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May 6, 1999

VIA FEDERAL EXPRESS

Ms. Blanca S. Bayo', Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL and  
981250-TL

Dear Ms. Bayo

Enclosed for filing on behalf of Sprint Communications Company Limited Partnership  
are an original and 15 copies of the Rebuttal Testimony of Melissa L. Closz and Michael D.  
West.

The Testimony of Michael D. West is being filed pursuant to the Notice of Intent to  
Request Confidential Classification filed by BellSouth Telecommunications, Inc. Copies of the  
Testimony have also been served as indicated on the enclosed certificate of service.

Please indicate receipt by stamping the enclosed extra copy of this letter.

Thank you for your assistance. Should you have any questions regarding this matter,  
please contact me at 404-649-6225.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

Monica M. Barone

MMB/jr

Enclosures

cc: Parties of record

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
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- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

05848 MAY-7 99

SPRINT RECORDS/REPORTING

**COPY**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP  
REBUTTAL TESTIMONY  
OF  
MELISSA L. CLOSZ  
DOCKETS 980946, 980947, 980948, 981011, 981012, AND 981250  
May 6, 1999**

DOCUMENT NUMBER-DATE

05848 MAY-7 8

FPSC-RECORDS/REPORTING

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2

3 A. My name is Melissa L. Cloz. My business address is 555 Lake Border Drive,  
4 Apopka, Florida 32703.

5

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

7

8 A. I am employed by Sprint as Director- Local Market Development.

9

10 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK  
11 EXPERIENCE.

12

13 A. I have a Master of Business Administration degree from Georgia State University  
14 in Atlanta, Georgia and a Bachelor of Business Administration degree from  
15 Texas Christian University in Fort Worth, Texas. I have been employed by  
16 Sprint for over eight years and have been in my current position since February,  
17 1997. I began my telecommunications career in 1983 when I joined AT&T Long  
18 Lines progressing through various sales and sales management positions. In  
19 1989, I joined Sprint's Long Distance Division as Group Manager, Market  
20 Management and Customer Support in Sprint's Intermediaries Marketing Group.  
21 In this capacity, I was responsible for optimizing revenue growth from products  
22 and promotions targeting association member benefit programs, sales agents and  
23 resellers. I owned and operated a consumer marketing franchise in 1991 and  
24 1992 before accepting the General Manager position for Sprint's Florida unit of  
25 United Telephone Long Distance ("UTLD"). In this role, I directed marketing

1 and sales, operational support and customer service for this long distance resale  
2 operation. In Sprint's Local Telecommunications Division, in 1993, I was  
3 charged with establishing the Sales and Technical Support organization for  
4 Carrier and Enhanced Service Markets. My team interfaced with interexchange  
5 carriers, wireless companies and competitive access providers. After leading the  
6 business plan development for Sprint Metropolitan Networks, Inc. ("SMNI"), I  
7 became General Manager in 1995. In this capacity, I directed the business  
8 deployment effort for Sprint's first alternative local exchange company  
9 ("ALEC") operation, including its network infrastructure, marketing and product  
10 plans, sales management and all aspects of operational and customer support.  
11 My present responsibilities include representation of Sprint in interconnection  
12 negotiations with BellSouth Telecommunications, Inc. ("BellSouth") and with  
13 Bell Atlantic. In addition, I am responsible for coordinating Sprint's entry into  
14 the local markets within BellSouth and Bell Atlantic states. I also interface with  
15 the BellSouth and Bell Atlantic account teams supporting Sprint to communicate  
16 service and operational issues and requirements.

17

18 Q. Are you the same Melissa Cloz who filed Direct Testimony in this proceeding?

19

20 A. Yes.

21

22 Q. What is the purpose of your testimony?

23

24 A. The purpose of my testimony is to respond to the testimony filed in this docket by  
25 W. Keith Milner and James D. Bloomer.

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**REBUTTAL OF MR. W. KEITH MILNER**

Q. On page 8, line 12 through page 9, lines 1-4, Mr. Milner provides BellSouth's definition of cageless collocation. Do you believe BellSouth's definition is consistent with the FCC's rules, orders and the Telecommunications Act of 1996?

