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February 14, 2000

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VIA HAND DELIVERY

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

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

Dear Ms. Bayo:

Enclosed for filing in the above dockets are the original and fifteen (15) copies of ALLTEL Communications, Inc.'s Posthearing Statement.

We are also submitting the Posthearing Statement on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

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APP	_____
CAF	_____
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Enclosures

cc: All Parties of Record (w/encls.)

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DOCUMENT NUMBER-DATE

01926 FEB 14 8

FPSC-RECORDS/REPORTING

ORIGINAL

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

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications, Inc.,
Sprint-Florida, Incorporated, and GTE Florida
Incorporated comply with obligation to provide
alternative local exchange carriers with flexible,
timely, and cost-efficient physical collocation:

DOCKET NO. 990321-TP
FILED: February 14, 2000

ALLTEL'S POSTHEARING STATEMENT

ALLTEL Communications, Inc. ("ALLTEL" or the "Company"), pursuant to Order No. PSC-99-1991-PCO-TP, submits the following Posthearing Statement:

I.

Introduction

By Proposed Agency Action Order No. PSC-99-1744-PAA-TP, issued September 7, 1999, the Florida Public Service Commission ("FPSC" or "Commission") consolidated Docket Nos. 990321-TP and 981834-TP for purposes of conducting a generic proceeding on collocation issues, and adopted a set of procedures and guidelines for collocation, focused largely on those situations in which an ILEC believes that there is no floor space available for physical collocation. After certain parties requested clarification of and protested that Order, the FPSC issued Order No. PSC-99-2393-FOF-TP, on December 7, 1999, approving certain stipulated modifications to the Collocation Guidelines. ALLTEL was allowed to intervene in this proceeding by Order No. PSC-99-2152-PCO-

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TP, issued November 3, 1999. Although it did not sponsor any witnesses, ALLTEL participated in the final hearing on this matter on January 12 – 14, 2000, and submits this posthearing statement.

II.

ALLTEL's Basic Position

Timely collocation provisioning is extremely important to emerging local competition. ILECs subject to Section 251(c)(6) of the 1996 Act should be required to provide a prompt and complete response to a request for collocation. The FPSC should establish specific guidelines for the ordering and provisioning of collocation space so both ILECs and ALECs will know what is expected.

III.

Issues and Positions

ALLTEL's positions on the issues, and argument/discussion in support of its position on the issues, are set forth below. The portions indicated with an asterisk (*) are identified for inclusion in the Staff Recommendation.

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: * Within 10 business days. The response should include the types of collocation that the ALEC may utilize, a preliminary price quote reflecting a reasonable estimate of costs to collocate in a given central office and other specifics associated with the space requested.

Discussion: ALLTEL generally agrees with Sprint, AT&T, and COVAD on the ten (10) day time interval, and its position is supported in the record at Tr. 601 [Closz], 834 [Moscaritolo] and 1172 [Mills]. Specifically, upon receipt of a complete and accurate application, the ILEC should

respond to the ALEC's request within 10 business-days. In its *Advanced Services Order*, the FCC noted that it considers 10 days a reasonable period by which to respond. See *First Report and Order and Further Notice of Proposed Rulemaking*, CC 98-147, released March 31, 1999. The FCC also noted that “timely collocation provisioning is extremely important to emerging local competition.” *Id.* at ¶¶ 54-55. According to the *Advanced Services Order*, both Ameritech and GTE respond to physical collocation requests within ten days. *Id.* Accordingly, the 15 day interval proposed by BellSouth and GTE would appear to be inconsistent with FCC policy. [Mills, Tr. 1171-72]

With respect to the type of information included in the response, ALLTEL believes that a variety of information should be made available to an ALEC who requests collocation. The response should include the types of collocation that the ALEC may utilize (i.e., cageless physical, physical, or virtual), and should include information which will facilitate and expedite the preparation of a firm order for collocation. [Closz, Tr. 603-604, Martinez, Tr. 693-694] ALLTEL notes that an ALEC is making a substantial business decision when it makes the determination to place a firm order for collocation space. As such, the ILEC should provide preliminary price quote information that represents a reasonable estimate of costs to collocate in a given central office. [Id.] In addition to the estimated price quote, ALLTEL concurs with MCI’s witness Martinez, who testified that the ILEC should provide the ALEC with all the other specifics associated with the space requested. [Tr. 693-694] At a minimum, this information should include: (1) estimated space preparation quotes, (2) the estimated provisioning intervals, (3) power requirements and associated costs, and (4) any other information that the ILEC provides that it will subsequently require an ALEC to include in its firm order. [Id.]

