

# ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP

JUNE 30, 2003

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## STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-02-1513-PCO-TP, issued November 4, 2002, revised by Order No. PSC-03-0288-PCO-TP, issued March 4, 2003, the Staff of the Florida Public Service Commission files its Prehearing Statement<sup>1</sup>.

- | a. | <u>All Known Witnesses</u>  | <u>Issues</u> |
|----|---|---------------|
|    | Rowland Curry (Rebuttal)  | 6A-B          |
| b. | <u>All Known Exhibits</u>   |               |
|    | Exhibit RLC-1 - Resume of Rowland Curry                                       |               |
|    | Exhibit RLC-2 - BellSouth Power Construction for Collocation; Cost per Ampere |               |

<sup>1</sup>Staff's Prehearing Statement addresses Issues 1a-8 as set forth in Order No. PSC-02-1513-PCO-TP.

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c. Staff's Statement of Basic Position

Staff's witness recommends an appropriate methodology for provisioning DC power to a CLEC's collocation space and the calculation and application of recurring and non-recurring power charges.

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1A: When should an ALEC be required to remit payment for non-recurring charges for collocation space?

STAFF: Staff has no position at this time.

ISSUE 1B: When should billing of monthly recurring charges begin?

STAFF: Staff has no position at this time.

ISSUE 1C: What cancellation charges should apply if an ALEC cancels its request for collocation space?

STAFF: Staff has no position at this time.

ISSUE 2A: Should an ALEC be required to justify its space reservation needs to the ILEC when an ILEC is forced to consider a building addition to accommodate future space requirements?

STAFF: Staff has no position at this time.

ISSUE 2B: Under what conditions should an ILEC be allowed to reclaim unused collocation space?

STAFF: Staff has no position at this time.

ISSUE 2C: What obligations, if any, should be placed on the ALEC that contracted for the space?

STAFF: Staff has no position at this time.

ISSUE 2D: What obligations, if any, should be placed on the ILEC?

STAFF: Staff has no position at this time.

ISSUE 3: Should an ALEC have the option to transfer accepted collocation space to another ALEC? If so, what are the responsibilities of the ILEC and ALECs.

STAFF: Staff has no position at this time.

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

STAFF: Staff has no position at this time.

ISSUE 5: Should an ILEC be required to offer, at a minimum, power in standardized increments? If so, what should the standardized power increments be?

STAFF: Staff has no position at this time.

ISSUE 6A: Should an ILEC's per ampere (amp) rate for the provisioning of DC power to an ALEC's collocation space apply to amps used or fused capacity?

STAFF: Staff has no position at this time.

STAFF WITNESS: The Commission should apply the methodology set out out by Verizon witness Ries which represents a workable solution to the concerns of both the incumbent carriers and the ALECs. ILECs should provision power based on ALEC load and fuse specifications.

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

STAFF: Staff has no position at this time.

STAFF WITNESS: The Commission should require the ILECs to recalculate and adjust, where appropriate, certain inputs, assumptions, or costs provided by the ILECs in their cost studies.

ISSUE 6C: When should an ILEC be allowed to begin billing an ALEC for power?

STAFF: Staff has no position at this time.

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

STAFF: Staff has no position at this time.

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

STAFF: Staff has no position at this time.

e. Pending Motions

1. Verizon Florida, Inc./Sprint-Florida, Incorporated's Joint Motion to Strike Revised Rebuttal Testimony of Steven E. Turner and Surrebuttal Testimony of Jeffrey A. King, filed on June 25, 2003. Responses are due on July 7, 2003.

f. Pending Confidentiality Claims or Requests

1. Verizon Florida, Inc.'s (Verizon) Request for Confidential Classification of DN 00495-03, filed January 16, 2003.
2. Verizon's Request for Confidential Classification of DN 00497-03, filed January 16, 2003.
3. Verizon's Request for Confidential Classification of DN 00495-03, filed February 4, 2003.
4. Sprint-Florida, Incorporated's (Sprint) Request for Confidential Classification of DNs 01152-03 and 01153-03, filed February 4, 2003.
5. Sprint's Claim of Confidentiality for Certain Documents and/or Records Identified as CD-ROM labeled "Curry Pics, Sprint Offices 1/21/03" filed February 11, 2003.
6. Verizon's Claim of Confidentiality for Photographs Taken by Staff Witnesses During Tours of Verizon's Tampa Main and Sweetwater Central Offices [DN 05699-03]
7. BellSouth Telecommunications, Inc.'s (BellSouth) Request for Specified Confidential Classification of DN 01947-03, filed February 25, 2003.
8. Sprint's Claim of Confidentiality for DN 02514-03, filed March 14, 2003.
9. Verizon's Request for Confidential Classification of DN 02752-03 and Motion for Protective Order, filed March 21, 2003.
10. Verizon's Request for Confidential Classification of DN 03044-03 and Motion for Protective Order, filed April 1, 2003.
11. BellSouth's Request for Specified Confidential Classification for DN 03294-03, filed April 8, 2003.

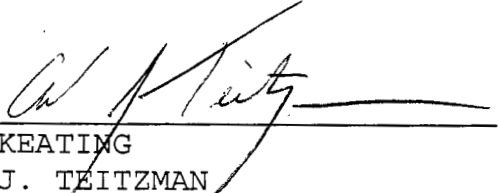
12. Verizon's Request for Confidential Classification of DN 03047-03, filed April 10, 2003.
13. AT&T Communications of the Southern States, Inc.'s (AT&T) Claim of Confidentiality for DN 03595-03, filed April 18, 2003.
14. Verizon's Request for Confidential Classification of DN 03668-03 and Motion for Protective Order, filed April 22, 2003.
15. Verizon's Request for Confidential Classification of DN 03673-03 and Motion for Protective Order, filed April 22, 2003.
16. Sprint's Request for Confidential Classification for Responses to Staff's PODs (No. 15) (DN 03152-03), filed April 23, 2003.
17. Sprint's Request for Confidential Classification of DN 03743-03, filed April 23, 2003.
18. BellSouth's Request for Confidential Classification for DN 03747-03, filed April 23, 2003.
19. BellSouth's Request for Specified Confidential Classification for DN 03998-03, filed May 1, 2003.
20. ALLTEL Communications Services, Inc.'s (ALLTEL) Request for Confidential Classification for DN 04053-03, filed May 5, 2003.
21. BellSouth's Request for Confidential Classification for DN 04062-03, filed May 5, 2003.
22. Verizon's Request for Confidential Classification of DN 04516-03 and Motion for Protective Order, filed May 20, 2003.
23. Verizon's Request for Confidential Classification of DN 04742-03 and Motion for Protective Order, filed May 28, 2003.

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24. AT&T's Claim of Confidentiality for DN 05079-03, filed June 9, 2003.
  25. Verizon's Request for Confidential Classification of DN 05517-03 and Motion for Protective Order, filed June 20, 2003.
  26. AT&T's Claim of Confidentiality for DN 05641-03, filed June 24, 2003.
- g. Compliance with Order Nos. PSC-02-1513-PCO-TP and PSC-03-0288-PCO-TP

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 30<sup>th</sup> day of June, 2003.



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FILED: JUNE 30, 2003

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's Prehearing Statement has been furnished by U.S. Mail this 30<sup>th</sup> day of June, 2003, to the following:

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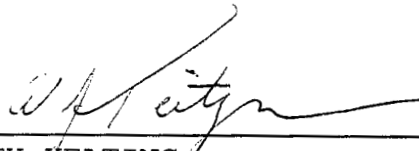
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