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Legal Department

NANCY B. WHITE
General Counsel - Florida

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

RECORDS AND
REPORTING

May 1, 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. 000436-TL (West Dade C.O.)

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 West Dade 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
(PW)

Nancy B. White

Enclosures

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

PC Docs 203007

AFA _____
APP _____
DAF _____
DMU _____
STR _____
EAG _____
EG _____
MAS _____
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VAW _____
YTH _____

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SC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05364 MAY-18

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of BellSouth's Notice of Intent to Request Temporary Waiver of Physical Collocation Requirements in the West Dade Central Office was served via U.S. Mail this 1st day of May, 2000 to the following:

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


Nancy B. White (PW)

PC Docs 205010

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Temporary Waiver of)	
Physical Collocation in the West Dade)	Docket No. 000436-TL
Central Office)	
_____)	Filed: May 1, 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 West Dade Central Office ("CO") located at 15000 S. W. 88th Street, Miami, Florida. 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. The estimated completion date of the addition is the end of the second quarter of 2001.

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

2. The area served by the West Dade CO is growing rapidly and thus the facility is under enormous space constraints. To meet the demands of the expanding

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FPSC-REGGROS/REPORTING

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 West Dade 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

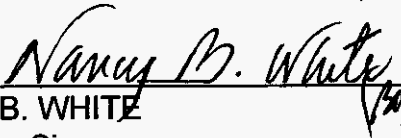
equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth currently has plans to build an addition to the facility.

8. The West Dade 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 West Dade CO.

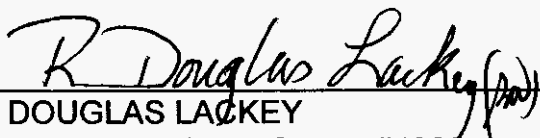
WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the West Dade CO until such time as the building addition is completed.

Respectfully submitted this 1st day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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



R. DOUGLAS LACKEY
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0747

SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

5/1/2000

1	CENTRAL OFFICE CLLI:		<u>MIAMFLWD</u>			
2	COLLOCATOR AND AMOUNT OF SPACE		<u>None</u> sf			
3.	TOTAL GROSS SQ. FT.		<u>13433</u>			
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED					
a.	BST occupied equipment space		<u>8920</u> sf			
	Nonregulated services		<u>0</u> sf			
	Administrative space - not related to installing, repairing, maintaining CO equipment		<u>558</u> sf			
b.	Retired equipment		<u>0</u> sf			
c.	Future BST space reservations		<u>467</u> sf			
	Switch	<u>56</u>				
	Circuit	<u>126</u>				
	Power	<u> </u>				
	Frame	<u>285</u>				
	Collocation	<u>0</u>				
d.	Existing Collocation space		<u>1049</u> sf			
e.	Other 3-d party space		<u>0</u> sf			
	What is the occupancy					
f.	Switch turnaround space					
	Service Yr <input style="width: 50px;" type="text"/>		<u>0</u> sf			
g.	Remaining space		<u>2439</u> sf			
	Unavailable space		<u>2439</u> sf			
	Space available for collocation		<u>0</u>			
h.	Central office growth plans.					
	Forecast completion					
	Yr					
	Addition	<table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td style="width: 50px; text-align: center;">2001</td><td style="width: 50px;"></td></tr></table>	2001		<u>13433</u>	sf
2001						
	Renovation	<table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td style="width: 50px;"></td><td style="width: 50px;"></td></tr></table>			<u>0</u>	sf
i.	Any other plans for relieving space exhaust					
5.	Floor loading	All Space	<u>150</u> sf			
		Power rooms on	<u>0</u> sf			

