

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

§ Docket Nos. 981834-TP and 990321-TP
§ (Consolidated)
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In re: Petition of Rhythms Links, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Inc., and GTE Florida Inc., comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient collocation

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§ Filed: November 24, 1999

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**PREHEARING STATEMENT
OF COVAD COMMUNICATIONS COMPANY**

Pursuant to Order PSC-99-1744-PAA-TP, Covad Communications Company ("Covad") submits its Prehearing Statement.

Witnesses

Michael Moscaritolo will testify for Covad regarding collocation requirements and availability in BellSouth central offices.

Exhibits

Covad may use the following exhibits at the hearing:

1. All exhibits attached to the testimony of Michael Moscaritolo;
2. All documents produced by BellSouth in these proceedings;
3. All documents produced by the intervenors in these proceedings;
4. All exhibits designated by BellSouth in these proceedings;
5. All exhibits designated by other intervenors in these proceedings.

If necessary, the exhibits shall be sponsored by witnesses or counsel for the producing parties. Covad reserves its right to amend or supplement this list.

AFA	_____
APP	_____
CAF	_____
GMU	_____
CTR	_____
EAG	_____
LEG	_____
MAS	_____
OPC	_____
PAI	_____
SEC	_____
WAW	_____
OTH	_____

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Statement of Position

The following paragraphs summarize Covad's position with respect to the tentative list of issues released by the Commission.

- Florida consumers need pro-competitive collocation policies to allow competitive entry into the telecommunications market;
- The Commission should adopt a flat-rate collocation application procedure similar to the procedure Covad uses with US West;
- The Commission should allow for timely, cost-effective conversion of virtual collocation arrangements to cageless collocation arrangements without requiring an ALEC to move its equipment from the ILECs' line-up;
- The Commission should require ILECs to provision cageless collocation within 45 calendar days when space and power is available;
- The Commission should ensure that space reservation policies applicable to the ILECs also apply to ALECs' reservation of space;
- The Commission should allow an ALEC to have access to the invoices and other cost information relating to an ILEC's fees for collocation;
- The Commission should not allow an ILEC to unilaterally extend the collocation provisioning interval without first obtaining an order from the Commission.

Statement of Position on Issues of Law, Fact and Policy

Michael Moscaritolo will testify on behalf of Covad on all issues of fact and policy. The outstanding issues of fact and policy are those identified in the Commission's tentative list of issues.


Statement of Stipulated Issues

Presently, Covad has not stipulated to any issue in this proceeding.

Statement of Pending Motions or Other Matters

Presently, no motion submitted by Covad is pending.

Respectfully submitted,

for 
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QUALIFIED REPRESENTATIVE
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CERTIFICATE OF SERVICE

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

Mail this 24th day of November, 1999 to the following:

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