A. No. BellSouth's definition of cageless collocation inappropriately requires using a "wall or similar structure" to separate collocator equipment from BellSouth equipment. Such a restriction is in direct conflict with the FCC's First Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 98-147 released March 31, 1999. In paragraph 42 of this order, the FCC specifies, "...an incumbent LEC must give competitors the option of collocating equipment in any unused space within the incumbent's premises, to the extent technically feasible, and may not require competitors to collocate in a room or isolated space separate from the incumbent's own equipment." Although the FCC's Order does not preclude separation of collocator equipment from ILEC equipment nor does it preclude the use of numerous continuous bays for collocators that may in fact be separate from ILEC equipment, the FCC's order clearly prohibits the requirement for physical separation of collocator equipment from ILEC equipment as is the case with BellSouth's policy. On page 9, lines 11-16, Mr. Milner further clarifies BellSouth's intent to physically separate collocator equipment from BellSouth equipment, noting that, "...these unenclosed physical arrangements will be located in the area designated for physical collocation within the BellSouth

1 premises.” Sprint urges the Commission to reject this physical separation  
2 requirement proposed by BellSouth.

3  
4 Q. What are BellSouth’s obligations with respect to the placement of cageless  
5 collocation equipment within the ILEC central office?

6  
7 A. As stated in my direct testimony, page 7, lines 16-21, Sprint believes that cageless  
8 collocation includes arrangements in which the requesting carrier can install and  
9 maintain its own equipment, not in separate equipment bays, but commingled  
10 with the ILEC and/or ALEC equipment. This capability is consistent with the  
11 FCC’s Order at paragraph 42 as described above because it does not require  
12 physical separation or isolation of collocation equipment.

13  
14 Q. On page 10, Mr. Milner states that BellSouth’s policy is that enclosed physical  
15 collocation arrangements must be at least 100 square feet. Do you agree?

16  
17 A. No. As stated in my direct testimony, page 15, lines 7-21, Sprint believes that  
18 there is no justification for requiring carriers to order at least 100 square feet of  
19 space for enclosed physical collocation arrangements. BellSouth’s 100 square  
20 foot minimum policy, according to Mr. Milner’s testimony, page 10, lines 17-21,  
21 “...was based on the belief that a physical collocation arrangement of 100 square  
22 feet would result in conformance with applicable building codes and safety  
23 codes.” While applicable building codes and safety codes may in some situations  
24 dictate minimum cage dimensions, it is inappropriate for BellSouth to globally  
25 exclude from consideration smaller square-footage collocation requests. While

1 Sprint recognizes that there needs to be sufficient room to allow an equipment  
2 rack to be placed in the cage and to give technicians “elbow room” to service the  
3 equipment, Sprint believes that as a practical matter, fifty square feet is a  
4 reasonable minimum size for caged collocation. Sprint further believes that  
5 BellCore standards for equipment configuration can be met by appropriately  
6 designed fifty square foot cages.

7  
8 Q. On pages 19 and 20, Mr. Milner states, “...the FCC’s requirement for adjacent  
9 CEVs and similar structures is inconsistent with the requirements of the Act that  
10 BellSouth provide collocation at its premises because adjacent CEVs and similar  
11 structures are not BellSouth’s premises and the equipment housed within the  
12 adjacent CEV or similar structure is not part of BellSouth’s network facilities.”  
13 Would you please comment on this statement?

14  
15 A. Yes. The FCC’s directive in its March 31, 1999 Order at paragraph 44 requires  
16 the ILEC “...when space is legitimately exhausted in a particular LEC premises,  
17 to permit collocation in adjacent controlled environmental vaults or similar  
18 structures to the extent technically feasible... subject only to reasonable safety  
19 and maintenance requirements.” BellSouth’s attempts to debate the FCC’s  
20 explicit directive through its interpretation of the definition of the term “premises”  
21 simply disregards the specific directive requiring ILECs to permit adjacent CEVs  
22 or similar structures as noted above. Mr. Milner confirms the FCC’s requirement  
23 on page 17, lines 24-25 through page 18, line 1, stating, “The FCC’s rules would  
24 apparently require BellSouth to accommodate such a request to the extent  
25 technically feasible.”

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Q. On page 21, lines 24-25, through page 22, lines 1-17, Mr. Milner expresses BellSouth's concerns regarding the requirement to produce lists of central offices within which space is not available. Does Sprint support such a requirement?

