

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

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 Boca Raton Boca Teeca Central Office, by BellSouth Telecommunications, Inc.

Docket No. 980947-TL

In re: Petition waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 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. 9801012-TL

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RECORDS AND REPORTING

INTERMEDIA COMMUNICATIONS INC.'S

REBUTTAL TESTIMONY OF RONALD W. BEASLEY

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May 7, 1999

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FPSC-RECORDS/REPORTING

1 **Q. PLEASE STATE YOUR NAME, EMPLOYER, AND BUSINESS**
2 **ADDRESS.**

3 **A.** My name is Ronald W. Beasley. I am employed by Intermedia Communications
4 Inc. ("Intermedia"). My business address is 21445 North Warson Road, St.
5 Louis, Missouri 63132.

6 **Q. IN WHAT CAPACITY ARE YOU EMPLOYED BY INTERMEDIA?**

7 **A.** I am employed as Senior Manager of Engineering and Implementation for the
8 Network Restructuring Organization.

9 **Q. WHAT ARE YOUR RESPONSIBILITIES IN THAT POSITION?**

10 **A.** I am responsible for the Incumbent Local Exchange Carrier ("ILEC") collocation
11 process, which consists of filing physical and virtual applications, developing
12 engineering specifications, ordering equipment, and supervising installation
13 contractors. I am also responsible for the development of Intermedia's
14 collocation standards and ensuring that those standards are followed at every
15 collocation site.

16 **Q. DID YOU FILE DIRECT TESTIMONY IN THESE PROCEEDINGS?**

17 **A.** Yes, I did.

18 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?**

19 **A.** One purpose of my testimony today is to respond to a number of
20 assertions in the direct testimony of BellSouth Telecommunications, Inc.'s
21 ("BellSouth's") witnesses Miguel F. Rodriguez, Louis A. Caban, and Guy Ream.
22 In particular, I will show that their assertions that certain space must be
23 designated as unusable and that switch and circuit equipment may not be

1 intermingled because of ground plane restrictions are technically unsound. I will
2 show further that BellSouth's space reservations for future needs are excessive in
3 some cases and that therefore they should be subordinated to Intermedia's
4 immediate needs for collocation space. Even where the BellSouth witnesses may
5 have testified legitimately in some instances that certain space is required for
6 BellSouth's growth projections, additional space still exists sufficient to
7 accommodate Intermedia's collocation needs. I will also show that their
8 assertions that space is not available for collocation are based, moreover, upon
9 applying BellSouth collocation guidelines that have been invalidated by the
10 FCC's recent amendments to Part 51 of Title 47 of the Code of Federal
11 Regulations.¹

12 Another purpose is to respond to a number of opinions reached by
13 Commission Staff Auditors Kathy L. Welch and Ruth K. Young in their originally
14 filed direct testimony. In particular, I will show that their opinions that certain
15 spaces in each of the BellSouth central offices in issue are unsuitable for
16 collocation are also based on applying BellSouth's invalidated collocation
17 requirements, as well as security requirements that likewise have been
18 invalidated. Moreover, they rely on an invalid premise that BellSouth is under no
19 obligation to modify existing equipment placements or space usage, particularly
20 where spaces are used for workstations and other administrative purposes, in
21 order to create collocation space. Intermedia witness Ms. Strow demonstrates in
22 her rebuttal testimony that BellSouth indeed has such an obligation.

¹ FCC 99-48, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-147, rel. March 31, 1999, Appendix B, Final Rules, Subpart D.

1 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

2 **A.** Nothing in the testimony of BellSouth witnesses Rodriguez, Caban or
3 Reams gives me reason to modify in any way the observations I make in my
4 direct testimony on the basis of walk through inspections concerning the
5 availability of collocation space in BellSouth's North Dade Golden Glades,
6 Miami Palmetto, Boca Raton Boca Teeca, or West Palm Beach Gardens central
7 offices.

8 *First*, in several instances BellSouth claims space reservations for future
9 needs as distant as 2001 and beyond, and in others, BellSouth fails to articulate
10 the basis for its reservations. These reservations are excessive and beyond any
11 reasonable interpretation of the FCC rule permitting incumbent LECs to reserve
12 limited central office space for their own needs. This Commission should
13 disallow them in subordination to Intermedia's immediate need to collocate and to
14 establish a meaningful presence in local markets. In some instances, even where
15 BellSouth's reservation claims appear sustainable, under the FCC's amended
16 collocation rules, ample collocation opportunities remain.

17 *Second*, BellSouth concludes that certain of the spaces that I identify as
18 potential collocation spaces are unavailable or unsuited for collocation on the
19 basis of BellSouth's collocation requirements or guidelines. In large and
20 significant part, these have been invalidated by the FCC's amended collocation
21 rules. BellSouth no longer may require minimum space leases, separation of
22 competing carriers' collocated equipment, enclosed collocation spaces or
23 discriminatory security measures. BellSouth must permit collocation even in

1 single-bay increments and in any unused space, including shared collocation, with
2 any type of equipment used or useful for interconnection or access to unbundled
3 network elements. On the basis then of the FCC's amended collocation rules,
4 each one of the spaces I identify in my direct testimony can accommodate
5 Intermedia's collocation requirements. Moreover, virtual collocation, which it
6 appears BellSouth will continue to accommodate, has become under the amended
7 rules all but completely indistinguishable from physical collocation.

8 *Third*, BellSouth removes several spaces from collocation availability on
9 the basis that switch and transport equipment may not be intermingled and that
10 separation of isolated and integrated ground planes is required. Neither of these
11 requirements is applicable if the collocated equipment is installed with isolation
12 designs.

13 *Fourth*, BellSouth inappropriately fails to recognize a responsibility to
14 "create" collocation spaces, especially from several spaces being presently used
15 for administrative functions. Because space is indeed scarce in these central
16 offices, BellSouth should be required to convert central office spaces being used
17 in these ways and not being put to their most valuable use, *i.e.*, to house the
18 telecommunications equipment of competing carriers, a use mandated, of course,
19 by the Telecommunications Act of 1996.

20 As for the testimony of staff auditors Welch and Young, I observe that
21 where they form opinions that space within these central offices is unsuited to
22 collocation, in contrast to my observations, their opinions are conditioned on the
23 applicability of BellSouth's collocation requirements, acceptance of BellSouth's

1 contention that it is under no obligation to rearrange space in order to
2 accommodate competing carrier's collocation requests, and on security
3 requirements that now must be seen as unnecessary and discriminatory. In fact,
4 their testimony precedes the release of the FCC's amended collocation rules, as it
5 takes no account of them. On April 29, 1999, Ms. Welch and Ms. Young filed
6 supplemental direct testimony in which they do take into account the FCC's
7 amended collocation rules and modify their original testimony accordingly. My
8 attorney has advised me that their supplemental testimony was submitted with a
9 request for leave to file it on which the Prehearing Officer has yet to rule.

10 Because of that, and in an abundance of caution, I provide primary rebuttal to
11 their original testimony as though they had not filed supplemental testimony. At
12 the same time, I acknowledge that their assessment in their supplemental
13 testimony of the effect that the FCC's amended collocation rules should have on
14 space availability determinations in BellSouth's central offices is largely
15 congruent with mine.

16 BellSouth's collocation requirements must fall in large part before the
17 FCC's amended collocation rules. BellSouth is indeed under an obligation to
18 rearrange equipment and space to create collocation opportunities. Finally, even
19 with Intermedia equipment intermingled with BellSouth's, BellSouth may not
20 impose security measures on Intermedia's technicians that it does not impose on
21 its own.

