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February 16, 2000

**ORIGINAL**

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket Number 990649

Dear Ms. Bayo:

I am enclosing for filing and distribution the original and 15 copies of the Joint Response of Competitive Carriers in Opposition to BellSouth's Motion to Add Collocation Pricing Issues.

Thank you for your assistance.

Yours truly,

Joseph A. McGlothlin

JAM/jk  
enc.  
cc/enc.:  
1 Tracy Hatch  
5 Catherine Boone  
Scott Sapperstein  
1

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*Man*  
**FPSC-BUREAU OF RECORDS**

DOCUMENT NUMBER-DATE  
**02098 FEB 16 8**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: :  
: :  
In Re: Investigation into : Docket No. 990649-TP  
pricing of unbundled network :  
elements : Filed on: February 16, 2000  
: :  
: :

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**JOINT RESPONSE OF COMPETITIVE CARRIERS  
IN OPPOSITION TO BELL SOUTH'S MOTION  
TO ADD COLLOCATION PRICING ISSUES**

The Florida Competitive Carriers Association ("FCCA"), AT&T Communications of the Southern States ("AT&T"), Covad Communications Company ("Covad"), and Intermedia Communications, Inc. ("Intermedia"), (collectively "Competitive Carriers"), through their undersigned attorneys, hereby respond in opposition to the Motion to Add Collocation Pricing Issues filed by BellSouth Telecommunications, Inc. ("BellSouth") on February 4, 2000.

1. The undersigned Competitive Carriers believe that the Commission should attach a high priority to the standardization of collocation terms, conditions, and pricing. These carriers believe that there is no question regarding whether to undertake this task, or even when; the only question to be decided is the choice of the forum that provides both needed context and administrative efficiency. For the following reasons, Competitive Carriers believe BellSouth's motion should be denied, but that the Commission should move directly and expeditiously to schedule its consideration of standardized collocation terms, conditions, and pricing in a second phase of the collocation docket already underway.

2. Competitive Carriers have sought, and continue to seek, standardized terms, conditions, and pricing of collocation items. In the collocation docket, consolidated Docket Nos. 981834-TP and 990321-TP, BellSouth argued to this Commission that each collocation situation is unique and

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must be addressed individually. Competitive Carriers are of course gratified to see BellSouth argue now that a delay in the elimination of the "individual case basis" approach to collocation pricing would not be good for consumers. However, through its motion BellSouth seems intent on incorporating for decision in the UNE case only the pricing considerations associated with collocation issues. To divorce pricing from terms and conditions at this stage would risk creating ambiguity concerning the very arrangements to which Competitive Carriers are entitled. Moreover, pricing for collocation fits more logically and flows more directly from the existing collocation docket. By creating a second phase of that docket for pricing issues, this Commission could maintain the clarity and focus of that proceeding, while moving quickly to resolve the pricing issues.

3. BellSouth erroneously argues that addressing collocation pricing in any docket other than the UNE pricing docket would delay the provisioning of collocation requests. That is not the case. For example, BellSouth routinely makes UNEs available before a commission acts to determine appropriate pricing. This is how BellSouth routinely conducts business and it is disingenuous for BellSouth to suggest that it cannot respond to requests for collocation until the conclusion of a collocation pricing docket.

4. The issue list for the UNE pricing docket is necessarily extensive. It includes 13 items, many with subparts. This Commission is already committed to ruling on those issues. To incorporate collocation terms, conditions, and pricing in the UNE pricing docket would complicate an already crowded pricing docket to the point where it would be unmanageable. Accordingly, Competitive Carriers oppose the motion.

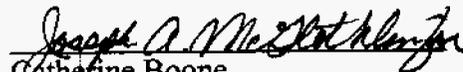
5. In its motion, BellSouth states that in the collocation docket ALECs requested, among other things, "assembly point collocation." So that there is no possible appearance of acquiescence to anything that may be intended or implied by the concept, Competitive Carriers note that ALECs did not request any arrangement by this name: the term was apparently coined by BellSouth. (The term appears to connote a concept in which BellSouth would deliver unbundled network elements

that the ALEC would then combine, and so may be related to BellSouth's interpretation of the FCC's rules governing the combining of UNEs. Competitive Carriers, of course, believe that BellSouth is obligated by law to combine for ALECs the elements that BellSouth combines for itself.)

For the foregoing reasons, the undersigned Competitive Carriers submit that the motion of BellSouth to add "collocation pricing" issues to this docket should be denied

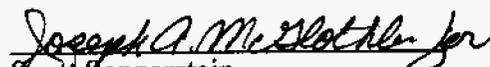
  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Joint Response of Competitive Carriers in Opposition to BellSouth's Motion to Add Collocation Pricing Issues by (\*) hand-delivery and by regular U.S. mail on February 16, 2000 to:

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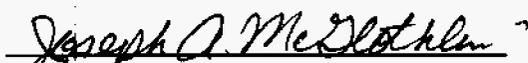
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