



ORIGINAL

Catherine F. Boone  
Regional Counsel

10 Glenlake Parkway  
Suite 650  
Atlanta, Georgia 30328

January 5, 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. 991761-TL (Mandarin-Loretto CO)**

Dear Mrs. Bayó:

Enclosed are an original and 16 copies of Covad Communications Company's Objections to BellSouth's Petition for Extension of Time. Please file these in the above referenced matter and return one copy to me stamped "filed" in the enclosed self-addressed, stamped envelop.

Copies have been served on to the parties on the attached Certificate of Service.

I also ask that you replace Christopher Goodpastor of Covad with myself on all service or notice lists. All such notices should be sent to the address below:

Catherine F. Boone  
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fax: (240) 525-5673  
email: cboone@covad.com

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAC \_\_\_\_\_  
LEG \_\_\_\_\_  
MAS \_\_\_\_\_  
OPC \_\_\_\_\_  
RRR \_\_\_\_\_  
SEC \_\_\_\_\_  
WAW \_\_\_\_\_  
OTH \_\_\_\_\_

Thank you for your assistance with these matters.

Sincerely,

Catherine F. Boone

cc: All parties of record

DOCUMENT NUMBER-DATE

00247 JAN-68

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by U.S.

Mail this 5<sup>th</sup> day of January, 2000 to:

Mr. Walter D'Haeseleer  
Florida Public Service Commission  
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Tallahassee, FL 32399-0850

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New York, NY 10048

Network Plus, Inc.  
Attn: Mike Bartelli  
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4<sup>th</sup> Floors  
New York, NY 10001


Mr. Mike Gallagher  
Florida Digital Network, Inc.  
390 North Orange Avenue  
20<sup>th</sup> Floor  
Orlando, FL 32801-1648

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1099 18<sup>th</sup> Street  
Suite 700  
Denver, CO 80202

Carol Lisowski  
MGC Communications, Inc.  
3301 North Buffalo Drive  
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Catherine F. Boone

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STATE OF FLORIDA  
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PUBLIC SERVICE COMMISSION

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: BellSouth Telecommunications, ) Docket No.: 99176-TL  
Inc.'s Petition for Waiver of Collocation )  
In the Mandarin-Loretto Central Office )  
\_\_\_\_\_ )

**COVAD COMMUNICATIONS' OBJECTIONS TO BELL SOUTH'S  
PETITION FOR EXTENSION OF TIME**

COMES NOW, DIECA Communications d/b/a Covad Communications Company ("Covad") and files these objections to the Petition of BellSouth Telecommunications, Inc. ("BellSouth") for Waiver (the "Petition") from physical collocation obligations in the Mandarin-Loretto Central Office ("Mandarin-Loretto CO") located at 11498 Old St. Augustine Road, Jacksonville, Florida 32257. It is unclear from BellSouth's Petition whether it is seeking a permanent or a temporary waiver from physical collocation requirements, since BellSouth apparently intends to offer Covad and other collocators space in a proposed new addition to the Mandarin-Loretto CO. For the following reasons, BellSouth's Petition should be denied.<sup>1</sup>

**I. BellSouth Failed to Follow Florida Rules Regarding No Space Facilities**

On July 16, 1999, Covad applied for 4 bays of physical collocation space in the Mandarin-Loretto CO to enable Covad to offer Digital Subscriber Line ("DSL") service to consumers served by that CO. A true and correct copy of that application is attached hereto as Exhibit 1. BellSouth responded to that application on September 30, 1999 stating that there was

<sup>1</sup> The walk through of the Mandarin-Loretto CO was scheduled for December 8, 1999. Covad was notified of this walk through date on December 6, 1999 and, because of commitments elsewhere, Covad was unable to attend.

DOCUMENT NUMBER-DATE

00247 JAN-68

no space available until BellSouth completed an addition in February 2000. A true and correct copy of that response is attached as Exhibit 2. With that response, BellSouth violated two rules of this Commission. First, BellSouth failed to provide Covad with a response to its collocation request within 15 calendar days. Second, BellSouth failed to file with the Florida Commission a Notice of Intent to Seek Waiver from Physical Collocation Obligations.

The Telecommunications Act and the regulations promulgated to enforce the Act demand that incumbent local exchange carriers (“ILECs”) provide any unused space to collocators. When no such space is available, ILECs must promptly inform the ALEC applying for such space and must take immediate steps to file for appropriated waivers from the state public service commission. (*See In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147 (March 31, 1999)(“FCC Order 99-48”), ¶ 56-57) To enforce that FCC Order, the Florida Commission ordered the following in Docket No. 990321-TP, Order No. PSC-99-1744-PAA-TP:

The ILEC shall respond to a complete and correct application for collocation within 15 calendar days. . . .

If the ILEC intends to deny collocation, the ILEC shall be required to submit Notice of Intent to Seek Waiver of Physical Collocation Requirements to the Commission on the same date of its initial response to the applicant carrier. The Notice shall include a basic statement of the reason for its denial (technically infeasible or lack of space). If the denial is based upon lack of space, the ILEC shall also file detailed floor plans or diagrams of the premises with the Notice, which shall also be provided by the ILEC to the applicant carrier.

(Id.)

BellSouth unacceptably delayed giving Covad any response to its request from July 16, 1999 until September 30, 1999. This Commission has decided that an ILEC must respond to a

collocation request within 15 calendar days. BellSouth's response was almost four times that interval. Although this Commission's Order was not issued until September 7, 1999 BellSouth failed under any reasonable analysis to respond to Covad's application in a timely way. Moreover, BellSouth failed even to respond to Covad's collocation application **within 15 calendar days of the Commission's Order**. These delays unnecessarily limit Covad's ability to serve Florida consumers and it harms Covad's competitive position.

We emphasize the importance of timely provisioning, and we are confident that state commissions recognize the competitive harm that new entrants suffer when collocation arrangements are unnecessarily delayed. The record in this proceeding reflects the significant competitive harm suffered by new entrants whose collocation space is not ready for as long as six to eight months after their initial collocation request is submitted to the incumbent LEC.

(FCC Order 99-48, ¶ 54)

Furthermore, if BellSouth had a shortage of space or was out of space when Covad applied in July 1999 to collocate, BellSouth was obligated to declare the Mandarin-Loretto CO a no space facility at that time. Under this Commission's rules, such a declaration would require BellSouth to file Notice of Intent to Seek Waiver from Physical Collocation Obligations. A declaration of no space also triggers the Commission's and Covad's right to tour the facility. By timely making such a declaration, BellSouth would have enabled the Commission to evaluate in July the availability or non-availability of space. As a result of BellSouth failure to file, Covad has been denied the opportunity to service customers during the entire pendency of the collocation process (since July 1999) and now Covad will be forced to sit idle for some undetermined amount of time while BellSouth builds its new addition.