1 **North Dade Golden Glades Central Office**

2 **Q. BELLSOUTH WITNESS RODRIGUEZ STATES THAT 276 SQUARE FEET**
3 **ARE BEING PRESENTLY USED FOR THE INSTALLATION OF A**
4 **TELLABS TITAN 5500 DIGITAL CROSS CONNECT SYSTEM**
5 **CONSISTING OF 14 EQUIPMENT BAYS IN THE NORTH DADE GOLDEN**
6 **GLADES (“GLADES”) CENTRAL OFFICE IN A SPACE (LOC. A, EXH.**
7 **CSCM PANEL-1) THAT YOU STATED IN YOUR DIRECT TESTIMONY**
8 **COULD ACCOMMODATE AN INTERMEDIA CLOSE COLLOCATION**
9 **ARRANGEMENT (“NOTE 2,” EXH. NO. RB-2.1). DOES THE**
10 **INSTALLATION OF THIS EQUIPMENT PRECLUDE AN INTERMEDIA**
11 **COLLOCATION IN THIS PARTICULAR SPACE?**

12 **A.** No, it does not. Space exists at one end of the line up being installed for three or four
13 collocation equipment bays. The FCC’s recent rule amendments require an
14 incumbent LEC to allow a competitor to collocate in any unused space in the
15 incumbent LEC’s premises. They also provide that an incumbent LEC may not
16 require competitors to collocate in a room or isolated space separate from the
17 incumbent’s own equipment. Indeed, these rule amendments effectively do away
18 with much of the commonly recognized distinction between physical and virtual
19 collocation. I note that BellSouth offers virtual collocation in the Glades central
20 office, as well as in the others here in issue. Under the collocation rule amendments,
21 BellSouth cannot with any consistency offer virtual collocation and decline physical
22 collocation. Ms. Strow discusses this point in greater length in her rebuttal testimony.

1 Q. BELLSOUTH WITNESS RODRIGUEZ TESTIFIES THAT 135 SQUARE
2 FEET (LOC. B, EXH. CSCM PANEL-1) IN THE GLADES CENTRAL
3 OFFICE ALSO IN SPACE (“NOTE 2,” EXH. NO. RB-2.1) THAT YOU
4 STATED IN YOUR DIRECT TESTIMONY COULD ACCOMMODATE
5 AN INTERMEDIA CLOSE COLLOCATION HAVE BEEN RESERVED
6 AS UNUSABLE FOR COLLOCATION BECAUSE OF A REQUIREMENT
7 TO SEPARATE INTEGRATED AND ISOLATED GROUND PLANES.
8 MUST THIS SPACE BE DECLARED UNUSABLE FOR COLLOCATION
9 FOR THE REASON CITED?

10 A. Not at all. It would only be necessary for collocation equipment racks or bays in
11 this space to be isolated. Both isolated and integrated grounding have a single
12 point of ground, i.e., the main central office ground. I note that BellSouth witness
13 James D. Bloomer also testifies erroneously that equipment installation in this
14 space would violate ground plane separation.

15 Q. BELLSOUTH WITNESS RODRIGUEZ FURTHER TESTIFIES THAT 674
16 SQUARE FEET (LOC. C1 AND LOC. C2, EXH. CSCM PANEL-1) IN THE
17 GLADES CENTRAL OFFICE IN SPACES (“NOTE 3” AND “NOTE 1,”
18 EXH. NO. RB-2.1) THAT YOU STATED IN YOUR DIRECT TESTIMONY
19 COULD ACCOMMODATE INTERMEDIA CLOSE COLLOCATIONS
20 HAVE BEEN RESERVED FOR 04T AND 03T TANDEM SWITCH
21 GROWTH THROUGH THE YEAR 2001 AND ARE UNAVAILABLE
22 THEREFORE FOR COLLOCATION PURPOSES. IS IT APPROPRIATE
23 FOR BELLSOUTH TO CLAIM THESE SPACE RESERVATIONS TO

1 **THE EXCLUSION OF INTERMEDIA COLLOCATION**
2 **OPPORTUNITIES?**

3 **A.** No, it is not. BellSouth's reservations of space in these locations even in the year
4 2000 may well exceed the "limited amount" of space it is entitled to reserve for its
5 future use under FCC rules, and, therefore, the Commission should critically
6 examine them. Indeed, the Commission should require BellSouth to turn over
7 space it is holding for future demand, when a competitive carrier demonstrates an
8 immediate intent to provide services and requests collocation space in BellSouth's
9 central offices. In location C1, however, BellSouth claims a reservation of two
10 equipment bays for 03T tandem switch growth not just in the years 1999 and
11 2000, but also in the year 2001. BellSouth should not be permitted to reserve
12 space for its year 2001 projected needs, while collocators, such as Intermedia,
13 stand ready to interconnect for purposes of immediately providing consumers
14 with telecommunications services choices. BellSouth's year 2001 projected needs
15 are highly speculative at this time and indeed could vanish competitively before
16 then.

17 BellSouth witness Rodriguez claims further that ground plane restrictions
18 preclude collocation in these spaces. I have explained above that Intermedia can
19 meet these restrictions by simply isolating its equipment. Finally, it is clear that
20 he also rests his assertion that these spaces are unsuitable for collocation on
21 BellSouth's now-invalidated requirements that collocations must be caged,
22 isolated from BellSouth's facilities, and leased in minimum space increments.

1 Q. BELLSOUTH WITNESS RODRIGUEZ ALSO TESTIFIES THAT 811
2 SQUARE FEET (LOC. F, LOC. G, AND LOC H, EXH. CSCM PANEL-1)
3 IN THE GLADES CENTRAL OFFICE IN SPACES (“NOTE 2,” “NOTE 3”
4 AND “NOTE 4,” EXH. NO. RB-2.1) THAT YOU STATED IN YOUR
5 DIRECT TESTIMONY COULD ACCOMMODATE INTERMEDIA
6 SCOPE OR CLOSE COLLOCATIONS HAVE BEEN RESERVED FOR
7 TOLL AND SWITCH GROWTH, THAT IT IS NOT CONTIGUOUS
8 SPACE, AND THAT FOR THOSE REASONS, IN ADDITION TO
9 GROUND PLANE RESTRICTIONS, IT IS NOT SPACE SUITABLE FOR
10 COLLOCATION. IS BELLSOUTH CORRECT TO CLAIM THIS SPACE
11 UNSUITABLE FOR INTERMEDIA COLLOCATION FOR THE
12 REASONS GIVEN?

13 A. No, it is not. I have addressed these points above. Under the FCC amended rules,
14 Intermedia must be permitted to collocate in any unused space in the Glades
15 central office without a requirement to segregate its equipment in any way from
16 that of BellSouth. Again, BellSouth’s ground plane separation requirement is
17 technically unsound.

18 Q. BELLSOUTH WITNESS RODRIGUES FINALLY TESTIFIES THAT 661
19 SQUARE FEET (LOC. A2, EXH. CSCM PANEL-1) IN THE GLADES
20 CENTRAL OFFICE IN SPACES (“NOTE 5” EXH. NO. RB-2.2) THAT
21 YOU STATED IN YOUR DIRECT TESTIMONY COULD
22 ACCOMMODATE AN INTERMEDIA CLOSE COLLOCATION HAVE
23 BEEN RESERVED FOR 01T TANDEM SWITCH GROWTH.