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: * Within 10 additional business days. All information necessary to submit a firm order should be provided by the ILEC within 20 business days from the date of the initial request.

Discussion: On this point, ALLTEL generally agrees with Supra. If the information discussed in issue number 1 cannot be provided within the recommended 10-business day timeframe referenced above, all additional information necessary to submit a firm order should be provided by the ILEC within 20-business days. [Tr. 952-952, Nilson] Within the 20 business-day interval, the estimated price quote should be fine-tuned and turned into a firm quote. [Id.] ALLTEL believes that it would be useful for the parties to schedule a joint planning session within this initial time period in order to clarify and gain a better understanding of the use of the space and other relevant issues. From start to finish, the ALEC should be in a move-forward position with respect to its execution of a firm order no later than 20 business days from the submission of its application. [Id.]

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: * The term "premises" refers to an ILEC's central offices and serving wire centers, as well as all buildings or similar structures owned or leased by the ILEC that house its network facilities and all structures that house ILEC facilities on public rights-of-way, including, but not limited to, vaults containing loop concentrators or similar structures.

Discussion: ALLTEL's position on this issue is supported by the FCC's rules and orders and the testimony of Sprint's witness Hunsucker. In its *Local Competition Order*, the FCC states that "premises" refers to an ILEC's central offices and serving wire centers, as well as all buildings or

similar structures owned or leased by the ILEC that house its network facilities and all structures that house ILEC facilities on public rights-of-way, including but not limited to vaults containing loop concentrators or similar structures. See *First Report and Order*, CC Docket No. 96-98, released August 8, 1996; 47 CFR 51.5. [Tr. 516-517, Hunsucker] The FCC intentionally defined the term “premise” broadly in order to facilitate the entry of new players into the telecommunications marketplace. [Tr. 516-517, Hunsucker] The FCC's *Advanced Services Order* states that collocation space should be available both inside and outside the central office. See *Advanced Services Order* at ¶¶ 39-45. Under the FCC’s definition of “premises” and the applicable rules and orders, ALECs are entitled to access to ILEC facilities at any technically feasible point of interconnection -- including shelves or remote terminals/cabinets.

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

Position: * ILECs subject to Section 251(c)(6) should be obligated to interconnect with ALEC collocation equipment located "off-premises" to the extent technically feasible.

Discussion: Under Section 251(f) of the 1996 Act, rural telephone companies are exempt from the collocation requirements in Section 251(c)(6), until such time as a bona fide request for collocation is made and the FPSC removes the “rural exemption.” Thus, the guidelines adopted in this docket should only apply to those ILECs that are subject to the requirements of Section 251(c)(6).

For those ILECs, ALLTEL notes that the FCC has been clear with respect to an ILEC’s obligation to interconnect with ALEC collocation equipment located “off-premises.” As noted in issue number 3, above, the definition of “premise,” contained in the 1996 Act, the FCC's *Local Competition* and *Advanced Services Orders*, and the FCC’s rules, together with the fact that the

incumbent must allow collocation at any technically feasible point, further suggests the appropriateness of collocation “off-premises.” As noted above, the *Advanced Services Order* states that collocation space should be available both inside or outside the ILEC central office. Specifically, the FCC notes: “we require incumbent LECs, when space is legitimately exhausted in a particular LEC premise, to permit collocation in adjacent controlled environmental vaults or similar structures to the extent technically feasible.” See *Advanced Services Order* at ¶ 44. Additionally, the FCC states that “the deployment by any incumbent LEC of a collocation arrangement gives rise to a rebuttable presumption in favor of a competitive LEC seeking collocation in any incumbent LEC premise that such an arrangement is technically feasible. Such a presumption of technical feasibility, we find, will encourage all LECs to explore a variety of collocation arrangements and to make such arrangements available in a reasonable and timely fashion.” *Id.* at ¶ 45.

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

Position: * Virtual to physical should be done seamlessly without interruption of service, on terms requiring no more than reversing equipment “ownership” and cageless security training for ALEC employees. When the ALEC migrates from virtual to cageless physical, the interval should be no greater than 30 business days.