EXHIBIT 1

SPACE ASSESSMENT WORK SHEET

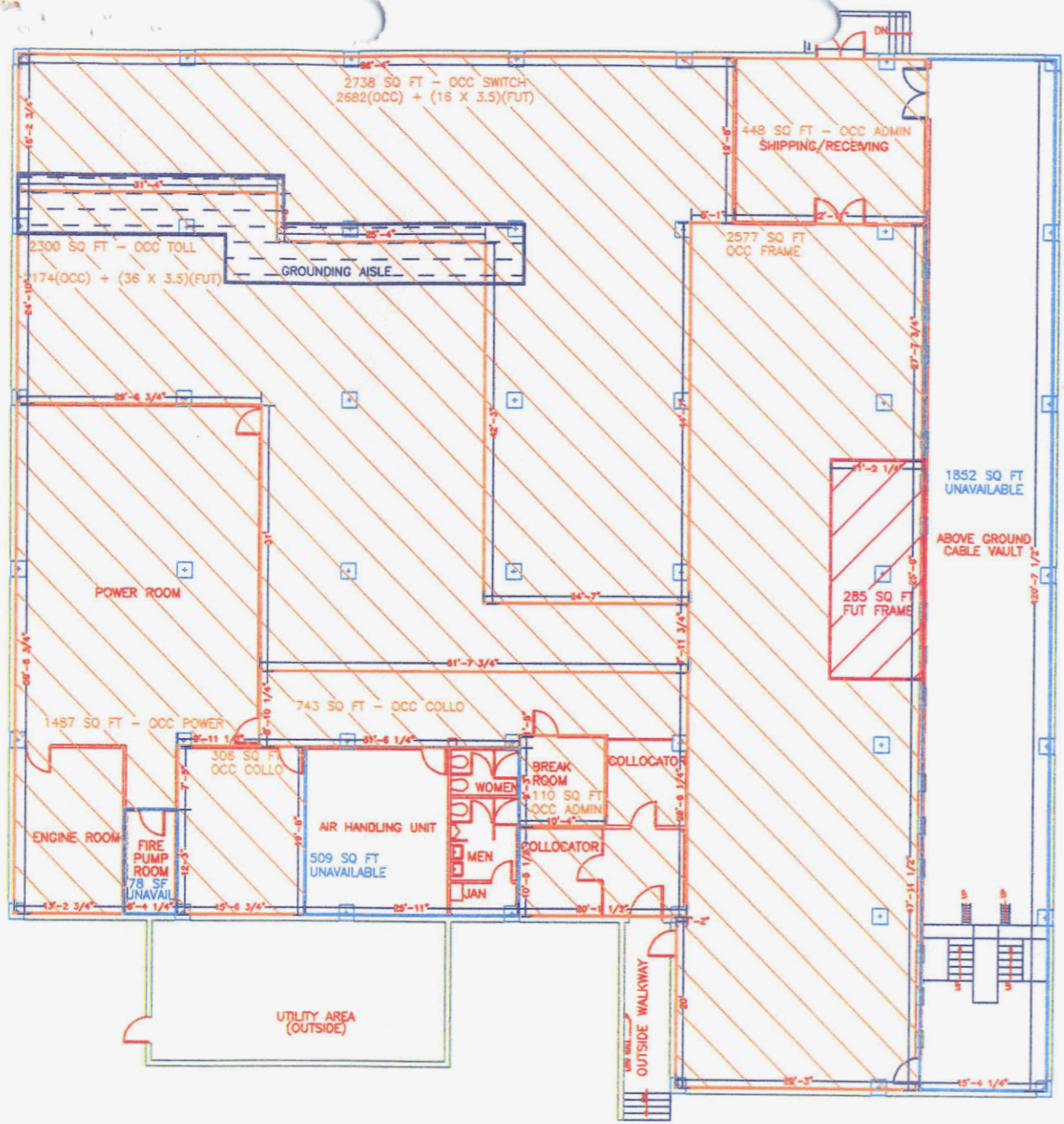
NAME OF PERSON FILLING OUT FORM:

(PRINT NAME AND TITLE)

TEL. NO. _____

AUTHORIZED BY:

TEL. NO. _____



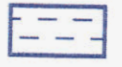
APRIL 10, 2000

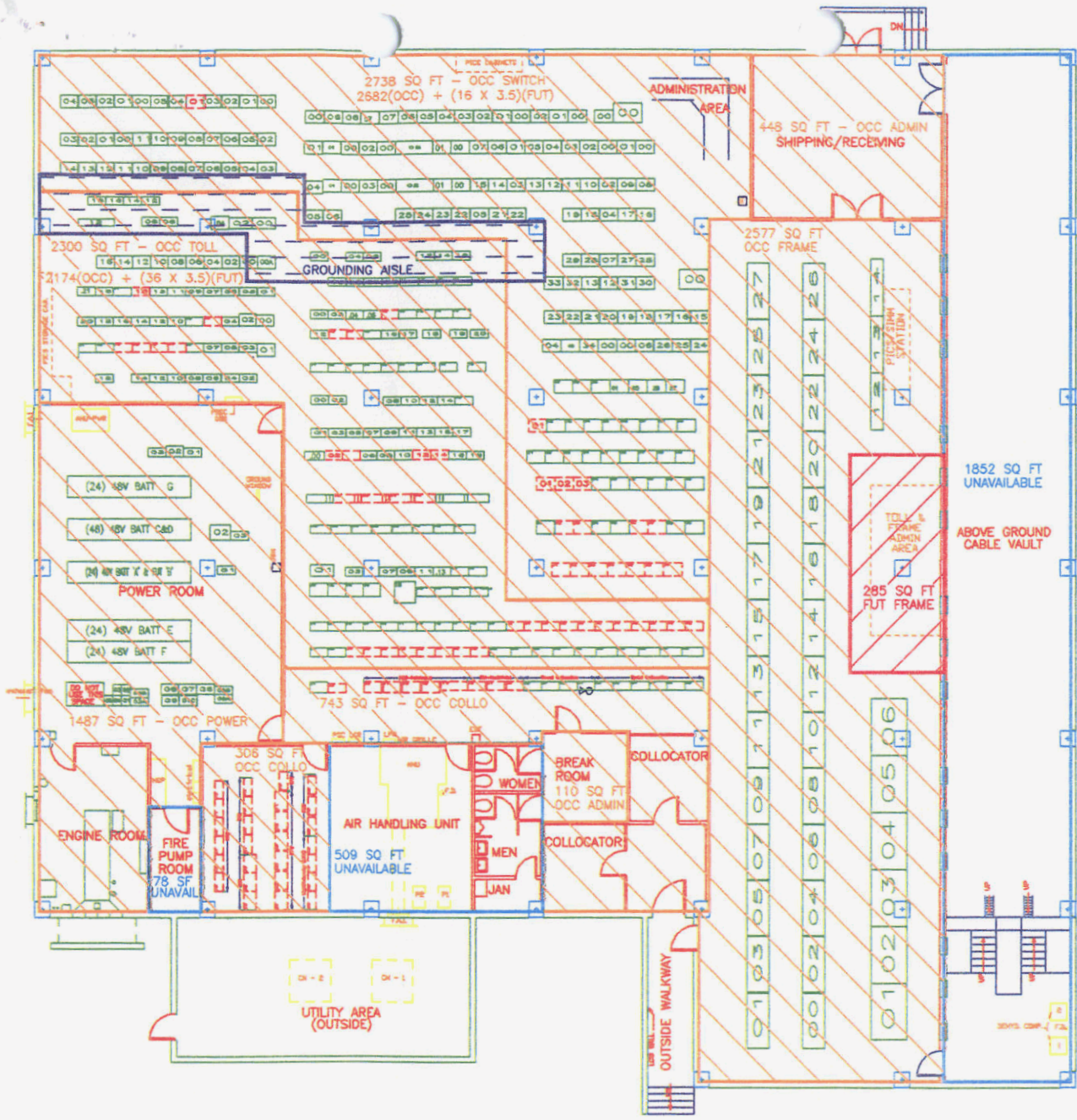
A	TOTAL GROSS SQ FT	13433	
	CABLE VAULT	1852	
	AIR HANDLING UNIT, JANITOR & RESTROOMS	509	
	FIRE PUMP ROOM	78	
B	TOTAL UNAVAILABLE SPACE	2439	
	SWITCH	2682	
	TOLL	2174	
	FRAME	2577	
	POWER & ENGINE	1487	
	ADMIN	448 + 110 = 558	
	COLLOCATION	306 + 743 = 1049	
C	TOTAL OCCUPIED SPACE	10,527	
	SWITCH	16 X 3.5 = 56	
	TOLL	36 X 3.5 = 126	
	FRAME	285	
D	TOTAL RESERVED SPACE	467	

GROUNDING AISLE

THIS AREA IS INCLUDED AS PART OF OCCUPIED SPACE FOR TOLL AND SWITCH EQUIPMENT. THIS AISLE SHOULD BE UNAVAILABLE FOR EQUIPMENT BECAUSE OF GROUNDING REQUIREMENTS BUT IS IN USE DUE TO LACK OF SPACE IN THIS OFFICE.