BellSouth cannot be permitted to decide arbitrarily when it will and will not grant space to potential collocators. BellSouth failed to adhere to its obligations. BellSouth neither filed an

intent to seek waiver when it responded to Covad's collocation application nor did it follow any of the Commission subsequent rules regarding an assertion that a central office had depleted all available collocation space. Thus, BellSouth deprived Covad and this Commission of an opportunity to challenge the no space designation in September 1999. Now, some three months after its belated response to Covad, BellSouth requests a waiver from its physical collocation obligations. Five months have passed since Covad applied for space in the Mandarin-Loretto CO and it now appears that BellSouth will further delay Covad's ability to serve customers for some unspecified period during the construction of the new addition. BellSouth's Petition should be denied because BellSouth has failed to follow any of the required procedures for timely notice of a no space facility.

**II. BellSouth Has Failed to Provide the Commission with Sufficient Detail about Use of Existing Space and Future Expansion of the Mandarin-Loretto CO**

BellSouth's Petition should be denied because BellSouth has failed to follow this Commission's rules regarding the contents of petitions for waiver from physical collocation requirements. The Commission has ordered that an ILEC file a request for waiver from physical collocation rules that includes:

\* \* \*

4. Floor plans, including measurements of the ILEC's premises showing:

\* \* \*

- c. Space that does not currently house ILEC equipment or administrative offices but is reserved by the ILEC for future use, **including the intended purpose or each area and the forecasted year of use;**

\* \* \*

- h. Central office rearrangement/expansion plans, if any;
- i. Description of other plans, if any, that may relieve space exhaustion.

(Order No. PSC-99-1744-PAA-TP, Docket No. 981834-TP/990321-TP, September 7, 1999, p.12.) BellSouth's Petitions fails to meet this obligation. Although the floor plans show numerous places where available space is "reserved" for future BellSouth use, there is no specific information provided about that future use. In fact, BellSouth drawings show large areas of space reserved for "future" battery space, "future" power expansion space, "future" frame growth, although none of those "future" uses are clearly defined. Additionally, BellSouth's plans show reserved space in bays 102, 103, 104, 113, 115, 116 and 117 as well as reserved space for "future" use in the room on the eastern side of the central office. (Petition, Drawings)

BellSouth provides somewhat more information in its Post Tour Report for Mandarin-Loretto Application for Temporary Waiver, failed (December 30, 1999)(hereafter "Post Tour Report), but BellSouth fails to prove that physical collocation space cannot be made available to Covad immediately. For example, BellSouth states:

Switch growth: There are currently nineteen vacant switch bay spaces. Twelve are reserved for a processor upgrade. These bays must be located together due to manufacturer-specified cabling limitations. Failure to reserve these bays means the office will not be able to handle calls for current and future customers. **This leaves seven remaining bays for growth. BellSouth forecasts require 3 spaces in 2000 and 2001.**

Integrated ground plane area:

There are currently 23 circuit bay spaces reserved for growth. **BellSouth forecasts require 14 spaces in 2000 and 10 in 2001.** This leaves BellSouth with a deficit of one circuit space. We must complete the building addition to meet our own space needs.

(Post Tour Report, III., p.10)

As these statements illustrate, BellSouth admits that it has immediate space available for collocation and that its future growth needs will not require use of much of that space until 2001. For example, out of the seven available bays in the switch growth area, BellSouth will require only 3 of those over the next two years. Since Covad has only requested 4 bays of collocation space, the remaining four should be made available to Covad immediately. Likewise, in the Integrated Ground Plane Area, BellSouth forecasts that it will need only 14 of the 23 circuit bays available in 2000. That leaves 13 bays available for immediate physical collocation. Surely BellSouth does not ask this Commission to believe that construction of its building addition will continue for more than twelve months from today or even further into 2001. Thus, BellSouth has shown that physical collocation space is currently available in this CO.

BellSouth must explain to Covad and to this Commission why its future growth needs could not be accommodated by the new addition it promises, especially its needs for 2001. That solution appears more logical than delaying Covad's immediate and pressing collocation needs by forcing Covad to wait for the new addition. BellSouth has shown that it does not immediately need the space that Covad has requested. Therefore, this Commission must decide whether Covad should be made to wait for space, while space sits idle and unused in the Mandarin-Loretto CO or whether BellSouth should be pushed to complete the building addition for its growth needs before 2001. Significantly, if some or all BellSouth future growth needs had to all be accommodated by the new addition, BellSouth would certainly have an incentive to move aggressively to complete the addition. BellSouth lacks that incentive now because by forcing Covad and other collocators to wait until the building addition is complete, it both stifles local competition and preserves space for future growth.



BellSouth's Petition vaguely mentions its planned addition to the Mandarin-Loretto CO. Nonetheless, it offers this Commission no concrete information about when the addition was originally planned, whether the construction of the addition has begun, how long the construction of the addition will take, and when space for collocators will be available in that addition. Before BellSouth is relieved of its obligation to comply with federal law, this Commission must be shown evidence that the addition will be promptly completed and that BellSouth will work aggressively to comply with its collocation obligations. Instead, BellSouth speaks in generalities about its future plans and speculates that "[t]here will be no space for additional physical collocation until the addition is completed." (Petition, p.2) Although the Petition routinely refers to BellSouth's plans "to build an addition to the facility" and asks that BellSouth be exempt from physical collocation obligations "until such time as the building addition is completed," BellSouth offers this Commission no information whatsoever about when that will be. BellSouth apparently wants this Commission and all ALECs to blindly accept its assertion that there is no space and to build their business plan around BellSouth's promised building addition.

The FCC and this Commission's rules on collocation, particularly regarding an ILEC's claim of space exhaustion, are designed to allow competitors access to information from which those competitors can judge for themselves the veracity of ILEC claims of no space. Without such information, an ILEC could effectively stifle competition unilaterally by denying collocation on the grounds that no space existed for such collocation. The FCC and this Commission have made it clear that such unilateral, anti-competitive activities will not be condoned. BellSouth's Petition fails to provide sufficient information about space reserved for

its future use, plans for future additions, and guarantees regarding the timeline for relieving its purported space exhaustion in the Mandarin-Loretto CO. For these reasons, BellSouth's Petition should be denied.

