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May 10, 1999

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Ms. Blanca 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

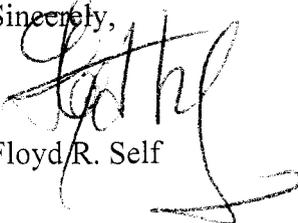
Dear Ms. Bayo:

Enclosed for filing on behalf of WorldCom Technologies, Inc. (MCI WorldCom, Inc.) is an original and fifteen copies of WorldCom's Prehearing Statement in the above referenced dockets. Also enclosed is a 3 1/2" diskette with the Prehearing Statement on it in WordPerfect 6.0/6.1 format.

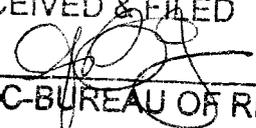
Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

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cc: Mr. Brian Sulmonetti
Donna McNulty, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

05888 MAY 10 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, Inc.'s Petition)
for temporary waiver of physical collocation)
requirement set forth in the 1996 Telecommunications) Docket No. 980946-TL
Act and the FCC's First Report and Order, for the)
Daytona Beach Port Orange Central Office)

In re: BellSouth Telecommunications, Inc.'s Petition)
for waiver of physical collocation requirement)
set forth in the 1996 Telecommunications Act) Docket No. 980947-TL
and the FCC's First Report and Order, for the)
Boca Raton Boca Teeca Central Office)

In re: BellSouth Telecommunications, Inc.'s Petition)
for waiver of physical collocation requirement)
set forth in the 1996 Telecommunications Act) Docket No. 980948-TL
Act and the FCC's First Report and Order, for the)
Miami Palmetto Central Office)

In re: BellSouth Telecommunications, Inc.'s Petition)
for waiver of physical collocation requirement)
set forth in the 1996 Telecommunications Act) Docket No. 981011-TL
Act and the FCC's First Report and Order, for the)
West Palm Beach Central Office)

In re: BellSouth Telecommunications, Inc.'s Petition)
for waiver of physical collocation requirement)
set forth in the 1996 Telecommunications Act) Docket No. 981012-TL
Act and the FCC's First Report and Order, for the)
North Dade Golden Glades Central Office)

In re: BellSouth Telecommunications, Inc.'s Petition)
for waiver of physical collocation requirement)
set forth in the 1996 Telecommunications Act) Docket No. 981250-TL
Act and the FCC's First Report and Order, for the) Dated: May 10, 1999
Lake Mary Central Office)

**PREHEARING STATEMENT
OF
WORLD COM TECHNOLOGIES, INC. (MCI WORLD COM, INC.)**

WorldCom Technologies, Inc., (MCI WorldCom, Inc., hereinafter "MCI WorldCom"),
through undersigned counsel, submits this prehearing statement.

DOCUMENT NUMBER-DATE

05888 MAY 10 99

FPSC-RECORDS/REPORTING

A. APPEARANCES

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B. WITNESSES

<u>Witness</u>	<u>Issues</u>
Ron Martinez (Direct and Rebuttal Testimony)	1-6
Joseph Gillan (Rebuttal Testimony) (Jointly sponsored by ACI Corp., AT&T Communications of the Southern States, e.spire Communications, Inc., MCI WorldCom, Inc., Supra Telecommunications & Information Systems, Inc., and Time Warner AxS of Florida, L.P.)	1-2, 5-6

C. EXHIBITS

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
_____ (JG-1)	Gillan	Comptel White Paper

MCI WorldCom is also assisting in sponsoring the photographic exhibits attached to the direct testimony of Sprint’s witness, Michael West. MCI WorldCom reserves the right to introduce additional exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

D. BASIC POSITION

The waivers requested by BellSouth should be denied because there is sufficient space for physical collocation at each office utilizing one or more of the forms of collocation authorized by the March 31, 1999 Advanced Services Order and the FCC’s new collocation rules.

E. ISSUES AND POSITIONS

ISSUE 1: What obligation does BellSouth have to make space available at these central offices to permit physical collocation pursuant to the Act and applicable state and federal requirements?

