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May 7, 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

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FEDERAL PUBLIC
SERVICE COMMISSION

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

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of the Prehearing Statement of Sprint Communications Company Limited Partnership. A disk with the Prehearing Statement is also enclosed.

An extra copy of this transmittal letter is enclosed which I ask you to please date stamp and return to the undersigned in the enclosed self-addressed stamped envelope.

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

Sincerely,

Monica M. Barone

- AFA _____
 - APP _____
 - CAF _____
 - CMU _____
 - CTR _____
 - EAG _____
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 - RRR _____
 - SEC _____
 - WAW _____
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 cc: Parties of record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05893 MAY 10 99
FPSC-RECORDS/REPORTING

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Daytona Beach Port Orange Central Office by BellSouth Telecommunications, Inc.

Docket No. 980946-TL

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Boca Raton Boca Teeca Central Office, by BellSouth Telecommunications, Inc.

Docket No. 980947-TL

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Miami Palmetto Central Office, by BellSouth Telecommunications, Inc.

Docket No. 980948-TL

In re: Petition for waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 and the FCC's First Report and Order, for the West Palm Beach Gardens Central Office, by BellSouth Telecommunications, Inc.

Docket No. 981011-TL

In re: Petition for waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 and the FCC's First Report and Order, for the North Dade Golden Glades Central Office, by BellSouth Telecommunications, Inc.

Docket No. 981012-TL

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Lake Mary Main Central Office, by BellSouth Telecommunications, Inc.

Docket No. 981250-TL

Filed: May 10, 1999

PREHEARING STATEMENT
OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned attorney, and pursuant to Rule 25-22.038, Florida Administrative Code, and order of the Florida Public Service Commission ("Commission"), hereby submits its Prehearing Statement in the above-captioned dockets.

A. and B. Witnesses and Exhibits

Sprint proposes to call the following witnesses to offer direct and rebuttal testimony on the issues as indicated:

<u>Witness</u>	<u>Issues</u>	<u>Exhibits</u>
Melissa L. Cloz	1, 2 and 6	None
Michael D. West	3, 4 and 5	MDW-1 (Confidential Pictures of each central office) MDW-2 (Confidential – NDADFLGGK32 STS Port – 3/1 Lcnt Chart) MDW-3 (Confidential - September 10, 1998 Memo)

Sprint reserves the right to call witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference currently scheduled to take place on May 17, 1999. Sprint reserves the right to file exhibits to any testimony that may be filed under these circumstances. Sprint also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the Florida Rules of Evidence and the Florida Administrative Code.

C. Statement of Basic Position

According to the Telecommunications Act of 1996 and the rules of the Federal Communications Commission, BellSouth is obligated to make space available for physical collocation in its central offices. Sprint has determined that space is available in each central office at issue in these proceedings for physical collocation. Therefore, the Commission should deny BellSouth's Petition in each docket. Space in as small as single-bay increments should be made available to requesting carriers on a first come, first served basis.

D.-F. Sprint's Position on the Issues

Sprint's position on the issues is preliminary and based on the information available at the time of filing this prehearing statement. Sprint reserves the right to amend its position on any issue upon information gathered through further discovery and at the hearing currently scheduled to be held June 9-11, 1999.

Issue No. 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?

Position:

A. Under Section 251 (c) (6) of the Act, Incumbent Local Exchange Companies (“ILECs”) have:

The duty to provide, on rates, terms and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

It is clear that ILECs are obligated to make space in their central offices available for physical collocation. Moreover, the ILEC is further obligated to demonstrate to State Commissions that physical collocation is not practical due to technical or space limitations.

Issue No. 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

Position:

Sprint believes the Commission should consider the following factors:

- 1) Whether there is non-essential, unused, little used or retired equipment that should be removed to provide space for collocation;
- 2) Whether there is administrative space that should be converted to provide space for collocation;
- 3) Whether there are partial line-ups or unfilled bays that should be reconfigured to provide space for collocation;
- 4) For what length of time BellSouth should be permitted to reserve space for its future use;
- 5) What security arrangements are reasonable to impose upon carriers requesting physical collocation;
- 6) Whether security concerns should be permitted to provide the sole basis for denial of a physical collocation request;
- 7) Whether BellSouth should permit subleasing or sharing of collocation space;
- 8) What minimum space requirements BellSouth should be able to impose upon carriers requesting collocation.

