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Legal Department

NANCY B. WHITE
GENERAL COUNSEL-FLORIDA

99 DEC 23 PM 3:05

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

December 23, 1999

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

Re: Docket No. 991897-TL West Palm Beach Gardens Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Waiver of Collocation Requirements in the West Palm Beach Gardens Central Office, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
(BN)

Nancy B. White

AFA	_____
APP	_____
CAF	_____
CMU	_____ <i>Favors</i>
CTR	_____
EAG	_____
LEG	_____ <i>J</i>
	_____ NBW/vf

REC	_____
SEC	_____ <i>1</i>
WAW	_____
OTH	_____

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

15713 DEC 23 99

FPSC-RECORDS/REPORTING

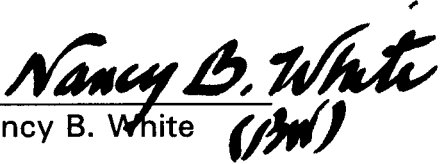
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of BellSouth's Notice of Intent to Request Waiver of Collocation Requirements in the West Palm Beach Gardens Central Office has been served by U. S. mail this 23rd day of December, 1999 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6181

Eston Kirby
Light Networks, Inc.
981 Ashby Street
Suite 103
Atlanta, GA 30318

David A. Bryson
JATO Operating Two Corp.
1099 18th Street
Suite 700
Denver, CO 80202
Tel. No. (303) 226-8398
Fax No. (303) 297-8905



Nancy B. White (BN)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.: 991897-TL
 Inc.'s Petition for Waiver of collocation)
 In the West Palm Beach Gardens)
 Central Office)
 _____) Filed: December 23, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Waiver in accordance with Order No. PSC-99-1744-PAA-TP, issued on September 7, 1999 ("PSC Order"), the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order"). Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements as set forth in the Act, in the Order and in the PSC Order for the West Palm Beach Gardens Central Office ("CO") located at 3700 RCA Boulevard, West Palm Beach, Florida 33410. BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC") on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth expects to construct an addition to the building.

1. The West Palm Beach Gardens CO building houses DMS switches providing local dial tone, tandem toll calling, operator services, as well as signal transfer equipment. Circuit equipment also located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross-connect panels and provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

DOCUMENT NUMBER-DATE

15713 DEC 23 89

FPSC-RECORDS/REPORTING

2. The area served by the West Palm Beach CO is growing rapidly and thus the facility is under enormous space constraints. This CO currently serves 68,700 access lines and 90,218 TI circuits.

3. Under the Act, Incumbent Local Exchange Companies (“ILECs”) have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

47 U.S. § 251(c)(b). Thus, an ILEC is required to provide physical collocation unless it is “not practical...because of space limitations.” Id. The term “space limitations” encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to “retain a limited amount of floor space for defined future uses” (Order, Par. 604). Without the latter element, competitive entrants “could prevent incumbent LECs from serving their customers effectively.” Id.

4. Due to space limitations in the West Palm Beach Gardens CO, BellSouth is unable to provide physical collocation to additional ALECs. There will be no space for additional physical collocation until the addition is completed. The space limitations faced by BellSouth are the result of the use of space by the amount of existing

BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers.

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and
6. BellSouth determined available collocation space by subtracting Items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for additional physical collocation until the addition is completed. Attached hereto is the space assessment worksheet that details the procedure set forth above. (Exhibit 1). This exhibit also identifies the central office language identifier, the identity of the requesting ALEC and the amount of space sought, the total amount of space at the premises and floor loading requirements. Also attached hereto as Exhibit 2 are floor plans that contain the remaining information required by the PSC Order.

7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth currently has plans to build an addition to the facility.

8. The West Palm Beach Gardens CO will contain no available space for physical collocation until the addition is completed and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the West Palm Beach Gardens CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the West Palm Beach Gardens CO until such time as the building addition is completed.

Respectfully submitted this ^{23rd}~~22nd~~ day of December, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5555

R. Douglas Lackey

R. DOUGLAS LACKEY

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0747

SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

12/21/1999

1	CENTRAL OFFICE CLLI:		WPBHFLGR	
2	COLLOCATOR AND AMOUNT OF SPACE		LightWorks	
			4 deep bays	
3..	TOTAL GROSS SQ. FT.			20314
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED			
a.	BST occupied equipment space		14153	sf
	Nonregulated services		0	sf
	Administrative space - not related to installing, repairing, maintaining CO equipment		807	sf
b.	Retired equipment		0	sf
c.	Future BST space reservations		2114	sf
	Switch	1013		
	Circuit	371		
	Power	0		
	Frame	730		
d.	Collocation space		976	sf
e.	Other 3-d party space		0	sf
	What is the occupancy			
f.	Switch turnaround space			
	Service Yr		0	sf
g.	Unavailable space		2264	sf
	Remaining space		0	sf
h.	Central office growth plans.			
	Forecast completion			
	Yr			
	Addition	2000	22908	sf
	Renovation		0	sf
i.	Any other plans for relieving space exhaust			
5.	Floor loading	150#sf	20314	sf
	Power rooms only	350#sf	0	sf

