James Meza III
Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

February 12, 2001

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. 010083-TL - Atlantic RSM Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver of Physical Collocation Requirements in the Atlantic RSM Central Office, which we ask that you file in the above-referenced 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,

James Meza III

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

CERTIFICATE OF SERVICE Docket No. 010083-TL

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

served via U.S. Mail this 12th day of February, 2001 to the following:

Felicia Banks Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Mr. F. B. Poag

Director - Regulatory Affairs

Sprint Communications Company, L.P.

Post Office Box 2214 (MC FLTLHO0107)

Tallahassee, FL 32316-2214

James Meza ااا ل

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: BellSouth Telecommunications | i,) | Docket No. 010083-TL |
|--|------|--------------------------|
| Inc.'s Request for Temporary Waiver | of) | |
| Physical Collocation in the Atlantic R | SM) | |
| Central Office |) | |
| | ý | Filed: February 12, 2001 |

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 a temporary exemption from the physical collocation requirements as set forth in the Act, in the Order and in the PSC Order for the Atlantic RSM Central Office ("CO") located at 13635 Atlantic Boulevard, Jacksonville, Florida 32225. BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC") on the grounds that it is temporarily unable to meet physical collocation requests due to space limitations, as detailed in the Space Assessment Worksheet attached hereto as Exhibit 1. However, an addition to the CO is scheduled to be completed by June 30, 2001, and at that time, BellSouth will be able to fulfill a collocator's request for space.

1. The Atlantic RSM 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 Atlantic RSM CO is growing rapidly and thus the facility is under enormous space constraints. To meet the demands of the expanding customer base, BellSouth has constructed an addition which is scheduled to be completed by June 30, 2001.
- 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 Atlantic RSM CO, BellSouth is unable to provide the amount of space requested for physical collocation by the ALEC involved. There are a limited number of unenclosed bays available for physical collocation. There will be no room for additional physical collocation once these bays are filled 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.

- 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 future projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility.

8. The Atlantic RSM CO contains a very limited amount of available space for physical collocation and for this reason should be temporarily excluded from the collocation requirements until the addition to the CO is completed. The current space available is insufficient to fill the request of the affected ALEC. BellSouth will, of course, offer virtual collocation in the Atlantic RSM CO.

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

Respectfully submitted this 12th day of February, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

MANCY B. WHITE JAMES MEZA III c/o Nancy Sims

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PC Docs #231982

SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

1/31/01 1 CENTRAL OFFICE CLLI: **JCBHFLATRSO** Jacksonville Atlantic RSM 2 COLLOCATOR AND AMOUNT OF SPACE Sprint (UTC) 100 3.. TOTAL GROSS SQ. FT. 2613 4. FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED a. BST occupied equipment space 2085.25 Nonregulated services 0 sf Administrative offices - not related to installing, repairing, maintaining CO equipment- ie ship-receiving/lounges 149 sf b. Retired equipment 0 sf Future BST space reservations 295.75 C. sf Switch 14 Circuit 38.5 Power 27.25 Frame 216 d. Collocation space (Actual and Future**) 14 sf e. Other 3-d party space 0 sf What is the occupancyf. Switch turnaround space Service Yr 0 sf Unavailable space 69 sf g. Unusable space (grounding and exit aisles) 0 Remaining space sf h. Central office growth plans. Forecast completion Υr Addition 2001 2,100 sf Renovation 0 sf 1. Any other plans for relieving space exhaust 5. Floor loading 150#sf 4700 sf Power rooms only 350#sf sf

EXHIBIT 1

JANUARY 24, 2001

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