Discussion: ALLTEL generally agrees with Rhythms and the Joint Statement parties on this issue. See Gillan [Tr. 1029] and Williams [Tr. 764 –765]. Importantly, the *Advanced Services Order* provides ALECs with collocation options other than “virtual” and “physical” arrangements. The introduction of cageless physical collocation reduces the amount of work and cost associated with collocation, and is one of the significant reforms or changes in the *Advanced Services Order*. [Gillan, Tr. 1023]

Under the typical virtual collocation arrangement, the ALEC sells equipment to the ILEC for a nominal amount (usually \$1), and the ALEC retains the right to repurchase the equipment for the same amount. ALLTEL concurs with witness Gillan's testimony that "terms for converting virtual collocation space should require no more than reversing the "ownership" of the virtually collocated equipment and assuring that the ALEC's employees are familiar with whatever security procedure applies to cageless collocation more generally." [Tr. 1029]

The conversion, or migration from a virtual to physical arrangement, must be accomplished in a seamless manner with no interruption of service to the competitor's customers. [Williams, Tr. 764-765] Of course, it may be appropriate for an ILEC to require a security escort for ALEC personnel if the ALEC's equipment is located amongst the ILEC's equipment; however, the cost of any additional security measures should be borne by the ILEC. [Williams, Tr. 765] As witness Williams noted in his testimony, ILECs should not be allowed to require ALECs move their equipment/arrangements as they seek to transition from virtual to cageless collocation. [Tr. 764] Such tactics will only delay market entry and possibly disrupt the service of ALEC customers. [Id.]

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

Position: * An initial response should be provided within 5 business days, with a total implementation interval of between 10 and 30 business days depending on the complexity of the changes.

Discussion: Deciding this issue will be difficult, because some changes are more complex than others; however, the FPSC must remember that unnecessary delay serves only to impede the efforts of new entrants to compete in the local exchange market. While the testimony on intervals ranges across the board, ALLTEL generally agrees with Intermedia and the Joint Statement parties that most changes within an ALEC's collocation space should not require any additional interval as

long as the ALEC is within its space and power forecast or the change is minor. [Jackson, Tr. 1108]. For intermediate or augmentation changes, the ILEC should provide a response to an application within five business days. [Jackson, Tr. 1108-1109]. ALLTEL agrees with MGC that the total interval should be no more than 30 days. [Tr. 907]

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

- A. a collocator shares space with, or subleases space to, another collocator;**
- B. a collocator cross-connects with another collocator.**

Position: * FCC Rules 51.323(k)(1) and 51.323(h) address the cost of shared collocation space and the cross connection between two collocators. The Commission's decision on this issue should be consistent with those rules.

Discussion: These issues are well covered in the FCC's rules, which rules should form the basis for the FPSC's decision on this issue. FCC Rules 51.323(k)(1) and 51.323(h) address the cost of shared collocation space and the cross connection between two collocators. The Commission's decision on this issue should be consistent with those rules. The details of these rules are discussed in the testimony of Sprint witness Hunsucker at Tr. 520 – 522.

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

Position: * When the ALEC migrates from virtual to cageless physical, the interval should be no greater than 30 business days. The interval for establishing an initial "cageless physical" arrangement should be no more than 50 business days.

Discussion: The appropriate provisioning interval depends on whether transitioning from a virtual to cageless physical arrangement or whether going "cageless" initially. ALLTEL generally agrees with MGC and the Joint Statement parties that the interval should be no greater than 30 business days generally and when the ALEC migrates from virtual to cageless physical. [Levy, Tr.

910] In some circumstances, the interval for establishing an initial “cageless physical” arrangement should be longer, but not more than 50 business 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: * If the ILEC provides the Tie, then the demarcation point should be the ALEC’s equipment. Conversely, if the ALEC provides the Tie facility, then the demarcation point should be the ILEC’s equipment.

Discussion: ALLTEL agrees with Rhythms that the point of interconnection between the ILEC’s network and the competitor’s facilities should be where the competitors determine is appropriate for their own network. [Williams, Tr. 770] ALLTEL notes that the *Advanced Services Order* prohibits the use of intermediate interconnection arrangements, such as POTS bays, because such arrangements increase the ALEC’s costs of interconnection. [Id.] Under the “ALEC chooses” standard proposed by Rhythms, ALLTEL generally believes that the demarcation point should be at the ALEC’s equipment when the ILEC provides the tie and the ILEC’s equipment if the ALEC provides the tie.

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

Position: An ILEC cannot retain space on terms more favorably than those that apply to ALECs seeking to reserve collocation space for their own future use.

Discussion: ALLTEL generally agrees with AT&T, MCI, COVAD, *Supra* and MCG that equal treatment and parity are the key concepts here. See Martinez, Tr. 703; Moscaritolo, Tr. 841; Levy, Tr. 011-912]. Using these concepts as guidelines, the Commission should rule that an ILEC cannot retain space on terms more favorably than those that apply to ALECs seeking to reserve

collocation space for their own future use. To rule otherwise would violate FCC rule 51.323(f)(4)-(6).

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: * No. The variance in central office infrastructure would make the attempt to establish generic parameters an onerous and unmanageable task.