### **III. Collocation Space Clearly Exists Because BellSouth Continues To Offer Virtual Collocation**

Despite its claims that the Mandarin-Loretto CO has no space for collocation, BellSouth continues to offer ALECs the opportunity to virtually collocate. "BellSouth will, of course, offer virtual collocation in the Mandarin-Loretto CO." (Petition, p.4) Although BellSouth's Petition quotes language from the Telecommunications Act purportedly entitling it to offer virtual collocation when physical collocation space has been exhausted, BellSouth neglects to inform this Commission that subsequent FCC regulations have limited its ability to assert that there is no space for physical collocation. The FCC has ordered that "incumbents must allow competitors to **collocate in any unused** space in the incumbent LEC's premises . . . and **may not require competitors to collocate in a room or isolated space separate from the incumbent's own equipment.**" (FCC Order 99-48, ¶ 42.)

Thus, the FCC requires BellSouth to provide any available space to an applicant carrier. Because there is space available that BellSouth could use to provide virtual collocation, there is clearly space available for Covad to physically collocate. Such space should be used for physical collocation, rather than being reserved for virtual collocation. Virtual collocation arrangements are decidedly less acceptable for collocators since they deprive competitive carriers of access to their own equipment for maintenance, trouble shooting or any other purpose. Rather than forcing Covad and other ALECs to accept a virtual arrangement, BellSouth should be required to

permit physical collocation in the space it is reserving for virtual collocation. Covad has applied for and is entitled to use "any unused space" for its collocation arrangements. Since BellSouth admitted that space exists for physical collocation, BellSouth's Petition should be denied.

**CONCLUSION**

For the foregoing reasons, BellSouth's Petition for physical collocation arrangements for the Mandarin-Loretto Central should be denied.

This 5<sup>th</sup> day of January, 2000.

Respectfully Submitted,

COVAD COMMUNICATIONS COMPANY

A handwritten signature in black ink, appearing to read "Catherine F. Boone", written over a horizontal line.

Catherine F. Boone  
Regional Counsel  
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Suite 650  
Atlanta, Georgia 30328  
(678) 579-8388

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by U.S.

Mail this 5<sup>th</sup> day of January, 2000 to:

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Florida Public Service Commission  
Division of Communications  
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Tallahassee, FL 32399-0850

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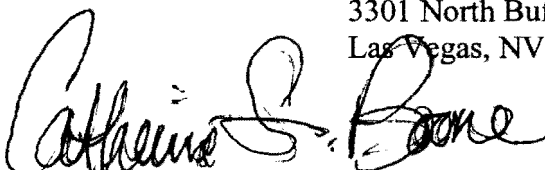
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Catherine F. Boone



<b>For BellSouth Use Only:</b>	
BellSouth Reference Number:	Issue:
Inquiry Receipt Date:	
Firm Order Confirmation Date:	

**EXPANDED INTERCONNECTION APPLICATION AND FIRM ORDER DOCUMENT**

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**Cageless Application**

**1. CUSTOMER INFORMATION**

Company Name Covad Communications Company ACNA OVC

Company Address 2330 Central Expressway Bldg. B City/State/Zip Santa Clara, CA 95050

Jurisdictions: IntraLata X Intrastate \_\_\_\_\_ Interstate \_\_\_\_\_

Signature date of local interconnection agreement with BellSouth: \_\_\_\_\_

Signature date of physical collocation agreement with BellSouth: \_\_\_\_\_

**COLLOCATION PROJECT COORDINATOR**

Name Angela Reymundo E-mail/Internet Address angelar@covad.com

Mailing Address 2330 Central Expressway Bldg. B City/State/Zip Santa Clara, CA 95050

Telephone # 408-844-7431 Pager # \_\_\_\_\_ Facsimile # 408-235-8101

**2. REQUESTED EIS LOCATION**

Wire Center Name Mandarin CLLI Code MNDRFLLO

Street Address Mandarin Rd City/State/Zip Mandarin, FL 32223

**3. TYPE OF INTERCONNECTION ACTIVITY**

- Initial arrangement installation
- Augmentation to an existing arrangement
- Existing arrangement, equipment change and/or wiring changes
- Existing arrangement, partial equipment disconnect and removal
- Existing arrangement, complete equipment disconnect and removal
- Conversion of existing virtual arrangement to a physical arrangement
- Interconnection of collocation arrangements within this location

**4. FLOOR SPACE REQUIREMENTS**

A. Equipment enclosure  Yes  No

B. Equipment enclosure to be constructed by BellSouth  Yes  No

If yes to A or B, enclosure floor space requirements \_\_\_\_\_ square feet

If no to A or B, non-enclosed floor space requirements 4 bays

Augmentation - Additional floor space requirements - enclosed \_\_\_\_\_ square feet

Augmentation - Additional floor space requirements - non-enclosed \_\_\_\_\_ square feet

Provide via attachment a proposed equipment floor plan layout, which will aid BellSouth's understanding of the space requirements for the equipment to be placed in the location.



**EXPANDED INTERCONNECTION APPLICATION  
AND FIRM ORDER DOCUMENT**

**5. EQUIPMENT TO BE INSTALLED OR REMOVED**

Complete columns 1 through 11 for all equipment to be installed or removed. Duplicate this table as required.

1	2	3	4	5	6	7	8	9	10	11
Rack No. (A)	Vendor/Manufacturer & Contact Number	Model No.	Description	Existing Quantity	Add	Remove	Total Quantity	Total Heat Dissipation (WATTS)	Total -48V DC Power Requirements (AMPS)	NEBS Yes/No (B)
101.01	Diamond Lane	50-0010	Master Shelf Assembly		X		1	71 Watts	1.48	Yes
101.01	Diamond Lane	50-0020	Line Card Assembly		X		4	167 Watts	3.48	Yes
101.02	Harris	107 A/F	Line Test RMU		X		1	3 Watts	.06	Yes
101.02	Harris	AS486 F02	Line Test CTAS		X		2	None	0	Yes
101.02	Hendry	06080-01R	Fuse Panel		X		1	4 Watts	.09	Yes
101.02	Cisco	2610	Network Manager		X		1	96 Watts	2	Yes
101.03			Work shelf		X		1			Yes

A: Show rack number on the attached floor plan layout.

B: Does this equipment meet the following Bell Communications Research Network Equipment-Building Systems (NEBS) requirements?

- Criteria Level 1 requirements as outlined in the Bellcore Special Report SR-3580, Issue 1.
- Equipment design spatial requirements per GR-63-CORE, Section 2.
- Thermal heat dissipation per GR-063-CORE, Section 4, Criteria 77-79.
- Acoustic noise per GR-063-CORE, Section 4, Criterion 128.
- Applicable National Electric Code requirements.

Enter a YES or NO. If NO, attach a separate document listing specific explanations for each equipment type and reasons for NEBS and/or National Electric Code noncompliance.

BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
AND FIRM ORDER DOCUMENT**

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**6. EQUIPMENT RACK/BAY REQUIREMENTS FOR NON-ENCLOSED EQUIPMENT**  
Completion of this section is not required if the enclosure option is selected.

