ORIGINAL

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MIGUEL F. RODRIGUEZ,

LOUIS A CABAN, ROBERT COOK, AND GUY REAM

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. MIGUEL F. RODRIGUEZ (North Dade Golden Glades and Miami Palmetto)

My name is Miguel F. Rodriguez. My business address is 18560 N.W.27th Avenue Miami, Florida 33056. I am a Common Systems Capacity Manager – Network Operations for BellSouth Telecommunications, Inc. (herein after "BellSouth" or "the Company"). I have served in my present role since October of 1998 and have been involved with space planning for BellSouth, including physical collocation, for the North Dade Golden Glades and Miami Palmetto central offices.

LOUIS A. CABAN (Boca Raton Boca Teeca)

My name is Louis A. Caban. My business address is 6451 North Federal Highway, Ft. Lauderdale, Florida 33308. I am a Common Systems Capacity Manager - Network Operations for BellSouth Telecommunications, Inc. (herein after "BellSouth" or "the Company). I have served in my present role since September of 1996 and have been involved with space planning for BellSouth, including physical collocation, for the Boca Raton Boca Teeca central office.

ROBERT COOK (Daytona Beach Port Orange and Lake Mary)

My name is Robert Cook. My business address is 301 W. Bay Street, Jacksonville Florida 32202. I am a Common Systems Capacity Manager – Network Operations for BellSouth Telecommunications, Inc. (herein after "BellSouth" or "the Company"). I have served in my present role since October of 1995 and have been involved with space planning for BellSouth, including physical collocation, for the Daytona Beach Port Orange and Lake Mary central offices.

GUY REAM (West Palm Beach Gardens)

My name is Guy Ream. My business address is 6451 North Federal Highway, Ft. Lauderdale, Florida 33308. I am a Common Systems Capacity Manager- Network Operations for BellSouth

Telecommunications, Inc. (herein after "BellSouth" or "the Company"). I have served in my present role since October of 1995 and have been involved with space planning for BellSouth, including physical collocation, for the West Palm Beach Gardens central office.

Q. ARE YOU THE SAME FOUR COMMON SYSTEMS CAPACITY MANAGEMENT (CSCM) PANEL WITNESSES WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. MIGUEL F. RODRIGUEZ (North Dade Golden Glades and Miami Palmetto)

I will provide rebuttal testimony to the direct testimony of Teleport Communications Group Inc. ("TCG") witness Scott Stinson, InterMedia Communications Inc.'("Intermedia") witness Ronald W. Beasley, ACI Corp. ("ACI") witness James D. Cuckler, Supra Telecommunications And Information Systems, Inc. ("Supra") witness David Nilson and Sprint Communications Company Limited Partnership ("Sprint") witness Michael D. West concerning the North Dade Golden Glades and Miami Palmetto central offices.

LOUIS A. CABAN (Boca Raton Boca Teeca)

I will provide rebuttal testimony to the direct testimony of Teleport Communications Group Inc. ("TCG") witness Scott Stinson, Intermedia Communications Inc. ("Intermedia") witness Ronald W. Beasley, ACI Corp ("ACI") witness James D. Cuckler, Supra Telecommunications and Information Systems, Inc. ("Supra") witness David Nilson and Sprint Communications Company Limited Partnership ("Sprint") witness Michael D. West concerning the Boca Raton Boca Teeca central office.

ROBERT COOK (Daytona Beach Port Orange and Lake Mary)

I will provide rebuttal testimony to the direct testimony of WorldCom Technologies, Inc. ("WorldCom") Witness Ron Martinez, Supra Telecommunications and Information Systems ("Supra") Witness David Nilson and Sprint Communications Company Limited Partnership ("Sprint") Witness Michael D. West concerning the Daytona Beach Port Orange and Lake Mary central offices.

GUY REAM (West Palm Beach Gardens)

I will provide rebuttal testimony to the direct testimony of Intermedia Communications Inc. ("Intermedia") witness Ronald W. Beasley, Supra Telecommunications and Information Systems, Inc. ("Supra") witness David A. Nilson, and Sprint Communications Company Limited

Partnership ("Sprint") witness Michael D. West concerning the West Palm Beach Gardens central office.

GENERAL COMMENTS

Q. ON PAGE 6, LINE 3 OF HIS TESTIMONY, MR. STINSON (TCG) STATES THAT IN A VIRTUAL COLLOCATION ARRANGEMENT, AN ALEC CANNOT ACCESS ITS EQUIPMENT FOR PROVISIONING AND MAINTENANCE. IS THIS TRUE?

A. No. In the North Dade Golden Glades Central Office, there is one virtually collocated ALEC that has a dial-up arrangement with a modem to remotely access its equipment for provisioning and limited maintenance.

Q. ON PAGE 6, LINES 7 - 8, MR. STINSON (TCG) STATES THAT ILECS REQUIRE ALECS TO GO THROUGH ELABORATE AND UNSATISFACTORY PROCEDURES TO PERFORM MAINTENANCE ON VIRTUALLY COLLOCATED EQUIPMENT. PLEASE COMMENT.

