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November 19, 1999

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

Dear Mrs. Bayo:

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

You will find enclosed for filing in the above-referenced dockets an original and fifteen (15) copies of AT&T's Prehearing Statement and the Rebuttal Testimony of Ronald W. Mills filed on behalf of AT&T.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Tracy Hatch

- AFA _____
 - APP _____
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Enclosures
cc: Parties of Record

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CERTIFICATE OF SERVICE
DOCKETS 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via
U.S. Mail to the following parties of record on this 19th day of November, 1999:

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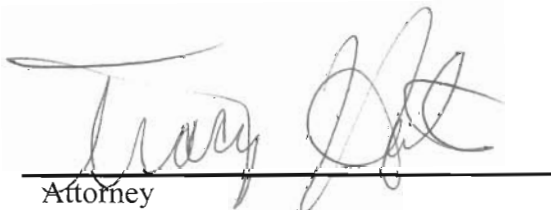
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)	Docket No. 981834-TP
for Commission Action to support)	
local competition in BellSouth)	
Telecommunications, Inc.'s territory.)	
_____)	

In re: Petition of Rhythm Links, Inc.)	Docket No. 990321-TL
for generic investigation to ensure that)	
BellSouth Telecommunications, Inc.,)	
Sprint, Florida, Inc. and GTE Florida,)	
Inc., comply with obligation to provide)	Filed: November 19, 1999
alternative local exchange carriers with)	
flexible, timely, and cost-efficient)	
collocation.)	
_____)	

AT&T'S Prehearing Statement

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rule 25-22.038, Florida Administrative Code, and order of the Florida Public Service Commission (hereinafter the "Commission") hereby submits its Prehearing Statement in the above-referenced docket.

A. Witnesses

AT&T intends to sponsor the testimony of the following witnesses:

Witnesses: Ron W. Mills Issues: All issues

B. Exhibits

AT&T does not intend to present any exhibits.

C. Basic Position

Collocation of ALEC facilities in ILEC central offices is an essential prerequisite to facilities based entry into the local market. It is absolutely critical that collocation be provided on a timely, efficient and economic basis. The potential for controversy and litigation underscores the critical need for the Commission to adopt thorough and concise rules regarding collocation. Much of the controversy and the potential for litigation regarding denials of waiver requests will be substantially reduced if the ILECs are required to accurately inventory the space available in their central offices and make that information available on their respective web sites. Keeping this information current is also essential. The potential for controversy will also be mitigated by clear and concise rules adopted by the Commission that make the most space available pursuant to the FCC's Advanced Services Order. Such rules must be adopted with a view to making collocation a standardized generally available offering that details the specific rights, responsibilities and obligations of the ILECs and ALECs. Only with such rules can collocation become an efficient economic mechanism that will foster facilities based local exchange competition.

D.-F. Positions 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: An ILEC should respond to an application within 10 calendar days as to whether space is available and should provide all information needed to make a firm

order within 15 calendar days of receipt of the application. If the ALEC's application is not complete and correct when received, the ILEC must describe with specificity all errors in the application within 5 calendar days of the receipt.

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: The only exception to the ILEC providing the data within 15 calendar days necessary for an ALEC to place a Firm Order is an Act of God.

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: "Premises" is generally defined as a piece of real estate; house or building and its associated land. Consistent with the pro-competitive purposes of the Telecom Act of 1996, and ILEC's "premises" should be broadly construed to include ILEC central offices, serving wire centers and tandem offices, as well as all buildings or similar structures owned or leased by the ILEC that house ILEC network facilities. ILEC premises should also include any structures that house LEC network facilities on public rights-of-way, such as 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: An ILEC is obligated to interconnect with off-premises ALEC physical collocation equipment if space is legitimately exhausted. In addition, off-premises is presumed feasible if an ILEC anywhere provides the requested off-premises interconnection unless the ILEC rebuts the presumption. Any such off-premises interconnection should not be limited to fiber optic cable.

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

Position: An ALEC, at its option, should be allowed to convert a virtual collocation arrangement to a physical collocation arrangement with no changes to the collocation configuration including retaining the same location in the central office.

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

Position: For changes to existing collocation space requiring work by the ILEC, the response under normal conditions should be no later than 15 calendar days from the request for the change and the implementation interval should be 60 calendar days from the request. For changes requested as a result of service threatening emergency situations, an ILEC should respond to the request within 48 hours and implement the necessary changes within 7 calendar days.