1 **ALTHOUGH IT INCLUDES A NUMBER OF OPEN EQUIPMENT BAYS**
2 **AS THE RESULT OF LINE MODULE TO LINE CONTROLLER**
3 **MODULE CONVERSIONS, HE ASSERTS THAT IT IS UNSUITABLE**
4 **FOR COLLOCATION BECAUSE IT IS NOT CONTIGUOUS AND IT IS**
5 **SUBJECT TO GROUND PLANE RESTRICTIONS. IS BELL SOUTH**
6 **CORRECT TO CLAIM THIS SPACE UNSUITABLE FOR INTERMEDIA**
7 **COLLOCATION FOR THE REASONS GIVEN?**

8 **A.** No, it is not. Again, I have addressed these points above.

9 **Q.** **WOULD YOU SUMMARIZE YOUR REBUTTAL OF BELL SOUTH**
10 **WITNESS RODRIGUEZ' TESTIMONY THAT STANDS IN OPPOSITION**
11 **TO YOUR WALK-THROUGH OBSERVATIONS OF THE GLADES**
12 **CENTRAL OFFICE AND YOUR ASSESSMENT OF A NUMBER OF**
13 **INTERMEDIA COLLOCATION OPPORTUNITIES EXISTING THERE?**

14 **A.** Yes. First, I note again, as I did in my direct testimony, that where I propose that
15 within the Glades central office space exists to accommodate a specific
16 Intermedia collocation arrangement, that is for illustration and I do not mean to
17 say that the space is suitable only for the arrangement I specify or that the
18 arrangements specified are the ones Intermedia prefers. BellSouth witness
19 Rodriguez testifies that six of the seven areas that I observed to be suited to
20 collocation are, in BellSouth's view, unsuited. His testimony, however, is based
21 upon the application of BellSouth collocation requirements that can no longer
22 stand scrutiny under the FCC's amended collocation rules. Intermedia is entitled
23 to collocate any equipment designed for interconnection or access to BellSouth's

1 unbundled network elements in any unused space in the Glades central office,
2 irrespective of contiguity considerations. BellSouth may no longer require caged
3 or otherwise enclosed collocation spaces and it may no longer require Intermedia
4 to separate its equipment from BellSouth's. He fails also to recognize that, apart
5 from some administrative considerations, physical and virtual collocation
6 arrangements have become indistinguishable. Last, BellSouth's ground plane
7 restrictions are unnecessary; since the potential for equipment damage or worker
8 injury from electrical shorts can be readily avoided by equipment isolation,
9 BellSouth should not be permitted to impose them, thereby keeping useful
10 collocation space in the Glades central office away from Intermedia. Witness
11 Rodriguez' testimony, in summary, presents no information that requires me to
12 any way modify my conclusions relative to the availability of collocation space
13 for Intermedia in the Glades central office.

14 **Miami Palmetto Central Office**

15 **Q. BELLSOUTH WITNESS RODRIGUEZ STATES THAT 265 SQUARE**
16 **FEET ARE BEING PRESENTLY USED FOR THE INSTALLATION OF A**
17 **TELLABS TITAN 5500 DIGITAL CROSS CONNECT SYSTEM**
18 **CONSISTING OF 14 EQUIPMENT BAYS AND 5 DSX BAYS IN THE**
19 **MIAMI PALMETTO ("PALMETTO") CENTRAL OFFICE IN A SPACE**
20 **(LOC. A, EXH. CSCM PANEL-2) THAT YOU STATED IN YOUR**
21 **DIRECT TESTIMONY COULD ACCOMMODATE AN INTERMEDIA**
22 **SCOPE COLLOCATION ARRANGEMENT ("NOTE 5," EXH. NO. RB-1).**

1 **DOES THE INSTALLATION OF THIS EQUIPMENT PRECLUDE AN**
2 **INTERMEDIA COLLOCATION IN THIS PARTICULAR SPACE?**

3 A. No, it does not. Space for three or four more equipment bays exists, one at the
4 lower end of the first line up, three within the second line up. As I testify above
5 relative to the Glades central office, under the amended FCC collocation rules,
6 which all but erase any differences between physical and virtual collocation,
7 Intermedia is permitted to intermingle its equipment in the Palmetto central office
8 with BellSouth's, without a need for any separation and subject only to
9 reasonable, nondiscriminatory security measures.

10 **Q. BELLSOUTH WITNESS RODRIGUEZ FURTHER TESTIFIES THAT 268**
11 **SQUARE FEET (LOC. B, EXH. CSCM PANEL-2) IN THE PALMETTO**
12 **CENTRAL OFFICE ALSO IN SPACE ("NOTE 5," EXH. NO. RB-1) THAT**
13 **YOU STATED IN YOUR DIRECT TESTIMONY COULD**
14 **ACCOMMODATE AN INTERMEDIA SCOPE COLLOCATION HAVE**
15 **BEEN RESERVED AS UNUSABLE FOR COLLOCATION BECAUSE OF**
16 **A REQUIREMENT TO SEPARATE INTEGRATED AND ISOLATED**
17 **GROUND PLANES. MUST THIS SPACE BE DECLARED UNUSABLE**
18 **FOR COLLOCATION FOR THE REASON CITED?**

19 A. Not at all. As I already testify, it would only be necessary for collocation
20 equipment racks or bays in this space to be isolated. Both isolated and integrated
21 grounding have a single point of ground, i.e., the main central office ground. A
22 grounding aisle is simply unnecessary.

1 **Q. BELLSOUTH WITNESS RODRIGUEZ ALSO TESTIFIES THAT 1,268**
2 **SQUARE FEET (LOC. C, EXH. CSCM PANEL-2) IN THE PALMETTO**
3 **CENTRAL OFFICE ALSO IN SPACE (“NOTE 5,” EXH. NO. RB-1) THAT**
4 **YOU STATED IN YOUR DIRECT TESTIMONY COULD**
5 **ACCOMMODATE AN INTERMEDIA SCOPE COLLOCATION HAVE**
6 **BEEN RESERVED FOR SWITCH GROWTH. SHOULD THIS**
7 **RESERVATION OF SPACE PRECLUDE INTERMEDIA**
8 **COLLOCATION?**

9 **A.** Not at all. First, even with the equipment bay space BellSouth would reserve to
10 itself, space for an additional 18 or so collocated equipment bays remains.
11 Second, to some unspecified extent, BellSouth’s reservation for switch growth in
12 this space extends to 2001. To that extent at least, whatever it is, the Commission
13 should disallow BellSouth’s reservation in favor of Intermedia’s immediate need
14 for collocation space. Third, BellSouth claims that here again ground plane
15 separation requirements preclude intermingling of equipment; this is simply not
16 the case, as I testify above. Intermingling of switch and transport equipment is
17 certainly feasible so long as the transport bays are isolated. Intermingling will
18 present numerous collocation opportunities in the Palmetto central office and in
19 the others here in issue also. I would note that witness Rodriguez does not state
20 that this space is unsuited for collocation.