A. All that is required is for a representative of the affected ALEC to place a call to an 800 number so that a centralized 24X7 facility can log the trouble report for tracking purposes and issue a ticket number for an ILEC technician to work on the trouble during normal business hours. If the report comes in during non-business hours, the centralized center

will make the necessary arrangements to have an ILEC technician dispatched to the central office in question.

Q. ON PAGE 6, LINE 13, MR. STINSON (TCG) STATES THAT ALECS ARE REQUIRED TO PROVIDE COSTLY TRAINING TO ILEC PERSONNEL NOT FAMILIAR WITH THE EQUIPMENT THAT THE ALECS ARE INSTALLING. PLEASE COMMENT.

A. To the best of the CSCM Panel's knowledge, training given in the field has consisted of merely a one-time overview of the equipment, which usually lasts about 4 hours. Surely, this cannot be very costly.

Q. ON PAGE 11, LINES 21 - 25 AND PAGE 12, LINES 1 - 6, MR. STINSON (TCG) ASKS THE COMMISSION TO ADDRESS THE BELLSOUTH FLOOR PLAN TO INCLUDE MUCH MORE DETAIL. PLEASE COMMENT.

A. The space plan drawings, which have been submitted in this proceeding, are meant to be used as a planning tool to provide general planning information for future growth. Detailed records are maintained by Lucent Technologies in a database for BellSouth on a contractual basis. This is used by certified area vendors to maintain a current view of the central offices. These drawings contain front equipment layouts, wiring lists, dimensions, cabling routes, power and fuse assignments, and alarms, along with appropriate equipment information for every

central office.

Q. MR. WEST (SPRINT), MR. NILSON (SUPRA), MR. BEASLEY (INTERMEDIA), AND MR. STINSON (TCG) ALL ADDRESS THE ISSUE OF OBSOLETE AND UNUSED EQUIPMENT. PLEASE COMMENT.

A. MIGUEL F. RODRIGUEZ (North Dade Golden Glades and Miami Palmetto)

To the best of my knowledge, there is not any obsolete equipment in the North Dade Golden Glades central office. What has been identified as possible removal, amounts to seven bays. Four bays, of the previously mentioned seven, are already planned for the deployment of BellSouth ADSL (Asymmetrical Digital Subscriber Loop) equipment.

To the best of my knowledge, there is not any obsolete equipment in the Miami Palmetto central office. Equipment that is installed and providing service to a customer is considered to be Telephone Plant in Service. Good and efficient customer service does not demand the latest and/or the newest technology.

LOUIS A. CABAN (Boca Raton Boca Teeca)

To the best of my knowledge, there is no obsolete or unused

equipment in the Boca Raton Boca Teeca Central Office. Additionally, this office does not contain any non-essential or retired equipment that can be removed. The existing equipment that is located in this office is functional and currently in service. The crossbar equipment that is referred to by several witnesses in these proceedings is also still operational and used for local testing and trouble isolation. In fact, all designed circuits requested by the ALECs require the use of this equipment for trouble isolation. It is economically unfeasible to remove older equipment, just for the sake of modernization. Any modernization must stand on its own merits, both technically and economically.

ROBERT COOK (Daytona Beach Port Orange and Lake Mary)

To my knowledge, there is no obsolete equipment in the Daytona Beach Port Orange or Lake Mary central offices. Equipment that is installed and providing service to a customer is considered to be Telephone Plant in Service. Good and efficient customer service does not demand the latest and/or the newest technology.

GUY REAM (West Palm Beach Gardens)

To my knowledge, there is no obsolete or unused equipment in the West Palm Beach Gardens central office, with the exception of one bay of fiber optical terminal equipment that is currently in the process of being removed.

NORTH DADE GOLDEN GLADES CENTRAL OFFICE

Q. ON PAGE 14, LINES 1 - 4, MR. STINSON (TCG) STATES THAT THE MANAGER'S OFFICE IN THE NORTH DADE GOLDEN GLADES CENTRAL OFFICE CAN BE RELOCATED TO A LOCATION OUTSIDE OF THE BELLSOUTH BUILDING. PLEASE COMMENT.

A. This is a critical BellSouth Operations Center due to the amount of transmission and switching equipment located here. This Manager oversees only this central office and he needs to be located at this facility. This is not a reasonable option.

Q. ON PAGE 4, LINES 18 - 23 AND PAGE 5, LINES 1 - 15, MR. BEASLEY (INTERMEDIA) MAKES SEVERAL GENERALITIES REGARDING FLOOR SPACE AVAILABILITY IN THE CENTRAL OFFICES UNDER DISCUSSION IN THESE PROCEEDINGS. PLEASE COMMENT.

