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April 21, 2009

Ms. Ann Cole, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No.:** \_\_\_\_\_  
**Request by BellSouth Telecommunications, Inc. d/b/a AT&T  
Florida Requesting Permission to Change Demarcation  
Point Specified in Rule 25-4.0345(1)(b), Florida Administrative  
Code**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Permission to Change Demarcation Point Specified in 25-4.0345(1)(b), which we ask that you file in the captioned *new* docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: All parties of record  
Jerry Hendrix  
Gregory R. Follensbee  
E. Earl Edenfield, Jr.

**CERTIFICATE OF SERVICE**  
**Request by BellSouth Telecommunications, Inc. d/b/a AT&T**  
**Florida Requesting Permission to Change Demarcation Point**  
**Specified in Rule 25-4.0345(1)(b), Florida Administrative Code**

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 April, 2009 to the following:

Adam Teitzman (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Charles E. Bennett  
Department of the Navy  
Commanding Officer – NCTS  
NCTS-N-2, Bldg. 27  
Naval Air Station Jacksonville  
Jacksonville, FL 32212-0111



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Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request by BellSouth Tele- )  
communications, Inc., d/b/a AT&T Florida ) Docket No.: \_\_\_\_\_  
Requesting Permission to Change )  
Demarcation Point Specified in 25-4.0345 )  
(1)(b), Florida Administrative Code ) Filed: April 21, 2009  
\_\_\_\_\_ )

**AT&T FLORIDA’S REQUEST FOR PERMISSION TO CHANGE  
DEMARCATIION POINT SPECIFIED IN RULE 25-4.0345(1)(b)**

BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T FLORIDA (“AT&T FLORIDA”) hereby requests that the Florida Public Service Commission grant permission for AT&T Florida to change the demarcation point specified in Rule 25-4.0345(1)(b), Florida Administrative Code, for service to non-residential customers at Panama City Naval Station, Panama City Beach, Florida (the “Naval Station”), as further described below. Specifically, AT&T Florida seeks the following:

1. AT&T Florida is a local exchange company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.
2. AT&T Florida is a Georgia corporation and its principal place of business is 675 W. Peachtree Street, NE, Atlanta, Georgia 30375.
3. All pleadings, notices and other documents filed in this proceeding should be directed to AT&T Florida’s representatives as follows:

E. Earl Edenfield, Jr.  
Tracy W. Hatch  
Manuel A. Gurdian  
AT&T Florida  
c/o Gregory R. Follensbee  
150 South Monroe Street, Ste. 400  
Tallahassee, FL 32301  
ke2722@att.com

th9467@att.com  
mg2708@att.com  
305.347.5558 (telephone)  
850.222.8640 (fax)

4. Pleadings and process for the Navy may be served upon:

Charles E. Bennett  
Department of the Navy  
Commanding Officer - NCTS  
NCTS-N-2, Bldg. 27  
Naval Air Station Jacksonville  
Jacksonville, FL 32212-0111

5. Rule 25-4.0345(1)(b), Florida Administrative Code (the “Rule”) sets forth the required location, unless otherwise ordered by the Commission for good cause shown, for the point of physical interconnection between the telephone network and the customer’s premises wiring, or the demarcation point.

6. Rule 25-4.0345(1)(b)(2) requires that the demarcation point for a single line/multi-customer building be located within the customer’s premises at a point easily accessed by the customer.

7. The Department of the Navy (the “Navy”) owns and operates the Naval Station. The Navy has asked to purchase certain of AT&T Florida’s existing cable and outside plant facilities and has advised AT&T Florida that, coincident with that sale, it desires to establish a single point of demarcation for AT&T Florida services to non-residential subscribers at the Naval Station.

8. If the single point of demarcation is established, AT&T Florida will be unable to locate its demarcation point within the customer’s premises, as set forth in Rule 25-4.0345(1)(b)(2).