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





APRIL 10, 2000

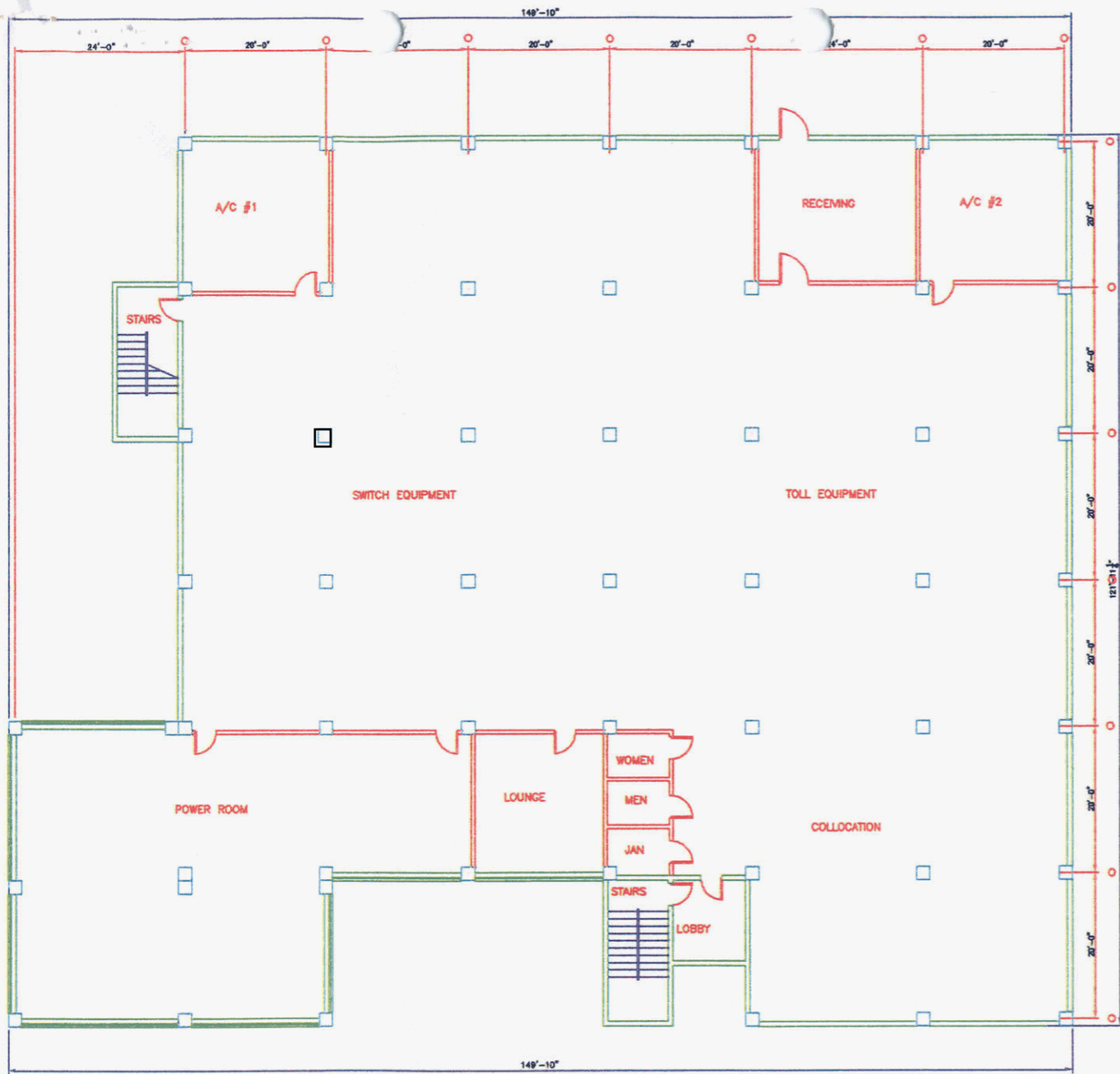
A	TOTAL GROSS SQ FT	13433	
	CABLE VAULT	1852	□
	AIR HANDLING UNIT, JANITOR & RESTROOMS	509	
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M2476 MIAMI WEST DADE FLOOR PLAN
 PSC WAIVER ITEM 4 A-F PAGE 2



M2476 MIAMI WEST DADE SECOND FLOOR PLAN
 2001 BUILDING ADDITION
 PSC WAIVER ITEM 4 G-H PAGE 2