

J. Phillip Carver
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

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January 21, 2003

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Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of A. Wayne Gray and W. Keith Milner, which we ask that you file in the captioned docket.

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,

J. Phillip Carver
J. Phillip Carver (24)

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

AUS _____
CAF _____
CMD *L. Fulwood*
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ECR _____
GCL *1*
OPC _____
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gray 00630-03
Milner 00631-03

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 21st day of January, 2003 to the following:

Beth Keating, Staff Counsel
C. Lee Fordham, Staff Counsel
Wayne Knight, Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
cfordham@psc.state.fl.us
wknight@psc.state.fl.us

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. for FCCA
Atty. for Network Telephone Corp.
Atty. for BlueStar
jmcglothlin@mac-law.com
vkaufman@mac-law.com

Richard D. Melson
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI & ACI
rmelson@hgss.com

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689
mash@mgcicorp.com

Patrick Wiggins
Charles J. Pellegrini
Katz, Kutter Law Firm
106 E. College Avenue
12th Floor
Tallahassee, FL 32301
Tel. No. (850) 224-9634
Fax. No. (850) 222-0103
Attys. for Intermedia
pkwiggins@katzlaw.com

Kimberly Caswell
Verizon
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com
Barbara@penningtonlawfirm.com

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Represented by Pennington Law Firm
Carolyn.Marek@twtelecom.com

Mark Buechele
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 531-5286
Fax. No. (305) 476-4282
buechele@stis.net

Donna Canzano McNulty, Esq.
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 219-1008
Fax. No. (850) 219-1018
Donna.mcnulty@wcom.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
ken@reuphlaw.com

Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm

Laura L. Gallagher
Laura L. Gallagher, P.A.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301
Tel. No. (850) 224-2211
Fax. No. (850) 561-3611
Represents MediaOne

Susan S. Masterton
Charles J. Rehwinkel
Sprint Comm. Co. LLP
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214
Tel: 850-599-1027
Fax: 407-814-5700
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel
Gene Watkins
Covad Communications
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com
gwatkins@covad.com

Bettye Willis
ALLTEL Comm. Svcs. Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com

Development Specialists, Inc.
Norton Cutler
c/o Steve Victor
70 West Madison Street
Suite 2300
Chicago, IL 60602-4250
Tel. No. (312) 263-4141
Fax. No. (312) 263-1180

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
Counsel for Network Access Solutions
rojce@shb.com

Brent McMahan, Vice President
Regulatory and Governmental Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
Tel. No. (850) 432-4855
Fax. No. (850) 437-0724

Network Access Solutions Corp.
Mr. Don Sussman
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602
Tel. No. : (703) 793-5102
Fax. No. (208) 445-7278
dsussman@nas-corp.com

Verizon Florida, Inc.
Ms. Michelle A. Robinson
%Mr. David Christian
106 East College Avenue
Suite 810
Tallahassee, FL 32301-7704
Tel. No. (813) 483-2526
Fax. No. (813) 223-4888
Michelle.Robinson@verizon.com

Ms. Lisa A. Riley
1200 Peachtree Street, N.E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax. No. (404) 877-7646
lriley@att.com

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net


FPTA, Inc.
Mr. David Tobin
Tobin & Reyes
7251 West Palmetto Park Road
#205
Boca Raton, FL 33433-3487
Tel. No. (561) 620-0656
Fax. No. (561) 620-0657
dst@tobinreyes.com

John McLaughlin
KMC Telecom. Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Telecomm. Resellers Assoc.
Andrew Isar
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474

Tracy W. Hatch, Esq.
Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents AT&T
fself@lawfla.com
thatch@lawfla.com



J. Phillip Carver (KA)

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2
3
4
5
6
7
8
9
10
11
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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NOS. 981834-TP and 990321-TP
JANUARY 21, 2003

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President - Interconnection Operations for BellSouth Telecommunications, Inc. ("BellSouth"). I have served in my present role since February 1996.

Q. ARE YOU THE SAME W. KEITH MILNER WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I respond to portions of the direct testimonies of Mr. Jeffrey King on behalf of AT&T Communications of the Southern States, LLC, and TCG South Florida, Inc. (collectively referred to as "AT&T") and Mr. Jimmy Davis on

1 behalf of Sprint – Florida, Inc. and Sprint Communications Limited
2 Partnership (collectively referred to as "Sprint") with regard to issues 4, 5,
3 6A, 6B, 6C, 7, and 8.

