

ORIGINAL

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May 12, 1999

Mrs. Blanca S. Bayó
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Florida Public Service Commission
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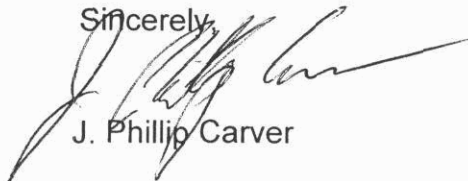
**Re: Docket Nos. 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL, and 981250-TL**

Dear Ms. Bayó:

Enclosed are an original and 15 copies of the corrected pages 52-60 of the testimony of James D. Bloomer, on behalf of BellSouth Telecommunications, Inc. Please file this document in the captioned matter. This testimony is being filed to correct a number of errors that appeared in the original testimony. Please replace pages 52-60 of Mr. Bloomer's previously filed testimony with the enclosed pages and either return the original pages to BellSouth or dispose of them.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,



J. Phillip Carver

AFA	<u>2</u>	
APP	_____	Enclosures
CAF	_____	
CMU	_____	
CTR	_____	cc: All parties of record
EAG	_____	M. M. Criser, III
LEG	<u>2</u>	N. B. White
MAS	<u>Stog</u>	William J. Ellenberg II (w/o enclosures)
OPC	_____	
RRR	_____	
SEC	<u>1</u>	
WAW	_____	
OTH	_____	

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06037 MAY 12 1999
FPSC-RECORDS/REPORTING

- 1 1. legitimate BellSouth space reservations,
- 2 2. code required exit aisles,
- 3 3. growth space in fixed equipment layouts or families, without
- 4 which no ALEC or BellSouth customer gets service, or
- 5 4. unusable areas caused by ground plane separations and air
- 6 conditioning intakes.

7

8 In Issue five, Mr. Beasley thinks BellSouth should not be actively using

9 Signal Maintenance Access Point technology even though it is still

10 state of the art. He further alleges BellSouth does not keep up to date

11 by consolidating/removing equipment to take advantage of today's

12 improved technology to liberate space. Everyday, BellSouth plans the

13 addition of new equipment, the redesigning of service, the reallocation

14 of floor space, and the best way of cabling to meet customer service

15 orders and anticipated demand. BellSouth does the right thing for our

16 customers, the ratepayer, and the stockholder with the best timing

17 BellSouth is able to achieve.

18

19 Q. MR. BEASLEY TRIES TO GENERATE PHYSICAL COLLOCATION

20 SPACE IN THE MIAMI PALMETTO CENTRAL OFFICE ON PAGE 6,

21 LINE 7 TO PAGE 7, LINE 3. IS HIS ANALYSIS CORRECT?

22

23 A. No. Mr. Beasley repeats most of the general errors committed by all the

24 parties rebutted at the start of this testimony. He refuses to

25 acknowledge building codes, takes properly forecasted space meeting

1 BellSouth requirements, and even tries to take newly occupied
2 equipment space. He confuses administrative space with that
3 necessary to install, maintain, repair, and service equipment.
4 Specifically,:

5

6 1. Page 6, lines 10 – 13 (Note 1) note an area mentioned on the audit
7 staff report as Audit Area No. 5. The room is used for an office,
8 conference room, and computer based training area. The room use
9 has been discussed earlier in this testimony and in my direct
10 testimony, page 57 and Exhibit JDB-19, page 16.

11

12 2. Page 6, lines 14 – 17 (Note 2) are claimed by Mr. Beasley to have
13 approximately 650 square feet. The area is actually 402 square
14 feet, including all code required aisles, and is detailed in the Audit
15 Report Area No. 13 and Exhibit JDB-12. Pictures can be found in
16 Exhibit JDB-19, pages 29 and 30. The space was noted by the Staff
17 Auditors to be unsuitable for physical collocation. The area is also
18 detailed in my rebuttal testimony above.

19

20 3. Page 6, lines 17 – 20, which contain Mr. Beasley's Note 3 is Audit
21 Report Area No. 4. This is the area that must be enclosed for code
22 required PICS storage area. This area has been rebutted above. It
23 is detailed in my direct testimony, page 57 and Exhibit JDB-19,
24 page 10. The audit staff found it inappropriate for physical
25 collocation.

- 1 4. Page 6, lines 20 - 23 detail an area called Note 4. Mr. Beasley must
2 be mistaken, there is no such vacant area noted on any exhibit. The
3 area is full of equipment.
4
- 5 5. Page 6, line 23, to Page 7, line 3 details an area called Note 5. This
6 area is pictured in Exhibit JDB-19, page 24 and in Audit Staff Report
7 as Audit Area No. 9. It is now partially full of equipment, with more
8 on the way. The area was deemed inappropriate for physical
9 collocation. It has been rebutted in my testimony above.