21 **Q. BELLSOUTH WITNESS RODRIGUEZ FINALLY TESTIFIES THAT 869**
22 **SQUARE FEET (LOC. F AND LOC. G, EXH. CSCM PANEL-2) IN THE**
23 **PALMETTO CENTRAL OFFICE ALSO IN OR ADJACENT TO SPACE**

1 **(“NOTE 2,” EXH. NO. RB-1) THAT YOU STATED IN YOUR DIRECT**
2 **TESTIMONY COULD ACCOMMODATE AN INTERMEDIA CLOSE**
3 **COLLOCATION HAVE BEEN RESERVED FOR “ALL OTHER**
4 **CIRCUIT GROWTH REQUIREMENTS.” SHOULD THIS**
5 **RESERVATION OF SPACE PRECLUDE INTERMEDIA**
6 **COLLOCATION?**

7 A. Not at all. First, witness Rodriguez again does not state that this space is not
8 suited to collocation and he advances no observations from which such a
9 conclusion might be inferred. Once again, with application of the amended FCC
10 collocation rules, the Commission should determine that this space is indeed
11 suited to collocation. Second, he is not specific in any sense as to what he means
12 by “all other circuit growth requirements.” BellSouth should not be permitted to
13 reserve space without specifying in reasonable detail the purposes of the
14 reservation and without identifying a reasonable period of time to activate the
15 space for those purposes. Short of this, as is the case here, the Commission
16 should require BellSouth to make this space available to requesting collocaters
17 with immediate service strategies, such as Intermedia. In fact, BellSouth should
18 not be permitted to establish any claim at all for the use of this space on the basis
19 of witness Rodriguez’ inappropriately vague testimony that would prejudice
20 Intermedia’s collocation rights. Third, locations F and G are part of or adjacent to
21 space being used for administrative functions (“Note 2,” Exh. No. RB-1), which
22 functions appear readily relocatable.

1 **Q. WOULD YOU SUMMARIZE YOUR REBUTTAL OF BELLSOUTH**
2 **WITNESS RODRIGUEZ' TESTIMONY THAT STANDS IN OPPOSITION**
3 **TO YOUR WALK-THROUGH OBSERVATIONS OF THE PALMETTO**
4 **CENTRAL OFFICE AND YOUR ASSESSMENT OF A NUMBER OF**
5 **INTERMEDIA COLLOCATION OPPORTUNITIES EXISTING THERE?**

6 **A.** Yes. First, I note again that where I propose that within the Palmetto central
7 office space exists to accommodate a specific Intermedia collocation arrangement,
8 that is for illustration and I do not mean to say that the space is suitable only for
9 the arrangement I specify or that the arrangements specified are the ones
10 Intermedia prefers. BellSouth witness Rodriguez appears to testify that two of the
11 five areas that I observed to be suited to collocation in the Palmetto central office
12 are, in BellSouth's view, unsuited; he does not, however, actually make that claim
13 for significant portions of some of those areas. His testimony here, as it is for the
14 Glades central office, is based upon the application of BellSouth collocation
15 requirements that can no longer stand scrutiny under the FCC's amended
16 collocation rules. Intermedia is entitled to collocate any equipment designed for
17 interconnection or access to BellSouth's unbundled network elements in any
18 unused space in the Palmetto central office, irrespective of contiguity
19 considerations. BellSouth may no longer require caged or otherwise enclosed
20 collocation spaces and it may no longer require Intermedia to separate its
21 equipment from BellSouth's. He again fails to recognize that, apart from some
22 administrative considerations, physical and virtual collocation arrangements have
23 become indistinguishable. Last, as I testify above, BellSouth's ground plane

1 restrictions are unnecessary; since the potential for equipment damage or worker
2 injury from electrical shorts can be readily avoided by equipment isolation,
3 BellSouth should not be permitted to impose them, thereby keeping useful
4 collocation space in the Palmetto central office away from Intermedia. Witness
5 Rodriguez' testimony, in summary, presents no information that requires me to
6 any way modify my conclusions relative to the availability of collocation space
7 for Intermedia in the Palmetto central office.

8 **Boca Raton Boca Teeca Central Office**

9 **Q. BELLSOUTH WITNESS CABAN TESTIFIES THAT 1,172 SQUARE**
10 **FEET IN THE BOCA RATON BOCA TEECA ("BOCA TEECA")**
11 **CENTRAL OFFICE (LOC. A, EXH. CSCM PANEL-3) IN SPACE ("NOTE**
12 **3," EXH. NO. RB-3.1) THAT YOU STATED IN YOUR DIRECT**
13 **TESTIMONY COULD ACCOMMODATE AN INTERMEDIA SCOPE OR**
14 **CLOSE COLLOCATION HAVE BEEN RESERVED FOR LOCAL**
15 **SWITCH GROWTH, AND ARE UNAVAILABLE THEREFORE FOR**
16 **COLLOCATION PURPOSES. IS IT APPROPRIATE FOR BELLSOUTH**
17 **TO CLAIM THIS SPACE RESERVATION TO THE EXCLUSION OF**
18 **INTERMEDIA COLLOCATION OPPORTUNITIES?**

19 **A.** No, it is not. First, witness Caban testifies that this space can accommodate
20 approximately 46 switch bays. Then, he testifies that BellSouth presently is
21 adding two switch bays in this space and will add 14 more switch bays in 2001.
22 As I testify above, it is not appropriate for BellSouth to reserve space for its needs
23 in the year 2001 to the exclusion of Intermedia's needs in 1999. Moreover,

1 BellSouth would consume only about 35 per cent of the available switch bay
2 capacity in this space even if the 2001 reservation were permitted to stand. He
3 next states that in the year 2000 BellSouth will have to relocate the local switch
4 maintenance center to this space, consuming 200 square feet. Assuming that
5 relocation of this maintenance center will become truly necessary, locations other
6 than location A are as, if not more, suitable for this purpose. Nothing compels
7 selection of space in location A for this purpose. He also relies on BellSouth
8 collocation requirements that I point out above are no longer applicable and on a
9 "7 foot grounding rule" separating isolated and integrated ground planes. Not
10 only is this separation unnecessary, as I point out above, but the occupied toll
11 space (Loc. B, EXH CSCM Panel-3) is already separated from location A by an
12 area of 2,787 square feet occupied by switch equipment. Even with toll growth
13 situated in the present DMS 100 maintenance area, it would be separated by
14 considerably more than seven feet from location A.

15 **Q. WOULD YOU SUMMARIZE YOUR REBUTTAL OF BELLSOUTH**
16 **WITNESS CABAN'S TESTIMONY THAT STANDS IN OPPOSITION TO**
17 **YOUR WALK-THROUGH OBSERVATIONS OF THE BOCA TEECA**
18 **CENTRAL OFFICE AND YOUR ASSESSMENT OF A NUMBER OF**
19 **INTERMEDIA COLLOCATION OPPORTUNITIES EXISTING THERE?**

20 **A.** Yes. I can summarize my rebuttal of witness Caban's testimony in much the
21 same way as I have for witness Rodriguez' testimony above. Witness Caban's
22 testimony appears to challenge the availability of one of five potential collocation
23 spaces for Intermedia that I observed on the walk through inspection of the Boca

1 Teeca central office. In asserting that location A in the Boca Teeca central office
2 is unsuitable for collocation, witness Caban inappropriately relies upon BellSouth
3 space reservations that are too distant and presently too speculative and that
4 should be subordinated to Intermedia's immediate need to collocate. Moreover,
5 he inappropriately would have BellSouth use significant space in location A for
6 administrative functions that could readily be placed elsewhere. He also relies
7 inappropriately upon the application of invalidated BellSouth collocation
8 requirements and ground plane separations that are unnecessary. Even if
9 BellSouth were permitted to reserve space in location A for its presently projected
10 switch growth through the year 2001, sufficient space would still be available to
11 accommodate Intermedia's collocation needs. Witness Caban's testimony
12 presents no information therefore that requires me to any way modify my
13 conclusions relative to the availability of collocation space for Intermedia in the
14 Boca Teeca central office.

