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November 19, 1999

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VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 981834-TP and 990321-TP

Dear Ms. Bayo:


Enclosed for filing in the above dockets are the original and fifteen (15) copies of ALLTEL Communications, Inc.'s Prehearing Statement.

We are also submitting the Prehearing Statement on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

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APP _____
CAF _____
GMU _____
CTR _____
EAG _____
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PAI _____
SEC _____
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Enclosures
cc: All Parties of Record (w/encls.)

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14328 NOV 19 99
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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: 11/19/99

ALLTEL'S PREHEARING STATEMENT

ALLTEL Communications, Inc. ("ALLTEL Communications"), pursuant to Order No. PSC-99-1991-PCO-TP, submits the following Prehearing Statement:

A. **WITNESS**: ALLTEL Communications did not pre-file testimony and does not intend to sponsor a witness at the final hearing; however, ALLTEL reserves the right to cross-examine other witnesses at the hearing.

B. **EXHIBITS**: ALLTEL Communications did not pre-file any exhibits, but reserves the right to use exhibits submitted by others during cross-examination.

C. **BASIC POSITION**: Timely collocation provisioning is extremely important to emerging local competition. ILECs subject to Section 251(c)(6) of the 1996 Act should be required to provide a prompt and complete response to a request for collocation. The FPSC should establish specific guidelines for the ordering and provisioning of collocation space so that ILECs and ALECs will know what is expected.

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FPSC-RECORDS/REPORTING

D-G. ISSUES AND POSITIONS:

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: Within 10 business days. The response should include the types of collocation that the ALEC may utilize (i.e., cageless physical, physical, or virtual), a preliminary price quote reflecting a reasonable estimate of costs to collocate in a given central office and other specifics associated with the space requested, including, at a minimum: (1) estimated space preparation quotes, (2) the estimated provisioning intervals, (3) power requirements and associated costs, and (4) any other information that the ILEC provides that it will subsequently require an ALEC to include in its firm order.

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: Within 10 additional business days. All information necessary to submit a firm order should be provided by the ILEC within 20 business days from the date of the initial request.

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: The term "premises" refers to an ILEC's central offices and serving wire centers, as well as all buildings or similar structures owned or leased by the ILEC that house its network facilities and all structures that house ILEC facilities on public rights-of-way, including, but not limited to, vaults containing loop concentrators or similar structures.

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

Position: ILECs subject to Section 251(c)(6) should be obligated to interconnect with ALEC collocation equipment located "off-premises" to the extent technically feasible.

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

Position: Migration from a virtual to physical arrangement should be accomplished in a seamless manner with no interruption of service to the ALEC's customers. The terms for converting virtual collocation space should require no more than reversing the "ownership" of the virtually collocated equipment and assuring that the ALEC's employees are familiar with whatever security procedure applies to cageless collocation. When the ALEC migrates from virtual to cageless physical, the interval should be no greater than 30 business days.

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

Position: An initial response should be provided within 5 business days, with a total implementation interval of between 10 and 30 business days depending on the complexity of the changes.

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

- A. a collocator shares space with, or subleases space to, another collocator;**
- B. a collocator cross-connects with another collocator.**

Position: No position at this time.

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

Position: When the ALEC migrates from virtual to cageless physical, the interval should be no greater than 30 business days. The interval for establishing an initial "cageless physical" arrangement should be no more than 50 business days.

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: If the ILEC provides the Tie, then the demarcation point should be the ALEC's equipment. Conversely, if the ALEC provides the Tie facility, then the demarcation point should be the ILEC's equipment.

Issue 10: What are reasonable parameters for serving space for future LEC and ALEC use?

Position: An ILEC cannot retain space on terms more favorably than those that apply to ALECs seeking to reserve collocation space for their own future use.

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: No. The variance in central office infrastructure would make the attempt to establish generic parameters an onerous and unmanageable task.

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

Position: ILECs subject to Section 251(c)(6) of the 1996 Act are required to permit collocation of any equipment required by the statute unless they first prove to the state commission that the equipment will not be actually used by the telecommunications carrier for the purpose of obtaining interconnection or access to unbundled network elements.

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?
- 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: Yes. “Best estimate” price quotes should be provided to the ALEC within 20 business days of request, together with detailed cost information. In the absence of “best estimates” of the detailed costs involved for collocating in a central office, the ALEC will be unable to properly evaluate alternative types of collocation for the CO in question. If estimates, rather than firm quotes are initially provided, once costs are firmed-up, that information should be expeditiously provided to the ALEC.

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: ALECs should not necessarily be involved in the price quote development; however, the ALEC should be provided an opportunity to review the quote prior to its finalization. A joint planning session preceding the development of the quote would provide both parties with a clear

understanding of how the space is going to be used, and provide insight to the ALEC relative to the vendors/contractors being utilized for construction and space rearrangement, if applicable.

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

Position: Yes, ALECs should be allowed to hire ILEC certified contractors to perform space preparation, racking and cabling, and associated power work. In certain instances, depending on the type of collocation arrangement, the ALECs themselves should be permitted to perform installation work within ILEC central offices. Permitting an ALEC to hire its own contractors or ILEC authorized vendors, or permitting an ALEC to complete the work itself, will expedite completion of work.

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: Timely entry into the market is dependent upon ILECs meeting provisioning intervals. Absent extraordinary circumstances, there are no viable reasons for which provisioning intervals should be unilaterally extended without the need for an agreement by the applicant ALEC.

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: ILECs subject to Section 251(c)(6) of the Act must allocate space preparation, security measures, and other collocation charges on a pro-rated basis so the first collocater in a particular incumbent premises will not be responsible for the entire cost of site preparation.

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: Yes, if insufficient space is available to satisfy an ALEC's request for collocation, the ILEC should be required to provide information regarding any space that may be utilized to satisfy the request. The ILEC should provide the ALEC, within 10-business days, information relative to the dimensions (square footage and shape) of the available space and its location within the central office. A floor plan and diagram, including the physical location of lighting, ventilation, power, heat and air conditioning of the CO should also be included in the ILEC response.

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: Notice should be provided to the FPSC within 10 business days of the space becoming available. Further, the FCC Web Posting requirement should also be utilized in these instances, with information noting that the CO is being removed from the Web posting due the fact that a waiver for that CO is no longer required. This information should remain on the Website for a period of 3 months. Within 15 business days, the incumbent should provide notification to all ALECs who have requested space in that CO within the last 6 months.

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

Position: 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?

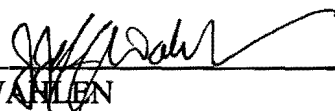
Position: Specific retention periods for collocation requests should be established and ILECs subject to Section 251(c)(6) should be required to maintain an inventory of requests. Any ALEC who had requested space in the CO for which space is not available should be notified within 15 business days of space availability for all ALECs requesting space within the last 6 months. Following the appropriate notification, a continuation of the “first-come, first-served” approach should be applied. Under this approach, the first party to have requested space would be the first party to whom the space is offered. Then, for all other ALECs a lottery should be conducted if the demand for the space exceeds what is available.

H. **STIPULATIONS:** The Company is not aware of any pending stipulations at this time.

I. **PENDING MOTIONS:** The Company is not aware of any pending motions at this time.

J. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** The Company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 19th day of November, 1999.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 19th day of November, 1999, to the following:

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