Discussion: On this issue, ALLTEL generally agrees with BellSouth and GTEFL. ALLTEL's position is supported by the testimony of witness Milner at Tr. 223-224 and witness Ries at Tr. 419.

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

Position: * ILECs subject to Section 251(c)(6) of the 1996 Act are required to permit collocation of any equipment required by the statute unless they first prove to the state commission that the equipment will not be used by the carrier for obtaining interconnection or access to unbundled network elements.

Discussion: The FCC's *Advanced Service Order* and current rules "require incumbent LECs to permit collocation of any equipment required by the statute unless they first prove to the state commission that the equipment will not be actually used by the telecommunications carrier for the purpose of obtaining interconnection or access to unbundled network elements." The FCC policy "require[s] incumbent LECs to permit competitors to collocate such equipment as DSLAMs, routers, ATM multiplexers, and remote switching modules." In addition, "...incumbent LECs may not place any limitations on the ability of competitors to use all the features, functions, and capabilities of collocated equipment, including, but not limited to, switching and routing features and functions." *Advanced Services Order* at ¶ 29.

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?**

Position: * Yes. "Best estimate" quotes should be provided within 20 business days of request with detailed cost information so that the alternative types of collocation for the CO in question can be evaluated. Estimates should be firmed-up to a firm quote as expeditiously as possible.

Discussion: According to the prehearing order, MCI and Rhythms believe that a firm price quote should be provided within 15 calendar days. BellSouth believes that a price estimate (subject to true-up) should be provided within 30 days. ALLTEL takes a middle of the road position that "best estimate" price quotes should be provided to the ALEC within 20 business days of request, prior to the firm order. In addition, detailed cost information should also be provided. In the absence of "best estimates" of the detailed costs involved for collocating in a CO (for a particular method of collocation), the ALEC is ill equipped to make decisions as to other possible types (i.e., cageless, virtual...) of collocation to consider for the CO in question. [Jackson, Tr. 1115-1116] If estimates, rather than firm quotes are initially provided, once costs are "firmed-up," that information should be expeditiously provided to the ALEC.

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: * ALECs should not necessarily be involved in the price quote development; but should be able to review the quote prior to its finalization. A joint planning

session preceding the development of the quote would be mutually beneficial to the parties.

Discussion: BellSouth and Sprint take the position that ALECs should only play a limited role in the development of the price quotes. [Hendrix, Tr. 34-35; Closz, 620-621]. ALLTEL agrees that ALECs should not necessarily be involved in the price quote development; however, the ALEC should provide information about its request to the ILEC and be provided an opportunity to review the quote prior to its finalization. ALLTEL believes that a joint planning session preceding the development of the quote would provide both parties with a clear understanding of how the space is going to be used (providing information that may not be on the application), and provide insight to the ALEC relative to the vendors/contractors being utilized for construction and space rearrangement, if applicable. As part of this meeting, the ILEC would be prepared to review and explain the cost components with the ALEC. The joint planning session would serve to mitigate misunderstanding and surprise, prior to the ALECs receipt of the final quote. In addition, it would allow the ALEC a “check” of the reasonableness of ILEC vendor and contractor/subcontractor estimates, prior to quote finalization.

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

Position: * Yes, for space preparation, racking and cabling, and associated power work. However, in certain instances, the ALECs themselves or their contractors should be permitted to perform installation work within ILEC central offices.

Discussion: Yes, ALECs should be allowed to hire ILEC certified contractors to perform space preparation, racking and cabling, and associated power work. See FCC Rule 51.323(j). However, depending on the type of collocation arrangement, the ALECs themselves or their own contractors should be permitted to perform installation work within ILEC central offices. See

Jackson, Tr. 1116 –1118, Levy, Tr. 915. Permitting an ALEC to hire its own contractors, ILEC authorized vendors or to complete the work itself will expedite completion of work.

ALLTEL generally agrees with witness Jackson, that ALECs are required to hire contractors from an ILEC's "approved" vendor list, which is unilaterally under the ILEC's control, terms and conditions. [Id.] Often, the list of vendors from which the ALEC can choose is short, does not include the ALEC, and therefore may be inadequate to handle the demand being placed by ALEC market entry. [Id.] The lack of options faced by the ALEC to influence the completion of this first step in site preparation can cause a domino effect leading ultimately to delays at every step in the provisioning process. [Id.] The FPSC can eliminate this potential problem by adopting more flexible requirements in this area.

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: * Timely entry into the market is dependent upon ILECs meeting provisioning intervals. Absent extraordinary circumstances, there are no viable reasons for which provisioning intervals should be unilaterally extended without the need for an agreement by the applicant ALEC.