15 **West Palm Beach Gardens Central Office**

16 **Q. BELLSOUTH WITNESS REAM TESTIFIES THAT 338 SQUARE FEET**
17 **IN THE WEST PALM BEACH GARDENS ("GARDENS") CENTRAL**
18 **OFFICE (LOC. B, EXH. CSCM PANEL-6) IN SPACE ("NOTE 5," EXH.**
19 **NO. RB-4) THAT YOU STATED IN YOUR DIRECT TESTIMONY**
20 **COULD ACCOMMODATE AN INTERMEDIA CLOSE COLLOCATION**
21 **HAVE BEEN RESERVED FOR POWER RESERVES GROWTH, AND**
22 **ARE UNAVAILABLE THEREFORE FOR COLLOCATION PURPOSES.**
23 **IS IT APPROPRIATE FOR BELLSOUTH TO CLAIM THIS SPACE**

1 **RESERVATION TO THE EXCLUSION OF INTERMEDIA**
2 **COLLOCATION OPPORTUNITIES?**

3 A. No, it is not. The function of batteries, of course, is to supply power to the facility
4 in the event of a commercial power outage. Normally, battery capacity is sized to
5 provide power during outages of four hours. Witness Ream fails to explain why
6 present battery capacity in the Gardens central office is insufficient to carry out
7 this function. Therefore, the use of space in location B for two additional battery
8 strings should be subordinated to Intermedia's collocation requirements.

9 **Q. BELLSOUTH WITNESS REAM FURTHER TESTIFIES THAT 329**
10 **SQUARE FEET IN THE GARDENS CENTRAL OFFICE (LOC. C, EXH.**
11 **CSCM PANEL-6) IN SPACE ("NOTE 5," EXH. NO. RB-4) THAT YOU**
12 **STATED IN YOUR DIRECT TESTIMONY COULD ACCOMMODATE**
13 **AN INTERMEDIA CLOSE COLLOCATION HAVE BEEN RESERVED**
14 **FOR A TOPS DMS SWITCH, AND ARE UNAVAILABLE THEREFORE**
15 **FOR COLLOCATION PURPOSES. IS IT APPROPRIATE FOR**
16 **BELLSOUTH TO CLAIM THIS SPACE RESERVATION TO THE**
17 **EXCLUSION OF INTERMEDIA COLLOCATION OPPORTUNITIES?**

18 A. No, it is not. In the first place, witness Ream fails to state the period of time in
19 which the TOPS DMS switch will be required. If it will be required in the year
20 2001 or later, then this reservation should be considered an excessive reservation
21 and subordinated to Intermedia's immediate collocation requirements. In the
22 second place, if it is to be needed sooner, then the Commission should recognize
23 that witness Ream's conclusion that this space is unsuited for collocation

1 purposes rests inappropriately on the application of invalidated BellSouth
2 collocation requirements, and cannot otherwise be sustained.

3 **Q. BELLSOUTH WITNESS REAM ALSO TESTIFIES THAT 102 SQUARE**
4 **FEET IN THE GARDENS CENTRAL OFFICE (LOC. I, EXH. CSCM**
5 **PANEL-6) IN SPACE (“NOTE 4,” EXH. NO. RB-4) THAT YOU STATED**
6 **IN YOUR DIRECT TESTIMONY COULD ACCOMMODATE AN**
7 **INTERMEDIA CLOSE COLLOCATION HAVE BEEN RESERVED FOR**
8 **A DIGITAL ACCESS CROSS CONNECT MACHINE AND**
9 **MISCELLANEOUS TEST EQUIPMENT BAYS, AND ARE**
10 **UNAVAILABLE THEREFORE FOR COLLOCATION PURPOSES. IS IT**
11 **APPROPRIATE FOR BELLSOUTH TO CLAIM THIS SPACE**
12 **RESERVATION TO THE EXCLUSION OF INTERMEDIA**
13 **COLLOCATION OPPORTUNITIES?**

14 **A.** No, it is not. Witness Ream testifies that with the placement already of four
15 equipment bays in location I, the space in this location available for collocation
16 has been reduced to 50 square feet, short of BellSouth’s minimum requirement of
17 100 square feet. As I testify above, under the amended FCC collocation rules,
18 collocation space minima are no longer enforceable. Rather, BellSouth must
19 make available to Intermedia any unused space in its premises suitable for
20 collocation, even a single equipment bay or rack. In addition, location I is but a
21 small fraction of the space I identify as “Note 4,” which potentially can
22 accommodate Intermedia’s collocation requirements.

1 Q. FINALLY, BELLSOUTH WITNESS REAM TESTIFIES THAT 561
2 SQUARE FEET IN THE GARDENS CENTRAL OFFICE (LOC. J, EXH.
3 CSCM PANEL-6) IN SPACE (“NOTE 2,” EXH. NO. RB-4) THAT YOU
4 STATED IN YOUR DIRECT TESTIMONY COULD ACCOMMODATE
5 AN INTERMEDIA SCOPE OR CLOSE COLLOCATION HAVE BEEN
6 RESERVED FOR LOCAL SWITCH GROWTH, AND ARE
7 UNAVAILABLE THEREFORE FOR COLLOCATION PURPOSES. IS IT
8 APPROPRIATE FOR BELLSOUTH TO CLAIM THIS SPACE
9 RESERVATION TO THE EXCLUSION OF INTERMEDIA
10 COLLOCATION OPPORTUNITIES?

11 A. No, it is not. Witness Ream testifies that local switch growth is occurring at a rate
12 of 110 square feet per year. One infers from this that BellSouth has reserved
13 location J for its projected needs as far out as 2004 or 2005. There can be little
14 question that a space reservation of this duration is entirely inappropriate. To a
15 large extent then, whatever that it is determined to be, it should be subordinated to
16 Intermedia’s immediate collocation requirements. Moreover, witness Ream
17 testifies that some space in this location is being used on a temporary basis for
18 equipment staging and other administrative functions. BellSouth should be
19 required to relocate these functions if Intermedia’s collocation requirement cannot
20 be otherwise met. Furthermore, location J is but a part of the space I identify as
21 “Note 2,” which potentially can accommodate Intermedia’s collocation
22 requirements.

1 **Q. WOULD YOU SUMMARIZE YOUR REBUTTAL OF BELL SOUTH**
2 **WITNESS REAM'S TESTIMONY THAT STANDS IN OPPOSITION TO**
3 **YOUR WALK-THROUGH OBSERVATIONS OF THE GARDENS**
4 **CENTRAL OFFICE AND YOUR ASSESSMENT OF A NUMBER OF**
5 **INTERMEDIA COLLOCATION OPPORTUNITIES EXISTING THERE?**

6 **A.** Yes. I can also summarize my rebuttal of witness Ream's testimony in much the
7 same way as I have for witness Rodriguez' testimony above. Witness Ream's
8 testimony appears to challenge the availability of three of five potential
9 collocation spaces for Intermedia that I observed on the walk through inspection
10 of the Gardens central office. In asserting that locations B, C, I, and J in the
11 Gardens central office are unsuitable for collocation, witness Reams
12 inappropriately relies upon BellSouth space reservations that are far too distant
13 and presently too speculative and that should be subordinated to Intermedia's
14 immediate need to collocate. Moreover, he inappropriately would have BellSouth
15 use significant space for administrative functions that could readily be placed
16 elsewhere, and should be, if Intermedia's collocation needs require displacement.
17 He also relies inappropriately upon the application of invalidated BellSouth
18 collocation requirements, particularly minimum space specifications. Even if his
19 contentions relative to locations I and J were supportable (and they are not), the
20 pertinent spaces I identify as "Note 2" and "Note 4" still provide ample
21 collocation opportunities. Witness Ream's testimony presents no information
22 therefore that requires me to any way modify my conclusions relative to the
23 availability of collocation space for Intermedia in the Gardens central office.