A. First, nowhere in the North Dade Golden Glades central office, has growth been reserved for a five-year term. Only two year's worth of growth has been reserved in the North Dade Golden Glades office. So far this year, BellSouth has been exceeding its growth forecasts for this office.

Second, Mr. Beasley alleges that out-of-date relay/crossbar equipment is located in all of the six central offices discussed in these proceedings. I believe he may be referring to BellSouth's SMAS (Switching Metallic Access System) equipment. Although it is electromechanical, this equipment is highly functional. It is the only means BellSouth has to test metallic cable pairs on circuits still on copper. Many ALEC dial tones that are going to subscribers on copper facilities are being installed with SMAS points as the ALEC is requiring verification of dial tone after the subscriber is transferred from BellSouth to the ALEC's service. Some special circuits going between different wire centers require specialized plug-ins in D4 channel banks. Wiring these circuits to SMAS points allows a toll test technician to remotely access the circuit and bring it into alignment for the subscriber's use. As a matter of practice, BellSouth does not rearrange special circuits to consolidate SMAS equipment, as this could cause service interruptions for the customer. It is through considerable expense and coordination that these rearrangements take place. It should also be mentioned that equipment is replaced when additional functionality can be achieved or economics support the replacement.

Third, Mr. Beasley states that BellSouth has not removed older equipment and replaced it with newer condensed bays. BellSouth takes great care not to put all of its 'eggs in one basket'. If everything were terminated in a high density DACS frame for example and the DACS frame experienced a major hardware failure, then it is possible

that everything terminated in that DACS frame could suffer substantial down time. If, on the other hand, only 50% of any wire center's trunks to another wire center were terminating on the DACS frame and the other 50% were terminating in older multiplexing equipment, then if the DACS frame failed, 50% of the trunk traffic would still be operational.

Q. ON PAGE 7, LINES 7 - 23 AND PAGE 8, LINES 1 - 5, MR. BEASLEY (INTERMEDIA) TALKS ABOUT 3,161 SQUARE FEET IN THE NORTH DADE GOLDEN GLADES CENTRAL OFFICE THAT HE FEELS COULD ACCOMMODATE PHYSICAL COLLOCATION. PLEASE COMMENT.

A. First, 795 square feet are identified as future switch on the first floor and eleven bays will be installed for the 04T Tandem switch in the first quarter of 2000 to meet year 2000 demand. Another fourteen bays will be needed at the end of year 2000 to meet year 2001 demands. This constitutes two years of growth. These growth demands are based on an average of the last three years growth for this particular tandem switch. This growth does not include two bays per year for the 03T operator tandem for a total of four more bays. Using 7.5 square feet per equipment bay, these twenty-nine bays will reduce the 795 square foot area by 217.5 feet. Also not included in this space is the addition of two additional STP (Signal Transfer Point) cabinets for years 2000 and 2001. These cabinets are of an odd-size and occupy 9.5 square feet, bringing the total to 236.5 square feet required for two years worth

of switch growth in this area. 795 square feet minus 236.5 square feet leaves 558.5 square feet of unusable space under the current guidelines for physical collocation.

Second, fourteen bay Tellabs Titan 5500 DACS frame now occupies the space identified in Note 2 as 970 square feet. This is only an initial installation, with another nine bays scheduled for year-end 2000 to meet year 2001 demand. Additional FOT (Fiber Optic Terminal) bays and DSX-1 (Digital Signal Cross Connect – 1) are also being installed in this area.

Third, the area marked Note 3 is the virtual collocation area established by BellSouth. This area is rapidly exhausting due to the number of virtual collocation installations. The next virtual collocation request will trigger the preparation of a new area for equipment to be laid out.

Fourth, the area addressed in Note 4 is being converted into a plug-in storage and unpacking room.

Fifth, the area addressed by Note 5 on the second floor will have ten equipment bays installed for the 01T Tandem by year-end 1999 to meet customer demands. Another four bays will either be needed by year-end 1999 or first quarter 2000. At this point, the switch will physically exhaust. An alternative tandeming solution is currently being studied. The 661 square feet will be reduced by 105 square feet as a

result of these equipment additions, leaving 556 square feet of isolated ground plane area. Under BellSouth's present collocation guidelines, this area would not be suitable for physical collocation.

Finally, the area marked Note 6 is used to provide computer based training on central office equipment for the employees in this office and could be utilized to provide training on ALEC virtually collocated equipment.

Q. ON PAGE 15, LINES 4 - 6, MR. WEST (SPRINT) SAYS THAT BELLSOUTH HAS RESERVED THIRTY-EIGHT BAYS OF 01T TANDEM EQUIPMENT FOR FUTURE GROWTH IN THIS OFFICE. PLEASE COMMENT.

A. I am not aware of thirty-eight bays reserved for future growth of the 01T Tandem. Only fourteen bays are reserved. After that, the capacity of the switch exhausts.

