

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:

Petition of ACI Corp. D/B/A Accelerated Connections, Inc. for Generic Investigation to Ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated Comply with Obligation to Provide Alternative Local Exchange Carriers with Flexible, Timely, and Cost-efficient Physical Collocation.

Docket No. 990321-TP

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Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory.

Docket No. 981834-TP

DIRECT TESTIMONY OF JULIA O. STROW

ON BEHALF OF

INTERMEDIA COMMUNICATIONS INC.

October 28, 1999

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1 **Q: Please state your name, employer, position and business address.**

2 **A:** My name is Julia Strow. I am employed by Intermedia Communications Inc.
3 (“Intermedia”) as Assistant Vice President, Industry Policy. My business address is 3625
4 Queen Palm Drive, Tampa, Florida 33619.

5
6 **Q: What are your responsibilities in that position?**

7 **A:** I am a primary interface between Intermedia and the incumbent local exchange carriers
8 (“ILECs”). I am responsible for the setting of Intermedia’s state and federal regulatory
9 policy. In that capacity, I testify on behalf of Intermedia in federal and state proceedings
10 dealing with local competition issues. I am also responsible for interconnection
11 negotiations with – and arbitrations against ILECs, and in rulemaking proceedings
12 addressing unbundled network elements, interconnection, collocation, resale, and related
13 matters

14
15 **Q: Please briefly describe your educational background and professional experience.**

16 **A:** I graduated from University of Texas in 1981 with a B.S. in Communications. I joined
17 AT&T in 1983 as a Sales Account Executive responsible for major market accounts. I
18 subsequently held several positions with BellSouth Telecommunications, Inc.’s
19 (“BellSouth’s”) Marketing and Regulatory Departments. I joined Intermedia in April 1996
20 as Director of Strategic Planning and Industry Policy, and subsequently was promoted to my
21 current position.

22

23

1 **Q: Please describe the nature of Intermedia's business.**

2 **A:** Intermedia is one of the country's largest and fastest growing integrated communications
3 providers (ICPs), providing a full range of local and long distance voice and data services
4 to business and government end users, long distance carriers, information service
5 providers, resellers and wireless carriers. Intermedia also provides Internet connectivity,
6 web site management, and private network solutions on a nationwide basis through
7 Digex, our national information service provider affiliate.

8
9 Intermedia has operated as a facilities-based communications service provider in Florida
10 beginning in 1992 with data services and moving into voice services in 1996. Intermedia
11 has five Nortel DMS 500 voice switches in the state of Florida. These switches are
12 located in Jacksonville (1), Orlando (2), Tampa (1), and Miami (1). These voice switches
13 provide a full range of local exchange services and long distance services. Intermedia
14 also has forty-seven data switches in the state of Florida. Fifteen of the forty-seven data
15 switches comprise the State of Florida frame relay network. This network is dedicated to
16 the State of Florida for use by its agencies and no commercial traffic traverses this
17 network. The commercial frame relay network in Florida is comprised of twenty-five
18 switches throughout Florida located in Daytona Beach, Ft. Lauderdale, Gainesville,
19 Jacksonville, Miami, Ocala, Orlando, Panama City, Pensacola, Tampa, Tallahassee, and
20 West Palm Beach. Intermedia also has seven (7) ATM switches in Florida located in
21 Jacksonville, Tallahassee, Orlando, Tampa, Ft. Lauderdale, and Miami. These advanced
22 telecommunications switches use packet-switched or cell-based technology for the
23 provision of many high-speed data services. At this time, Intermedia has approximately

1 33,000 customers in Florida for whom we provide local, long distance, data, private line,
2 or Internet services.

3
4 **Q: What is the purpose of your testimony?**

5 **A:** The purpose of my direct testimony in this proceeding is to discuss the incumbent local
6 exchange carrier's ("ILEC's") collocation obligations under the Federal Communications
7 Commission's ("FCC's") First Report and Order FCC 99-48, CC Docket No. 98-147, In
8 the matter of Deployment of Wireline Services Offering Advanced Telecommunications
9 Capability (or "FCC Collocation Order"), released March 31, 1999. I will also discuss
10 what the Florida Public Service Commission ("Commission") should require of the
11 ILECs beyond what was ordered by the FCC.

