mr. Stinson ignores the specified manufacturer layouts for various
14 families of equipment. When the equipment could not grow to
15 handle calls, customer service would be in jeopardy.

16

17 5. Finally, Mr. Stinson refuses to allow any BellSouth space
18 reservation in spite of the FCC rulings to the contrary.

19

20 Q. ON PAGE 18, LINES 9 – 11, MR. STINSON SAYS BELLSOUTH
21 SHOULD ONLY HONOR REASONABLE REQUESTS. HOW CAN
22 THIS BE DONE?

23

24

25

1 A. Obviously, it cannot be done. BellSouth treats each collocator request
2 as reasonable, regardless of the size or type of collocation requested.
3 BellSouth does not see any reason to put itself in any other position.

4

5 **REBUTTAL TO MR. BEASLEY (INTERMEDIA)**

6

7 Q. PLEASE RESPOND TO MR BEASLEY'S GENERAL COMMENTS ON
8 PAGE 5, LINES 4 - 15?

9

10 A. I can address his general Issues three through five. Issues one and two
11 are discussed in the rebuttal testimony of BellSouth witnesses Milner
12 and Cruit. In Issue three, Mr. Beasley notes that there are many areas
13 where 7 foot tall equipment is installed with 3 - 4 feet of vertical space
14 left before the overhead racks. This is exactly the situation referred to
15 earlier in this testimony. Equipment frames are bigger, hotter, deeper,
16 and require more cabling and air conditioning to function. The
17 overhead support racking and air conditioning ducts above them limit
18 the available equipment space in a new equipment bay. Any one of the
19 cable congestion pictures in Exhibit JDB-14 through JDB-19 amply
20 illustrate this point.

21

22 In Issue four, Mr. Beasley indicates he saw "vast" areas of usable
23 space in the lineups between racks and bays currently unused. While
24 allowing for some enrichment for making his point, Mr. Beasley makes
25 no allowances for the following:

1

2

1. legitimate BellSouth space reservations,

3

2. code required exit aisles,

4

3. growth space in fixed equipment layouts or families without

5

which no ALEC or BellSouth customer gets service, or

6

4. unusable areas caused by ground plane separations and air

7

conditioning intakes.

8

9

In Issue five, Mr. Beasley thinks BellSouth should not be actively using

10

Signal Maintenance Access Point technology even though it is still

11

state of the art. He further alleges BellSouth does not keep up to date

12

by consolidating/removing equipment to take advantage of today's

13

improved technology and liberate space. Everyday, BellSouth plans

14

the addition of new equipment, the redesigning of service, the

15

reallocation of floor space, and the best way of cabling to meet

16

customer service orders and anticipate demand. BellSouth does the

17

right thing for our customers, the ratepayer, and the stockholder with

18

the best timing BellSouth can muster.

19

20 Q.

MR. BEASLEY TRIES TO GENERATE PHYSICAL COLLOCATION

21

SPACE IN MIAMI PALMETTO ON PAGE 6, LINE 6 TO PAGE 7, LINE

22

3. IS HIS ANALYSIS CORRECT?

23

24 A.

No. Mr. Beasley repeats most of the general errors committed by all the

25

parties and rebutted at the start of this testimony. He refuses to

1 acknowledge building codes, takes properly forecasted space meeting
2 BellSouth requirements, and even tries to take newly occupied
3 equipment space. He confuses administrative space with that
4 necessary to install, maintain, repair, and service equipment.
5 Specifically,:

- 6
- 7 1. Line 6 notes an area mentioned on the audit staff report as Audit
8 Area No. 5. The room is used for an office, conference room, and
9 computer based training area. The room use has been discussed
10 earlier in this testimony and in my direct testimony, page 57 and
11 Exhibit JDB-19, page 16.
 - 12
 - 13 2. Page 6, lines 14 – 17 is claimed by Mr. Beasley to have
14 approximately 650 square feet. The area is actually 402 square
15 feet, including all code required aisles, and is detailed in the Audit
16 Report Area No. 13 and Exhibit JDB-12. Pictures can be found in
17 Exhibit JDB-19, pages 29 and 30. The space was noted by the
18 auditors to be unsuitable for collocation. The area is also detailed in
19 rebuttal testimony above.
 - 20
 - 21 3. Page 6, line 17 containing Mr. Beasley's Note 3 is Audit Report
22 Area No. 4. This is the area that must be enclosed for code
23 required PICS storage area. This area has been rebutted above. It
24 is detailed in my direct testimony, page 57 and Exhibit JDB-19,
25 page 10. The audit staff found it inappropriate for collocation.