A. Yes. Sprint supports the FCC's proposal adopted in paragraph 58 of its March 31, 1999 Order requiring, "...that incumbent LECs ...maintain a publicly available document, posted for viewing on the Internet, indicating all premises that are full, and ... update such a document within ten days of the date at which a premises runs out of physical collocation space." Sprint agrees with the FCC that this reporting requirement will allow competitors to avoid applying for collocation in ILEC premises where space no longer exists. Sprint further supports additional reporting designed to provide new entrants with critical information required for network deployment decision-making. Specifically, within six months of the effective date of such requirements, Sprint supports the requirement for all incumbent LECs to create, maintain and make available (upon request and posted on the Internet, or through ILEC publication in accordance with par. 51.325 through 51.334 of Title 47 of the Code of Federal Regulations) a report of the collocation space availability status in each of their central offices, wire centers, or comparable facilities that serve in excess of 10,000 access lines in the top 100 MSAs. For the remaining central offices, wire centers, or comparable facilities that serve in excess of 10,000 access lines in the remaining MSAs, the incumbent LECs should create, maintain, and similarly make available such a report pursuant to a bona fide request. This report should include the following information for each premises: (i) address, town and state; (ii) CLLI code; (iii) number of entities



1 with established physical collocation arrangements; (iv) number of entities with  
2 established virtual collocation arrangements; (v) total amount of floor space  
3 supporting physical collocation arrangements; (vi) amount of already-conditioned  
4 floor space (listed in bays) available for collocation; (vii) all forms of physical  
5 collocation (including, but not limited to cageless and CEV) and virtual  
6 collocation that are available on the premises; (viii) amount of floor space being  
7 retained by the incumbent LEC for future specific uses; (ix) amount of floor space  
8 devoted to collocation arrangements that are currently in process; (x) measures  
9 the incumbent LEC is taking to comply with Section 51.323 of the Rules and  
10 make additional space available for physical collocation; (xi) the number of loops  
11 served from the serving location by loop type; (xii) a reasonable estimate of (or  
12 actual, if available) the percentage of loops that are less than 18,000 feet, 12,000  
13 feet, and 9,000 feet in length; and (xiii) the number of loops served from digital  
14 loop carriers. The incumbent LECs should update this report every six months  
15 and whenever the incumbent LEC installs, replaces, retires or removes equipment  
16 from the premises.

17

18 Q. On page 22, lines 19-25 through page 23, lines 1-9, Mr. Milner expresses his  
19 opinion that BellSouth's policy regarding the removal of obsolete, unused  
20 equipment is consistent with the FCC's recently published rules. Does Sprint  
21 agree?

22

23 A. No, primarily because it was unclear from Mr. Milner's testimony what  
24 BellSouth's policy is in this matter. As stated in my direct testimony, page 10,  
25 lines 7-24 through page 11, lines 1-2, Sprint believes that BellSouth should be

1 required to remove non-essential, unused, little used or retired equipment within  
2 or upon its premises in order to meet demands for collocation should it determine  
3 that insufficient space is available. Technological advances have tended to  
4 dramatically reduce the size of equipment necessary to perform a function over  
5 time, but as long as the ILEC continues to actively use older equipment in its  
6 network, there can be no hard-and-fast rule requiring it to remove that equipment  
7 from service merely to free up additional space. In such cases, it is reasonable to  
8 require the ILEC to make such changes provided that the requesting carrier is  
9 willing to fund replacement of the older equipment in order to free up additional  
10 space.

11  
12 Q. On pages 26 and 27, Mr. Milner states that neither the Telecommunications Act  
13 of 1996 ("Act") nor the rules of the Federal Communications Commission require  
14 BellSouth to make relocations and renovations to accommodate requests for  
15 physical collocation. Would you please comment?

16  
17 A. Yes. The Act and the FCC's rules are designed to promote competition and in  
18 doing so, require reasonable measures to free up space. These measures include  
19 permitting adjacent CEVs or similar structures on ILEC premises and removing  
20 obsolete unused equipment in order to free up space for collocation. These are  
21 examples of ILEC relocations and renovations that serve to expand collocation  
22 opportunities for new entrants and as a result promote competition. Moreover, the  
23 Commission has the authority to specifically identify those relocations and  
24 renovations that it believes will provide the greatest incentive to local exchange  
25 competition in Florida. The eight factors detailed in my direct testimony provide

1 input on several such actions that Sprint believes ILECs should be required to  
2 take to accommodate collocation requests.