MIAMI PALMETTO CENTRAL OFFICE

Q. ON PAGE 4, LINES 18 - 23 AND PAGE 5, LINES 1 - 15, MR. BEASLEY (INTERMEDIA) MAKES SEVERAL GENERALITIES REGARDING FLOOR SPACE AVAILABILITY IN THE CENTRAL OFFICES UNDER DISCUSSION IN THESE PROCEEDINGS. PLEASE COMMENT ON THE MIAMI PALMETTO CENTRAL OFFICE.

A. First, nowhere in the Miami Palmetto central office, has growth been reserved for a five-year term. Only three years worth of growth has been reserved in the Miami Palmetto office. So far this year, BellSouth has been exceeding its growth forecasts for this office.

Second, when the Miami Palmetto office was 'cut over' to a LUCENT 5ESS, the switching equipment was installed on the North end of the building. When that area exhausted for future growth, a new area was established on the South end of the building. This area needed to be within 200 feet of the isolated power ground window. Preparing an area for switching equipment requires a certain amount of building work to insure adequate air conditioning. Cable rack infrastructure also needs to be planned out ahead of time and provisions made for hanging any future required racks to serve the equipment bays installed, such as ceiling inserts. Since the main processor for the switch was on the North side of the building where the switch was originally installed, the switch vendor had to install fiber optic connections to the modules being installed on the South end. This was to insure the integrity of the switch, along with other metallic measuring test equipment. This new area of switch equipment on the South end should have provided many years of future growth. Because of the recent collocation activity, BellSouth has reserved only three years of growth and has installed a Tellabs Titan 5500 digital cross connect system at the extreme southern portion of this area to meet the needs of BellSouth. This equipment was needed because three existing

LUCENT DACS (Digital Access Cross Connect Systems) frames had been exhausted. This new equipment has four times the capacity of the LUCENT product. A six to seven foot separation needs to be maintained between the integrated ground plane of the Tellabs equipment and the isolated ground plane of the switch.

Q. ON PAGE 6, LINE 6 THROUGH PAGE 7, LINE 3, MR. BEASLEY (INTERMEDIA) ADDRESSES 2,839 SQUARE FEET THAT HE FEELS COULD BE TURNED INTO PHYSICAL COLLOCATION AND ON PAGE 9, LINES 12 –16, MR. WEST (SPRINT) REFERS TO 600 – 800 SQUARE FEET THAT IS USED FOR STORAGE FILES. PLEASE COMMENT.

A. The first thing that strikes me about this piece of testimony is that Mr. Beasley suggests that we relocate a total of 2,054 square feet of maintenance and provisioning areas, with no suggestion as to where to put it.

Second, the 414 square foot conference room is utilized for vendor training, staff meetings, and a place for the supervisor to have an office for general office functions. In an office with this much activity, BellSouth believes it is necessary to retain this area as it exists.

Third, the 650 square foot area (Note 2), referred to specifically by Mr. West, is used to maintain all of the interoffice carrier records. Located

in this area, there is also a TLWS (Trunk Line Work Station) used during provisioning and trouble shooting of Integrated DLC (Digital Loop Carrier). There is also a terminal to retrieve cable and pair records maintained in BellSouth's COSMOS (Computer System for Mainframe Operation Support) database. Also in this area is a terminal for the employees to retrieve their daily work assignments and close out any trouble tickets they may have worked on during the day.

Fourth, the 372 square feet referred to in Note 3 will be used to construct a fire-rated plug-in storage area. These plug-ins are stored in cardboard anti-static containers.

Fifth, the area marked Note 4 contains the 'tub' files, where the records of all special circuits are contained in the central office. Although it might be argued that these records could be kept electronically or in some other form, they contain much hand-written information about each circuits' designs that is not contained in the database (because it is not inventoried). For example, tie pairs used in wiring the circuits are contained in these records.

Sixth, the area marked Note 5 was only a temporary storage or staging area for equipment being installed in the office at the time of the walkthrough in February of 1999. This area now contains the initial installation of fourteen bays of a Tellabs 5500 Titan DACS, with a potential for up to fifty-five bays when fully grown. Nine future bays for

this equipment have been reserved in this area for installation in the first quarter of 2000 to meet demand through the first quarter of 2001.

Q. ON PAGE 9, LINES 23-25 AND PAGE 10, LINES 1-10, MR. CUCKLER (ACI) MAKES SEVERAL RECOMMENDATIONS ON MAXIMIZING THE USE OF SPACE IN THIS OFFICE. PLEASE COMMENT.

A. Referring to Photograph 99-2Y-08, these cabinets house the spare plug-ins for the 5ESS Switch in the building. Because of its central location in the division and expanded hours of coverage, the Miami Palmetto central office serves as a 'hub' for plug-in storage for other 5ESS offices in the North Dade area (i.e., Hialeah and Northside). An oscilloscope is also seen in the picture, which is used by the RTSG (Regional Technical Support Group) when trouble shooting difficult back plane problems (a back plane is a printed circuit board that ties together the electronics of individual circuit packs). Photograph 99-2Y-19 shows the temporary relocation of circuit plug-in equipment that was placed when the physical collocation common area was built. The plan is to build an enclosed fire-rated storage area in the space depicted in Photograph 99-2Y-02 to house all circuit plug-ins for this facility.