NAME OF PERSON FILLING OUT FORM:

J. D. Bloomer - Manager Facility Planning

SPACE ASSESSMENT WORK SHEET

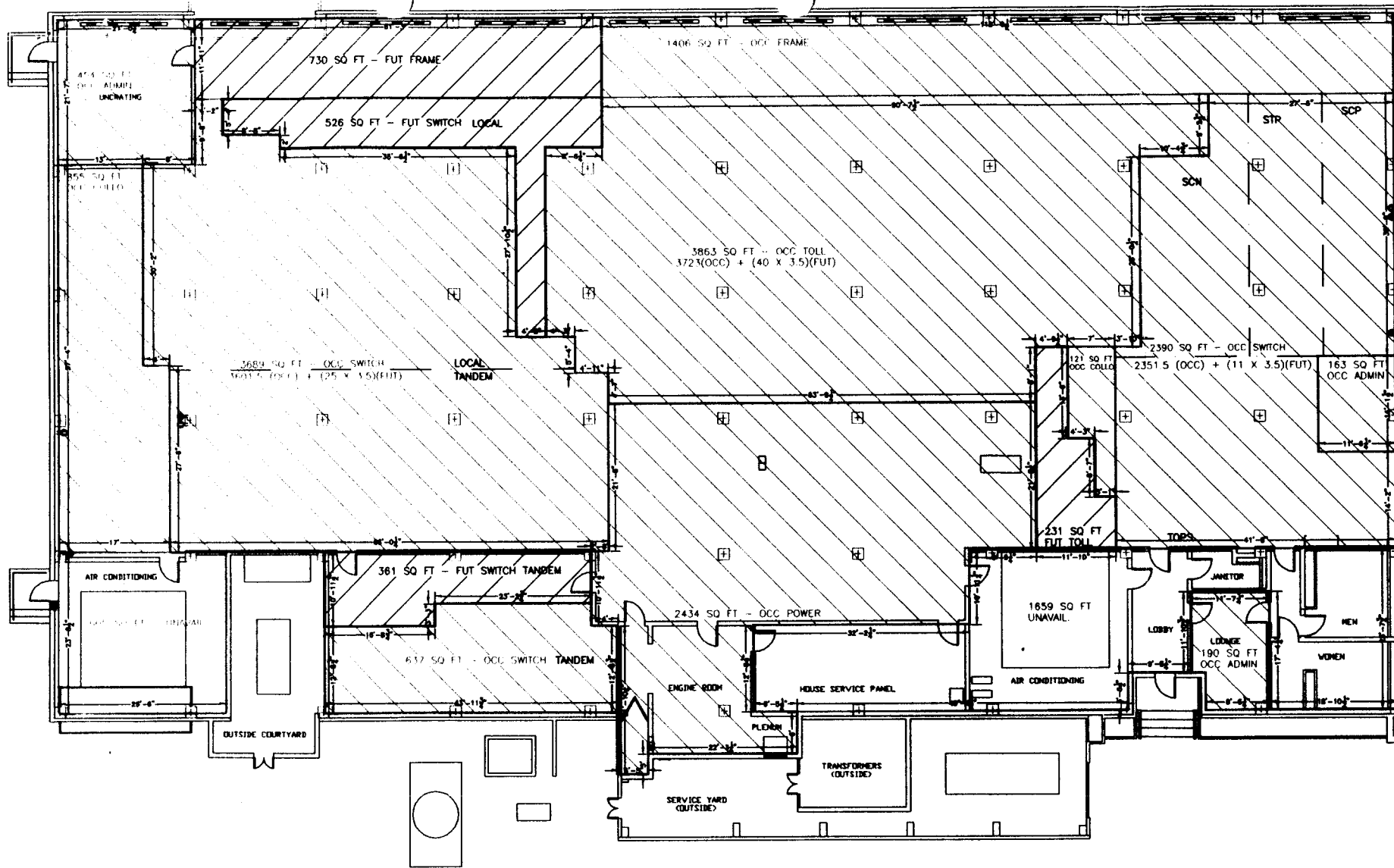
(PRINT NAME AND TITLE)

TEL. NO. 904-350-3428

AUTHORIZED BY:

J. D. Bloomer

TEL. NO. 904-350-3428



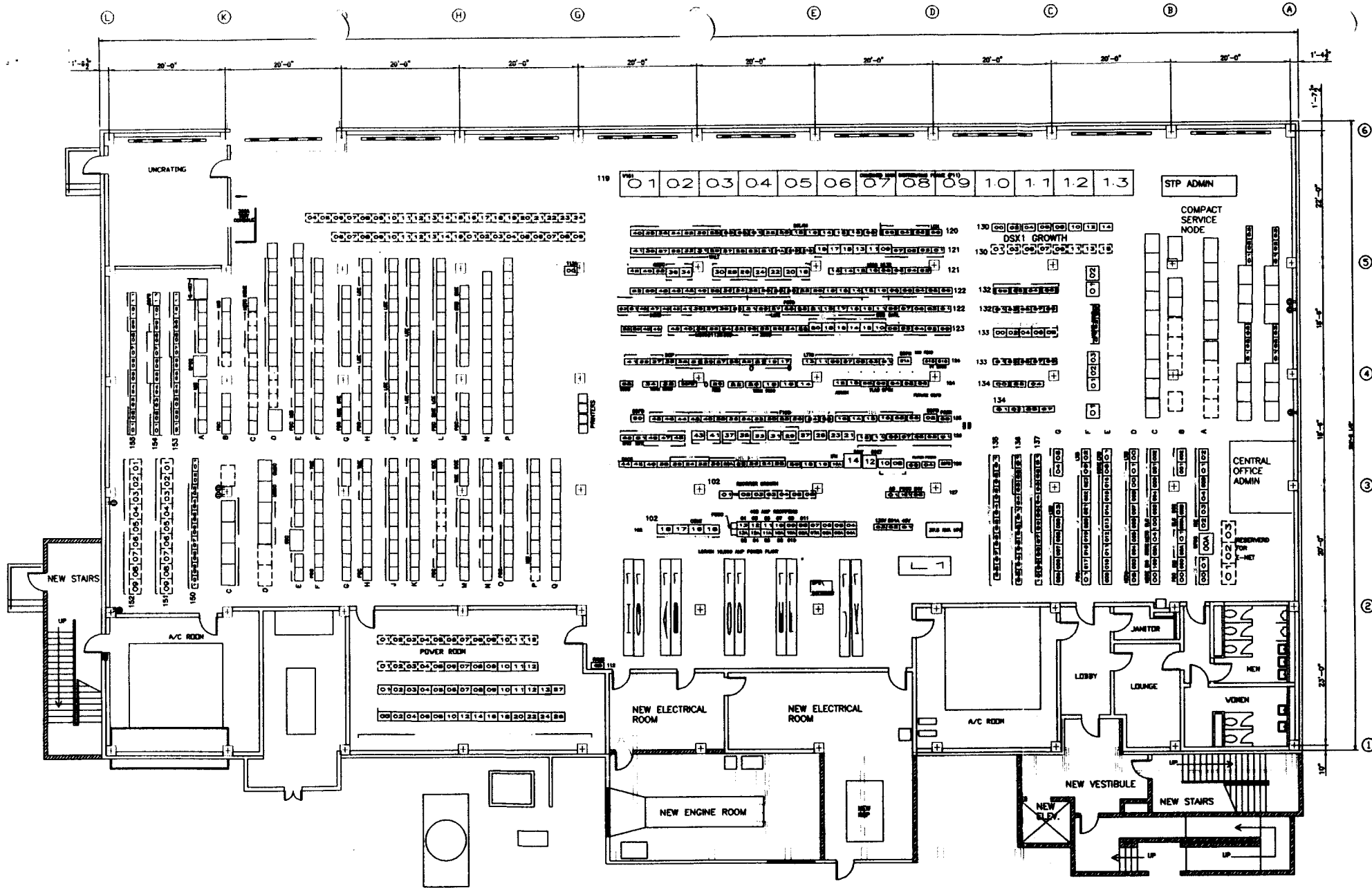
DECEMBER 22, 1999

A	TOTAL GROSS SQ FT	20,314
B	AIR CONDITIONING ROOM, HOUSE SERVICE PANEL, AIR CONDITIONING ROOM, LOBBY, JANITOR AND RESTROOMS	1659
	TOTAL UNAVAILABLE SPACE	2264
C	SWITCH TOLL FRAME POWER AND ENGINE ADMIN COLLOCATION	3601.5 + 637 + 2351.5 = 6590 3723 1406 2434 807 976
	TOTAL OCCUPIED SPACE	15,936
D	SWITCH TOLL FRAME	526 + 381 + (25 X 3.5) + (11 X 3.5) = 1013 231 + (40 X 3.5) = 371 730
	TOTAL RESERVED SPACE	2114