4

5 **Issue 4: Should the ILEC be required to provide copper entrance facilities**
6 **within the context of a collocation inside the central office?**

7

8 Q. ON PAGE 8 OF HIS DIRECT TESTIMONY, MR. KING STATES THAT
9 ALECS SHOULD BE ALLOWED TO USE COPPER PLANT FOR
10 COLLOCATION WITHIN THE CENTRAL OFFICE BECAUSE "COPPER
11 TECHNOLOGY, INCLUDING COPPER ENTRANCE FACILITIES, IS
12 STILL AN INTEGRAL PART OF THE TELECOMMUNICATIONS
13 INDUSTRY." PLEASE RESPOND.

14

15 A. Mr. King is correct only in the sense that some copper cables currently
16 enter BellSouth central offices. However, Mr. King fails to acknowledge
17 that these older copper cables are associated with BellSouth's loop
18 distribution facilities rather than interoffice facilities or interconnection
19 facilities. Entrance facilities are for interconnection trunks, and all of
20 BellSouth's interconnection trunk cables entering BellSouth central offices
21 are provisioned over optical fiber facilities. Furthermore, the FCC rules
22 regarding an ILEC's collocation obligations under the Telecommunications
23 Act of 1996 (the "Act") state that the ILEC should only accommodate
24 copper entrance facilities if such interconnection is first ordered by the
25 state commission. See 47 C.F.R. 51.323 (d)(3). The FCC clearly

1 anticipated that this authority to place non-fiber optic entrance facilities
2 would be granted by a state commission on a location by location basis.
3 For any state commission to permit copper entrance facilities universally
4 would undermine the importance the FCC attributed to this issue and
5 would be to the detriment of other ALECs desiring to collocate in an office
6 with limited entrance space available. Neither AT&T nor any other ALEC
7 should be permitted to place copper entrance facilities in a premises until
8 this Commission has reviewed the particular circumstances of the
9 premises, the specific needs of the requesting ALEC at that location, and
10 has determined that the ALEC's needs override BellSouth's and other
11 ALEC's concerns, if any, with entrance space availability in those
12 premises. To my knowledge, no ALEC in BellSouth's nine-state region,
13 including Florida, has made such a showing to a state Public Service
14 Commission.

15

16 **Issue 5: Should an ILEC be required to offer, at a minimum, power in**
17 **standardized increments? If so, what should the standardized power**
18 **increments be?**

19

20 Q. ON PAGE 8 OF HIS DIRECT TESTIMONY, MR. KING SUGGESTS THAT
21 ILECS SHOULD BE REQUIRED TO PROVISION POWER IN ONE (1)
22 AMP INCREMENTS AND IN FUSE SIZE INCREMENTS BEGINNING
23 WITH 5 AMPS TO 225 AMPS AND ABOVE AS AVAILABLE FROM THE
24 MARKET; AND IF REQUESTED BY AN ALEC, FUSE SIZES OF 70
25 AMPS OR GREATER SHOULD BE PROVISIONED FROM THE ILEC

1 POWER DISTRIBUTION BOARD. PLEASE COMMENT.

2

3 A. An ALEC may require different quantities of power and as such, the ALEC
4 has the ability to order fused power in increments as small as 10 amps
5 and as large as 225 amps, when the ALEC uses combinations of industry
6 standard fuse size protection devices (*i.e.*, TPS type fuses) from a
7 BellSouth Battery Distribution Fuse Board ("BDFB"). There are single
8 industry standard fuse sizes that range from 10 to 60 amps (*i.e.*, BellSouth
9 uses industry standard 10, 15, 30, 45 and 60 amp fuses). Anything higher
10 than 60 amps would require the combination of various fuse sizes to
11 achieve the desired total.

12

13 As to the suggestion for fuse sizes of 70 amps or greater provisioned from
14 the ILEC power distribution board at the request of the ALEC, as I stated
15 in my direct testimony in this docket, BellSouth now offers TPL type fuses
16 in 70, 80, 90, and 100 amps from a BellSouth BDFB (not from the main
17 power board). Although TPL type fuses are larger fuses that were
18 originally designed for power boards instead of BDFBs, at least one
19 vendor has been able to design a field retrofit to its existing BDFB
20 products to replace two (2) TPS fuse positions with a TPL fuse block.
21 Consequently, BellSouth now offers the 70, 80, 90, and 100 amp TPL type
22 fuses to all ALECs on single redundant power feeds at the BellSouth
23 BDFB. These additional power options will be deployed in all of
24 BellSouth's central offices on an as-ordered basis.

