

ORIGINAL

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Legal Department

NANCY B. WHITE  
General Counsel - Florida

00 APR 17 PM 4:18

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

RECORDS AND  
REPORTING

April 17, 2000

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. 000376-TL - (Miami Palmetto C.O.  
Waiver)**

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver of Physical Collocation Requirements in the Miami-Palmetto Central Office, which we ask that you file in the captioned matter.

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

Sincerely,

*Nancy B. White*  
Nancy B. White (PW)

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_ *FWD*
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

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

PC Docs 202882

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
**04656** APR 17 8  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 000376-TL**

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

U.S. Mail this 17th day of April, 2000 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

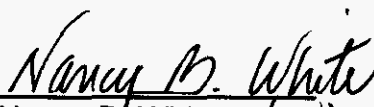
Ms. Ellen Richards  
Mr. Ned Feldman  
Network Access Solutions  
100 Carpenter Drive  
Sterling, VA 20164  
Tel. No. (703) 995-2055  
Fax. No. (703) 742-7706

Jim Merchant  
CEO and President  
Maxcess, Inc.  
14119 West Newberry Road  
Newberry, FL 32669-2753

Michelle Seals  
BlueStar Networks, Inc.  
401 Church Street  
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Nashville, TN 37219  
Tel.: (615) 46-3828

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
Arnold & Steen, P.A.  
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Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606

Norton Cutler  
V.P. Regulatory & General Counsel  
BlueStar Networks, Inc.  
L & C Tower, 24th Floor  
401 Church Street  
Nashville, Tennessee 37219  
Tel. No. (615) 346-6660  
Fax. No. (615) 255-2102

  
Nancy B. White (PN)

PC Docs 203005

**ORIGINAL**  
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: BellSouth Telecommunications )  
Inc.'s Petition for Temporary Waiver of )  
Physical Collocation in the Miami ) Docket No. 000376-TL  
Palmetto Central Office )  
\_\_\_\_\_ ) Filed: April 17, 2000

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

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Temporary Waiver in accordance with Order No. PSC-99-1744-PAA-TP, issued on September 7, 1999 ("PSC Order"), the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order"). Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements as set forth in the Act, in the Order and in the PSC Order for the Miami-Palmetto Central Office ("CO") located at 9056 N.W. 41st Street, Miami Florida 33166. BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC") on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth expects to construct an addition to the building if granted certain relief in a timely fashion. The estimated completion date of the addition is the end of the second quarter of 2002.

1. The Miami-Palmetto CO building houses switches providing local dial tone. Circuit equipment also located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross-connect panels and provides

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FPSC-RECORDS/REPORTING

connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Miami-Palmetto CO is growing rapidly and thus the facility is under enormous space constraints. To meet the demands of the expanding customer base, BellSouth currently has on order from the manufacturer additional Toll/Circuit and Switching equipment.

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

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

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

4. Due to space limitations in the Miami-Palmetto CO, BellSouth is unable to provide physical collocation to additional ALECs. There will be no room for additional physical collocation until the addition is completed. The

space limitations faced by BellSouth are the result of the use of space by the amount of existing BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers.

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

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

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

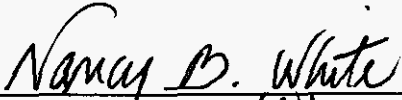
7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth currently has plans to build an addition to the facility by the end of the second quarter of 2002.

8. The Miami-Palmetto CO contains no available space for physical collocation and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Miami-Palmetto CO.

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

Respectfully submitted this 17th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (17)  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5555

*R Douglas Laakey (ps)*  
R. DOUGLAS LAOKEY  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0747