12
13 **Q: What obligations, if any, does an ILEC have to interconnect with ALEC physical**
14 **collocation equipment located "off-premises"?**

15 **A:** As a result of the FCC's Collocation Order, it is clearly the obligation of the ILEC to
16 provide collocation the FCC adopted rule 51.323(k)(1) requiring the ILECs to provide
17 "off-premises" or "Adjacent Collocation" where space is legitimately exhausted in a
18 particular ILEC central office and where it is technically feasible. The FCC's
19 Collocation Order acknowledged that many state and local regulations such as zoning
20 laws will most likely affect the ILECs ability to provide adjacent collocation. Therefore,
21 it asked state commissions to address such issues.

1 **Q: What terms and conditions should apply to converting virtual collocation to**
2 **physical collocation?**

3 **A:** The ILECs should be required, upon request, to convert any virtual collocation to a
4 physical cageless collocation arrangement. Intermedia asserts that the FCC's Collocation
5 Order and rules specifically provide for alternative local exchange companies ("ALECs")
6 to remain commingled with the ILECs equipment, but under a physical cageless
7 collocation arrangement. The FCC's Collocation Order specifies that:

8 An incumbent LEC must give competitors the option of collocating
9 equipment in any unused space within the incumbent's premises, to the
10 extent, technically feasible, and may not require competitors to collocate
11 in a room or isolated space separate from the incumbent's own equipment
12 (§ 42).
13

14 In addition, the FCC goes on to state that ILECs must make cageless available in single-
15 bay increments, which means that an ALEC can purchase space small enough to
16 collocate a single rack, or bay of equipment.
17

18 **Q: Can the ILECs require ALECs to reconfigure or move existing virtual equipment to**
19 **a separate space when converting from virtual to physical cageless collocation?**

20 **A:** Absolutely not. The FCC Collocation Order was very clear on this issue. The ILEC
21 cannot require such separation or rearrangement because it imposes unnecessary
22 additional costs on competitors. The FCC makes this clear in its Collocation Order:

23 The incumbent LEC may take reasonable steps to protect its own
24 equipment, such as enclosing the equipment in its own cage, and other
25 reasonable security measures...The incumbent LEC may not, however,
26 require competitors to use separate rooms or floors, which only serves to
27 increase the cost of collocation and decrease the amount of available
28 collocation space. The incumbent LEC may not utilize unreasonable

1 segregation requirements to impose unnecessary additional costs on
2 competitors (§ 42).
3

4 Therefore, this Commission should require ILECs to convert, upon request by the ALEC,
5 existing virtual collocation arrangements to physical cageless collocation without moving
6 or rearranging the equipment and at no charge. The ALEC equipment must remain in its
7 existing space and be subject to terms and conditions of physical cageless collocation.
8

9 **Q: Is there a difference between provisioning collocation in a new space and**
10 **provisioning changes to an existing collocation arrangement?**

11 **A:** Yes. As a general rule, response and implementation intervals will be shorter when
12 making changes to existing collocation arrangements. These intervals are shorter because
13 the collocation arrangement is already established, and in most of the augmentations the
14 ALEC is simply installing additional equipment. In these cases, the ALEC is doing most
15 of the work so any work by the ILEC should not take long. Finally, most augmentation
16 do not require additional space for the ALEC, therefore unlike new collocation
17 arrangements, these response and implementation intervals are much shorter. ALEC
18 access to its collocation arrangement was one of the factors that the FCC looked at when
19 it developed its new rules. In order to give ALECs the ability to effectively compete, it is
20 very important that they have the flexibility to make quick and efficient changes to its
21 collocation arrangements.
22

23 **Q: What are the appropriate response and implementation intervals for ALEC**
24 **requests for changes to existing collocation space.**

1 A: Although the FCC's Collocation Order does not provide for specific response and
2 implementation intervals with respect to requests for changes to existing collocation
3 space, it does require that the ILEC notify ALECs within ten (10) days whether its
4 collocation application for a new collocation arrangement is accepted or denied.
5 Intermedia requests that this Commission prescribe implementation interval standards for
6 changes to existing collocation space which are binding on the ILEC. In fact, the FCC
7 encourages state commissions to implement specific time intervals in its Collocation
8 Order.