25

1 As I stated in my direct testimony, BellSouth does not support smaller
2 protection devices than 225 amps at the main power board because there
3 are inherent standardization and provisioning interval improvements
4 associated with the use of 225-amp fused power capacity¹ and this
5 complies with specific National Electric Code (“NEC”) requirements for
6 electrical system coordination (Article 240-12). The NEC requires
7 coordination to properly localize a fault condition to restrict outages to the
8 equipment affected.

9
10 **Issue 6A: Should an ILEC’s per ampere (amp) rate for the provisioning of**
11 **DC power to an ALEC’s collocation space apply to amps used or fused**
12 **capacity?**

13
14 Q. MR. KING, ON PAGE 9 OF HIS DIRECT TESTIMONY, STATES “THE
15 ILECS ‘PER AMPERE’ POWER RATE SHOULD BE BASED ON THE
16 ALEC’S ACTUAL USAGE SUCH AS THE SPECIFIED LOAD OR AMPS
17 USED.” PLEASE COMMENT.

18
19 A. When this Commission issued its ruling in the Florida MCI Arbitration
20 Order, FPSC Docket No. 000649-TP, released March 30, 2001, regarding

¹ BellSouth’s standard size circuit breaker protection device of 225 amps was developed before collocation (in TR73503, circa 1993) based on BellSouth’s interpretation of findings from a Telcordia/Bellcore study on arcing in central offices resulting from the Hinsdale incident (*i.e.*, a devastating fire in a Chicago central office). Prior to the Hinsdale incident, BellSouth typically installed standard size circuit breaker protection devices of 225 amps and 400 amps at the main power board. The Telcordia/Bellcore study found that: 1) arcing may occur in central offices, usually due to poor workmanship in H-tap and other connectors and 2) while no protection device will operate 100% of the time due to the physical nature of a DC arc, 225 amp protection devices experience a significantly higher chance of operating properly during an arc than 400 amp or larger protection devices. So BellSouth’s 225-amp circuit breaker standard was developed three years before the Act was issued and is an attempt by BellSouth to minimize the potential for fire in its central offices.

1 the proper assessment of power capacity, the Commission ruled in favor
2 of BellSouth concluding:

3
4 . . .we agree with BellSouth witness Milner that metering
5 WorldCom's actual usage would be costly and time consuming.
6 While specific numbers were not provided, we suspect that the
7 costs of metering could exceed the difference in costs of applying
8 the rate to fused capacity versus amperes used. Therefore, we find
9 that the per ampere rate for the provision of DC power to
10 WorldCom's collocation space shall apply to fused capacity.²

11 Therefore, the Commission has previously determined that the billing of
12 DC power on a fused amp basis, instead of a per-load basis, is
13 appropriate. Mr. King has offered nothing new in this regard that should
14 cause the Commission to reach a conclusion different than in the MCI
15 Arbitration cited above.

16
17 Q. MR. DAVIS, ON PAGES 7-8 OF HIS DIRECT TESTIMONY, STATES
18 "THE MOST FEASIBLE METHOD OF BILLING FOR DC POWER
19 CONSUMPTION IS TO BILL BASED ON THE AMOUNT OF POWER
20 THE ALEC DECLARES ON ITS APPLICATION THAT IT NEEDS TO
21 POWER ITS EQUIPMENT IN THE COLLOCATION SPACE. THIS
22 APPROACH EQUATES TO BILLING ON THE BASIS OF 'AMPS' USED
23 WITHOUT THE ADDED COST FOR THE ILEC TO METER OR
24 OTHERWISE ESTIMATE POWER USAGE ON A MONTHLY BASIS." DO
25 YOU AGREE WITH THIS APPROACH?