- 4   Rack(s) for initial equipment installation.                      Quantity of racks:   4
- Add rack(s) to existing arrangement.                              Quantity of racks:
- Existing rack location: \_\_\_\_\_
- Remove rack(s) from an existing arrangement.                      Quantity of racks:
- Rack addition not required for this application.

	Rack 1	Rack 2	Rack 3	Rack 4	Rack 5	Rack 6	Rack 7	Rack 8
Rack Width	23 in.	23 in.	23 in.	23 in.				
Spacer Width*	2 in.	2 in.	2 in.	2 in.				
Rack Total Depth	12 in.	12 in.	12 in.	12 in.				
Rack Height	7 foot	7 foot	7 foot	7 foot				
Location								
Equipment Overhang	F R	F R	F R	F R	F R	F R	F R	F R

\* If required.  
Equipment Overhang: F = Front, R = Rear Indicate the number of inches that the equipment depth exceeds the rack depth on the front and/or rear of the rack, if applicable.

Total footprint area (width x depth) of all racks (and spacers) to be installed for this application  
\_\_\_\_\_ Square Feet

**7. -48V POWER AND GROUNDING**

Completion of this section is required if -48V telecommunications equipment power is to be provided by BST. Power plant construction requirements and costs will be based upon the information provided. BST can provide -48V DC feeders configured to power equipment installed as part an isolated single point ground or as part of the building integrated ground plane. Isolated ground power options are addressed in section 7B. Integrated ground power options are in section 7C.

7A. Does any of this equipment require an Isolated ground plane and associated power supply grounding as described in Bellcore Technical Reference TR-NWT-000295 and BellSouth Engineering and Installation Standards for Central Office Equipment TR-73503?

7A1. Yes \_\_\_\_\_ No   X   If yes, complete section 7B.

Will any of this equipment be installed (and grounded) as part of the building integrated ground plane (i.e. not part of an isolated ground plane)?

7A2. Yes   X   No \_\_\_\_\_ If yes, complete section 7C.

**7. -48V POWER AND GROUNDING continued from page 3.**

BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
AND FIRM ORDER DOCUMENT**

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**7B. Power Feeders for Equipment Installed as Part of an Isolated Ground Plane**

If equipment requires TR-000295 compliant isolated ground plane, the collocator must provide Battery Distribution Fuse Bay, Power Distribution Frame, or similar power distribution equipment for distributing power to the equipment to be installed on the isolated ground plane. This BDFB/PDF must be dedicated to the isolated ground equipment. If integrated ground equipment is also installed it must utilize one of the power options described in section 7C.

Specify the quantity of the BST provided isolated ground power feeders to the collocator provided BDFB/PDF. State quantities in multiples of 2 for redundant "A" and "B" feeder pairs (i.e., 2 feeders = 1 A feeder and 1 B feeder. Note: All BST provided power feeders to BDFBs/PDFs will be rated at 180 Amps protected at the BST power board by 225 amp circuit breakers.

Existing	Additional	Total	Terminating BDFB/PDF Rack No. per collocator provided equipment layout

BST will provide power feeder cable support structure between the BST power board and the collocator equipment enclosure. BST will connect the feeder to the BST power board and run the feeder to the enclosure. The collocator's vendor will be responsible for constructing power cable support structure and completing the feeder installation within the enclosure and terminating the cable at the collocator provided BDFB/PDF.



BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
AND FIRM ORDER DOCUMENT**

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7. **-48V POWER AND GROUNDING** continued from page 4.

**7C. Power Feeders for Equipment installed as Part of the Building Integrated Ground Plane**

Collocator may provide or request BST to provide Battery Distribution Fuse Bay, Power Distribution Frame, or similar power distribution equipment for distributing power to integrated ground equipment.

**7C1. Collocator Provided BDFB/PDF**

If collocator will provide BDFB/PDF, specify the quantity of the BST provided integrated ground power feeders to the collocator provided BDFB/PDF. State quantities in multiples of 2 for redundant "A" and "B" feeder pairs. (i.e., 2 feeders = 1 A feeder and 1 B feeder). Note: All BST provided power feeders to BDFBs/PDFs will be rated at 180 Amps protected at the BST power board by 225 amp circuit breakers.

Existing	Additional	Total	Terminating BDFB/PDF Rack No. per collocator provided equipment layout

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BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
AND FIRM ORDER DOCUMENT**

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7. **-48V POWER AND GROUNDING** continued from page 5.

7C2. **BST Provided BDFB or Miscellaneous Power Board Fuse Positions.** (See note.)  
Complete the following table for all fuse positions to be provided by BST.

BST Provided BDFB Fuse Position Quantity	Protection Device Rating (amperes)
2	40 Amps (60 fused)
State quantity in multiples of 2, one "A" and one "B"	(Max 60 amps)

Note: Some BST -48V power boards are equipped with miscellaneous fuse positions. These fuse positions may be made available for use with collocated equipment in lieu of BDFB fuse positions. BST and collocator responsibilities as described in this section shall apply to the use of these fuse positions.

BST will provide fuse positions as requested. **The collocator must provide the protection devices (fuses) and the appropriately sized power feeders between the BDFB or power board and the collocator provided equipment.** BST will provide power cable support structure between the BST provided BDFB/power board and the collocator's enclosure (or equipment if no enclosure is requested). The collocator's vendor is responsible for the installation of all cable support structure within a collocation enclosure. The maximum rating for a protection device to be placed in a BST provided BDFB or misc. power board fuse position is 60 amps. Typical sizes are 10, 15, 30, 45 and 60 amps. Protection devices should be sized at 1.5 times the maximum load. Quantities should be specified in multiples of 2 for 1 "A" and 1 "B" fuse position.

It is recommended that all collocated equipment arrangements be configured with a power disconnect capability, either internal to the collocated equipment frame(s) or via a collocator provided fuse panel. If no power disconnect is provided, a request will have to be submitted to BST to disconnect power at the BST provided fuse or breaker whenever power must be removed from the equipment.

7D. **Framework Ground**

BST will provide an interconnection point (ground bar or ground cable extension) for connecting the collocator provided equipment framework ground to the building principal ground. BST will extend the floor framework ground connection to a common collocation area ground bar or will extend a framework ground cable to the collocation enclosure for grounding all equipment to be grounded through the building integrated ground plane. If a ground bar is placed in the collocation area (adjacent to a collocation enclosure) the collocator will be responsible for extending a single framework ground connection from the enclosure to the BST provided bar.

If BST provides -48V battery and battery return feeds to collocated equipment grounded through a TR-000295 compliant isolated ground plane, the collocator's certified vendor will be responsible for engineering and installing framework grounds from the equipment to the BST provided ground window.