9
10 Because changes to an existing collocation space generally require less work by the
11 ILEC, response and implementation intervals must be less for new collocation
12 arrangements. Therefore, Intermedia will first address appropriate ILEC *response*
13 *intervals* to augment existing collocation spaces. To clarify, response intervals are the
14 time frame that the ILEC must respond to the ALEC's augmentation application. Then I
15 will discuss the *implementation intervals* that must be prescribed when ALECs need to
16 make changes to their existing collocation space. Implementation intervals are the actual
17 timeframe that the ILEC has to do the work required by the ALEC in its augmentation
18 application.

19
20 Response Intervals

21 For changes to existing collocation arrangements requiring no additional space, the
22 Commission should require ILECs to respond to such applications within five (5) days.

1 For changes to existing collocation arrangements that require additional space, the ILEC
2 should be held to the 10-day interval prescribed by the FCC in its Collocation Order.

3 Implementation Intervals

4 Intermedia is recommending three different implementation intervals for changes to
5 existing collocation spaces – (1) augmentations requiring no ILEC work; (2)
6 augmentations requiring ILEC work; and (3) augmentations requiring additional space.

7
8 First, if the augmentation of the collocation arrangement requires no work by the ILEC,
9 then ALECs should be able to begin work on the arrangement as soon as the application
10 is accepted. For example, if the existing collocation arrangement already has a POT bay
11 and the only change the ALEC is making is adding a piece of equipment, then there is no
12 work for the ILEC to perform. As a result the ALEC should be able to begin installing
13 the equipment as soon as the application is accepted by the ILEC. Second, when work is
14 required by the ILEC on the collocation arrangement, such as the addition of facilities
15 (DS1s or DS3s) or engineering additional power to the collocation arrangement, the
16 Commission should require ILECs to implement such changes within 45 days. These
17 types of changes take longer because the ILEC must review, engineer, and prepare the
18 space and then install and test the facilities. Third, when the ALEC submits an
19 application for changing existing collocation space that requires additional space, the
20 Commission should require the ILECs to implement such changes within 60 days. The
21 only difference between this situation and last augment discussed is that the ILEC must
22 prepare the space; the rest of the work is identical. Therefore, Intermedia asserts that an
23 additional 15 days is sufficient time for the ILEC to accomplish all changes.

1 **Q: Does the FCC Collocation Order specify if the intervals should be counted as**
2 **calendar or business days?**

3 **A:** No. However, Intermedia recommends that the Commission order all intervals in this
4 proceeding to be business days since this has been the standard industry practice.
5

6 **Q: What is the appropriate provisioning interval for cageless physical collocation?**

7 **A:** Again, the FCC's Collocation Order does not provide for specific provisioning intervals
8 with respect to cageless physical collocation. However, it has emphasized the importance
9 of timely provisioning and asked the state commission to implement such intervals so
10 that ALECs are able to compete. For cageless physical collocation, Intermedia requests
11 the Commission to prescribe the ten (10) day response interval as prescribed by the FCC
12 Collocation Order which is the interval the ILEC has for determining if space is
13 available. Assuming space is available, then the implementation interval for provisioning
14 the cageless physical collocation, should be no more than fifty (50) days. Therefore, the
15 total interval for "occupancy-readiness" should be at most sixty (60) days. Generally,
16 cageless physical collocation intervals should be shorter than traditional caged physical
17 collocation since the ILEC is not required to build a cage in a separate designated area of
18 the central office.
19

20 **Q: What are the responsibilities of the ILEC and collocators when a collocator shares**
21 **space with, or subleases space to, another collocator?**

22 **A:** Again, the FCC's Collocation is very clear in this matter. In ¶ 41 of the Order, the FCC
23 requires that ALECs sharing space with, or subleasing space to another collocator, be

1 able to negotiate the collocation arrangement subject to the rates, terms and conditions
2 that the two or more ALECs agree upon. Therefore, the ALECs are responsible for
3 setting the terms and conditions of the shared space and not the ILEC.

