

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Consideration of BellSouth  
Telecommunications, Inc.'s entry into  
interLATA services pursuant to Section  
271 of the Federal Telecommunications  
Act of 1996.

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Docket No. 960786-TL

Filed: July 20, 2001

**REBUTTAL TESTIMONY OF RON BEASLEY**

**ON BEHALF OF NEWSOUTH COMMUNICATIONS CORP.**

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1       **Q.     Please state your name and business address.**

2       A.     My name is Ron Beasley. My business address is Two North Main Street,  
3       Greenville, South Carolina 29601.

4       **Q.     By whom are you employed and in what capacity?**

5       A.     I am employed by NewSouth Communications Corp. (“NewSouth”), as Director of  
6       Collocation Engineering and Implementation.

7       **Q.     What are your responsibilities as Director of Collocation Engineering and  
8       Implementation?**

9       A.     I am responsible for all matters concerning ILEC collocation applications augments  
10      to applications, engineering, and installation and upkeep of equipment.

11      **Q.     What is the purpose of your testimony?**

12      A.     The purpose of my testimony is to rebut the direct testimony of W. Keith Milner and  
13      Cynthia Cox as it relates to BellSouth’s assertion that it has complied with Item 1 of  
14      the Competitive Checklist as it relates to collocation.

15      **Q.     Briefly describe your professional and educational background.**

16      A.     I have been employed in the communications industry for over 24 years. I have  
17      personally engineered, installed and upgraded numerous power plants in central  
18      office environments running power leads from the Main Power Board to BDFBs,  
19      bays/racks, and switching equipment.

20      **CHECKLIST ITEM 1: DOES BELL SOUTH CURRENTLY PROVIDE**  
21      **INTERCONNECTION IN ACCORDANCE WITH THE REQUIREMENTS OF**  
22      **SECTIONS 251(C)(2) AND 252(D)(1) OF THE TELECOMMUNICATIONS ACT OF**

1        **1996, PURSUANT TO SECTION 271(C)(2)(B)(I) AND APPLICABLE RULES**  
2        **PROMULGATED BY THE FCC?**

3        **Q.     What does this checklist item require as it relates to collocation?**

4        A.     This item requires BellSouth to provide “[i]nterconnection in accordance with the  
5        requirements of sections 251(c)(2) and 252(d)(1).” (47 U.S.C § 271(c)(2)(b)(1)).  
6        Section 252(d)(1) provides that “the just and reasonable rate for the interconnection  
7        of facilities and equipment . . . shall be . . . based on the cost of providing the  
8        interconnection. . .” (47 U.S.C. § 252(d)(1)). Rates for interconnection must be  
9        determined in accordance with the FCC’s pricing rules. (See, *AT&T Corp. v. Iowa*  
10       *Utilities Board*, 525 U.S. 366, 385 (1999)). BellSouth is not in compliance with Item  
11       I of the Competitive Checklist because of unreasonable practices that result in  
12       excessive charges for power in collocation space that are not based upon the cost of  
13       providing interconnection.

14       **Q.     Explain NewSouth’s power requirements.**

15       A.     NewSouth’s typical collocation space contains equipment that draws an average of  
16       27.3 amps of power, which requires fused capacity of at least 45 amps. In order to  
17       avoid paying the cost of separate BellSouth power feeds for each item of equipment,  
18       NewSouth utilizes a Battery Distribution Fuse Board (“BDFB”) that accepts a single  
19       power feed from BellSouth and separate fuses for the power feeds required within  
20       NewSouth’s collocation space. In order to allow for future growth, NewSouth  
21       requires approximately 100–120 amps of fused capacity.

22       **Q.     Explain how BellSouth currently provisions power to a collocation space.**

1       A.     BellSouth provides power to an ALEC collocation space using a Main Power Board  
2             that holds a fuse for each collocation space power feed. The very purpose of such  
3             Main Power Boards is to utilize the numerous size fuses that are available to address  
4             and meet the power needs of various areas within the central office. For this reason,  
5             power board manufacturers make available a wide variety of fuses to meet varying  
6             load requirements. Fuses are available for BellSouth's Main Power Boards in  
7             capacities between 60 amps and 224 amps. However, BellSouth has standardized  
8             certain fuse capacities and strictly limits ALECs' choice of power feed capacities to  
9             these standard fuse sizes, although power board manufacturers offer fuses in different  
10            sizes, and other ILECs offer a broader range of fuse capacities to ALECs. The fused  
11            capacities offered by BellSouth do not represent the actual amount of usable power  
12            provided to the ALEC, as the actual power drain of equipment can be only  
13            approximately two-thirds of the fused capacity. Thus, the BellSouth capacities of 10,  
14            15, 30, 45, 60 and 225 fused amps represent 6.7, 10, 20, 30 , 40 and 180 amp drains.  
15            BellSouth will only offer power only at capacities of 10, 15, 30, 45, 60, and 225  
16            fused amps. Thus, BellSouth's charges for power are based upon the fused amps  
17            provided to an ALEC's collocation space. Because the smallest fuse that BellSouth  
18            offers that will meet NewSouth's requirements with any room for growth is the 225  
19            amp fuse, BellSouth charges NewSouth for an average of 140 amps of power that it  
20            does not use.