Specific grounding arrangements should be clarified during the BST-collocator coordination meetings.

BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
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**8. ENGINEERING AND INSTALLATION VENDOR(S) Complete for Firm Order.**

T E = Transmission Equipment; S E = Switching Equipment

Equipment Type & Vendor Function	BST Certified Vendor Name	BST Certified Vendor Contact	BST Certified Vendor Phone #
T E - Engineering			
T E - Installation			
S E - Engineering	NA		
S E - Installation	Lucent Technologies	310 East Park Court Sandston, VA 23130	804-737-2999

**9. COLLOCATION INTERCONNECTION REQUIREMENTS**

Do you plan to directly interconnect collocation arrangement(s) in this location? Yes \_\_\_ No X  
 Type of cable to be used to interconnect collocation arrangements: Copper \_\_\_\_\_ Fiber \_\_\_\_\_

The following table must be completed for each requested direct interconnection. BST will provide cable support structure, if feasible, for the interconnection of two collocation arrangements occupying non-contiguous space.

Collocation No.	Controlling Collocation		Interconnected Collocation			Type	Quantity of Circuits	Optical Interconnect
	New <u>X</u>	Existing	Virtual	Physical	Owner			
	Rack Loc. or "ENC"	Rack Loc. or Enc. Loc.	Rack Location	Rack Loc. or Enc. Loc.		DS0, DS1, DS3, Optical	Capacity of cable	Preferred Conductor Cable (C) or Patch Cord (P)

When separately owned collocation arrangements are to be interconnected, the arrangement of the owner requesting the interconnection shall be the "Controlling Collocation".  
 When commonly owned collocation arrangements are to be interconnected, the owner should designate one as the "Controlling Collocation". **NOTE:** The "controlling" owner will serve as the BST contact on all issues related to the interconnection and will be billed by BST for any and all applicable charges.

All abandoned/disconnected interconnection facilities must be removed from BST cable support structure by the collocater's certified vendor when the interconnected equipment is disconnected or removed. Identify the collocation number from the previous table to be removed per this application:

\_\_\_\_\_

BellSouth Reference No. \_\_\_\_\_



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**10. FIBER CABLE INFORMATION**

Collocator provided & owned fiber entrance facilities Yes \_\_\_\_\_ No X

A. Complete the table below for each fiber entrance cable to be installed or removed.

- \_\_\_\_\_ Add fiber entrance cable(s) for initial installation.
- \_\_\_\_\_ Add fiber entrance cable(s) to existing arrangement.
- X Fiber entrance cable not required for this application.
- \_\_\_\_\_ Fiber entrance cable to be removed.

Cable #	Outside diameter (in.)	Size of fiber cable	Weight (lb/kft)	Metallic/Dielectric	Cable Tensile Load (lb/f)

**Note 1:** Outside plant cable must meet the requirements in Bellcore GR-20-CORE or TR-NWT-000020.  
**Note 2:** If multiple entry is requested, please show 2 cables on the fiber entrance cable table. Multiple entry availability will be provided in response to an application.

B. Complete the table below for each fiber riser cable to be installed or removed.

- \_\_\_\_\_ Add fiber riser cable(s) for initial installation.
- \_\_\_\_\_ Add fiber riser cable(s) to existing arrangement.
- X Fiber riser cable not required for this application.
- \_\_\_\_\_ Fiber riser cable to be removed.

Cable #	Outside diameter (in.)	Size of fiber cable	Weight (lb/kft)	Sheath Type	Cable Tensile Load (lb/f)
				Dielectric	
				Dielectric	

**Note 1:** Pre-terminated, dielectric, fire retardant riser cable should be provided. Riser cable must meet the requirements in Bellcore GR-409-CORE.  
**Note 2:** If multiple entry is requested, please show 2 cables on the riser cable table. Multiple entry availability will be provided in response to an application.  
**Note 3:** Abandoned/disconnected fiber riser cable must be removed by the collocator's certified vendor at the time the associated equipment is removed.

C. Additional information: \_\_\_\_\_ Multiple entry points requested.  
 \_\_\_\_\_ Microwave entrance requested.

BellSouth Reference No. \_\_\_\_\_



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**11. EQUIPMENT WIRING REQUIREMENTS**

Initial installation   X   Equipment Addition \_\_\_\_\_ Wiring changes \_\_\_\_\_

Enter the number of DS0 2 wire, DS1, DS3, and/or fiber lowspeed equipment ports that will be wired to the POT.

DS0 POT DS0 2 Wire	DS1 POT DS1 Connections	DS3 POT DS3 Connections	Optical POT Fiber Connections
900	10	5	0

**Note:** It is recommended that all low speed ports not used for connection to other equipment be wired to the POT.

Will local trunks and/or unbundled loops be ordered for interconnection to this physical arrangement?  
       Yes        No (An interconnection agreement between BellSouth and your company is required for interconnection of unbundled loops into a collocation arrangement.)

**EQUIPMENT WIRING DISCONNECTS**

All abandoned/unused cable connections to the POT must be removed by the collocator's certified vendor when the associated equipment is removed. Indicate the type, quantity, and POT bay location of the circuits to be disconnected. For partial removals, attach a cable and pair and/or T1TIE/T3TIE inventory identifying specific connections to be disconnected.

DS0 POT DS0 2 Wire		DS1 POT DS1 Connections		DS3 POT DS3 Connections		Optical POT Fiber Connections	
Quantity	POT	Quantity	POT	Quantity	POT	Quantity	POT

**Additional Information:**

BellSouth Reference No. \_\_\_\_\_



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**12. CONTACT INFORMATION**

EQUIPMENT WIRING: Name Angela Andrews Telephone # 703-847-6732  
Facsimile # 703-847-8286 Pager # \_\_\_\_\_ E-mail/Internet Address aandrews@covad.com

TECHNICAL: Name Angela Andrews Telephone # 703-847-6732  
Facsimile # 703-847-8286 Pager # \_\_\_\_\_ E-mail/Internet Address aandrews@covad.com

LOCAL COORDINATION: Name Angela Andrews Telephone # 703-847-6732  
Facsimile # 703-847-8286 Pager # \_\_\_\_\_ E-mail/Internet Address aandrews@covad.com

BUILDING ACCESS: Name Janet O'Brien Telephone # 408-844-7379  
Social Security Number (Required for issuing building access cards.) \_\_\_\_\_  
Facsimile # 408-235-8101 Pager # \_\_\_\_\_ E-mail/Internet Address jobrien@covad.com

**13. DESIGN LAYOUT RECORD (DLR) CONTACT INFORMATION**

**A: COLLOCATION ARRANGEMENT IDENTIFICATION CIRCUIT**

DLR Contact Name/Title Angela Reymundo Telephone # 408-844-7431  
Address 2330 Central Expressway Bldg. B City/State/Zip Santa Clara, CA 95050  
E-mail/Internet Address angelar@covad.com

\_\_\_\_\_ Use mechanized DLR capability via a DRC code. Enter 3 digit DRC code \_\_\_\_\_  
\_\_\_\_\_ Use regular mail to provide DLR to the design contact shown above.