1 **Commission Staff Audit Disclosures**

2 **Q. IN AUDIT DISCLOSURE NO. 1, COMMON TO EACH OF THE FOUR**
3 **CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS WELCH AND**
4 **YOUNG APPEAR TO ADOPT FOR PURPOSES OF IDENTIFYING**
5 **AVAILABLE COLLOCATION SPACE THE BELLSOUTH**
6 **ASSUMPTION THAT A SEVEN-FOOT SEPARATION BETWEEN**
7 **SWITCH EQUIPMENT AND OTHER EQUIPMENT, SUCH AS CIRCUIT**
8 **AND POWER EQUIPMENT, IS NECESSARY TO AVOID**
9 **ELECTROCUTION AND EQUIPMENT DAMAGE. IS THIS**
10 **ASSUMPTION APPROPRIATE?**

11 **A.** No, it is not. I address this matter several times above in connection with the
12 testimony of the BellSouth witnesses. Let me add that switch equipment is
13 typically placed on isolated ground planes because of the extreme sensitivity of
14 the processor to foreign or extraneous currents and that transmission equipment,
15 because it is less sensitive, is typically placed on integrated ground planes. All of
16 these ground planes cabled to the same main ground and ground field. The
17 essential point is that with Intermedia's circuit equipment isolated there is no
18 potential difference between ground planes and the hazard to life and property is
19 avoided without a requirement that it be separated by any distance from other
20 equipment for this purpose.

21 **Q. ALSO IN AUDIT DISCLOSURE NO. 1, COMMON TO EACH OF THE**
22 **FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS**
23 **WELCH AND YOUNG APPEAR TO ACCEPT FOR PURPOSES OF**

1 IDENTIFYING AVAILABLE COLLOCATION SPACE A BELLSOUTH
2 CONTENTION THAT, BECAUSE CIRCUIT PACKS USED FOR
3 STORAGE OF PLUG INS HAVE CARDBOARD LINERS AND ARE
4 THEREFORE A SUFFICIENT RISK UNDER CODE TO REQUIRE
5 STORAGE IN A FIRE-RATED ENCLOSURE, WHERE BELLSOUTH IS
6 NOT PRESENTLY IN COMPLIANCE WITH THIS REQUIREMENT IT
7 MUST FIND THE NECESSARY SPACE FOR COMPLIANCE BEFORE
8 CONSIDERING SPACE FOR COLLOCATION. IS BELLSOUTH'S
9 CONTENTION SUPPORTABLE?

10 A. No, it is not. Storage cabinets especially made to accommodate plug ins are
11 available that do not have cardboard liners; hence, the risk arguably associated
12 with cardboard liners that would require fire-rated storage need not be present.
13 Therefore, BellSouth should not be permitted to advance a need to find space for
14 fire-rated plug in storage as superior to a need to find Intermedia collocation
15 space.

16 Q. AGAIN IN AUDIT DISCLOSURE NO. 1, COMMON TO EACH OF THE
17 FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS
18 WELCH AND YOUNG APPEAR TO CONCLUDE THAT PHYSICAL
19 COLLOCATION SPACE NEEDS TO BE WITHIN A ROOM WITH FIRE-
20 RATED WALLS AND AN EXIT DOOR TO THE OUTSIDE OR ONE
21 WITH "HYBRID" WALLS GIVEN LEAVE BY LOCAL BUILDING
22 CODE OFFICIALS. IS SUCH A CONCLUSION CORRECT?

1 A. No, it is not. Under the FCC's amended collocation rules, incumbent LECs must
2 make cageless collocation with nondiscriminatory security measures available to
3 requesting carriers. Moreover, Intermedia understands that BellSouth is
4 continuing discussions, which have met already with some success, with local
5 building code officials concerning the applicability of multi-tenancy separation
6 requirements to collocations. As I note above, I again acknowledge that the staff
7 auditors prepared this testimony before release of the FCC's declaratory ruling
8 and amended collocation rules and that their supplemental testimony leads them
9 to a different conclusion.

10 **Q. IN AUDIT DISCLOSURE NO. 2, ALSO COMMON TO EACH OF THE**
11 **FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS**
12 **WELCH AND YOUNG APPEAR TO OFFER THE OPINION THAT**
13 **WHERE BELLSOUTH'S GROWTH "FOOTPRINTS" ARE**
14 **"REASONABLE" AND ENTAIL WORK STATIONS AND OTHER**
15 **ADMINISTRATIVE SPACE, WHETHER INEFFICIENTLY ARRANGED**
16 **OR NOT, WITHIN SWITCH AND CIRCUIT SPACES, SUCH SPACE**
17 **SHOULD NOT BE CONSIDERED AVAILABLE FOR COLLOCATION.**
18 **IS THIS OPINION TROUBLESOME?**

19 A. Yes, it is. Under the FCC's rules, BellSouth may reserve limited space for its
20 own future use but may not make such reservations on terms more favorable than
21 those that it would apply to requesting carriers, such as Intermedia, seeking space
22 for their future use. Where Intermedia has an immediate need for collocation
23 space, and has made a bona fide request, Intermedia's need should be given a

1 priority over a BellSouth future need, especially one going out to 2001 or 2002.

2 (See Audit Disclosure 3.)

3 **Q. IN AUDIT DISCLOSURE NO. 3, ALSO COMMON TO EACH OF THE**
4 **FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS**
5 **WELCH AND YOUNG APPEAR TO OFFER THE OPINION THAT**
6 **WHERE BELLSOUTH HAS RESERVED SPACES FOR FUTURE USE**
7 **THAT ARE IN A LINE UP OF BAYS, SUCH SPACE IS NOT**
8 **“CONDUCTIVE” TO COLLOCATION. IS THIS A CORRECT**
9 **ASSESSMENT?**

10 A. No, it is not. Under the FCC’s amended collocation rules, Intermedia must be
11 permitted to collocate in any unused space within BellSouth’s premises, even in
12 single-bay increments and without the need for separation from BellSouth’s
13 equipment. As I do above, I again acknowledge that the staff auditors prepared
14 this testimony before release of the FCC’s declaratory ruling and amended
15 collocation rules and that their supplemental testimony leads them to a different
16 conclusion.

17 **Q. IN AUDIT DISCLOSURE NO. 4, ALSO COMMON TO EACH OF THE**
18 **FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS**
19 **WELCH AND YOUNG APPEAR TO ACCEPT BELLSOUTH’S**
20 **CONTENTION THAT IT IS UNDER NO OBLIGATION TO REMOVE OR**
21 **REPLACE OBSOLETE EQUIPMENT TO CREATE COLLOCATION**
22 **SPACE. IS SUCH A CONTENTION SUPPORTABLE?**

1 A. No, it is not. Under FCC rules, BellSouth must make technically feasible
2 modifications to its facilities and its equipment to facilitate interconnection. Ms.
3 Strow will further address this point in her rebuttal of BellSouth witness Milner's
4 testimony.