21       **Q.     What has NewSouth attempted to do to remedy this situation?**

22       A.     NewSouth has offered to pay the cost of labor and materials for BellSouth to install

1 power board fuses that are sized to meet NewSouth's actual power requirements.  
2 NewSouth has also offered to maintain a supply of spare parts for any necessary  
3 repairs or replacements. However, BellSouth insists upon using fuses that are either  
4 smaller or vastly larger than NewSouth requires, resulting in thousands of dollars in  
5 charges for power that NewSouth does not use. The fuse capacities BellSouth offers  
6 do not meet NewSouth's requirements for assigning power as needed per rack or bay  
7 and do not allow NewSouth to utilize its collocation space to best suit its needs. The  
8 power provided is either too much or not enough, with the result that NewSouth must  
9 pay for power it does not use or waste rack space due to lack of power. BellSouth's  
10 refusal to utilize fuses that are appropriate to NewSouth's requirements is analogous  
11 to a power utility basing its demand charges to a commercial customer upon the  
12 capacity of the transformer the utility chooses to use to serve the customer, rather  
13 than upon the customer's actual power demand.

14 **Q. Do other ILECs offer more appropriate collocation power increments?**

15 A. Yes. Other ILECs, such as Southwestern Bell Telephone Company, offer collocation  
16 power to ALECs in increments of 20, 30, 50, 100, and 200 amps of usable power, or  
17 drain. The 100-amp increment offered by Southwestern Bell would meet NewSouth's  
18 power requirements if BellSouth offered it. Bell operating companies, such as SBC,  
19 that have obtained 271 approval offer fuse capacities that are appropriate for ALECs'  
20 power requirements.

21 **Q. Has the FCC addressed this issue?**

22 A. Yes. The FCC addressed a similar practice resulting in overcharges for collocation

1 power in the *Verizon Massachusetts Order*. In comments opposing Verizon’s  
2 Section 271 application for Massachusetts, various parties contended “that Verizon  
3 improperly charges for the number of amps fused, rather than the number of drained  
4 amps actually requested and used by competitive LECs.” (*See*, *Verizon Mass. Order*  
5 at ¶ 200). The FCC noted that Verizon has “amended its tariff to apply collocation  
6 power charges on a per-load amp requested basis, rather than on a per-fused amp  
7 basis. (*Id.*) The FCC found that collocation power pricing disputes did not prevent  
8 Verizon from satisfying Competitive Checklist Item I “*because, unlike BellSouth,*  
9 “*Verizon amended its collocation tariff... to address the concerns of the parties.*”  
10 (*Id.* at ¶ 201 (emphasis added).)

11 **Q. Is the rationale in the Verizon order applicable here?**

12 A. Yes. The standard applied by the FCC to Verizon’s collocation power charges in the  
13 *Verizon Massachusetts Order* applies to BellSouth’s collocation power charges as  
14 well. Unlike Verizon, however, BellSouth has not revised its power charges so that  
15 it applies collocation power charges based on the amount of power that ALECs  
16 actually request and use, rather than the arbitrarily limited number of fuse capacities  
17 that BellSouth chooses to offer. Until BellSouth reforms its collocation power charge  
18 practices, it cannot be found to satisfy Item I of the Competitive Checklist.

19 **Q. Have you discussed NewSouth’s concerns with BellSouth?**

20 A. Yes. I have spoken with BellSouth representatives on several occasions and have  
21 requested that BellSouth either utilize Main Power Board fuses that are appropriately  
22 sized to meet NewSouth’s requirements or place metering devices on NewSouth’s

1 collocation power feeds to capture the actual current draw. As I said earlier,  
2 NewSouth has offered to pay for all charges for materials and labor involved to make  
3 these changes and would make available any spare equipment needed for repairs and  
4 replacements. BellSouth personnel consistently have responded that BellSouth will  
5 not deviate from its standard Main Power Board fuse capacities. When I have asked  
6 whether these are the only fuse capacities used to serve ALECs' BDFBs, BellSouth  
7 engineers have responded that BellSouth may utilize larger Main Power Board fuses  
8 at some sites. BellSouth personnel have not explained why BellSouth cannot use  
9 fuses providing the drain required by NewSouth if BellSouth is willing to provide  
10 fuses that are larger than the BellSouth standard fuse sizes.

11 **Q. What effect has BellSouth's position regarding power for collocation sites had**  
12 **on NewSouth?**

13 **A.** BellSouth's refusal to utilize Main Power Board fuses that are sized appropriately to  
14 meet NewSouth's collocation power requirements results in thousands of dollars in  
15 charges for power that NewSouth has not requested and does not use at numerous  
16 collocation sites, including NewSouth's collocation space at 8 offices in Jacksonville,  
17 2 in Orlando and 1 office each at Melbourne and Sanford.

18 **Q. Does this conclude your testimony at this time?**

19 **A.** Yes.



**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Rebuttal Testimony of Ron Beasley on Behalf of NewSouth Communications Corp. has been furnished by (\*) hand delivery or by U. S. Mail on this 20th day of July, 2001, to the following:

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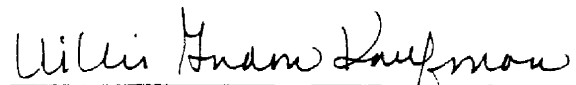
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