4
5 The Order also states that the ILECs cannot increase the cost of site preparation beyond
6 what is charged to a single collocator and additionally must also prorate the charge for
7 site conditioning and preparation regardless of how many collocators there are in the
8 cage.

9
10 Finally, the FCC also made it clear in its Collocation Order that, “if two or more
11 competitive LECs who have interconnection agreements with the incumbent LEC utilize
12 a shared collocation arrangement, the incumbent LEC must permit each competitive LEC
13 to order UNEs to and provision service from that shared collocation space, regardless of
14 which competitive LEC was the original collocator” (§ 41).

15
16 **Q: What are the responsibilities of the ILEC and collocators when a collocator cross-**
17 **connects with another collocator?**

18 **A:** It is the responsibility of the ILEC to require such cross connections without any
19 additional costs or any restrictive terms and conditions. The FCC’s Collocation Order, ¶
20 33, states that if a collocator cross-connects with another collocator, the collocators can
21 construct their own cross connect facilities subject to the same safety requirements the
22 ILEC imposes on itself. This scenario would also apply even if the collocator’s
23 equipment were located in the same room as the ILEC. The ILEC cannot require the

1 ALEC to purchase any equipment or cross connect capability solely from the ILEC at
2 tariffed rates. Therefore, it is the ALECs responsibility to work with the other collocator
3 and the ILEC when making such cross connections between collocators.

4 **Q: What are the reasonable parameters for reserving space for future LEC and ALEC**
5 **use?**

6 **A:** ILECs should follow a procedure that contains at least a three-year planning horizon. For
7 this three-year period, ILECs should forecast the need for future space for both its
8 internal growth and for projected collocation growth. ALECs should work with ILECs to
9 provide accurate forecast for future collocation needs. A minimum amount of space for
10 ILEC growth and ALEC collocation should be available at each central office. If the
11 space falls below this threshold, the ILEC should have to begin to create plans for
12 expansion of the central office space. The FCC contemplated such planning procedures
13 in its Collocation Order, ¶ 58, when it required ILECs to submit a report to a requesting
14 carrier that specifies measures that the ILEC is taking to make additional space available
15 for collocation.

16
17 **Q: Do you have a recommendation for the threshold of minimum amount of space that**
18 **ILECs should reserve for their own growth and for ALEC collocation?**

19 **A:** No. Intermedia does not know how much space within each central office the ILECs will
20 need for their own growth. However, the ILECs should be required to have enough space
21 for at least two collocators in a specific central office. When space falls below the
22 amount necessary for two collocators, the ILEC should first be required to give up the

1 space it has reserved for growth if an ALEC or ALEC requests the space. Next, the ILEC
2 should then begin to create plans for expansion of the central office.

3
4 **Q: Can generic parameters be established for the use of administrative space by an**
5 **ILEC, when the ILEC maintains that there is insufficient space for physical**
6 **collocation?**

7 **A:** Yes. The Commission should develop such procedures in order to assign space that
8 becomes available through creation, conversion or reclamation of any space, including
9 administrative space, by the ILEC or by the implementation of the collocation
10 alternatives as discussed in the FCC's Collocation Order. The Commission should
11 require the ILECs to maintain on file, for five years, all applications for physical
12 collocation. When space becomes available or when an ILEC knows that space will
13 become available in the near future, it should immediately provide written notification to
14 the ALECs who had originally requested space and were denied. ILECs should make
15 space available in the order in which the ALECs originally applied (first-come first-
16 served).

17
18 **Q: Applying the FCC's "first-come, first-served" rule, if space becomes available in a**
19 **central office because a waiver is denied or a modification is made, who should be**
20 **given priority?**

21 **A:** Priority should be given to the ALEC based on the order in which the ALEC's originally
22 applied for collocation in that specific central office --- first-come first-served. ALECs
23 that receive notification should be required to respond in writing to the ILEC within three

1 business days, or be deemed to forfeit the space. If more ALECs respond than for which
2 there is space available, then the available space should be allocated to the requesting
3 ALECs on a first-come first-served basis.

4 If the amount of space that becomes available is less than the ALEC originally requested,
5 the ALEC should have the right of first refusal for the space. For example, if the first
6 ALEC had originally requested 100 square feet on August 1, 1998, and the second ALEC
7 had originally requested 75 square feet on October 1, 1998, and 75 square feet became
8 available, then the first ALEC should be able to choose the space or to pass.