Issue No 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

Position:

a) Daytona Beach Port Orange

Approximately 1,801 square feet have been identified that should be considered available. This does not include space that can be reclaimed through reconfiguration of partial line-ups and removal of 3 M.A.P positions.

b) Boca Raton Boca Teeca

Approximately 1,211 square feet reserved for future use have been identified that should be considered available. In addition, there are over 13,000 square feet of administrative space that should be considered available. These figures do not include space that can be reclaimed through reconfiguration of partial line-ups and more efficient use of space currently utilized.

c) Miami Palmetto

Approximately 2,700 square feet have been identified that should be considered available.

d) West Palm Beach Gardens

Approximately 1,300 square feet have been identified that should be considered available. This does not include space that can be reclaimed through more efficient use of space.

e) North Dade Golden Glades

Approximately 2,500 feet have been identified that should be considered available.

f) Lake Mary

Approximately 642 square feet have been identified that should be considered available.

Issue No 4: If space is considered available in any of these central offices, is the space sufficient for physical collocation?

Position:

The space considered available in each central office is sufficient for physical collocation.

Issue No 5: Should BellSouth's Petitions 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

Position:

- a) No.
- b) No.
- c) No.
- d) No.
- e) No.
- f) No.

Issue No 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?

Position:

- A. Sprint believes that requests for physical collocation in such central offices should be processed on a “first come, first served” basis. In other words, the first collocater that was denied physical collocation in such central office should be offered the opportunity to obtain physical collocation space that subsequently becomes available, with other physical collocation applications being subsequently considered in the order that they were received.

D. Stipulations

There have been no stipulations entered into by the parties at this time.

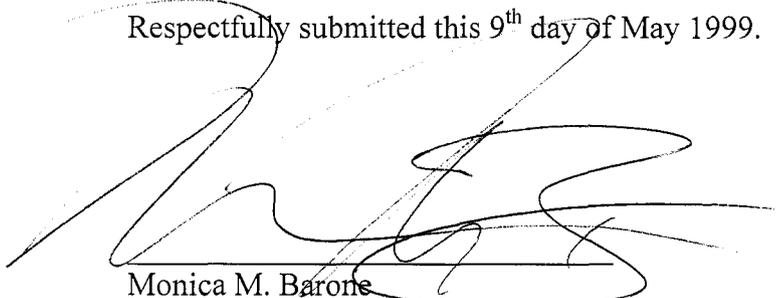
E. Pending Motions

Sprint does not have any pending Motions before the Prehearing Officer at this time.

F. Other Requirements

There are no requirements in the Prehearing Order for which Sprint is unable to comply at this time.

Respectfully submitted this 9th day of May 1999.

A large, stylized handwritten signature in black ink, appearing to read 'M. Barone', is written over a horizontal line. The signature is highly cursive and loops around the line.

Monica M. Barone
Sprint Communications Company Limited Partnership
3100 Cumberland Circle
Atlanta, Georgia 30339
(404) 649-6225

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the Prehearing Statement of Sprint Communications Company Limited in Docket Nos. 980946, 980947, 980948, 981011, 981012, and 981250 via Federal Express (*) or United States First Class Mail, postage prepaid upon the following:

BellSouth Telecommunications, Inc. (*)
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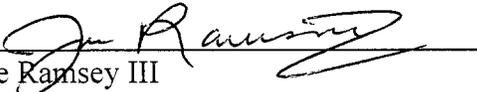
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Beth Keating, Esq. (*)
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

* (Delivered by Federal Express)

** (Entered Protective Agreement)

This 7 day of May, 1999.



Joe Ramsey III
Sprint Communications Company Limited Partnership