Q. ON PAGE 14, LINES 14 - 16, MR. CUCKLER (ACI) ASSERTS THAT BELLSOUTH APPEARS TO HAVE RESERVED TWENTY-FOUR BAYS FOR FUTURE GROWTH, WHEN FORECASTS ONLY SHOW ONE BAY IN 1999 AND ONE BAY IN 2000. PLEASE COMMENT.

A. The number twenty-four has no particular significance. Much goes into the preparation of an area for DSX line-ups. First, it is imperative that this space be contiguous in nature to avoid central office tie pairs that only serve as potential points of failure, which affects customer service and contributes to overhead cable rack congestion that may exist in the office. DSX panels and bays are not considered electronic equipment , nor do they have circuit packs associated with them. They serve as monitoring and testing points for cross-connecting different pieces of equipment, including collocated equipment, to other pieces of equipment in the network. They also serve as test access points in trouble shooting. Because physical wires are run from one panel to another, it would be extremely cumbersome to have cable troughs scattered throughout the line-up to "jump over" telecommunications equipment. This office currently has three DSX-1 locations with tie pairs between the three of them. The plan is to create one long contiguous line-up in which to place all future growth and hopefully, eliminate the need to start new line-ups, with more tie pairs. The area where this line-up has been created is a high traffic area next to the MDF (Main Distribution Frame). Collocators, as well as BellSouth, would not appreciate the risk of a rolling ladder possibly hitting their equipment. DSX bays are less susceptible to any damage, since the panels used in this office cross connect in the back, with the front solely used for testing purposes.

Q. ON PAGE 15, LINE 7 THROUGH PAGE 17, LINE 13, MR. NILSON (SUPRA) DISCUSSES DIFFERENT AREAS IN THIS OFFICE THAT HE BELIEVES COULD ACCOMMODATE PHYSICAL COLLOCATION. PLEASE COMMENT.

A. Mr. Nilson indicates that 300 square feet of "valuable telephone central office space has been allocated to a BellSouth Subsidiary." This space is actually occupied by Bellsouth Telecommunication's own video equipment. This equipment can be found in our Detailed Continuing Property Records (DCPRs). He also refers to frame relay equipment located in the same general area. However, this equipment is not associated with BellSouth's video equipment. It is currently being used to provide frame relay service to Bellsouth Telecommunication's customers.

In regard to Photograph 99-2Y-19, Mr. Nilson notes that BellSouth has copious quantities of space in the Miami Palmetto Central office. This space is now occupied by a Tellabs Titan 5500 DACS frame. The shelving units he refers to in his testimony are only being located there temporarily, until a fire rated 'pics' storage room can be built in the Southwest corner of the office. Photograph 99-2y-20 shows another view of the same area. The 'junkpile' that Mr. Nilson refers to in his testimony is now an extremely efficient, high density digital cross connect system that will serve BellSouth traffic, as well as ALEC traffic, in the coming months. The yellow caution tape shown in Photograph

99-2Z-05 indicates that three years of switch growth is anticipated to extend out to this area, which includes the current footprint of the switching equipment being utilized. Photograph 99-2X-08, which Mr. Nilson refers to as another instance of BellSouth's cluttered inefficient use of space, is actually a very organized switch spare plug-in room. This area is referred to in my rebuttal to ACI witness Cuckler. The area depicted by Photograph 99-2X-12 is discussed in the rebuttal of BellSouth witness Bloomer. The remaining Photographs (99-2Y-01, 99-2Y-02, 99-2Y-09, 99-2Y-10, 99-2Y-14, 99-2Z-11, 99-2Z-12, and 99-2Z-17) are also discussed in the rebuttal testimony of BellSouth witness Bloomer.

As further clarification regarding Photograph 99-2Z-17, there is space directly East of the DSX-3 growth area, where BellSouth currently plans to install six bays of virtual collocation equipment, four bays of BellSouth ADSL equipment and one bay of Fiber Optic Terminal equipment (which is a 'node' of a customer SMARTRing™ service). In other words, much of the space depicted in this area has already been allocated for use.

Q. ON PAGE 10, LINES 15 - 20, MR. WEST (SPRINT) ASSERTS THAT BELLSOUTH HAS BEGUN PLACING 5ESS LINE MODULES AND PERIPHERALS WITHIN A NEW AREA WHEN THERE WAS STILL ROOM IN AN EXISTING AREA. PLEASE COMMENT.