**B: TIE (T1 & T3) CARRIER(S)**

DLR Contact Name/Title Angela Reymundo Telephone # 408-844-7431  
Address 2330 Central Expressway Bldg. B City/State/Zip Santa Clara, CA 95050  
E-mail/Internet Address angelar@covad.com

\_\_\_\_\_ Use mechanized DLR capability via a DRC code. Enter 3 digit DRC code \_\_\_\_\_  
\_\_\_\_\_ Use regular mail to provide DLR to the design contact shown above.

**Note!** Please be sure the DRC code provided is correct. An incorrect code will result in improper distribution of the DLR, possibly causing a delay in the initial ordering of service. If you do not have mechanized DLR capability, and would like information on how to obtain mechanized DLR capability, contact your Account Executive.

BellSouth Reference No. \_\_\_\_\_



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**13. C: CABLE & PAIR (DS0)**

Contact Name/Title: Angela Reymundo Telephone # 408-844-7431

Address: 2330 Central Expressway Bldg. B City/State/Zip: Santa Clara, CA 95050

E-mail/Internet Address: angelar@covad.com

**14. BILLING INFORMATION**

BAN (Billing Account Number - Provided by BellSouth) \_\_\_\_\_

Billing Name Covad Communications Company  
(Indicate the legal business name as it should appear on the monthly billing statement.)

Bill Department/Title: Accounts Payable

Bill Address: 2330 Central Expressway City/State/Zip: Santa Clara, CA 95050

Billing Contact Name: Nikkol Ward

Address: 2330 Central Expressway Bldg. B Santa Clara, CA 95050

Telephone Number: 408-844-7340 Facsimile Number: 408-235-8101

List Billing Account Number(s) for other BellSouth communication service(s) \_\_\_\_\_

**15. ATTACHMENTS** List attachments and the number of pages for each attachment. Provide rack equipment drawings for the floor plan layout.

Attachment 1: Floor Plan Layout

Attachment 2: Equipment Specs (2 pgs)

Attachment 3: \_\_\_\_\_

Attachment 4: \_\_\_\_\_

Remarks: \_\_\_\_\_

BellSouth Reference No. \_\_\_\_\_



**EXPANDED INTERCONNECTION APPLICATION  
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**16. TECHNICAL COMPLIANCE**

Applicant certifies that equipment is in compliance with the following industry standards:

- Criteria Level 1 requirements as outlined in the Bellcore Special Report SR-3580 Issue 1.
- Equipment design spatial requirements per GR-63-CORE, Section 2.
- Thermal heat dissipation per GR-63-CORE, Section 4, Criteria 77 - 79.
- Acoustic noise per GR-63-CORE, Section 4, Criterion 128.
- Applicable National Electric Code requirements.

I hereby certify that the equipment listed on page 2 in this document meet the industry standards for safety and compatibility. For equipment which is noncompliant, attached is documentation describing the equipment, including exceptions or deviations from the above standards.

Signature \_\_\_\_\_ Date July 16, 1999

Print Name Angela Reymundo Title Collocation Specialist

Company Covad Communications

**Use of Space In Central Offices**

From time to time BellSouth may require access to space occupied by collocator. BellSouth retains the right to access such space for the purpose of making equipment and building modifications, e.g., running, altering or removing racking; ducts; electrical wiring; HVAC; and cables. BellSouth will give reasonable notice to collocator when access to collocation space is required and collocator may elect to be present whenever BellSouth performs work in the collocation space. It is agreed that collocator will not bear any of the expense associated with this work.

**17. Dates are negotiated during the Firm Order process. For planning purposes, you may indicate your**

desired **Space Acceptance** date: 60 days from Inquiry Application date and

desired **Commencement** date: 30 days from Space Acceptance for this arrangement.

The **Space Acceptance** date will be the date that BellSouth's floor space and infrastructure construction are complete.

The **Commencement** date will be the date that the collocator's transmission and/or switch equipment are operational and ready for service. Notification of the commencement date should be provided by the collocator to BellSouth in writing.