MCI WorldCom's Position: The Telecommunications Act of 1996 places on BellSouth the duty to make space available anywhere on its premises unless and until such time as BellSouth satisfactorily demonstrates to this Commission that space is unavailable on the premises.

ISSUE 2. What factors should be considered by the Commission in making its determination on BellSouth's Petitions for Waiver and Temporary Waiver of the requirement to provide physical collocation for the following central offices:

- (a) Daytona Beach Port Orange**
- (b) Boca Raton Boca Teeca**
- (c) Miami Palmetto**
- (d) West Palm Beach Gardens**
- (e) North Dade Golden Glades**
- (f) Lake Mary**

MCI WorldCom's Position: The factors that must be evaluated by the Commission in its determination of space availability on the premises include:

1. Placement of existing unused equipment.
2. Future growth.
3. Security arrangements.
4. Administrative space allocations.
5. Building codes and other local government requirements.
6. Space accessibility
7. Outside space.

ISSUE 3: Based on the factors identified in Issue 2, how much space should be considered available in the following central offices:

- (a) Daytona Beach Port Orange**
- (b) Boca Raton Boca Teeca**
- (c) Miami Palmetto**
- (d) West Palm Beach Gardens**
- (e) North Dade Golden Glades**
- (f) Lake Mary**

MCI WorldCom's Position: 3(a), 3(b), 3(d), and 3(e) - No position.

3(c) Miami Palmetto: There is between 900 and 3,910 square feet of potential physical collocation space within this office, with additional potential space available outside of the office.

3(f) Lake Mary: There is approximately 750 square feet of potential physical collocation space within this office, with additional potential space available outside of the office.

ISSUE 4: If space is considered available in any of these central offices, is the space sufficient for physical collocation?

MCI WorldCom's Position: Yes. Under the FCC's Advanced Services Order, released March 31, 1999, and accompanying rules, space is available at each office for a number of different forms of physical collocation that should be made available to the ALECs on the basis of the FCC's first come, first served rule

ISSUE 5. Should BellSouth's Petition for Waiver and Temporary Waiver of the requirement to provide physical collocation in the following central offices be granted:

- a) Daytona Beach Port Orange**
- b) Boca Raton Boca Teeca**
- c) Miami Palmetto**
- d) West Palm Beach Gardens**
- e) North Dade Golden Glades**
- f) Lake Mary**

MCI WorldCom's Position: No. Since the offices have space available that could be used to provide physical collocation through one or more of the different forms that are available, the waivers should be denied.

ISSUE 6. If the Commission determines that a waiver request should be denied, how should BellSouth effectuate FCC Rule 47 C.F.R. §51.323(f)(1) in processing requests for physical collocation in those central offices?

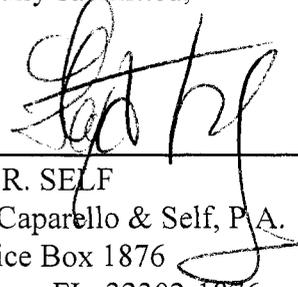
MCI WorldCom's Position: BellSouth should contact each ALEC denied space on the basis of the FCC's first come, first served rule and present all of the then available space. With this information, the ALEC will be able to evaluate each area of space and how it might be configured to meet the ALEC's physical collocation requirements.

G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

All requirements of the procedural orders can be met by WorldCom Technologies, Inc. (MCI WorldCom, Inc.)

Dated this 10th day of May, 1999.

Respectfully submitted,



FLOYD R. SELF
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Attorneys for WorldCom Technologies, Inc.
(MCI WorldCom, Inc.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of WorldCom Technologies, Inc. (MCI WorldCo, Inc.)'s Prehearing Statement in Docket No. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL, and 981250-TL has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 10th day of May, 1999:

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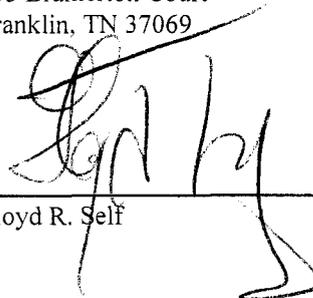
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