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November 19, 1999

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

Re: Collocation--Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom, Inc. and its Operating Subsidiaries are the original and fifteen copies of its:

- 1) Prehearing Statement ~~14363-99~~
- 2) Rebuttal Testimony of Ron Martinez ~~14364-99~~

By copy of this letter, these documents are being furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

AFA _____
 APP _____
 CAF _____
 CMU _____
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Enclosures
cc: Parties of Record

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 19th day of November, 1999.

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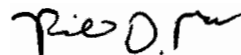
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

In re: Petition of ACI Corp.)	
d/b/a Accelerated Connections,)	
Inc. for generic investigation)	
to ensure that BellSouth)	Docket No. 990321-TP
Telecommunications, Inc.,)	
Sprint-Florida, Incorporated,)	
and GTE Florida Incorporated)	
comply with obligation to)	
provide alternative local)	Filed: November 19, 1999
exchange carriers with flexible,)	
timely, and cost-efficient)	
physical collocation)	

MCI WORLDCOM'S PREHEARING STATEMENT

MCI WorldCom, Inc. and its Operating Subsidiaries (collectively MCIW) hereby files its prehearing statement in accordance with the requirements of Order No. PSC-99-1991-PCO-TP.

A. Appearances. Donna C. McNulty, MCI WorldCom, Inc., 325 John Knox Road, The Atrium, Suite 105, Tallahassee, FL 32303 and Richard D. Melson, Hopping Green Sams & Smith, P.A., P.O. Box 6526, Tallahassee, FL 32314 appearing on behalf of MCI WorldCom, Inc. and its Operating Subsidiaries.

B. Known Witnesses. MCIW will present the direct and rebuttal testimony of the following witness:

DOCUMENT NUMBER-DATE

14363 NOV 19 99

Witness	Testimony	Issues
Ronald Martinez	Direct	1-7, 10-13, 15-19, 21
	Rebuttal	6-7, 9, 16-17, 21

C. Known Exhibits. MCIW has no direct or rebuttal exhibits. MCIW reserves the right to identify additional exhibits for purposes of cross-examination.

D. Basic Position. MCIW urges the Commission to establish a clear set of guidelines for collocation to ensure that the ILECs offer collocation arrangements in an efficient and cost-effective manner that will support the introduction of local competition.

E. Issues. MCIW's positions on the issues identified in Order No. PSC-99-1991-PCO-TP are as follows:

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?

MCIW: An ILEC should be required to respond to an application for collocation within 15 calendar days. The response should include all the information necessary for the ALEC to make a business decision on whether to place a firm order for collocation. This would include pricing information, dimensions of the offered space, and information on obstructions, diversity, power considerations, hazards, engineering considerations and proposed due date.

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?

MCIW: The initial 15-day response should contain sufficient information for the ALEC to place a firm order. No

alternative procedure should be implemented, since it would only create an incentive to delay providing the necessary information.

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?

MCIW: The term premises applies to any location where ILEC network equipment is housed. When space is legitimately exhausted in a central office, it includes other LEC-owned space such as administrative offices located on the same or adjacent property.

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

MCIW: The Texas PUC requires UNES to be extended to off-premises locations when space is legitimately exhausted in the central office. Under the best practices provisions of the Advanced Services Order, Florida ILECs should also be required to connect to ALEC equipment located "off-premises" in space obtained by the ALEC from third parties.

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

MCIW: An ALEC should have the option, but not be required, to convert virtual collocation arrangements to caged or cageless physical collocation when space becomes available. If a move is required to honor an ALEC's request for a caged space, the ILEC and ALEC should develop a migration plan to minimize impact on the ALEC's customers.

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

MCIW: There should be a simple notification procedure with no implementation interval if the change does not cause the ALEC's initial estimate of space and power requirements to be exceeded. If a physical modification is required, standard intervals should apply.

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

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

MCIW: The ALEC should be required to notify the ILEC of the sublease arrangement, which should contain terms that are not inconsistent with the Advanced Services Order or the underlying collocation agreement with the ILEC. The ILEC should be required to honor the sublease and to permit each party to order services directly, and should not place unreasonable restrictions on the use of the space.

B. a collocator cross-connects with another collocator?

MCIW: So long as the ILEC is not required to perform any work, the ALEC should simply notify the ILEC of the cross-connections and should not be required to pay any application fee.

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

MCIW: Adopt the position of FCCA.

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?

MCIW: The FCC has determined that the requesting carrier may choose any method of interconnection or access to unbundled elements (including access at the main distribution frame) that is technically feasible at a particular point.

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

MCIW: The ALECs and ILECs should be at parity with respect to the ability to reserve space for future use, which should not exceed two years in any event. Any space for future use that extends beyond the building relief

date should be available to ALECs who have a current need for 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?

MCIW: Yes. If an ILEC claims there is insufficient space for physical collocation, then the ILEC should be required to eliminate all space for administrative functions that can be performed elsewhere and that do not directly support the operation of the network equipment located in the central office. Staffing and administrative space guidelines should be established in advance for each type of central office.

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

MCIW: Under the Advanced Services Order, ILECs are obligated to allow collocation of any equipment that is "used and useful" for either 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?

MCIW: The ILEC should provide a firm price quote to an ALEC within 15 calendar days from receipt of an application for collocation.

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?

MCIW: No position.

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

MCIW: Yes, an ALEC should have the option to have work performed by ILEC-certified contractors, or its own certified personnel, either inside or outside of its dedicated collocation space.

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 extension of time?

MCIW: The provisioning intervals should never be extended without either an agreement by the ALEC or a ruling by the Commission on a waiver request.

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?

MCIW: The cost for existing security arrangements should already be included in the existing charges for collocation. The cost of any additional security arrangements designed to protect the ILEC's equipment should be borne solely by the ILEC.

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?

MCIW: Yes. In addition, the ALEC should be allowed to amend its request, without paying any additional application fee, in order to take the space that is available.

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 be ILEC be required to inform the Commission and any requesting ALECs of the availability of space in that office?

MCIW: The ILEC should be required to advise the Commission and ALECs by mail and by posting on its web site as soon as it knows when additional space will be available.

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

MCIW: 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?

MCIW: An ALEC should have priority based on its firm order date or, if earlier, the date that its application for space is denied.

F. Stipulations. MCIW is not aware of any issues that have been stipulated by the parties.

G. Pending Motions. MCIW has no pending motions that require action at this time.

H. Requirements of Order. MCIW believes that this prehearing statement is fully responsive to the requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 19th day of November, 1999.

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