10

11 Q. DOES MR.BEASLEY'S ANALYSIS OF THE NORTH DADE GOLDEN
12 GLADES CENTRAL OFFICE ON PAGE 7, LINE 7 TO PAGE 8, LINE 5
13 STAND UP TO REVIEW?

14

15 A. No. He makes the same general errors as the other parties.
16 Specifically,:

17

18 1. Page 7, lines 11 – 12 (Note 1) talk about an area of 795 square
19 feet. The area is not 795 square feet but actually 531 square feet as
20 detailed in my Exhibit JDB-2. The area is so configured that safe
21 physical collocation space cannot be built. This is Audit Report Area
22 No. 11 and detailed in Exhibit JDB-14, page 20.

23

24 2. Page 7, lines 12 - 14 (Note 2) talk about an area of 970 square
25 feet. This area does not exist. There are two separate areas of 317

1 and 283 square feet (600 square feet total) as detailed on Exhibit
2 JDB-2. These two areas are so small and configured such with
3 BellSouth space reservations that the Staff Auditors did not think
4 physical collocation was appropriate.

5

6 3. Page 7, lines 14 – 17 cover an area identified as Note 3. Note 3 is
7 actually two spaces: one full of virtual collocation equipment of 249
8 square feet, and the other properly reserved for 04T toll switch
9 growth of 143 square feet. Both are noted on my Exhibit JDB-2.
10 Obviously, neither space is available for physical collocation as they
11 are either occupied or properly reserved.

12

13 4. Page 7, lines 17 - 21 cover an area identified as Note 4. This note
14 tries to combine the code-required PICS storage area and the exit
15 hallway into a physical collocation suite. This area has been
16 discussed in my rebuttal many times above. It is Audit Area Nos. 3
17 and 5 and detailed in my direct testimony and exhibits as
18 referenced above. If Commission order PSC-99-0060-FOF-TP is
19 upheld on appeal, this space will be unavailable for any other
20 collocater.

21

22 5. Page 7, lines 21 - 23 (Note 5) note an area of 661 square feet. This
23 area is properly reserved for BellSouth local and tandem switch
24 growth. The area is detailed as Audit Report Area No. 9 and is
25 pictured on Exhibit JDB-14, pages 17 and 18.

1 6. Page 8, lines 1 - 3 cover an area identified as Note 6. This area is
2 the 93 square foot computer-based training area. This area has
3 been rebutted several times above. It is pictured in Exhibit JDB-14,
4 page 6.

5

6 7. Page 8, lines 3 – 5 depict an area identified as Note 7. The area is
7 actually 114 square feet, not 349 square feet, and is properly
8 reserved for BellSouth tandem switch growth. This area is not
9 available for physical collocation.

10

11 Q. DID MR. BEASLEY MAKE COMMENTS ON THE BOCA RATON
12 BOCA TEECA CENTRAL OFFICE SPACE AVAILABILITY ON PAGE
13 8, LINE 9 TO PAGE 9, LINE 7 THAT YOU CAN COMMENT ON?

14

15 A. Yes, I can. Mr. Beasley still makes the same general errors as the
16 other parties. Specifically,:

17

18 1. Page 8, lines 13 – 15 talk about an area identified as Note 1. This is
19 Audit Area No. 5 on the Staff Audit Report and pictured on Exhibit
20 JDB-18, pages 8 and 9. Given the code and grounding plane
21 separation issues, the area is not adequate for safe, code-compliant
22 physical collocation installation.

23

24 2. Page 8, lines 15 - 17 identify an area called Note 2. This area is
25 actually 1,165 square feet, not 1,756 square feet. It is properly

1 reserved for BellSouth switch growth and code-required exit aisles.
2 This area is noted on the Audit Report as Area No. 4. It has been
3 rebutted above. It is pictured in Exhibit JDB-18, pages 6 and 7.

4

5 3. Page 8, lines 18 – 20 identify an area as Note 3. Actually, Mr.
6 Beasley is confused. This is the same area described in Note 2.
7 There is no such space in Note 3 unless he is subdividing Note 2. If
8 he is, then his square footages are off in both cases.

9

10 4. Page 8, line 21 to Page 9, line 2 identifies an area as Note 4. There
11 is no such area of vacant space on any exhibit. The area is totally
12 occupied by working switch equipment.