A. I believe Mr. West may be referring to the SM2K's (Switching Module 2000's) that are being installed on the South end of the building. This is newer technology that became available and was purchased in the 1997 timeframe. This equipment has a much larger footprint than the older 'classic" Switching Modules (SMs) that comprise the rest of the 5ESS switch located at the North end of the building. The only spaces on the North end were for the expansion of the CM2 (Computing Module 2) of the existing switch. This is the "brain" of the switch and as the switch grows, so does the brain. It is imperative that the cabinets grow side by side and in the order specified by the manufacturer.

Q. ON PAGE 11, LINES 7 - 22, MR. WEST (SPRINT) ADDRESSES PARTIAL LINE-UPS OR UNFILLED BAYS THAT CAN BE RECONFIGURED FOR PHYSICAL COLLOCATION. PLEASE COMMENT.

A. Many times, BellSouth's drawings reflect areas where BellSouth thinks it might want to install a particular family of equipment, with the understanding that this is subject to change. An area shown to be future circuit could be used for virtual collocation (i.e., if the area was suitable and the area where virtual collocation was currently located in the office had exhausted). Floor space is not actually reserved until the manager knows there is a job going into a particular location. BellSouth's central office profiles indicate to the area vendor where to install equipment based on families of equipment. BellSouth does not

mix switch equipment with circuit equipment because of differences in grounding potentials and the obvious risk of damage to equipment and people in the event of a lightning strike. Families of equipment are defined as switch, circuit or toll, and DSX. Within the circuit family, there are multiplexers, Fiber Optic Terminals, DACS frames, D4 channel banks, Digital Loop Carrier, Next Generation Digital Loop Carrier, DAML, frame relay, ATM, ADSL, etc. It makes for a much more organized operation to keep like equipment grouped together.

Q. ON PAGE 12, LINES 15 - 23, MR. WEST (SPRINT) SUGGESTS THAT BELLSOUTH HAS RESERVED AT LEAST FIVE YEARS WORTH OF GROWTH IN THIS OFFICE. PLEASE COMMENT.

A. Switch growth on the South side of the building has been reserved through the end of year 2001. This would be three years for the reasons I have explained in my rebuttal to witness Beasley. The Titan DACS installation has now been completed. It will take up a total of fourteen bays (plus five DSX bays in another part of the building for a total of nineteen bays) to meet growth demands through year-end 1999 and into the first quarter of 2000. Another job will add eight more bays, plus five DSX bays for a total of thirteen bays, in the first quarter of 2000 to meet demand through year 2000 and into the first quarter of 2001. This is based on past trends in this office. DSX bays are added in a different part of the office. In this case, the next addition will add bays to the new contiguous DSX-1 line-up started next to the MDF.

BOCA RATON BOCA TEECA CENTRAL OFFICE

Q. ON PAGE 4, LINES 18 - 23 AND PAGE 5, LINES 1 - 15, MR. BEASLEY (INTERMEDIA) STATES THAT BELLSOUTH HAS RESERVED FLOOR SPACE FOR FIVE YEARS IN THE BOCA RATON BOCA TEECA CENTRAL OFFICE.

A. Nowhere, in the Boca Raton Boca Teeca central office, has growth been reserved for a five-year term. Space has been reserved only for the next two years. Year to date, BellSouth has exceeded its growth forecasts for this office.

Q. ON PAGE 8, LINES 9 - 23 AND PAGE 9, LINES 1 - 7, MR. BEASLEY (INTERMEDIA) TALKS ABOUT DIFFERENT AREAS IN THIS OFFICE THAT HE FEELS COULD ACCOMMODATE PHYSICAL COLLOCATION. PLEASE COMMENT.

A. The area shown as "Note 1", consisting of 314 square feet identified as "OCC FRAME" is used as the alternate entrance to the first floor vault. Any collocator located in this area would interfere with access to the building for future equipment and service to customers. It is the only way of accessing a diverse route into the building.

"Note 2", consisting of 1,756 square feet, is identified as a "Future Switch Area" and cannot support a collocator, since it has the only

cable entrance to the Resource Room. This area includes the fire exit and is filled with terminals and desks that support our technicians.

The area shown as "Note 3", consisting of 1,721 square feet and identified as "Future – Occupied" cannot support a collocator because it is the only access to the equipment area from the receiving room. There are also desks and terminals located in this area.

The first floor area shown as "Note 4", consisting of 1,422 square feet, is not an open area, but encompasses various empty locations spread out over the whole area, which individually are too small to support a collocator's equipment.

Q. MR. NILSON (SUPRA) MAKES VARIOUS OBSERVATIONS ABOUT THIS OFFICE USING PHOTOGRAPHS SUPRA-BOCA-05, SUPRA-BOCA-06, SUPRA-BOCA-18, P1010025, AND P1010028. PLEASE COMMENT.

A. First, Photographs SUPRA-BOCA-05, SUPRA-BOCA-06 and SUPRA-BOCA-18 are not pictures of the Boca Raton Boca Teeca central office. Second, Photograph P1010025 shows cable reels moved there temporarily to facilitate the addition of a switch equipment addition that is currently being installed in this office. It was not a consideration in the refusal of physical collocation space. In Photograph P1010028, the area depicted will be utilized for future switch growth.