Discussion: ALLTEL's position on this issue is consistent with Sprint and AT&T. [See Closz, 623-624; Mill, 1184] Absent extraordinary circumstances, there are no viable reasons for which provisioning intervals should be unilaterally extended without the need for an agreement by the applicant ALEC. [Id.]

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: * ILECs subject to Section 251(c)(6) of the Act must allocate space preparation, security measures, and other collocation charges on a pro-rated basis so the first collocator in a particular incumbent premises will not be responsible for the entire cost of site preparation.

Discussion: ALLTEL concurs with the general premise advocated by the FCC in its *Advanced Service Order* with respect to the allocation of non-recurring building and site modification costs. Specifically, the Order states:

the incumbent LECs must allocate space preparation, security measures, and other collocation charges on a pro-rated basis so the first collocator in a particular incumbent premises will not be responsible for the entire cost of site preparation. For example, if an incumbent LEC implements cageless collocation arrangements in a particular central office that requires air conditioning and power upgrades, the incumbent may not require the first collocating party to pay the entire cost of site preparation. In order to ensure that the first entrant into an incumbent's premises does not bear the entire cost of site preparation, the incumbent must develop a system of partitioning the cost by comparing, for example, the amount of conditioned space actually occupied by the new entrant with the overall space conditioning expenses. We expect state commissions will determine the proper pricing methodology to ensure that incumbent LECs properly allocate site preparation costs among new entrants. We also conclude that these standards will serve as minimum requirements, and that states should continue to have flexibility to adopt additional collocation requirements, consistent with the Act.

Advanced Services Order at ¶ 51.

The FPSC should ensure that its decision on this issue conforms with this provision of the *Advanced Services Order*.

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, if insufficient space is available, the ILEC should be required to provide information regarding available space within 10-business days, including dimensions, shape and location. A floor plan and diagram, including the physical location of lighting, ventilation, power, heat and air conditioning of the CO should also be provided.

Discussion: ALLTEL's position on this issue is consistent with FCC Rule 51.231(h). BellSouth, GTEFL and Sprint all agree that if insufficient space is available to satisfy an ALEC's request for collocation, the ILEC should be required to provide information regarding any space that may be utilized to satisfy the request. [Closz, Tr. 624-625; Hendrix, Tr. 62; Ries, Tr. 424] The ILEC should provide the ALEC, within 10-business days, information relative to the dimensions (square footage and shape) of the available space and its location within the central office. A floor plan and diagram, including the physical location of lighting, ventilation, power, heat and air conditioning of the CO should also be included in the ILEC response. This data will enable the ALEC to further analyze and consider other options which might enable it to more expeditiously enter the market.

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: * Notice should be provided to the FPSC within 10 business days of availability. In addition, when a waiver is no longer required, that fact should be posted on a website for 3 months. Within 15 business days, the ILEC should give actual notice to all ALECs who have requested space in that CO within the last 6 months.

Discussion: Both GTEFL and BellSouth appear to agree to some form of website posting. ALLTEL generally agrees with MCI on notice to the FPSC and ALECs, and believes that notice should be provided within 10 business days from the date the space becomes available. [See Martinez, Tr. 710-711]

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

Discussion: ALLTEL agrees with AT&T on this issue and notes that its position is supported in paragraph 585 of the FCC's *First Report and Order* in the Local Competition docket. See Ries, Tr. 425.


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: * ILECs subject to Section 251(c)(6) should be required to maintain a request inventory. ALECs that requested space within the last 6 months in a CO with new space should be notified within 15 business days. The first requester would be offered the space.

Discussion: ALLTEL generally agrees with Sprint that specific retention periods for collocation requests should be established for COs with exhausted space. [Hunsucker, Tr. 542] The ILEC should be responsible for maintaining "inventory" of requests. [Id.] Any ALEC that requested space in the CO in the last six months for which space is now available shall be notified as indicated above within 15 business-days of space availability. [Hunsucker, Tr. 543 (10 days)] Thereafter, a continuation of the "first-come, first-served" philosophy would be applied, with the first party to have

requested space (and for whom the request was denied due to a lack of space) being the first party to whom the space is offered. [Tr.541]

DATED this 14th day of February, 2000.



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ATTORNEYS FOR ALLTEL COMMUNICATIONS,
INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 14th day of February, 2000, to the following:

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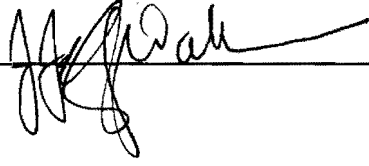
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A handwritten signature in black ink, appearing to be "J. J. Walsh", written over a horizontal line.