9
10 ALECs that receive notification should be required to respond in writing to the ILEC
11 within three business days, or be deemed to forfeit the space. If more ALECs respond
12 than for which there is space available, then the available space should be allocated to the
13 requesting ALECs on a first-come first-served basis.

14
15 If the amount of space that becomes available is less than the ALEC originally requested,
16 the ALEC should have the right of first refusal for the space. For example, if the first
17 ALEC had originally requested 100 square feet on August 1, 1999, and the second ALEC
18 had originally requested 75 square feet on October 1, 1999, and 75 square feet became
19 available, then the first ALEC should be able to choose the space or to pass.

20
21 **Q: What equipment is the ILEC obligated to allow in a physical collocation**
22 **arrangement?**

1 **A:** Section 251(c)(6) of the Communications Act requires ILECs to allow collocation of
2 “equipment necessary for interconnection or access to unbundled network elements.....”
3 FCC Rule 51.323(b) provides that equipment used for interconnection and access to
4 UNEs includes, but is not limited to:

- 5 (1) Transmission equipment including, but not limited to, optical terminating
6 equipment and multiplexers.
- 7 (2) Equipment being collocated to terminate basic transmission facilities.
- 8 (3) Digital subscriber line access multiplexers, routers, asynchronous transfer
9 mode multiplexers, and remote switching modules.

10 The FCC concluded in its Collocation Order that ILECs should not be permitted to
11 impede competing carriers from offering advanced services by imposing unnecessary
12 restrictions on the type of equipment that competing carriers may collocate, including
13 equipment which provides switching functionality, enhanced services capabilities or
14 other functionalities. As a result, ILECs can no longer prohibit the types of equipment
15 collocated by ALECs as long as it is used for interconnection or access to unbundled
16 network elements. Given the trend in manufacturing to integrate multiple functions into
17 telecommunications equipment, Intermedia wants to make sure that ILECs do not place
18 any restrictions on these new types of equipment as long as the equipment is used for
19 interconnection or access to UNEs. This Commission should require all types of
20 equipment used or useful for interconnection to be allowed, and that it is the ILECs
21 responsibility to prove that such equipment does not meet the requirements of the FCC’s
22 rules.
23
24
25
26

1 **Q: If space is available, should the ILEC be required to provide price quotes to an**
2 **ALEC prior to receiving a firm order for space in a central office (CO)?**

3 **A:** Yes. Not only should the ILEC provide the ALEC with a price quote for the space, but
4 they should also provide a detailed explanation of the quote, justifying the amount
5 charged. A break out of the costs is required initially for review by the ALEC, and the
6 ultimate billing should reflect this same breakdown so that the bills can be verified and
7 reconciled. The ALEC needs to see exactly what the ILEC is proposing to do and how
8 much it is going to charge when it prepares the space for the ALEC. Otherwise, there is
9 no way for an ALEC to justify that it has received a correct billing statement for the
10 space. Today, Intermedia only receives one flat price back from the ILEC after
11 submitting the application. Intermedia must know how the ILEC arrived at the price.

12
13 **Q: If an ILEC should provide price quotes to an ALEC prior to receiving a firm order**
14 **from that ALEC, when should the quote be provided?**

15 **A:** The ILEC should provide price quotes to the ALEC within thirty (30) days from the date
16 of the application. This time frame is reasonable and must be met because the ALEC
17 must know if the price quoted by the ILEC is justified before the work on the space has
18 begun.

19
20 **Q: If an ILEC should provide price quotes to an ALEC prior to receiving a firm order**
21 **from that ALEC, should the quote provide detailed costs?**

22 **A:** Yes. As I have stated earlier, there is no way for the ALEC to justify reasonable costs
23 without the ILEC providing a detailed and itemized explanation for the cost(s).

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Q: Should an ALEC be permitted to hire an ILEC certified contractor to perform space preparation, racking and cabling, and power work?

A: Yes. However, an ALEC should not be *required* to hire ILEC certified contractors. Intermedia asserts that functions such as space preparation, racking and cabling, and power should be performed by the ILEC. All of these types of functions are the ultimate responsibility of the ILECs. ALECs should not have to assume the responsibility for performing these functions.