202997

## SPACE ASSESSMENT WORK SHEET

### PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

4/17/2000

1	CENTRAL OFFICE CLLI:	MiamFLPL
2	COLLOCATOR AND AMOUNT OF SPACE	NAO and MXE 100sf each
3.	TOTAL GROSS SQ. FT.	24398
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED	
a.	BST occupied equipment space	16029.5 sf
	Nonregulated services	0 sf
	Administrative offices - not related to installing, repairing, maintaining CO equipment	1484 sf
b.	Retired equipment	0 sf
c.	Future BST space reservations	3214.5 sf
	Switch	709
	Circuit	1975.5
	Power	245
	Frame	285
d.	Collocation space (Actual and Future**)	1456 sf
e.	Other 3-d party space	0 sf
	What is the occupancy	
f.	Switch turnaround space	
	Service Yr <input style="width: 80px; height: 20px;" type="text"/>	0 sf
g.	Unavailable space	1636 sf
	Unusable space (grounding and exit aisles)	578
	Remaining space	0 sf
h.	Central office growth plans.	
	Forecast completion	
	Yr	
	Addition <input style="width: 80px; height: 20px; border: 1px solid black;" type="text" value="2002"/>	24,398 sf
	Renovation <input style="width: 80px; height: 20px;" type="text"/>	0 sf
i.	Any other plans for relieving space exhaust	
5.	Floor loading	150#sf 24,398 sf
	Power rooms only	350#sf sf

### EXHIBIT 1

PC DOCS # 205543



## SPACE ASSESSMENT WORK SHEET

NAME OF PERSON FILLING OUT FORM:

James D. Bloomer - Manager - Facility Planner  
(PRINT NAME AND TITLE )

TEL. NO. \_904-350-3428

AUTHORIZED BY:

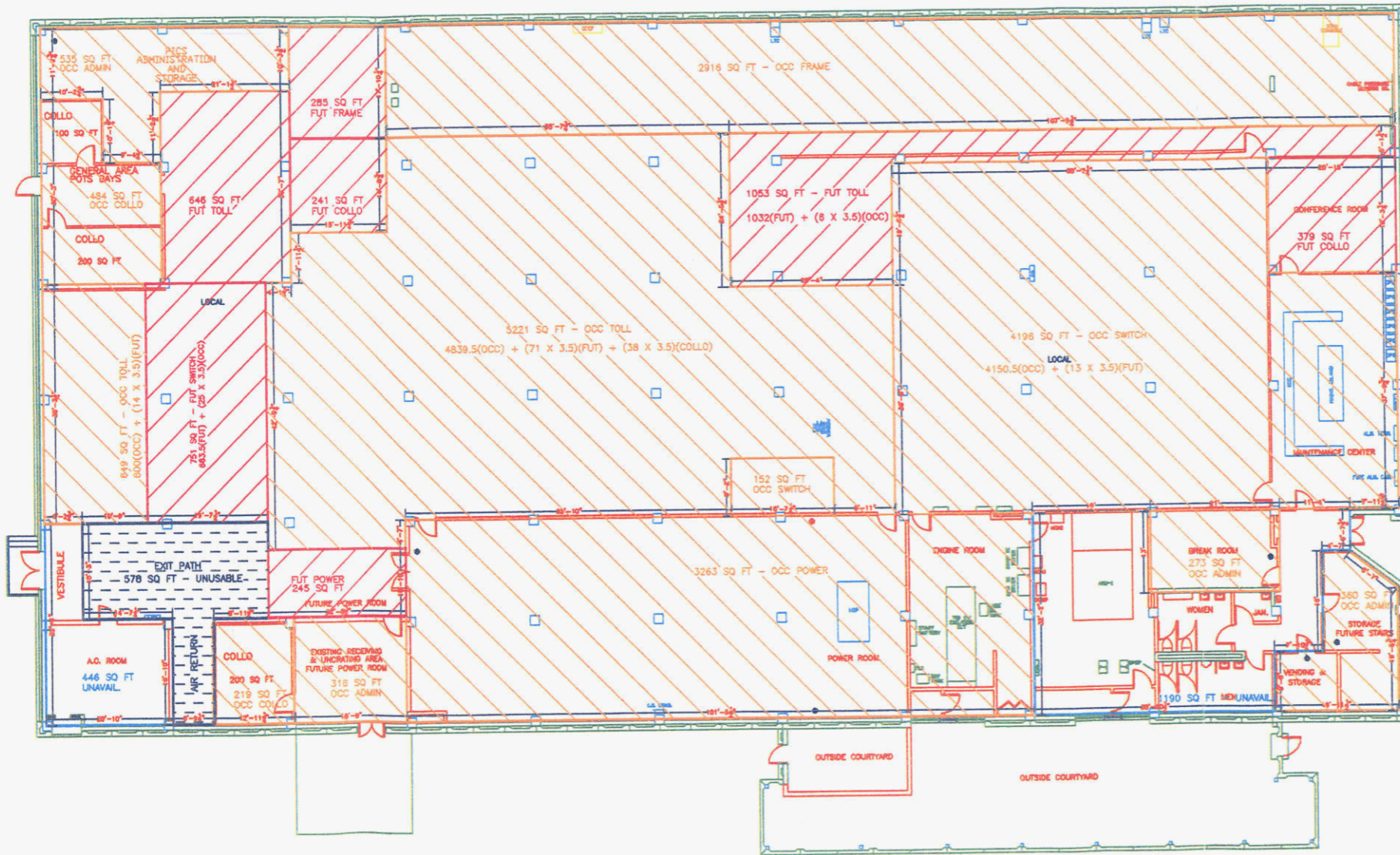
Same as above

TEL. NO. \_Same as Above

2

PRIVATE

THE INFORMATION CONTAINED HEREIN SHOULD NOT BE DISCLOSED TO UNAUTHORIZED PERSONS. IT IS MEANT  
SOLELY FOR USE BY AUTHORIZED BELLSOUTH EMPLOYEES