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4. Page 6, line 20 details an area called Note 4. Mr. Beasley must be mistaken, there is no such vacant area noted on any exhibit. The area is full of equipment.

5. Page 6, line 23, to Page 7, line 3 details an area called Note 5. This area is pictured in Exhibit JDB-19, page 24 and in audit staff report as Audit Area No. 9. It is now partially full of equipment, with more on the way. The area was deemed inappropriate for collocation. It has been rebutted in testimony above.

Q. DOES MR. BEASLEY'S ANALYSIS OF GOLDEN GLADES ON LINE 7 PAGE 4 TO LINE 5 PAGE 6 STAND UP TO REVIEW?

A. No. He makes the same general errors as the other carriers. Specifically,:

1. Page 7, line 11 talks about an area of 795 square feet. The area is not 795 square feet but actually 531 square feet as detailed in my Exhibit JDB-2. The area is so configured that safe collocation space cannot be built. This is Audit Report Area No. 11 and detailed in Exhibit JDB-14, page 20.

2. Page 7, line 13 talks about an area of 970 square feet. This area does not exist. There are two separate areas of 317 and 283

1 square feet (600 square feet total) as detailed on Exhibit JDB-2.
2 The two areas are so small and configured such with BellSouth
3 space reservations that the auditors did not think collocation was
4 appropriate.
5

6 3. Page 7, line 14 covers an area identified as Note 3. Note 3 is
7 actually two spaces: one full of virtual collocation equipment of 249
8 square feet, and the other properly reserved for 04T toll switch
9 growth of 143 square feet. Both are noted on my Exhibit JDB-2.
10 Obviously, neither space is available for collocation as they are
11 either occupied or properly reserved.

12 4. Page 7, line 17 covers an area identified as Note 4. This note tries
13 to combine the code-required PICS storage area and the exit
14 hallway into a collocation suit. This area has been discussed in
15 rebuttal many times above. It is Audit Area Nos. 3 and 5 and
16 detailed in my direct testimony and exhibits as referenced above. If
17 Commission order PSC-99-0060-FOF-TP is upheld on appeal, this
18 space will be unavailable for any other collocator.
19

20 5. Page 7, line 22 notes an area of 661 square feet. This area is
21 properly reserved for BellSouth local and tandem switch growth.
22 The area is detailed as audit report area No. 9, and is pictured on
23 Exhibit JDB-14 pages 17 and 18.
24
25

1 6. Page 8, line 1 covers an area identified as Note 6. This area is the
2 93 square foot computer-based training area. This area has been
3 rebutted several times above. It is pictured in Exhibit JDB-14, page
4 6.

5

6 7. Page 8, line depicts an area identified as Note 7. The area is
7 actually 114 square feet, not 349 square feet, and is properly
8 reserved for BellSouth tandem switch growth. This area is not
9 available for physical collocation.

10

11 Q. DID MR. BEASLEY MAKE COMMENTS ON BOCA TEECA SPACE
12 AVAILABILITY ON PAGE 8, LINE 6 TO LINE 7, PAGE 9 THAT YOU
13 CAN COMMENT ON?

14

15 A. Yes, I can. Mr. Beasley still makes the same general errors as the
16 other carriers. Specifically,:

17

18 1. Page 8, line 14 talks about an area identified as note 1. This is area
19 No. 5 on the audit report and pictured on Exhibit JDB-18, pages 8
20 and 9. Given the code and grounding plane separation issues, the
21 area is not adequate for safe, code compliant collocation
22 installation.

23

24 2. Page 8, line 16 identifies an area called Note 2. This area is
25 actually 1165 square feet, not 1756 square feet. It is properly

1 reserved for BellSouth switch growth and code required exit aisles.
2 This area is noted on the Audit Report as Area No. 4. It has been
3 rebutted above. It is pictured in Exhibit JDB-18, pages 6 and 7.