Q: Should ALEC vendors be allowed to install and work on their own equipment within their collocation arrangement?

A: Absolutely. As required by the FCC’s Collocation Order, ALECs “must have access to their collocated equipment 24 hours a day, seven days a week”(¶ 49). The FCC also requires this access without requiring a security escort of any kind. ILECs should not be allowed to require use of their own certified vendors. Presently, ALECs in Florida are “forced” to hire a certified contractor from the ILEC’s supplied vendor list under the ILEC’s terms and conditions. Such vendor lists are inadequate due to the short supply of vendors who have been certified under the strict certification guidelines of the ILEC. For example, in order to be certified as vendor by most ILECs, you must also be an equipment vendor. This requirement alone eliminates most ALECs from the possibility of becoming a vendor. As a result of these requirements, ALECs must operate under the vendor’s schedule and must submit a RFQ (Request for Quote) to the limited number of certified vendors and are forced to pay higher rates for service due to the limited number

1 of available contractors. Intermedia asserts that this process is inadequate and
2 monopolistic and that Intermedia should be able to install and work on its own
3 equipment.

4
5
6 In addition, ILECs should not be allowed to place more stringent requirements on ALEC
7 vendors than they place on their own vendors. Any such restriction by the ILEC severely
8 limits an ALEC's ability to compete.

9
10 **Q: Has Intermedia experienced a situation where an ILEC has placed more stringent**
11 **requirements on Intermedia than itself?**

12 **A:** Yes. BellSouth required Intermedia to use the industry standard for cable size when
13 extending the ground window to its collocation arrangement. A ground window is the
14 extension of the main central office ground. However, during the work on this extension
15 Intermedia discovered that BellSouth was not following the industry standards on its own
16 ground window extensions.

17
18 **Q: How should the costs of security arrangements, site preparation, collocation space**
19 **reports, and other costs necessary to the provisioning of collocation space, be**
20 **allocated between multiple carriers?**

21 **A:** Consistent with the FCC's Collocation Order, at the very least, ILECs should allocate
22 space preparation, security measures and other collocation charges on a pro-rated basis so

1 the first collocator in a particular incumbent premises will not be responsible for the
2 entire cost of site preparation.

3
4 Further, the FCC states that this allocation recommendation will serve as a minimum
5 standard and that states should determine the proper pricing methodology to ensure that
6 ILECs properly allocate site preparation costs.

7 **Q: Can you please summarize your testimony?**

8 **A:** Yes. The Commission must require the ILECs to fully comply with the FCC's
9 Collocation Order and Rules regarding collocation. In addition, where the FCC did not
10 set specific standards for installation and provisioning intervals, the Commission must do
11 so in this proceeding. Specific installation and provisioning intervals are vital for ALECs
12 if they are to provide competitive choices for telecommunication consumers in the state
13 of Florida.

14
15 **Q: Does this conclude your testimony?**

16 **A:** Yes.

CERTIFICATE OF SERVICE

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

Mail this 28th day of October, 1999 to the following:

BellSouth Telecommunications, Inc.
Ms. Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: (850) 222-8640

AT&T Communications of the
Southern States, Inc.
Ms. Rhonda P. Merritt
101 North Monroe St., Suite 700
Tallahassee, FL 32301-1549
Phone: (805) 425-6342
Fax: (805) 425-6361

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
Phone: (303) 476-4200

Accelerated Connections, Inc.
7337 South Revere Parkway
Englewood, CO 33414
Phone: (303) 476-4200

BellSouth Telecommunications, Inc. (Mia)
Nancy B. White
150 West Flagler St., Suite 1910
Miami, FL 33130
Phone: (305) 347-5558
Fax: (305) 577-4061

BellSouth Telecommunications, Inc.
(Atl)
E. Earl Edenfield, Jr.
675 W. Peachtree St., #4300
Atlanta, GA 30375
Phone: (404) 335-0763
Fax: (404) 614-4054

Blumemfeld & Cohen
Elise Kiely/Jeffrey Blumenfeld
1625 Massachusetts Ave. NW
Suite 300
Washington, DC 20036
Phone: (202) 955-6300
Fax: (202) 955-6460