9. Pursuant to a signed agreement between AT&T Florida and the Navy, AT&T Florida plans to sell, and the Navy plans to purchase, such existing cable and outside plant facilities and effect the change to the single point of demarcation as aforesaid, subject to any necessary approvals from this Commission. AT&T Florida understands that the Navy would advise affected customers of the change and its ramifications by letter in the form of the attached Exhibit A sent at least 30 days in advance of the change. *See* Draft Letter from Navy to Existing/Future Occupants regarding Single Demarcation Point attached hereto as Exhibit "A". The letter advises that AT&T Florida services will terminate at the new single point of demarcation (to be located at Building #110 at the Naval Station) and that customers will need to work with the Navy or its designees to extend service or repair service from the single point of demarcation to their premises.

10. Thus, to the extent AT&T Florida needs the permission of the Commission to effect the change to the single demarcation point for service to non-residential subscribers at the Naval Station, this Petition requests such permission for "good cause shown" under the Rule.

11. AT&T Florida's request for permission to change the demarcation point for good cause shown request meets the "good cause shown" standard. AT&T Florida fully supports the existing Rule but is requesting the waiver for good cause -- in order to provide service given the changes that the property owner, the Navy, has requested.

WHEREFORE, AT&T Florida requests that, having demonstrated good cause for its request, the Commission grant its Petition.

Respectfully submitted this 21st day of April, 2009.

AT&T FLORIDA



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E. EARL EDENFIELD JR.

TRACY W. HATCH

MANUEL A. GURDIAN

c/o Gregory R. Follensbee

150 South Monroe Street, Ste. 400

Tallahassee, FL 32301

(305) 347-5558

733108

EXHIBIT A

**Draft Letter From Navy to Existing/Future Occupants, Except Residents of  
Naval Support Activity Housing, Regarding  
Single Demarcation Point**

Date \_\_\_\_\_

Naval Computer and Telecommunications Station, (NCTS) Jacksonville will assume ownership of outside plant cable previously operated by BellSouth Telecommunications, Inc. d/b/a AT&T Southeast on Naval Support Activity, Panama City on \_\_\_\_\_ . This action allows the US Navy to upgrade and better control the use of outside plant cables. The demarcation point between Navy owned cables and AT&T Southeast services will be located at Building #110. The following procedures for communications services at Naval Support Activity Panama City apply. This letter and the changes discussed in this letter do not apply to communications services provided by AT&T Southeast to residents of housing at the Station.

1. For installation of any new service, please contact the Panama City Base Communications Office (BCO), 850-230-7025. This is to determine if there is existing Outside Cable Plant to meet your requirements. Then, contact your AT&T Southeast Account Executive, or Local Exchange Vendor.
2. If your communications service needs to be extended outside of Building #110, you may contract with the BCO, or any communications contractor you choose to

extend service to your building, or location. Note: Pair assignments need to be coordinated with the BCO.

3. For repair troubles, contact the Panama City Base Communication Office (BCO), 850-230-7025, first. The BCO will determine which side of the demarcation point the repair trouble exists, and provide you with any information you need to provide to AT&T Southeast if AT&T Southeast needs to be called. The BCO will only check the outside cable plant to determine if the problem is in the Navy-Owned cable. If BCO advises you that the trouble is on AT&T Florida's side of the demarcation point, please contact AT&T Southeast's Repair Center for service at 800-615-0709.
4. You will need to notify the BCO of connects and disconnects of services from AT&T Southeast or another vendor.
5. If any equipment is required to extend Special Circuits (T1, DS3, 56kb, 256kb), it will be the responsibility of the end user to purchase said equipment, as AT&T Southeast will no longer extend Special Circuits from Building #110, under detarriffed wiring charges.
6. In all cases, the Command's Telephone Liaison Officer (TLO) of record must be kept informed of your communications needs.



Please contact the Panama City BCO at 850-230-7025 if you have any questions regarding the establishment of a single point of demarcation at Naval Support Activity Panama City.

Naval Computer and Telecommunications Station, (NCTS)  
Jacksonville