4

5 3. Page 8, line 19 identifies an area as Note 3. Actually, Mr. Beasley is
6 confused. This is the same area described in Note 2. There is no
7 such space in Note 3 unless he is subdividing Note 2. If he is, then
8 his square footages are off in both cases.

9

10 4. Page 8, line 21 identifies an area as Note 4. There is no such area
11 of vacant space on any exhibit. The area is totally occupied by
12 working switch equipment.

13

14 5. Page 9, line 3 discusses an area identified as Note 5. This is the
15 administrative space for forty-nine people, not sixteen, as he
16 suggests. The space is located on another floor. This is Audit
17 Report Area Nos.1 and 2. This area has been rebutted above
18 several times. It is pictured in Exhibit JDB-18, pages 10-22.

19

20 Q. CAN YOU COMMENT ON MR BEASLEY'S ASSESSMENT OF WEST
21 PALM BEACH GARDENS ON PAGE 9, LINE 8 TO PAGE 10, LINE 10?

22

23 A. Yes. Mr. Beasley continues to make the same general errors made by
24 all the carriers. Some specific comments follow:

25

1 1. Page 9, line 15 tries to identify an area as Note 1. It is an area of
2 180 square feet not 475 square feet as stated by Mr. Beasley. The
3 area is a fixed layout maintenance area workstation ordered from
4 the vendor. It is located immediately adjacent to the processor. The
5 area was noted in the audit report as Audit Area No.1 and pictured
6 in Exhibit JDB-15, pages 10 and 11. The auditors determined the
7 space was unsuitable for physical collocation.

8
9 2. Page 9, line 19 talks about an area identified as Note 2. The
10 majority of this space is two code-required exit aisles and ground
11 plane separation aisles. The area is noted as Audit Area No. 2 in
12 the audit report and is shown on Exhibit JDB-15, pages 7 and 8.
13 The area was deemed unsuitable for physical collocation. There is
14 no overhead door in this area. Mr. Beasley may be referring to the
15 large smoke exhaust louvers necessary to vent a smoke filled
16 central office in case of fire.

17
18 3. Page 9, line 23 identified as Note 3. This is the collection of fixed
19 layout maintenance centers detailed in Audit Report Area No.11.
20 This area includes code required exit aisles. This area has been
21 rebutted in testimony above. It is the only place available for
22 relocating the code required exit aisle and receiving area if the
23 Commission Order No. PSC-99-0060-FOF-TP is upheld on appeal.
24 This space is, therefore, not available for collocation. It is pictured
25 in Exhibit JDB-15, pages 4-6.

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4. Page 10, line 4 is called Note 4. The alleged Note 4 space of 1,279 square feet does not exist. Exhibit RB-4 shows the area covering the fully occupied power area, existing virtual collocators, a new Titan 5500 DCS, and occupied miscellaneous toll equipment. The area is partially pictured in my Exhibit JDB-15, page 24.

Q. IS THERE SPACE FOR MORE STRUCTURES ON THE FOUR SITES VISITED BY MR. BEASLEY AS REPORTED ON LINES 14, PAGE 11 TO LINE 12, PAGE 12.?

A. The answer is no for Golden Glades and West Palm Beach Gardens. The Golden Glades building sits against three setbacks or property lines. The fourth side faces the parking lot that contains the code-required number of spaces for a full two-story building. The site is also at maximum development in terms of paving and coverage. The BellSouth property is fully surrounded by developed warehouse properties. West Palm Beach Gardens has similar setback, zoning, and parking limitations. BellSouth is surrounded by land held in trust and zoned for large residential projects.

The other two sites, Boca Teeca And Miami Palmetto, have some parking area left unoccupied. However, Boca Teeca Central Office is in a highly restricted construction area. This is obvious to those attending the site visits. One cannot assume one will get zoning permission for

1 any outlying structure of any kind. Miami Palmetto has land held for
2 relocating the parking area when a horizontal building addition is
3 added. This land area is sized to support the maximum building size.
4 One cannot assume that zoning in the Doral Country Club area will
5 allow for outlying buildings.

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8

9 A. Yes, it does.

10

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