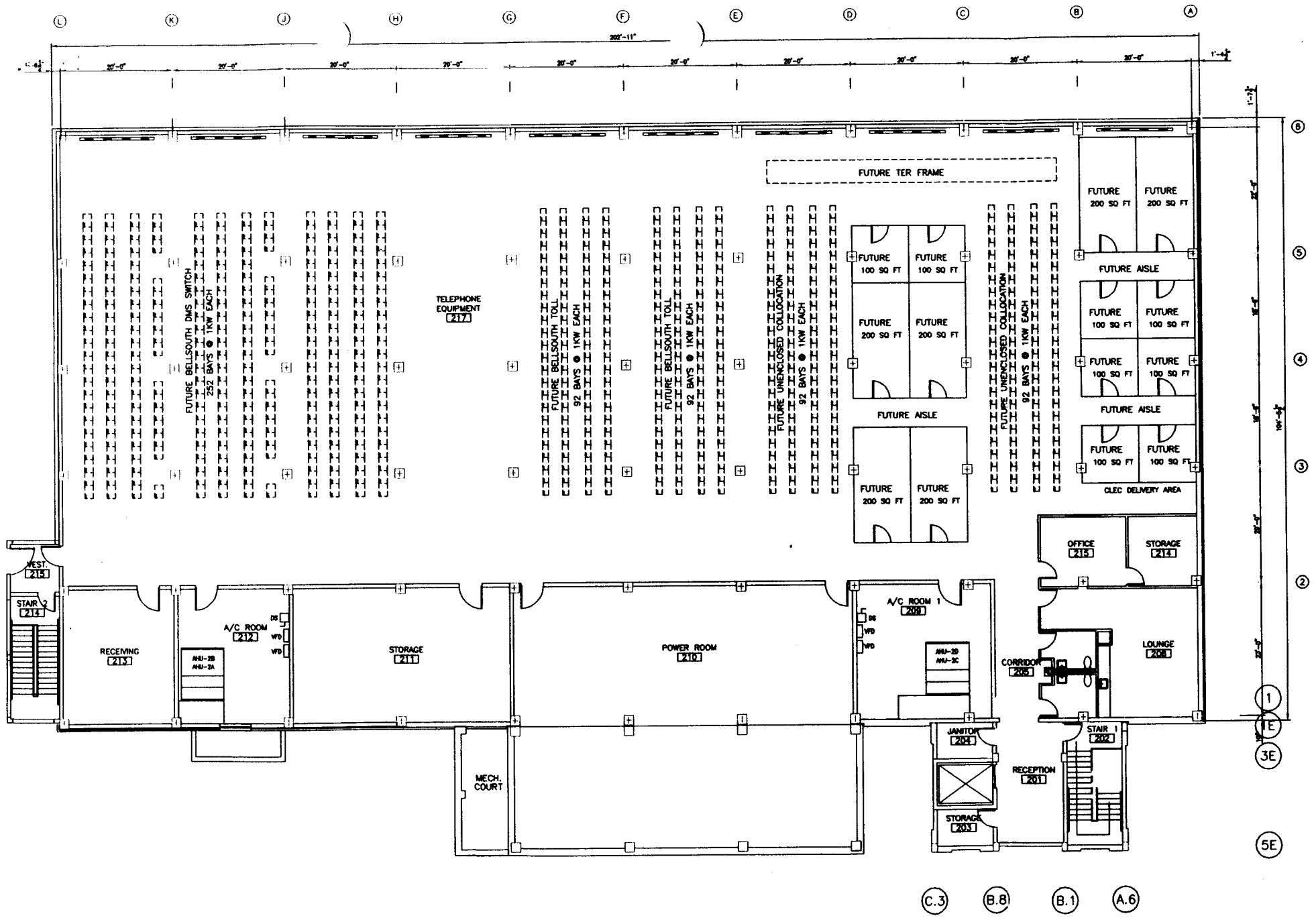
TOPS - TELEPHONE OPERATOR POSITION SYSTEM
STP - SIGNAL TRANSFER POINT
SCN - SUBSCRIBER CUSTOMER NETWORK
SCP - SIGNAL CONTROL POINT
OCC - OCCUPIED SPACE
FUT - FUTURE/GROWTH SPACE
UNAVAIL - UNAVAILABLE SPACE
COLLO - COLLOCATION
⊕ - BUILDING COLUMN

E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN
PAGE 1 PSC WAIVER ITEM 4 A-F

EXHIBIT 2



E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN
 YEAR 2000 BUILDING ADDITION
 PSC WAIVER ITEM 4 G-H



E8519 WEST PALM BEACH GARDENS SECOND FLOOR PLAN
 YEAR 2000 BUILDING ADDITION
 PSC WAIVER ITEM 4 G-H