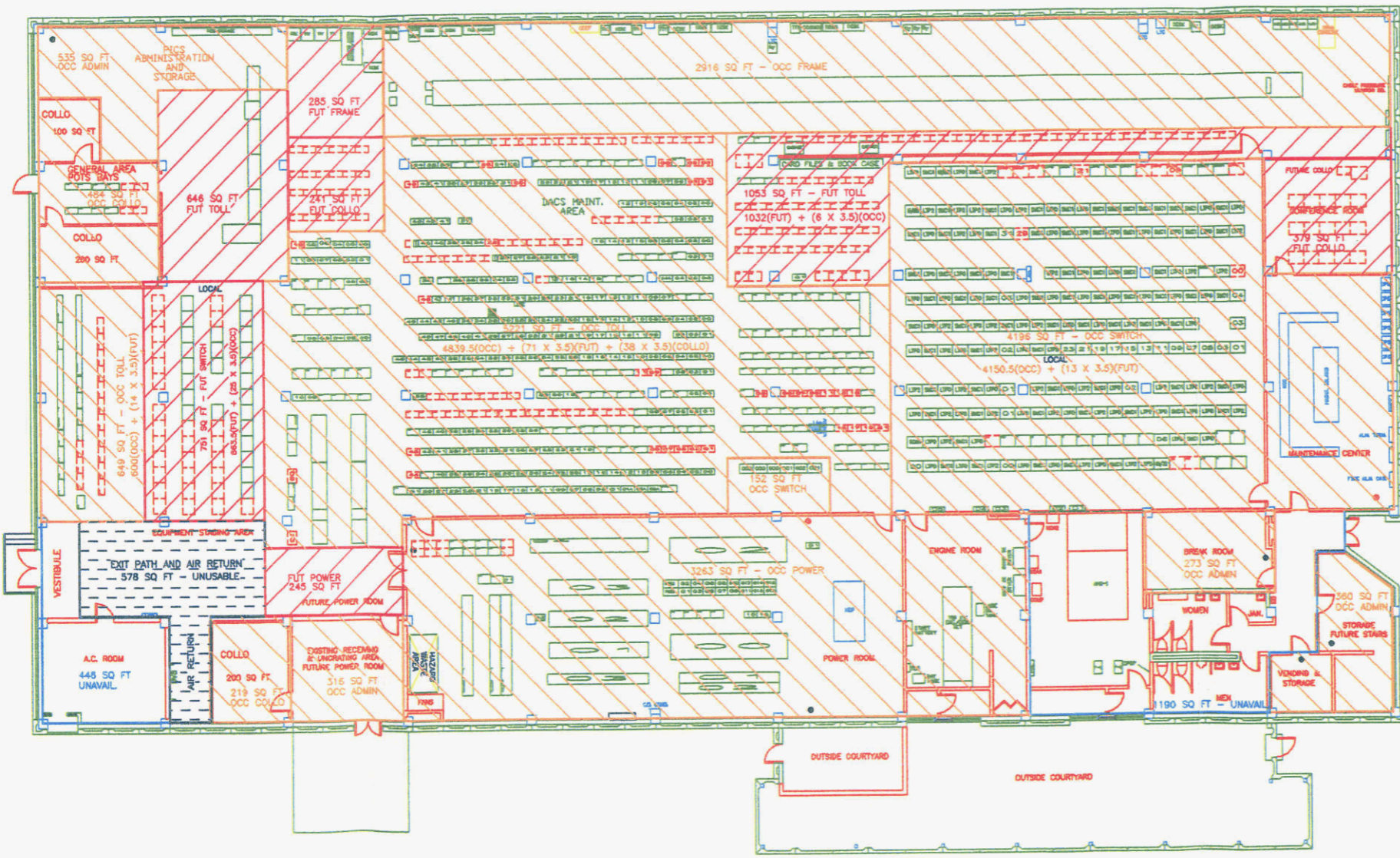


APRIL 4, 2000

<b>A</b>	TOTAL GROSS SQ FT	24,398
	AIR CONDITIONING ROOM AND VESTIBULE	446
	AIR HANDLING UNIT, PLENUM, RESTROOMS AND JANITOR	1190
<b>B</b>	TOTAL UNAVAILABLE SPACE	1636
	SWITCH	$152 + 4150.5 + (25 \times 3.5) = 4390$
	TOLL	$500 + 4839.5 + (6 \times 3.5) = 2916$
	FRAME	$500 + 4839.5 + (6 \times 3.5) = 2916$
	POWER AND ENGINE	$360 + 273 + 318 + 335 = 3286$
	ADMIN	$484 + 219 + (38 \times 3.5) = 838$
<b>C</b>	COLLOCATION	$484 + 219 + (38 \times 3.5) = 838$
	TOTAL OCCUPIED SPACE	18,549.5
	SWITCH	$846 + 1032 + (14 \times 3.5) + (13 \times 3.5) = 799$
	TOLL	$846 + 1032 + (14 \times 3.5) + (71 \times 3.5) = 1975.5$
	FRAME	285
	POWER	245
	COLLO	$379 + 241 = 820$
<b>D</b>	TOTAL RESERVED SPACE	3834.5
<b>E</b>	AIR RETURN AND EXIT PATH	578
	TOTAL UNUSABLE SPACE	578

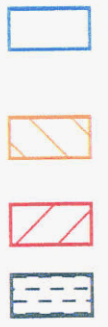
COLLO - COLLOCATION  
 OCC - OCCUPIED  
 FUT - FUTURE  
 UNAVAIL - UNAVAILABLE  
 □ - BUILDING COLUMN