Convad Communications Company
Christopher V. Goodpaster
9600 Great Hills Trail, Suite 150 W
Austin, TX 78759
Phone: (512) 502-1713
Fax: (419) 818-5568

e.spire Communications, Inc.
James Falvey
133 National Business Parkway
Suite 200
Annapolis Junction, MD 20701
Phone: (301) 361-4298
Fax: (301) 361-4277

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301
Phone: (850) 681-1990
Fax: (850) 681-9676

Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: (850) 222-2525
Fax: (850) 222-5606

Florida Public Telecommunications
Assoc.
Angela Green, General Counsel
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525
Phone: (850) 222-5050
Fax: (850) 222-1355

GTE Florida Incorporated
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-2617
Fax: (813) 223-4888

Hopping Law Firm
Richard Melson/Gabriel Nieto
P.O. Box 6526
Tallahassee, FL 32314
Phone: (850) 222-7500
Fax: (850) 224-8551

GTE Florida Incorporated
Ms. Beverly Y. Menard
c/o Ms. Margo B. Hammar
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704
Phone: (813) 483-2526
Fax: (813) 223-4888

Intermedia Communications, Inc.
Scott Sapperstein
3625 Queen Palm Drive
Tampa, FL 33619-1309
Phone: (813) 621-0011
Fax: (813) 829-4923

Lockheed Martin IMS
Anita L. Fourcard
Communications Industry Services
1200 K Street, N.W.
Washington, DC 20005
Phone: (202) 414-3724
Fax: (202) 408-5922

MCImetro Access Transmission
Services LLC
Ms. Donna Canzano McNulty
326 John Knox Road, Suite 105
Tallahassee, FL 32303
Phone: (850) 422-1254
Fax: (850) 422-2586

McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: (850) 222-2525
Fax: (850) 222-5606

MediaOne Florida Telecommunications,
Inc.
c/o Laura L. Gallagher
101 E. College Ave., Suite 302
Tallahassee, FL 32301
Phone: (850) 224-2211
Fax: (850) 561-3611

Messer Law Firm
Floyd Self/Norman Horton
P.O. Box 1876
Tallahassee, FL 32302
Phone: (850) 222-0720
Fax: (850) 224-4359

MGC Communications, Inc.
Susan Huther
3301 North Buffalo Drive
Las Vegas, NV 89129
Phone: (702) 310-4272

Pennington Law Firm
Peter Dunbar/Barbara Auger/Marc Dunbar
P.O. Box 10095
Tallahassee, FL 32301
Phone: (850) 222-3533
Fax: (850) 222-2126

Sprint Communications Company
Limited Partnership
Susan Masterton/Charles Rehwinkel
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Phone: (850) 847-0244
Fax: (850) 878-0777

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MCFLTLHO0107)
Tallahassee, FL 32316-2214
Phone: (850) 599-1027
Fax: (407) 814-5700

Supra Telecommunications &
Information Systems, Inc.
Mark E. Buechele
2620 S. W. 27th Avenue
Miami, FL 33133
Phone: (305) 531-5286
Fax: (305) 476-4282

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Phone: (850) 681-6788
Fax: (850) 681-6515

Telecommunications Resellers Assoc.
Andrew Isar
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98335
Phone: (253) 851-6700
Fax: (253) 851-6474

Time Warner Telecom
Ms. Carloyn Marek
233 Bramerton Court
Franklin, TN 37069
Phone: (615) 376-6404
Fax: (615) 376-6405

Wiggins Law Firm
Charlie Pellegrini/Patrick Wiggins
P.O. Drawer 1657
Tallahassee, FL 32302
Phone: (850) 385-6007
Fax: (850) 385-6008

Time Warner Telecom
2301 Lucien Way, Suite 300
Maitland, FL 32751

CompTel
Terry Monroe
1900 M Street, NW, Suite 800
Washington, DC 20036
Phone: (202) 296-6650

WorldCom Technologies, Inc.
Donna McNulty, Esq.
325 John Knox Road, Suite 105
Tallahassee, FL 32303
Phone: (850) 422-1254
Fax: (850) 422-2586


Scott A. Sapperstein