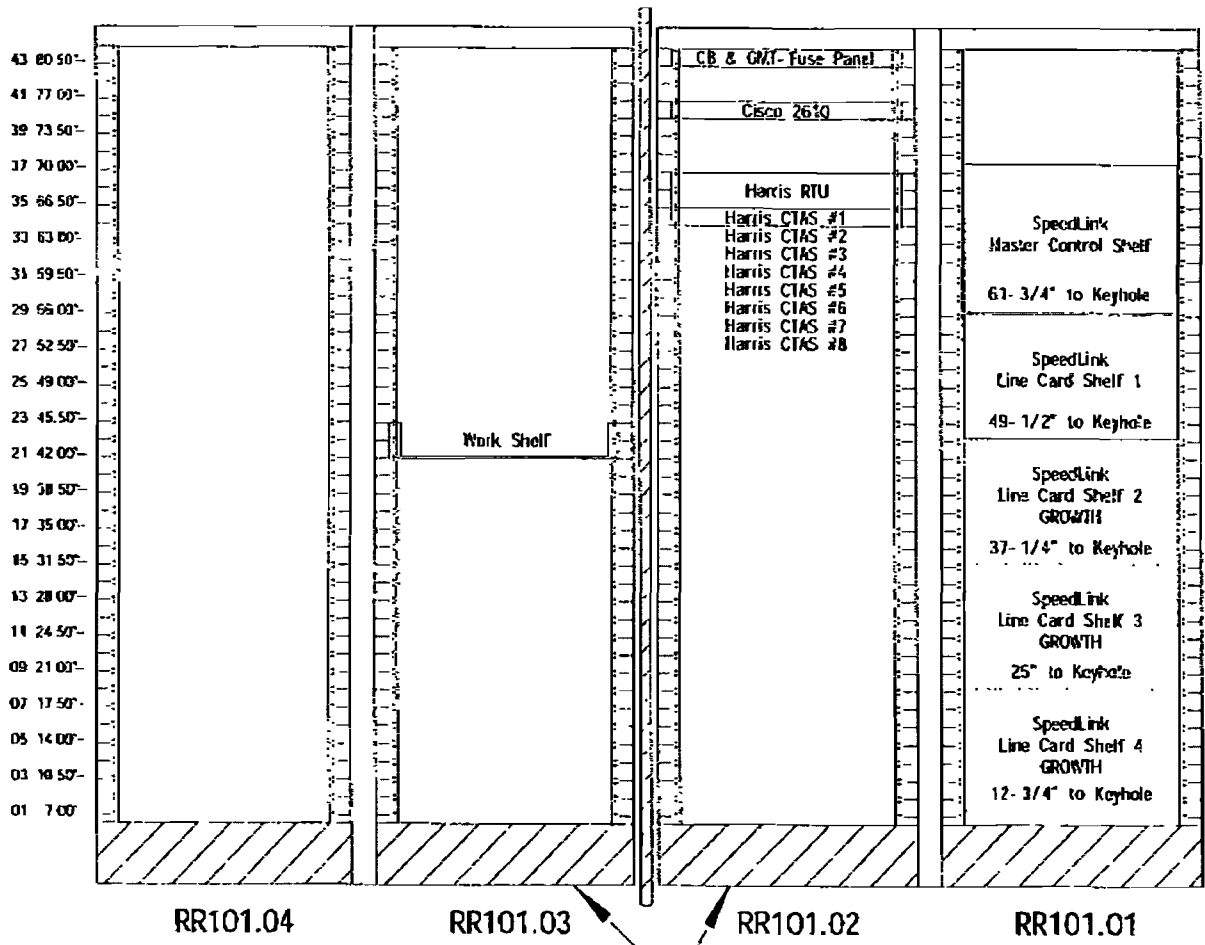
**18. BSTEI-1-P PREPARATION DATE**

Inquiry/Application Preparation Date \_\_\_\_\_

Firm Order Preparation Date July 16, 1999



Rev	Date	Reason
A	1999-02-26	Initial Issue, NECO 99-021



Mount SpeedLink shelves with the keyhole screw at the height shown above the rack base dust cover.

Harris CTAS Shelves #2 - 8, and Speedlink Shelves #2, 3, 4, can be equipped later for growth.

DSL Cageless Collo of 4 Bays, without IDF.

Arrange equipment as shown.

In Covad cage, number racks as shown.

In ILEC lineup, adopt ILEC numbering when available, otherwise number racks as shown.

RR101.04      RR101.03      RR101.02      RR101.01

Bays MAY or may NOT be together.

<b>Covad</b>				Dimensions Inches Scale 1:18, 1" = 1.5'	
Title <b>DSL Cageless Collo, 4 Bays, No IDF</b>					
Rev	Status	Dep	Rev		
1999-02-26	Issued	001-0058	A		
Rev	Title Identifier			Drawn By	
A	001-0058-A-Elev-DSL-4Bay-CL			R. Rawson	

## SPECIFICATIONS

Table 3 lists the electrical and physical characteristics of the IDSL.

Table 3. Specifications

Description	Specifications
<b>A. Electrical</b>	
EMI protection	Meets FCC part 15 Class A
Input protection	Meets UL1459 second edition
NEBS	Meets Bellcore GR-63-CORE
Power Consumption	Allows 48 channel chassis to be filled with 48 units
Power Consumption	<2 watts
<b>B. Reference Specifications</b>	
Bellcore	TR-NWT-000063 TR-NWT-0000397 TR-NWT-001089
American National Standards Institute	T1.618 T1.618 Annex D T1.606 Add. 1 2B1Q protocols
<b>C. Mechanical and Environmental</b>	
Temperature Range, operating and storage	0° to 70°
Relative humidity, no condensation	Up to 95% non-condensing
Size (Height x Width x Depth)	4.4 x 1.4 x 10 in
Weight	20 ounces

## 6. INSTALLATION

**WARNING**

This unit includes components that are susceptible to damage from static electricity. DO NOT handle units without protection from electrostatic discharge.

Install the unit according to the Procedure 1. All connections are made automatically when the IDSL 128 card is inserted into the system.

**A. Options**

There are no options to be selected on the IDSL.

4. SPECIFICATIONS

Table 5 lists the 16:i/23 Transport System specifications

Table 5. 16:i/23 Specifications

Description	Specification
<b>A. Power Requirements</b>	
Input Power	-42 to -56 VDC
Current Drain (Fully equipped with all common and channel units installed)	4 Amps
<b>B. Physical</b>	
Dimensions (height x width x depth)	9.9 x 23 x 11 inches
Weight	14 pounds
<b>C. Environmental</b>	
Operating Temperature	0° to + 55°C
Storage Temperature	-20° to +60°C
Humidity	Up to 95%
Recognition	Underwriter's Laboratories 1459 Canadian Standard Association 225

5. MAINTENANCE

The 16:i/23 Transport System requires no routine maintenance. Except for fuse replacement, Pulsecom does not recommend performing repairs in the field.

Fuses are located on the upper left designator strip. Replacement GMT™ Fuses are available from Pulsecom. When ordering, specify the Pulsecom part number listed in Table 6.

Table 6. Fuse Information

Circuit	Fuse Type	Rating	Color	Pulsecom Part Number
-48 VDC Power	GMT 5	5 Amps	Green	3343-0500
Ringling	GMT 44	1/4 Amp	Violet	3343-0025



BellSouth Application Response for Physical Collocation

BSTEI-3-P

Project Reference Number: MNDRFLO.OVC.01 Response Expiration Date: NOVEMBER 2, 1999  
 MNDR LORETTO, 11499 ST AUGUSTINE RD, JACKSONVILLE FL 32258

State Information

I. State Coordinator Data

State Interdepartmental Coordinator	PAT SOLIN @ 954.928.4707
Central Office Representative	STEVE SPICKELMIER @ 904.350.4691

Fiber Cable Information

II. Contact Data

Outside Plant Construction Supervisor (PCS)	Name @ Number
Outside Plant Manhole Access	Name @ Number
Master Contractor	Name @ Number

III. Manhole Data

Diverse Fiber Entrance Access to Wire Center	Available:	Yes	No
Manhole Address	Cable Distance Manhole to CO Point of Interconnection		
Manhole #1:	Feet		
Manhole # 2:	Feet		
Manhole #3:	Feet		

Note: Distances shown are estimates.

IV. Riser Cable Length Data

Connectorized Fire Retardant Riser Cable	CO Point of Interconnection to EIS Location
Riser Cable #1	Feet
Riser Cable #2	Feet

Note: Distances shown are estimates.

V. Tie Cable Length Data

BST Termination	# TIES	POT* Bay to BST	POT* Bay to EIS Location
DSO Distribution Frame	500	** Feet	Feet
DSX - 1	2	** Feet	Feet
DSX - 3	2	** Feet	Feet
LGX (Fiber Cross Connection)	N/A	Feet	Feet
** DISTANCES CANNOT BE DETERMINED UNTIL BUILDING ADDTION IS COMPLETE			

\* POT = Point of Termination

DSX 1 Note: The Collocator must set the collocation transmission equipment to pre-emphasis options required to deliver a DS-1 level signal, as described in BellSouth TR 73572, to the BellSouth DSX.