M6121 MIAMI PALMETTO FIRST FLOOR PLAN  
 PSC WAIVER ITEM 4 A-F PAGE 1



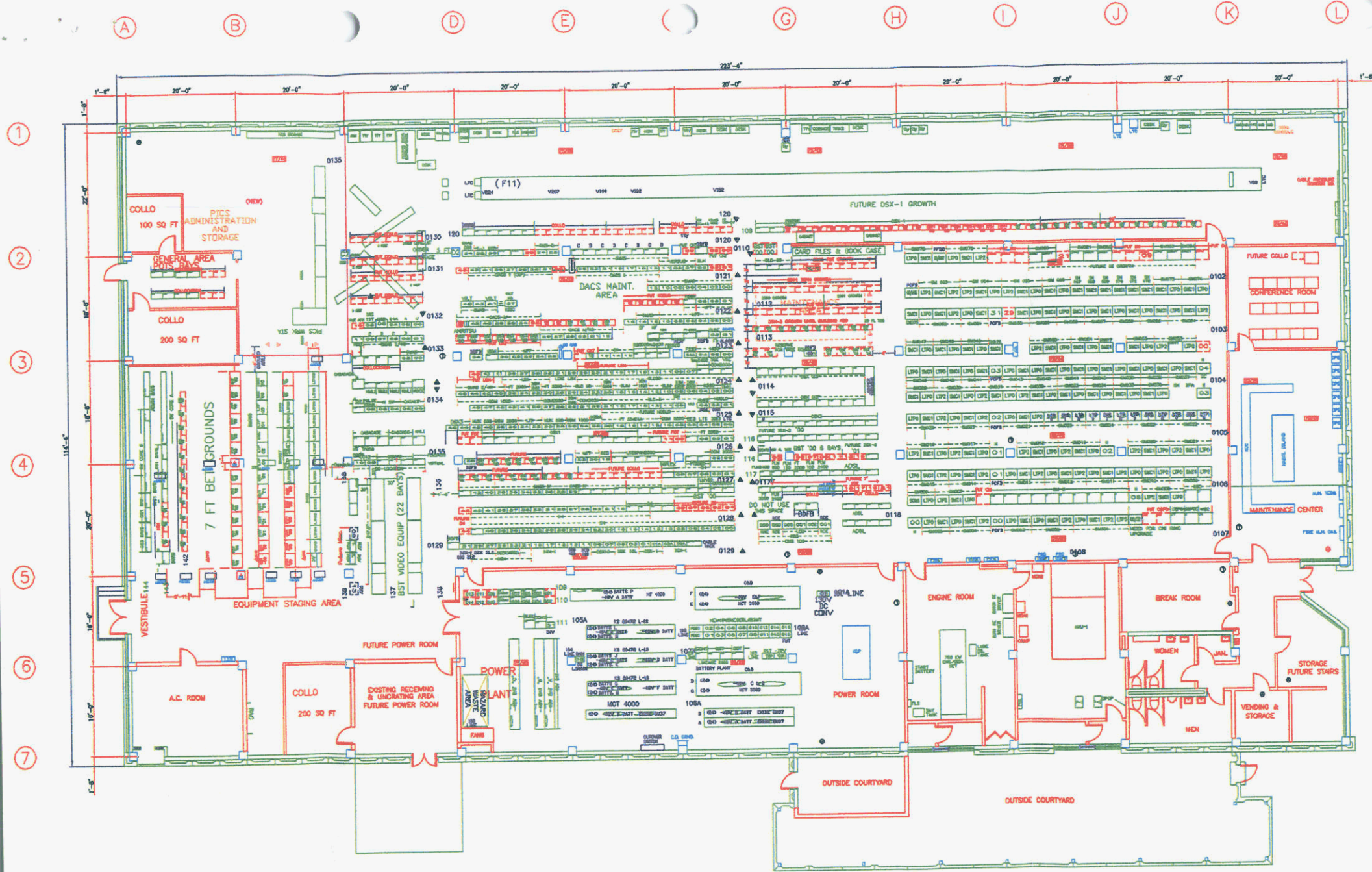
APRIL 4, 2000

<b>A</b>	<b>TOTAL GROSS SQ FT</b>	<b>24,398</b>
	AIR CONDITIONING ROOM AND VESTIBULE	446
	AIR HANDLING UNIT, PLENUM, RESTROOMS AND JANITOR	1190
<b>B</b>	<b>TOTAL UNAVAILABLE SPACE</b>	<b>1636</b>
	SWITCH	152 + 4150.5 + (25 X 3.5) = 4390
	TOLL	600 + 4839.5 + (6 X 3.5) = 5460.5
	FRAME	2915
	POWER AND ENGINE	3285
	ADMIN	360 + 273 + 318 + 535 = 1486
	COLLOCATION	484 + 219 + (38 X 3.5) = 838
<b>C</b>	<b>TOTAL OCCUPIED SPACE</b>	<b>18,549.5</b>
	SWITCH	646 + 1032 + (14 X 3.5) = 709
	TOLL	863.5 + (13 X 3.5) = 1975.5
	FRAME	285
	POWER	245
	COLLO	245
<b>D</b>	<b>TOTAL RESERVED SPACE</b>	<b>3834.5</b>
<b>E</b>	<b>AIR RETURN AND EXIT PATH</b>	<b>578</b>
	<b>TOTAL UNUSABLE SPACE</b>	<b>578</b>