3  
4 **REBUTTAL OF MR. JAMES D. BLOOMER**

5 Q. Beginning on page 3, Mr. Bloomer discusses the factors BellSouth considers in  
6 determining whether adequate space is available. Would you please comment?

7  
8 A. Yes. The four categories of factors described by BellSouth appear to relate  
9 primarily to the physical characteristics of the central offices being evaluated as  
10 well as BellSouth's historical policies and practices for managing its central office  
11 space. While this information is certainly relevant to the evaluation of whether  
12 space is available in a particular central office, it falls short of evaluating any  
13 alternative configurations or collocation alternatives that may serve to free up  
14 space for collocation.

15  
16 Q. Why is it important to consider more than historical practices when evaluating  
17 whether there is space available in a central office for collocation?

18  
19 A. ALECs are extremely dependent on ILECs for important physical network  
20 components when constructing alternative local exchange network infrastructures.  
21 One such component is collocation. In order to facilitate the development of local  
22 exchange competition in Florida, the space available for collocation must be  
23 carefully scrutinized in order to maximize ALEC's opportunities to physically  
24 connect to ILEC networks. This critical need requires that BellSouth revise its  
25 approach to floor space evaluation such that its processes are designed to

1 maximize floor space opportunities for ALECs versus using traditional  
2 methodologies which would tend to restrict the space made available.

3

4 Q. What factors does Sprint believe the Commission should consider when  
5 evaluating whether there is space available in the central offices under review in  
6 this docket?

7

8 A. As stated in my direct testimony, Sprint believes that the following factors should  
9 be considered:

10 1) Whether there is non-essential, unused, little used or retired equipment that  
11 should be removed to provide space for collocation;

12 2) Whether there is administrative space that should be converted to provide  
13 space for collocation;

14 3) Whether there are partial line-ups or unfilled bays that should be reconfigured  
15 to provide space for collocation;

16 4) For what length of time BellSouth should be permitted to reserve space for its  
17 future use;

18 5) What security arrangements are reasonable to impose upon carriers requesting  
19 physical collocation;

20 6) Whether security concerns should be permitted to provide the sole basis for  
21 denial of a physical collocation request;

22 7) Whether BellSouth should permit subleasing or sharing of collocation space;  
23 and

24 8) What minimum space requirements BellSouth should be able to impose upon  
25 carriers requesting collocation.

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Q. On page 5, lines 21-14, Mr. Bloomer states that reserved space is held in accordance with forecasted needs for the next 2-year shipping interval and is subtracted from the space available for collocation in each central office. Does Sprint agree with the reservation of space for a 2-year interval?

A. No. As stated on page 12 of my direct testimony, Sprint believes that BellSouth should be able to reserve space needed for its network within the next year (on a rolling basis), but if such space is not earmarked for such use, it should be made available for collocation. By the same token, requesting carriers should be required to make use of their collocation space (i.e., install equipment connected to BellSouth's network) within six months after the space is ready for occupancy. If they fail to do so, and there is insufficient other space in the office to allow collocation by other requesting carriers, they should have to vacate their space.

Q. On page 7 of Mr. Bloomer's testimony, lines 1-17, administrative space is defined as one element that is subtracted from available space in each central office. Does Sprint agree with this approach?

A. No. As stated in my direct testimony, page 11, lines 4-21, many ILEC central office locations that are "full" (thus precluding physical collocation) may house administrative offices that could easily be sited at other locations. In these cases, relocating the administrative offices may impose net costs on the ILEC, such as the cost of moving and a differential in the cost of leased space as between the existing location and other commercial space. If the requesting carrier is willing

1 to fully compensate the ILEC for its pro rata share of these costs, the ILEC should  
2 agree to move these administrative offices unless it can show valid business  
3 reasons why these administrative offices need to remain where they are.

4

5 Q. Does this conclude your testimony?

6

7 A. Yes it does.

8

## CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of Sprint Communications Company Limited Partnership's Rebuttal Testimony of Melissa L. Closz and Michael D. West (\*), in Docket Nos. 980946, 980947, 980948, 981011, 981012, and 981250 via FedEx (\*\*) or United States First Class Mail, postage prepaid upon the following parties, including those parties that have entered into a Protective Agreement with BellSouth Telecommunications, Inc.

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- \* (Entered Protective Agreement)
- \*\* (Served via FedEx)

This 10 day of MAY, 1999.

  
\_\_\_\_\_  
Joe Ramsey III  
Sprint Communications Company Limited Partnership