DSX-3 Note: The Collocator may be required to set the collocated equipment Line Build Out option when total cable distances from the BellSouth DSX-3 to the EIS location are less than 225 feet. Refer to BellSouth TR 73572

Note: Distances shown are estimates. Cable installation to the POT Bay is the responsibility of your BST Certified Vendor.

Please direct questions to: Nancy K. Nelson, Regional Collocation Manager  
 Office 205.321.4986 FAX 205.321.5058 Internet - Nancy.Nelson1@bridge.bellsouth.com





BellSouth Application Response for Physical Collocation

BSTEI-3-P

Project Reference Number: MNDRELO.OVC.01 Response Expiration Date: NOVEMBER 2, 1999  
 MNDR LORETTO, 11499 ST AUGUSTINE RD, JACKSONVILLE FL 32258

Environment Data

VI. Environment Data / Space

Requested Space Size: Cageless <b>CAGELESS.</b>	<b>AVAILABLE: CAGELESS RELAY RACKS TO BE PROVIDED</b>
<b>Floor Plan provided: AVAILABLE</b>	

Note: See floor plan for additional information.

Note: Please plan to post emergency contact names and telephone numbers on the exterior of the physical space enclosure or attach directly to the racking of an unenclosed physical arrangement. From time to time, BellSouth may require access to space occupied by Collocator. BellSouth retains the right to access such space for making equipment and building modifications, e.g., running, altering or removing racking; ducts; electrical wiring; HVAC; and cables. BellSouth will give reasonable notice to Collocator when access to collocation space is required. Collocator may elect to be present whenever BellSouth performs work in the collocation space. The Collocator will not bear any of the expense associated with this work.

VII. Environment Data / Racking

<b>Rack Height</b>	<b>Seven (7) Foot Equipment allowed to seven (7) Foot Height</b>
<b>Rack Depth</b>	<b>Twelve (12) Inches</b>

VIII. Environment Data / Miscellaneous

<b>Location within Wire Center</b>	<b><u>FIRST</u> Floor NEW BUILDING ADDITION TO BE PROVIDED Room Number</b>
<b>7 Day &amp; 24 Hour Entrance Access</b>	<input checked="" type="checkbox"/> <b>No Escort Required</b> <input type="checkbox"/> <b>Paid Escort Required</b> <b>NO ESCORT MAY REQUIRE NEW SECURITY REQUIREMENTS</b>
<b>Rest Room Access Availability</b>	<input checked="" type="checkbox"/> <b>Available without Escort</b> <input type="checkbox"/> <b>Available with Escort</b> <input type="checkbox"/> <b>Not Available</b>
<b>Parking</b>	<input checked="" type="checkbox"/> <b>On site parking available</b> <input type="checkbox"/> <b>On street parking available</b>

Note: Access to the wire center and the Physical Collocation area requires proper identification at all times. Your company issued picture identification is required. **Access will be denied to anyone without proper identification. There will be no exceptions to this policy.**

Please direct questions to: Nancy K. Nelson, Regional Collocation Manager  
 Office 205.321.4986 FAX 205.321.5058 Internet - Nancy.Nelson1@bridge.bellsouth.com



**BellSouth Application Response for Physical Collocation**

**BSTEI-3-P**

Project Reference Number: **MNDRFLO.OVC.01** Response Expiration Date: **NOVEMBER 2, 1999**  
**MNDR LORETTO, 11499 ST AUGUSTINE RD, JACKSONVILLE FL 32258**

**Interval and Cost Summary**

The **Space Acceptance** date will be the date that BellSouth's floor space and infrastructure construction are complete.

The preparation interval estimate for space acceptance is **90** \*\*\*calendar days following a Bona Fide Firm Order and coordination team conference call meeting. At the meeting, we suggest having your collocation coordinator and the chosen BellSouth Certified Vendor present to provide input into the establishment of critical dates. An estimated preparation and construction interval includes average build outs, but excludes government permit intervals. BellSouth cannot predict what the actual interval is for the attainment of local government permits or Collocator initiated changes to the project.

In accordance with the terms, conditions, and rates that appear in the executed BellSouth Physical Collocation Agreement for **DIEGA d/b/a COVAD**, we submit the following costs for your application.  
**\*\*\* NOTE: THESE IS NO SPACE AVAILBLE UNTIL BUILDING ADDITON COMPLETES APPROXIAMTELY FEBRUARY 2000. FOLLOWING THE BUILDING COMPLETION THE BellSouth INTERVAL WILL BE 90 DAYS.**

**IX. Cost Summary**

Line Item	Item Total	Prepayment Total
Item 1: Space Construction Fee	\$ 4,500.00	\$ CAGELESS N/A
Item 2: Space Preparation See Cost detail below	\$ 17,763.00	\$ 8,881.50
Item 3: Cable Installation	# cables = 0	
<b>Total</b>		<b>\$ 8,881.50 Prepayment Due</b>

<b>Additional Engineering hours estimate</b>	<b>42 Hours</b>
--	-----------------

Note: Some information within this response is estimates of the project work requirements. Actual distances, costs, or intervals may differ from the estimate shown and are dependent upon the ultimate work done. Final cost calculations follow completion of the project.

**X. Supporting Space Preparation Cost Data**

Line Item	Prorate Amount
Space Construction	\$ 9,644.00
Frame, Cable, Cable Support, etc.	\$ 8,000.00
Power	\$ 119.00
<b>Estimated Space Preparation Fee Total - Item 2 above</b>	<b>\$ 17,763.00</b>

Please direct questions to: Nancy K. Nelson, Regional Collocation Manager  
 Office 205.321.4986 FAX 205.321.5058 Internet - Nancy.Nelson1@bridge.bellsouth.com

**BellSouth Application Response for Physical Collocation****BSTEI-3-P**

Project Reference Number: MNDRELLLO.OVC.01 Response Expiration Date: NOVEMBER 2, 1999

MNDR LORETTO, 11499 ST AUGUSTINE RD, JACKSONVILLE FL 32258

Major changes to the firm order will require you to reapply to proceed with an arrangement at this location with a new application (BSTEI-1-P), including the payment of a new application fee. The following items are examples of, but not limited to, major changes:

- An increase or decrease in floor space
- An increase or decrease in power
- An increase or decrease in the number or type of cross connects

Please direct questions to: Nancy K. Nelson, Regional Collocation Manager  
Office 205.321.4986 FAX 205.321.5058 Internet - Nancy.Nelson1@bridge.bellsouth.com