13

14 5. Page 9, lines 3 – 7 discuss an area identified as Note 5. This is the
15 administrative space for forty-nine people, not sixteen, as he
16 suggests. The space is located on another floor. This is Audit
17 Report Area Nos.1 and 2. This area has been rebutted above
18 several times. It is pictured in Exhibit JDB-18, pages 10-22.

19

20 Q. CAN YOU COMMENT ON MR BEASLEY'S ASSESSMENT OF THE
21 WEST PALM BEACH GARDENS CENTRAL OFFICE ON PAGE 9,
22 LINE 11 TO PAGE 10, LINE 9?

23

24 A. Yes. Mr. Beasley continues to make the same general errors made by
25 all the parties. Some specific comments follow:

- 1 1. Page 9, lines 15 – 18 try to identify an area as Note 1. It is an area
2 of 180 square feet not 475 square feet as stated by Mr. Beasley.
3 The area is a fixed layout maintenance area workstation ordered
4 from the vendor. It is located immediately adjacent to the processor.
5 The area was noted in the Audit Report as Audit Area No.1 and
6 pictured in Exhibit JDB-15, pages 10 and 11. The Staff Auditors
7 determined the space was unsuitable for physical collocation.
8
9 2. Page 9, lines 18 - 19 talk about an area identified as Note 2. The
10 majority of this space is two code-required exit aisles and ground
11 plane separation aisles. The area is noted as Audit Area No. 2 in
12 the Audit Report and is shown on Exhibit JDB-15, pages 7 and 8.
13 The area was deemed unsuitable for physical collocation. There is
14 no overhead door in this area. Mr. Beasley may be referring to the
15 large smoke exhaust louvers necessary to vent a smoke filled
16 central office in case of fire.
17
18 3. Page 9, line 23 to Page 10, line 3 identify Note 3. This is the
19 collection of fixed layout maintenance centers detailed in Audit
20 Report Area No.11. This area includes code-required exit aisles.
21 This area has been rebutted in my testimony above. It is the only
22 place available for relocating the code-required exit aisle and
23 receiving area if Commission Order No. PSC-99-0060-FOF-TP is
24 upheld on appeal. This space is, therefore, not available for physical
25 collocation. It is pictured in Exhibit JDB-15, pages 4-6.

1 4. Page 10, lines 3 - 6 references Note 4. The alleged Note 4 space
2 of 1,279 square feet does not exist. Exhibit RB-4 shows the area
3 covering the fully occupied power area, existing virtual collocators, a
4 new Titan 5500 DCS, and occupied miscellaneous toll equipment.
5 The area is partially pictured in my Exhibit JDB-15, page 24.

6

7 Q. IS THERE SPACE FOR MORE STRUCTURES ON THE FOUR SITES
8 VISITED BY MR. BEASLEY AS REPORTED ON PAGE 11, LINE 14
9 TO PAGE 12, LINE 12?

10

11 A. The answer is no for the North Dade Golden Glades and West Palm
12 Beach Gardens central offices. The North Dade Golden Glades central
13 office building sits against three setbacks or property lines. The fourth
14 side faces the parking lot that contains the code-required number of
15 spaces for a full two-story building. The site is also at maximum
16 development in terms of paving and coverage. The BellSouth property
17 is fully surrounded by developed warehouse properties. The West
18 Palm Beach Gardens central office has similar setback, zoning,
19 and parking limitations. BellSouth is surrounded by land held in trust
20 and zoned for large residential projects.

21

22 The other two sites, Boca Raton Boca Teeca and Miami Palmetto,
23 have some parking area left unoccupied. However, the Boca Raton
24 Boca Teeca central office is in a highly restricted construction area.
25 This is obvious to those attending the site visits. One cannot assume

1 one will get zoning permission for any outlying structure of any kind.
2 The Miami Palmetto central office has land held for relocating the
3 parking area when a horizontal building addition is added. This land
4 area is sized to support the maximum building size. One cannot
5 assume that zoning in the Doral Country Club area will allow for
6 outlying buildings.

7

8 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

9

10 A. Yes, it does.

11

12

13

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25

CERTIFICATE OF SERVICE
Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL
981012-TL, and 981250-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

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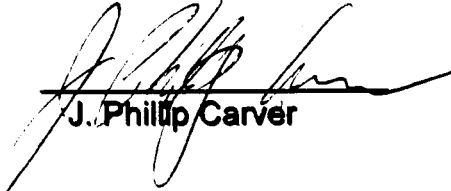
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