Q. ON PAGE 17, LINES 15 - 17, MR. WEST (SPRINT) REFERENCES PARTIAL LINEUPS, OR FILLED BAYS, THAT SHOULD BE CONFIGURED TO PROVIDE SPACE FOR PHYSICAL COLLOCATION. PLEASE COMMENT.

A. Most equipment today is designed and engineered by the manufacturer with future growth in mind. BellSouth prefers to keep families of equipment together within the same location to facilitate future growth. BellSouth's central office profiles indicate to the area vendor where to install equipment based on families of equipment. BellSouth does not mix switch equipment with circuit equipment because of differences in grounding potentials and the obvious risk of damage to equipment and people in the event of a lightning strike. Families of equipment are defined as switch, circuit or toll, and DSX. Within the circuit family, there are multiplexers, fiber optic terminals, DACS frames, D4 channel banks, Digital Loop Carrier, Next Generation Digital Loop Carrier, DAML, Frame Relay, ATM, ADSL, etc.

DAYTONA BEACH PORT ORANGE CENTRAL OFFICE

Q. MR. WEST (SPRINT) AND MR. MARTINEZ (WORLDCOM) STATE THAT BELLSOUTH HAS RESERVED SPACE FOR MORE THAN TWO YEARS IN THE DAYTONA BEACH PORT ORANGE CENTRAL OFFICE. PLEASE COMMENT.

A. The forecasted space allocation for the Daytona Beach Port Orange central office covers a two-year period.

Q. ON PAGE 10, LINES 6 - 9 AND PAGE 11, LINES 21 - 24, MR. NILSON (SUPRA) ASSERTS THAT BELLSOUTH HAS PERMITTED A SUBSIDIARY TO PLACE EQUIPMENT IN THE DAYTONA BEACH PORT ORANGE CENTRAL OFFICE. IS THIS TRUE?

A. To my knowledge, there is no BellSouth subsidiary equipment installed in the Daytona Beach Port Orange office.

Q. ON PAGE 10, LINE 18 THROUGH PAGE 11, LINE 2, MR. NILSON (SUPRA) ASSERTS THAT BELLSOUTH HAS "HAPHAZARDLY" UTILIZED ITS TECHNICAL AND ADMINISTRATIVE SPACE IN THIS OFFICE. PLEASE COMMENT.

A. The area depicted in the picture is an area designated for circuit/toll growth. Cable racking from this area to the terminating equipment is congested and must be reconfigured for the type of equipment to be installed. The overall size of the area is not suitable for physical collocation according to BellSouth's current guidelines.

Q. IN PHOTOGRAPHS SUPRA-DAYTONA-05 AND SUPRA-DAYTONA-10, AS REFERENCED ON PAGE 11, LINES 12-21 OF HIS TESTIMONY, MR. NILSON (SUPRA) ASSERTS THAT

BELLSOUTH IS TRYING TO COVER UP AS MUCH OPEN SPACE AS POSSIBLE IN THIS OFFICE. IS THIS TRUE?

A. No. The area shown in the pictures is an area designated for future switch growth. The boxes shown in the picture contain the tools and test equipment of a vendor who was working on an equipment addition to the switch at the time of the central office tour.

Q. ON PAGE 7, LINES 6 - 15, MR. WEST (SPRINT) ADDRESSES THE ESTIMATED 600 SQUARE FOOT MAINTENANCE AREA WITH THREE MAP POSITIONS AND DUPLICATE POSITIONS ON THE SECOND FLOOR. CAN YOU PROVIDE FURTHER CLARIFICATION ABOUT THE THREE MAP POSITIONS?

A. Yes. Mr. West's statements are a little confusing. The Daytona Beach Port Orange central office is a single story building and the only MAP positions are located in the first floor maintenance area.

Q. ON PAGE 8, LINES 18 - 19, MR. WEST (SPRINT) ASSERTS THAT OPEN SPACE WITHIN THE TOLL SWITCHING AREA SHOULD BE USED BEFORE STARTING NEW EQUIPMENT LINE-UPS. DO YOU CONCUR WITH HIS STATEMENT?

A. No. The existing toll/circuit line-ups will be grown consistent with the building study plan, which defines the growth strategy of all classes of

central office equipment in accordance with the forecast. Unforecasted equipment requirements, such as virtual collocation, may cause different growth arrangements.

LAKE MARY CENTRAL OFFICE

Q. MR. WEST (SPRINT) AND MR. MARTINEZ (WORLDCOM) STATE THAT BELLSOUTH HAS RESERVED SPACE FOR MORE THAN TWO YEARS IN THE LAKE MARY CENTRAL OFFICE. PLEASE COMMENT.