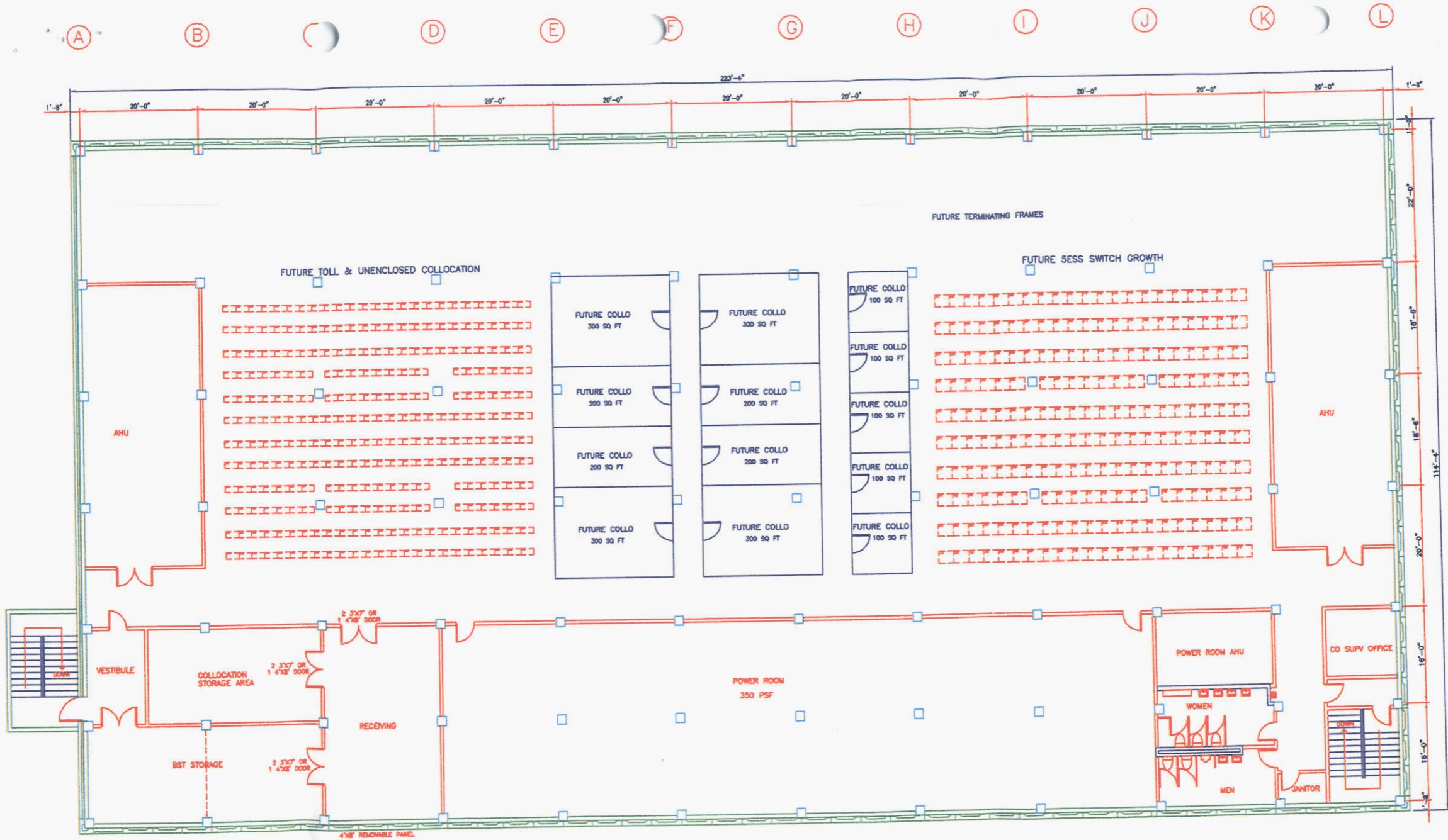


COLLO - COLLOCATION  
 OCC - OCCUPIED  
 FUT - FUTURE  
 UNAVAIL - UNAVAILABLE  
 □ - BUILDING COLUMN

M6121 MIAMI PALMETTO FIRST FLOOR PLAN  
 PSC WAIVER ITEM 4 A-F PAGE 2



M6121 MIAMI PALMETTO FIRST FLOOR PLAN  
 2002 BUILDING ADDITION  
 PSC WAIVER ITEM 4 G-H PAGE 1



M6121 MIAMI PALMETTO SECOND FLOOR PLAN  
 2002 BUILDING ADDITION  
 PSC WAIVER ITEM 4 G-H PAGE 2