5 **Q. IN AUDIT DISCLOSURE NO. 5, ALSO COMMON TO EACH OF THE**
6 **FOUR CENTRAL OFFICES HERE IN ISSUE, STAFF AUDITORS**
7 **WELCH AND YOUNG APPEAR TO ACCEPT BELLSOUTH'S**
8 **COLLOCATION HANDBOOK REQUIREMENTS THAT**
9 **COLLOCATIONS BE SEPARATED FROM BELLSOUTH'S**
10 **EQUIPMENT AND THAT THEY BE A MINIMUM OF 100 SQUARE**
11 **FEET. ARE THESE REQUIREMENTS VALID?**

12 A. No, they are not. Both of these requirements are unsustainable under the FCC's
13 amended collocation rules, and they should not be imposed. I again acknowledge
14 that the staff auditors prepared this testimony before release of the FCC's
15 declaratory ruling and amended collocation rules and that their supplemental
16 testimony leads them to a different conclusion.

17 **Q. IN AUDIT DISCLOSURE NO. 9, CONCERNING THE GLADES**
18 **CENTRAL OFFICE, STAFF AUDITOR WELCH APPEARS TO OFFER**
19 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
20 **8 (P4 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS "NOTE 7"**
21 **(EXH. NO. RB-2.2), IS UNSUITED FOR COLLOCATION BECAUSE OF**
22 **INSUFFICIENT SPACE AND GROUND PLANE SEPARATION**
23 **REQUIREMENTS. CAN YOU RESOLVE THE APPARENT**

1 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
2 **OPINION?**

3 **A.** Yes. It is apparent that Ms. Welch's opinion here is based upon an
4 acceptance of BellSouth's collocation requirements, which I point out above, are
5 inconsistent with the FCC's amended collocation rules. Even so, she
6 acknowledges that some collocation space is or can be made available in area 8. I
7 also explain above why BellSouth's ground plane separation requirement is
8 unnecessary.

9 Areas 6 (p3 of diagram insert) and 8 can be consolidated into one
10 Maintenance Administration Panel ("MAP") workstation to create a cageless
11 collocation opportunity. Furthermore, in areas 9 (p4 of diagram insert), 10 (p3 of
12 diagram insert) and 11 (p1 of diagram insert), BellSouth has inappropriately
13 reserved space for its own needs out to the year 2001. These areas are suited to
14 cageless collocation of isolated equipment.

15 **Q. IN AUDIT DISCLOSURE NO. 9, CONCERNING THE GLADES**
16 **CENTRAL OFFICE, STAFF AUDITOR WELCH APPEARS TO OFFER**
17 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
18 **9 (P4 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS "NOTE 5"**
19 **(EXH. NO. RB-2.2), IS UNSUITED FOR COLLOCATION BECAUSE OF A**
20 **YEAR 2001 RESERVATION, OVERHEAD CABLING AND DUCT**
21 **CONGESTION AND GROUND PLANE SEPARATION**
22 **REQUIREMENTS. CAN YOU RESOLVE THE APPARENT**

1 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
2 **OPINION?**

3 **A.** Yes. Once again, it is apparent that Ms. Welch's opinion here as well is based
4 upon an acceptance of BellSouth's invalidated collocation requirements and
5 unnecessary ground plane separation requirement. Furthermore, as I state above,
6 BellSouth should not be permitted to reserve space for its future needs out to the
7 year 2001 to the prejudice of Intermedia's immediate collocation needs.

8 During the walk through, BellSouth personnel stated that while some of
9 the cabling might not be in use at this time, there were no plans to remove it.
10 Under the amended FCC collocation rules, ILECs must, upon request by an
11 ALEC or state commission, remove obsolete unused equipment and cabling from
12 central offices and conduit to increase the amount of space available for
13 collocation.

14 **Q. IN AUDIT DISCLOSURE NO. 9, CONCERNING THE GLADES**
15 **CENTRAL OFFICE, STAFF AUDITOR WELCH ALSO APPEARS TO**
16 **OFFER AN OPINION, IN CONTRAST TO YOUR OBSERVATION,**
17 **THAT AREA 11 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY**
18 **AS "NOTE 1" (EXH. NO. RB-2.1), IS UNSUITED FOR COLLOCATION**
19 **BECAUSE OF A YEAR 2001 RESERVATION, OVERHEAD CABLING**
20 **CONGESTION AND GROUND PLANE SEPARATION**
21 **REQUIREMENTS. CAN YOU RESOLVE THE APPARENT**
22 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
23 **OPINION?**

1 A. Yes. My response to the previous question addresses this question also.

2 **Q. IN AUDIT DISCLOSURE NO. 6, CONCERNING THE GARDENS**
3 **CENTRAL OFFICE, STAFF AUDITOR YOUNG APPEARS TO OFFER**
4 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
5 **11 (P2 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS “NOTE 3”**
6 **(EXH. NO. RB-4), IS UNSUITED FOR COLLOCATION BECAUSE OF**
7 **GROUND PLANE SEPARATION REQUIREMENTS AND A NEED TO**
8 **REARRANGE THE AREA. CAN YOU RESOLVE THE APPARENT**
9 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
10 **OPINION?**

11 A. Yes. Ms. Young acknowledges that collocation space would exist in area 11,
12 were it not for BellSouth’s ground plane separation requirement and a need for
13 BellSouth to renovate the space to accommodate collocaters. As I often testify
14 above, ground plane separation is not necessary. I also testify above that I
15 understand that FCC collocation rules require BellSouth to modify its facilities
16 and equipment to an extent reasonably necessary to facilitate interconnection,
17 although in this instance, with collocated equipment isolated, that might be
18 unnecessary. Ms. Strow discusses this point at greater length in her rebuttal
19 testimony.

20 **Q. IN AUDIT DISCLOSURE NO. 6, CONCERNING THE GARDENS**
21 **CENTRAL OFFICE, STAFF AUDITOR YOUNG ALSO APPEARS TO**
22 **OFFER AN OPINION, IN CONTRAST TO YOUR OBSERVATION,**
23 **THAT AREA 2 (P2 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS**

1 **“NOTE 2” (EXH. NO. RB-4), MAY BE UNSUITED FOR COLLOCATION**
2 **BECAUSE OF BELL SOUTH’S ASSERTION THAT IT IS NOT**
3 **OBLIGATED TO CONSTRUCT A NEW EXIT OR FIRE-RATED**
4 **CORRIDOR THAT WOULD BE REQUIRED. CAN YOU RESOLVE THE**
5 **APPARENT DISCREPANCY BETWEEN YOUR OBSERVATION AND**
6 **HER OPINION?**

7 **A.** Yes. BellSouth’s assertion that it is not required to make these space renovations
8 as reasonably necessary to facilitate interconnection is simply not sustainable
9 under the FCC’s collocation rules.

10 **Q.** **IN AUDIT DISCLOSURE NO. 7, CONCERNING THE GARDENS**
11 **CENTRAL OFFICE, STAFF AUDITOR YOUNG APPEARS TO OFFER**
12 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
13 **12 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS “NOTE 5”**
14 **(EXH. NO. RB-4), IS UNSUITED FOR COLLOCATION BECAUSE OF**
15 **GROUND PLANE SEPARATION REQUIREMENTS, SECURITY ISSUES,**
16 **AND OVERHEAD DUCT CONGESTION. CAN YOU RESOLVE THE**
17 **APPARENT DISCREPANCY BETWEEN YOUR OBSERVATION AND**
18 **HER OPINION?**

19 **A.** Yes. It is apparent that Ms. Young’s opinion here, as Ms. Welch’s above, is based
20 upon an acceptance of BellSouth’s collocation requirements, which I point out
21 above, are inconsistent with the FCC’s amended collocation rules. Ms. Young’s
22 modified opinion in her supplemental testimony is consistent with my
23 observation. Even so, she acknowledges that some collocation space is or can be

1 made available in area 12. Again, BellSouth's ground plane separation
2 requirement is unnecessary with isolated equipment.