26

²*Petition by MCI metro Access Transmission Services LLC and MCI WorldCom Communications, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996, Order No. PSC-01-0824-FOF-TP at 126, FPSC Docket No. 000649-TP, (rel. Mar. 30, 2001) ("Florida MCI Arbitration Order").*

1 A. No. To use an analogy, this would be the same as if the customer of a
2 power company, in regard to their monthly bill, said "Trust me, I'll tell you
3 what my monthly usage will be." This approach would fall far short of
4 providing an accurate, reasonable, or credible account of usage and
5 should be rejected. Additionally, because there would be no means of
6 determining the validity of the ALEC's stated usage, adopting Mr. Davis'
7 proposal would require the metering that Mr. Davis apparently opposes.

8

9 **Issue 6B: If power is charged on a per-amp-used basis or on a fused**
10 **capacity basis, how should the charge be calculated and applied?**

11

12 Q. ON PAGE 9 OF HIS DIRECT TESTIMONY, MR. KING STATES THAT
13 POWER CHARGES SHOULD BE BASED ON ACTUAL USAGE AS
14 ATTEMPTS TO CHARGE ON A "PER FUSED" BASIS CREATES
15 OPPORTUNITIES FOR SIGNIFICANT OVER RECOVERY OF THE
16 ILEC'S TRUE COST. PLEASE COMMENT.

17

18 A. The manner in which BellSouth charges for DC power capacity is based
19 on the power requirements of the telecommunications equipment being
20 served. Fuse type protection devices are sized at 1.5 times the
21 anticipated drain to ensure that the equipment can be operated at its full
22 capacity without "blowing" the fuse device. However, for purposes of
23 billing, the recurring power rate assessed by BellSouth includes a 0.67
24 multiplier (that is, 1.0 divided by 1.5) to take into account the fact that an
25 ALEC would not normally use the full capacity of the protection device.

1 BellSouth provisions power based on a "per fused amp" basis, but actually
2 bills the ALECs for power based on usage. Even though BellSouth sizes
3 the requested power usage at 1.5 times the anticipated drain (or use) by
4 the ALEC's equipment, BellSouth then backs down the rate by the 0.67
5 multiplier, which is used in the calculation of the billing. Thus, there is no
6 over-recovery as Mr. King suggests.

7
8 Further, BellSouth provides a redundant power feed defined as a pair of
9 power feeds, usually designated as A and B feeds, that can carry DC
10 current individually and simultaneously to power a bay, shelf, or individual
11 piece of collocation equipment in an ALEC's collocation space. The
12 equipment manufacturer designs its equipment such that if there is a
13 failure on one of the feeds, the other feed will operate the equipment
14 without the occurrence of a power outage or failure. BellSouth does not
15 charge the ALEC on the individual amount of power available on each
16 feed. Instead, BellSouth assesses power based on a redundant power
17 feed (A and B feed). In other words, BellSouth does not charge ALECs
18 extra for the redundancy in the power feed.

19
20 **Issue 6C: When should an ILEC be allowed to begin billing an ALEC for**
21 **power?**

22
23 Q. MR. KING, ON PAGE 11 OF HIS DIRECT TESTIMONY, STATES "AN
24 ALEC SHOULD BE BILLED FOR POWER ONCE POWER IS BEING
25 PROVIDED AND USED BY THE ALEC." DO YOU AGREE?

1 A. No. As stated in my direct testimony, since DC power is assessed by
2 BellSouth as a recurring monthly charge, and if the ALEC requests, and is
3 granted by BellSouth, the right to occupy its collocation space prior to the
4 Space Ready Date, BellSouth begins billing the monthly recurring charges
5 on the date the ALEC accepts the space. The ILEC should be allowed to
6 begin billing an ALEC for power at the Space Ready Date. On the Space
7 Ready Date, BellSouth turns the requested collocation space over to the
8 requesting ALEC, at which time the ALEC has the capability to begin
9 using power. At the Space Ready Date, BellSouth has performed work on
10 the ALEC's behalf for power plant construction and associated
11 components such as batteries and rectifiers as well as circuit breaker
12 positions at the main power board.

