

ORIGINAL

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

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

FILED: NOVEMBER 16, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-1991-PCO-TP, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff has no witnesses.

b. All Known Exhibits

Staff has no exhibits at this time, but may file exhibits at a later time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing.

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS 3
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

14055 NOV 16 99

FPSC-RECORDS/REPORTING

Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1: When should an ILEC be required to respond to a complete and correct application for collocation and what information should be included in that response?

Position: Staff has no position at this time.

ISSUE 2: If the information included in the ILEC's initial response is not sufficient to complete a firm order, when should the ILEC provide such information or should an alternative procedure be implemented?

Position: Staff has no position at this time.

ISSUE 3: To what areas does the term "premises" apply, as it pertains to physical collocation and as it is used in the Act, the FCC's Orders, and FCC Rules?

Position: Staff has no position at this time.

ISSUE 4: What obligations, if any, does an ILEC have to interconnect with ALEC physical collocation equipment located "off-premises"?

Position: Staff has no position at this time.

ISSUE 5: What terms and conditions should apply to converting virtual collocation to physical collocation?

Position: Staff has no position at this time.

ISSUE 6: What are the appropriate response and implementation intervals for ALEC requests for changes to existing collocation space?

Position: Staff has no position at this time.

ISSUE 7: What are the responsibilities of the ILEC and collocators when:

A. a collocator shares space with, or subleases space to, another collocator;

Position: Staff has no position at this time.

B. a collocator cross-connects with another collocator.

Position: Staff has no position at this time.

ISSUE 8: What is the appropriate provisioning interval for cageless physical collocation?

Position: Staff has no position at this time.

ISSUE 9: What is the appropriate demarcation point between ILEC and ALEC facilities when the ALEC's equipment is connected directly to the ILEC's network without an intermediate point of interconnection?

Position: Staff has no position at this time.

ISSUE 10: What are reasonable parameters for reserving space for future LEC and ALEC use?

Position: Staff has no position at this time.

ISSUE 11: Can generic parameters be established for the use of administrative space by an ILEC, when the ILEC maintains that there is insufficient space for physical collocation? If so, what are they?

Position: Staff has no position at this time.

ISSUE 12: What types of equipment are the ILECs obligated to allow in a physical collocation arrangement?

Position: Staff has no position at this time.

ISSUE 13: If space is available, should the ILEC be required to provide price quotes to an ALEC prior to receiving a firm order for space in a central office (CO)?

A. If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from that ALEC, when should the quote be provided?

Position: Staff has no position at this time.

B. If an ILEC should provide price quotes to an ALEC prior to receiving a firm order from that ALEC, should the quote provide detailed costs?

Position: Staff has no position at this time.

ISSUE 14: Should an ALEC have the option to participate in the development of the ILEC's price quote, and if so, what time frames should apply?

Position: Staff has no position at this time.

ISSUE 15: Should an ALEC be permitted to hire an ILEC certified contractor to perform space preparation, racking and cabling, and power work?

Position: Staff has no position at this time.

ISSUE 16: For what reasons, if any, should the provisioning intervals be extended without the need for an agreement by the applicant ALEC or filing by the ILEC of a request for an extension of time?

Position: Staff has no position at this time.

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

Position: Staff has no position at this time.

ISSUE 18: If insufficient space is available to satisfy the collocation request, should the ILEC be required to advise the ALEC as to what space is available?

Position: Staff has no position at this time.

ISSUE 19: If an ILEC has been granted a waiver from the physical collocation requirements for a particular CO, and the ILEC later makes modifications that create space that would be appropriate for collocation, when should the ILEC be required to inform the Commission and any requesting ALECs of the availability of space in that office?

Position: Staff has no position at this time.

ISSUE 20: What process, if any, should be established for forecasting collocation demand for CO additions or expansions?

Position: Staff has no position at this time.

ISSUE 21: Applying the FCC's "first-come, first-served" rule, if space becomes available in a central office because a waiver is denied or a modification is made, who should be given priority?

Position: Staff has no position at this time.

e. Pending Motions

Staff has no pending motions at this time.

f. Pending Confidentiality Claims or Requests

Staff has no confidentiality claims or requests at this time.

g. Compliance with Order No. PSC-99-1991-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 16th day of November, 1999.

*Marlene Stern*

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one copy of Staff's Prehearing Statement has been furnished by U.S. Mail, this 16th day of November, 1999, to the following:

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