3 **Q. IN AUDIT DISCLOSURE NO. 11, CONCERNING THE GARDENS**
4 **CENTRAL OFFICE, STAFF AUDITOR YOUNG ALSO APPEARS TO**
5 **OFFER AN OPINION, IN CONTRAST TO YOUR OBSERVATION,**
6 **THAT AREA 7 (P2 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS**
7 **"NOTE 4" AND "NOTE 5" (EXH. NO. RB-4), MAY BE UNSUITED FOR**
8 **COLLOCATION BECAUSE OF RESERVATION AND BELL SOUTH'S**
9 **"CONCEPT OF FAMILIES." CAN YOU RESOLVE THE APPARENT**
10 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
11 **OPINION?**

12 **A.** First, Ms. Young does not identify the period of time for which area 7 has been
13 reserved by BellSouth for its needs. To the extent that BellSouth reserves this
14 space out to the year 2001, and perhaps the year 2000, Intermedia's collocation
15 request should be given priority for the use of this space. Second, BellSouth's
16 historical use of the "concept of families" for designing its central office facilities
17 arrangements is by no means essential for this purpose. Where necessary to
18 facilitate collocation, BellSouth should be reasonably required to devise new
19 facilities arrangements that may deviate from the "concept of families."

20 **Q. IN AUDIT DISCLOSURE NO. 6, CONCERNING THE PALMETTO**
21 **CENTRAL OFFICE, STAFF AUDITOR YOUNG APPEARS TO OFFER**
22 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
23 **1 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS "NOTE 4"**

1 **(EXH. NO. RB-1), IS UNSUITED FOR COLLOCATION BECAUSE THE**
2 **SPACES IN THE AREA ARE SCATTERED AND DO NOT LEAVE**
3 **ROOM ENOUGH FOR PHYSICAL COLLOCATION. CAN YOU**
4 **RESOLVE THE APPARENT DISCREPANCY BETWEEN YOUR**
5 **OBSERVATION AND HER OPINION?**

6 **A.** Yes. Here again, Ms. Young’s opinion appears to have preceded the FCC’s
7 determination that ILECs must make any unused space in their premises available
8 for collocation, including unrestricted cageless collocation.

9 **Q.** **IN AUDIT DISCLOSURE NO. 6, CONCERNING THE PALMETTO**
10 **CENTRAL OFFICE, STAFF AUDITOR YOUNG ALSO APPEARS TO**
11 **OFFER AN OPINION, IN CONTRAST TO YOUR OBSERVATION,**
12 **THAT AREA 4 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS**
13 **“NOTE 3” (EXH. NO. RB-1), IS UNSUITED FOR COLLOCATION**
14 **BECAUSE IT IS TO BE USED BY BELLSOUTH FOR FIRE-RATED**
15 **STORAGE OF PLUG-INS. CAN YOU RESOLVE THE APPARENT**
16 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
17 **OPINION?**

18 **A.** Yes. As I testify above, plug ins may be stored in special cabinets that obviate the
19 need for fire-rated storage enclosures.

20 **Q.** **IN AUDIT DISCLOSURE NO. 8, CONCERNING THE PALMETTO**
21 **CENTRAL OFFICE, STAFF AUDITOR YOUNG APPEARS TO OFFER**
22 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA**
23 **8 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS “NOTE 5”**

1 (EXH. NO. RB-1), IS UNSUITED FOR COLLOCATION BECAUSE OF
2 RESERVATIONS THROUGH THE YEAR 2001, GROUND PLANE
3 RESTRICTIONS, FIRE AISLE REQUIREMENTS, PLUG-IN STORAGE,
4 AND OVERHEAD RACKING AND DUCTS. CAN YOU RESOLVE THE
5 APPARENT DISCREPANCY BETWEEN YOUR OBSERVATION AND
6 HER OPINION?

7 A. Yes. For reasons stated above, these objections to the use of this area for
8 collocation are simply not supportable.

9 Q. IN AUDIT DISCLOSURE NO. 8, CONCERNING THE PALMETTO
10 CENTRAL OFFICE, STAFF AUDITOR YOUNG ALSO APPEARS TO
11 OFFER AN OPINION, IN CONTRAST TO YOUR OBSERVATION,
12 THAT AREA 9 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS
13 "NOTE 5" (EXH. NO. RB-1), IS UNSUITED FOR COLLOCATION
14 BECAUSE OF RESERVATIONS THROUGH THE YEAR 2002, GROUND
15 PLANE RESTRICTIONS, AND FIRE AISLE REQUIREMENTS. CAN
16 YOU RESOLVE THE APPARENT DISCREPANCY BETWEEN YOUR
17 OBSERVATION AND HER OPINION?

18 A. Yes. I address these same objections several times above. Moreover, here
19 BellSouth claims a space reservation to the year 2002 for its own needs, without a
20 question an excessive claim.

21 Q. IN AUDIT DISCLOSURE NO. 10, CONCERNING THE PALMETTO
22 CENTRAL OFFICE, STAFF AUDITOR YOUNG APPEARS TO OFFER
23 AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT AREA

1 **13 (P1 OF DIAGRAM INSERT), WHICH YOU IDENTIFY AS “NOTE 2”**
2 **(EXH. NO. RB-1), IS UNSUITED FOR COLLOCATION BECAUSE OF**
3 **GROUND PLANE SEPARATION REQUIREMENTS, AISLE**
4 **RESTRICTIONS AND SECURITY ISSUES. CAN YOU RESOLVE THE**
5 **APPARENT DISCREPANCY BETWEEN YOUR OBSERVATION AND**
6 **HER OPINION?**

7 **A.** Yes. Again, I address these same objections several times above.

8 **Q.** **IN AUDIT DISCLOSURE NO. 8, CONCERNING THE BOCA TEECA**
9 **CENTRAL OFFICE, STAFF AUDITOR WELCH APPEARS TO OFFER**
10 **AN OPINION, IN CONTRAST TO YOUR OBSERVATION, THAT**
11 **AREAS 1 AND 2 (2ND DIAGRAM INSERT/2ND FLOOR), WHICH YOU**
12 **IDENTIFY AS “NOTE 5” (EXH. NO. RB-3.2), MAY BE UNSUITED FOR**
13 **COLLOCATION BECAUSE OF A NEED TO MAKE SPACE**
14 **REARRANGEMENTS. CAN YOU RESOLVE THE APPARENT**
15 **DISCREPANCY BETWEEN YOUR OBSERVATION AND HER**
16 **OPINION?**

17 **A.** BellSouth does indeed have an obligation to rearrange space if that is necessary to
18 create collocation opportunities. Ms. Welch appears to recognize that at least this
19 is a question to be resolved by the Commission. Ms. Strow discusses this point
20 more fully in her rebuttal testimony.

21 **Q.** **DOES THIS CONCLUDE YOUR TESTIMONY?**

22 **A.** Yes. I reserve the right, however, to amend or modify my testimony, as
23 appropriate.

1

2

END OF TESTIMONY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand Delivery (*) or U.S. Mail this 10th day of May, 1999, to the following:

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