13
14 On May 11, 2000, This Commission issued Order No. PSC-00-0941-FOF-
15 TP requiring BellSouth to respond to applications for physical collocation
16 within 15 calendar days. This interval was premised upon the use of
17 standard rates for physical collocation space preparation. BellSouth has
18 developed such rates reflecting the intervals and requirements contained
19 in that Order. Pursuant to the Order, on June 26, 2000, BellSouth issued
20 a Carrier Notification SN91081846 indicating that space preparation will
21 be billed on a recurring basis using flat rates rather than billing up-front
22 nonrecurring individual case basis ("ICB") charges. The recurring power
23 element was modified to include all power-related space preparation as
24 well as usage. As a result, BellSouth should be allowed to begin
25 recovering those costs in the form of recurring power rates in accordance

1 with the rate structure as discussed above. To allow otherwise, might
2 encourage ALECs to “game” the process by requesting that BellSouth
3 perform work to provide the ALEC DC power but then delay paying
4 BellSouth for its work simply because the ALEC’s business plans or needs
5 have changed.

6

7 **Issue 7: Should an ALEC have the option of an AC power feed to its**
8 **collocation space?**

9

10 Q. MR, KING, ON PAGE 11 OF HIS DIRECT TESTIMONY, STATES THAT
11 AN ALEC SHOULD HAVE THE OPTION OF AN AC POWER FEED TO
12 ITS COLLOCATION SPACE BECAUSE IT WOULD ENABLE THE ALEC
13 TO PLACE AC POWERED EQUIPMENT IN ITS COLLOCATION SPACE;
14 ADDITIONALLY, THE ALEC CAN ALSO CONVERT AC POWER TO DC
15 POWER AS NECESSARY. PLEASE COMMENT.

16

17 A. BellSouth already allows an ALEC to order AC power feeds for its
18 collocation space, both for convenience outlets as well as to power any
19 AC equipment for testing purposes. However, the convenience outlets are
20 not for use in converting AC power to DC power for powering the ALEC’s
21 collocation equipment. BellSouth already provides DC power in its central
22 offices for collocation to enable the ALECs to power their equipment.
23 Rectifiers convert AC power from the commercial electric utility to DC
24 power. Batteries and generators provide back-up DC power in the event
25 of a loss of AC power from both the commercial electric utility and AC

1 system or from rectifier failure. An ALEC that used AC power would
2 require that the ALEC provide and maintain its own back-up power supply,
3 which would have to be located in an area of the central office that meets
4 strict code requirements for power equipment. The collocation area of the
5 central office is not an area that would comply with these strict code
6 requirements. Thus, the installation of rectifiers and/or backup power
7 equipment is not allowed in typical collocation arrangements.

8

9 **Issue 8: What are the responsibilities of the ILEC, if any, when an ALEC**
10 **requests collocation space at a remote terminal where space is not**
11 **available or space is nearing exhaustion?**

12

13 Q. ON PAGES 11-12 OF HIS DIRECT TESTIMONY, MR. KING SUGGESTS
14 THAT ILECS SHOULD BE RESPONSIBLE FOR NOTIFYING ALECS OF
15 THE REMOTE TERMINAL SITES THAT ARE EXHAUSTED VIA
16 WEBSITE POSTINGS OR CARRIER NOTIFICATION LETTERS, AS
17 WELL AS A PLAN OF ACTION AS TO WHEN NEW CONSTRUCTION
18 OF A REMOTE TERMINAL WILL BE COMPLETED. PLEASE
19 COMMENT.

20

21 A. As stated in my direct testimony, BellSouth permits the collocation of any
22 type of equipment necessary for interconnection to BellSouth's network or
23 for access to unbundled network elements in the provision of
24 telecommunications services and will do so in accordance with the
25 alternatives outlined in my direct testimony in regards to space availability.

1 While this Commission has addressed processes for postings and waivers
2 for central offices, a requirement that BellSouth notify ALECs every time a
3 remote terminal site becomes exhausted, particularly when there are over
4 10,000 remote sites in Florida, compared to over 200 central offices in
5 Florida, or when new construction of a remote terminal will be completed
6 is not only impractical but would impose an enormous and costly
7 administrative burden on BellSouth without significantly increasing the
8 level of access that ALECs can realize. Further, such administratively and
9 financially burdensome requirements should not be imposed, especially
10 given that there are no pending requests for remote site collocation in
11 Florida. Finally, since BellSouth is not privy to ALECs' plans to collocate
12 equipment in particular remote terminals, BellSouth cannot determine with
13 precision where and when space within remote terminals will be
14 exhausted.

15

16 Q. DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?

17

18 A. Yes.