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: AT&T takes no position on this issue at this time.

- B. a collocator cross-connects with another collocator.

Position: The responsibilities ILECs and collocators are set forth in FCC Rule 51.323. The ILEC should be notified of any ALEC-to-ALEC interconnection of collocated facilities. However, to the extent that the ILEC does not actually provide any of the ALEC-to-ALEC interconnection, the interconnecting ALECs should not be required to pay any application or other fees, or await the approval of the ILEC before performing the work.

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

Position: The appropriate provisioning interval for cageless physical collocation should be the same as for virtual collocation – 60 calendar 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: ALEC should have the option to place a POTs bay in or immediately adjacent to its collocation space and the demarcation point should be the POTs bay. Other demarcation points from the MDF to other intermediate distribution frames should be mutually agreed upon by the ILEC and the ALEC.

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

Position: ALECs and ILECs should be allowed to reserve space under a procedure that insures equal treatment of ALECs and ILECs. If an ALEC has a documented business plan for use of the reserved space, the ALEC should not be required to surrender any of the reserved space.

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: Yes. Any administrative space not critical to the operation of the ILEC premises for which collocation is requested should be available for use in ALEC physical collocation.

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

Position: ILECs should permit the collocation of the facilities and equipment set forth in the FCC's Advanced Services Order, FCC 99-48.

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: Price quotes should be provided within 30 calendar days of the ILEC's receipt of a complete and accurate application. This should be part of the information the ILECs provide to ALECs so they can place a Firm Order.

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. Regardless of when received, all price quotes should include detailed cost information. The cost detail should be sufficient to enable the ALEC to reasonably verify the reasonableness of the ILEC's price quote.

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: Yes. The ILEC should permit an ALEC to participate in development of the ILEC's price quotes.

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

Position: An ILEC is responsible for space preparation, racking and cabling and power work. However, an ALEC, at its option, should be allowed to hire an ILEC certified contractor to perform space preparation, racking and cabling.

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: Absent an agreement between an ILEC and an ALEC, provisioning intervals should be extended only due emergency circumstances or acts of God.

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: The costs of security arrangements should be allocated based on each ALEC's occupied square footage divided by the total central office square footage including the ILEC's occupied space. The costs of site preparation should be allocated based on each ALEC's square footage divided by the total central office square footage receiving renovation of upgrade. Costs of collocation space reports and other costs should be allocated the same as site preparation cost.

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. In addition, the ALEC should be permitted to modify its initial request without any additional cost.

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: The ILEC should be required to notify ALECs and the Commission within 10 calendar days of when work begins to reconfigure or add space in the central office. The notice should include the date that the space will become available. The ILEC should then notify ALECs 30 calendar days before the space will be ready for use by an ALEC.

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

Position: ALECs should provide forecasts to ILECs to prevent premature space exhaust. Based on ALEC forecasts, ILECs should be able to develop or construct space sufficient to prevent exhaust of space.

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: For space that becomes available due to modification to a central office, collocation requesters whose requests were denied should be awarded space based on a first come first served based on the order in which their requests were initially received by the ILEC. For space that becomes available due to denial of a waiver, the ILEC should award space to the ALECs that challenged the waiver request in the order in which the ALECs that actually challenge the waiver requested space. To the extent that a requestor fails to participate in the challenge of the waiver request, that requestor will have waived its place in the priority of space allocated as a result of the successful challenge of the waiver request.

G. Stipulated Issues

AT&T is not aware of any issues that have been stipulated at this time.

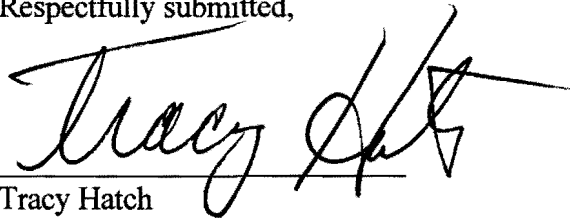
H. Pending Motions

AT&T has no pending motions.

I. Requirements of Order No. PSC-99-1991-PCO-TP

There are no requirements of Order No. PSC-99-1991-PCO-TP with which AT&T can not comply.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tracy Hatch", written over a horizontal line.

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