A. The forecasted space allocation is only for a two-year period. One equipment line-up in the toll/circuit area is for future growth of DSX1 (Digital Signal Cross-Connect) terminating equipment. With cross aisle jumper troughs, this line-up is contiguous to the existing DSX1 growth line-up. BellSouth's central office profiles indicate to the area vendor where to install equipment based on families of equipment. BellSouth does not mix switch equipment with circuit equipment because of differences in grounding potentials and the obvious risk of damage to equipment and people in the event of a lightning strike. Families of equipment are defined as switch, circuit or toll, and DSX. Within the circuit family, there are multiplexers, Fiber Optic Terminals, DACS frames, D4 channel banks, Digital Loop Carrier, Next Generation Digital Loop Carrier, DAML, frame relay, ATM, ADSL, etc.

Q. MR. WEST (SPRINT) AND MR. MARTINEZ (WORLDCOM) STATE THAT THE EQUIPMENT FROM THE HEATHROW TRIAL SHOULD BE REMOVED FROM THE LAKE MARY CENTRAL OFFICE. PLEASE COMMENT.

A. All central office equipment associated with the Heathrow trial has been removed.

Q. ON PAGE 6, LINES 4 - 9, MR. WEST (SPRINT) ADDRESSES THE PLACEMENT OF DACS EQUIPMENT. WHY DID BELLSOUTH PLACE DACS EQUIPMENT IN THIS OFFICE?

A. The placement of the DACS equipment was consistent with the building study plan, which defined the growth strategy of all classes of central office equipment in the Lake Mary central office.

WEST PALM BEACH GARDENS CENTRAL OFFICE

Q. IN HIS DIRECT TESTIMONY ON PAGE 9, LINE 8 THROUGH PAGE 10, LINE 9, MR. BEASLEY (INTERMEDIA) IDENTIFIES FIVE AREAS TOTALLING 4,537 SQUARE FEET THAT HE BELIEVES COULD ACCOMMODATE PHYSICAL COLLOCATION IN THE WEST PALM BEACH GARDENS CENTRAL OFFICE. PLEASE COMMENT.

A. Mr. Beasley grossly overstates the amount of unused floor space in each of his five examples by including aisles and working equipment. For example in " Note 4," he states that there is an area of 1,279 square feet that could accommodate "CLOSE" collocation. This area is one-half of an existing power area and one-half of an existing switching equipment area. Mr. Beasley begins the discussion with comments about physical collocation and concludes that the area is suitable for "CLOSE " or Virtual collocation. In fact, in all of Mr. Beasley's examples, he concludes that the space is only suitable for virtual (CLOSE) or cageless (SCOPE) collocation. To date, Intermedia has not requested either in the West Park Beach Gardens central office.

Q. ON PAGE 17 LINE 23, MR. NILSON (SUPRA) DESCRIBES WHAT HE CALLS AN "INSTANCE WHERE BELLSOUTH HAS APPARENTLY THROWN OR DISCARDED ITEMS AND EQUIPMENT INTO A BACK CORNER". IS THIS TRUE?

A. No. Mr. Nilson is referring to the central office shipping and receiving room of one of our busiest central offices. Equipment is not thrown or discarded into this room. Materials are stored in racks attached to the ceiling and shelving along the walls. Since materials are moved in and out on a daily basis, some boxes and cable reels are on the floor. This is a working central office and as such, it is unreasonable to expect it to look like a trade show exhibit.

Q. ON PAGE 18, LINE 2, MR. NILSON (SUPRA) DECRIBES PHOTOGRAPH MVC-009S AS AN AREA BEING USED AS A BREAK ROOM, THAT COULD BE USED FOR PHYSICAL COLLOCATION. PLEASE COMMENT.

A. On the several occasions that I have given Mr. Nilson tours of the West Palm Beach Gardens central office, I have advised that this area is reserved for the TANDEM switch growth and will exhaust by the end of the year 2000. I also advised that the tables located there had been displaced from other areas within the central office and would be moved when the new switch equipment was added.

Q. MR. NILSON (SUPRA) STATES ON PAGE 18, LINE 6, THAT PHOTOGRAPHS MVC-014S AND MVC-017S SHOW AREAS THAT WOULD PERMIT PHYSICAL COLLOCATION. PLEASE COMMENT.

A. Batteries are being placed at this time in Photograph MVC-014S and additional SCP (Signal Control Point) and STP (Signal Transfer Point) equipment is scheduled to be added in Photograph MVC-017S by year-end 1999. These equipment projects and forecasts were explained on each central office tour.

Q. ON PAGE 19, LINE 24 OF HIS TESTIMONY, MR. WEST (SPRINT) STATES THAT BELLSOUTH HAS RESERVED SPACE FOR THREE YEARS OF GROWTH. IS THIS CORRECT?

A. No. Space has been only been reserved for two years of forecasted growth in the West Palm Beach Gardens central office.

Q. DOES THIS CONCLUDE THE PANEL TESTIMONY?

A. Yes.