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BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF W. KEITH MILNER
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET No. 980800-TP
SEPTEMBER 18, 1998

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. My name is W. Keith Milner. My business address is 675 West
Peachtree Street, Atlanta, Georgia 30375. I am Senior Director -
Interconnection Services for BellSouth Telecommunications, Inc.
("BellSouth" or "the Company"). I have served in my present role since
February 1996 and have been involved with the management of certain
issues related to local interconnection, resale, and unbundling.

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

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
TODAY?

A. I will provide rebuttal to the direct testimony of Supra Telecommunications

1 and Information Systems, Inc., ("Supra") witnesses David A. Nilson and
2 Olukayode A. Ramos regarding Issues 2, 3A, and 5 in this docket.

3

4 Q. MR. RAMOS' TESTIMONY, BEGINNING ON PAGE 9, REFERENCES A
5 DISCUSSION PAPER ENTITLED "REGULATION OF ACCESS TO
6 VERTICALLY-INTEGRATED NATURAL MONOPOLIES" THAT WAS
7 FILED BY BELLSOUTH CORPORATION IN NEW ZEALAND IN 1995.
8 WOULD YOU PLEASE COMMENT ON THIS PAPER.

9

10 A. Yes. Mr. Ramos has taken selected excerpts of the discussion paper out
11 of context in order to misrepresent the position and policy of BellSouth
12 toward competition. The discussion paper was drafted in the context of
13 the New Zealand market. In contrast to both the U.S. and the State of
14 Florida, the New Zealand government did not create a regulatory body
15 with responsibility for industry oversight. Further, the New Zealand
16 market had no industry specific competition law to create a framework for
17 competitive behavior. The comments in the discussion paper were
18 framed in the context of an environment which is unlike most other
19 countries and certainly unlike the competitive environment in Florida. The
20 discussion paper was in fact drafted as input to the New Zealand
21 government's review of whether such laws or regulation should be
22 created. Therefore, Mr. Ramos' excerpts can not be extrapolated to a
23 view of competition in general or to BellSouth's policy toward competition.

24

1 I believe BellSouth's opinion is well stated in the Executive Summary from
2 which Mr. Ramos draws his excerpts which reads, "BellSouth believes
3 that competition on a level playing field under a symmetrical regulatory
4 regime is in BellSouth's best interests over the long term and maximizes
5 the contribution of these sectors to the overall growth of the economy
6 through promotion of economic efficiency."
7

8 Q: SUPRA WITNESS MR. NILSON, ON PAGE 10 OF HIS TESTIMONY,
9 CLAIMS THAT SUPRA'S PHYSICAL COLLOCATION APPLICATION
10 "DID NOT INCLUDE FUTURE PROJECTED REQUIREMENT OF EVEN
11 12 MONTHS" BECAUSE BELLSOUTH TOLD SUPRA THEY "ARE NOT
12 ALLOWED TO RESERVE SPACE FOR FUTURE USE". DOES THIS
13 STATEMENT REFLECT BELLSOUTH'S POLICY"?

14
15 A. No. BellSouth may not reserve space for itself for future use on terms
16 more favorable than it applies to those seeking collocation space.
17 Consistent with this guideline, BellSouth allows the provision of
18 collocation equipment and terminations for up to a two-year forecast.
19 This policy was conveyed in BellSouth's written response to Supra's
20 applications, sent on July 24, 1998 and in a follow-up telephone
21 conversation between BellSouth and Supra and on or about September 8,
22 1998. BellSouth requested written clarification from Supra that its
23 requirements stated on its application would not exceed a two (2) year or
24 twenty-four (24) month forecast. This procedure of requesting
25 clarification is followed by BellSouth with any requesting collocator when

1 the number of cross-connect terminations requested either does not
2 match the capacity of the equipment placement or appears unreasonable
3 for a two-year time frame. In the September 8, 1998, telephone
4 conversation between BellSouth and Supra, Supra advised BellSouth that
5 the requirements on their applications were "actually more like an 18
6 month forecast." Within the context of the September 8, 1998, telephone
7 conversation, Supra displayed an apparent understanding of BellSouth's
8 willingness to permit forecasted capacity. Supra also acknowledged
9 Supra's inclusion of future capacity needs beyond 12 months. This is a
10 direct contradiction of his written testimony filed just three days following
11 the telephone conversation, on September 11, 1998.

12
13 Q. ON PAGE 15 OF HIS TESTIMONY, MR. RAMOS LISTS THREE
14 FACTORS WHICH HE STATES SHOULD BE CONSIDERED IN
15 DETERMINING IF THERE IS ADEQUATE SPACE TO PROVIDE AN
16 ALTERNATIVE LOCAL EXCHANGE COMPANY (ALEC) A PHYSICAL
17 COLLOCATION ARRANGEMENT IN A BELLSOUTH CENTRAL OFFICE.
18 HE LISTS THE THREE FACTORS AS: 1) THE AMOUNT OF
19 ADMINISTRATIVE SPACE USED BY BELLSOUTH; 2) THE AMOUNT OF
20 SPACE RESERVED BY BELLSOUTH FOR ITS OWN FUTURE USE,
21 AND; 3) WHETHER BELLSOUTH HAS UTILIZED A DESIGN FOR THE
22 CENTRAL OFFICE THAT MAXMIZES THE OPPORTUNITY FOR
23 PHYSICAL COLLOCATION FOR TELECOMMUNICATIONS CARRIERS
24 SUCH AS SUPRA. DO YOU AGREE THAT THESE ARE THE PROPER
25 FACTORS THAT SHOULD BE CONSIDERED IN MAKING SUCH A

1 DETERMINATION?

2
3 A. No. While Mr. Ramos offers no basis for the factors he has put forth, my
4 direct testimony in this proceeding cited the FCC's First Report and
5 Order, at paragraph 604, et al, as providing the proper categories of
6 factors that should be considered. For example, Mr. Ramos makes no
7 mention of important criteria such as fire and safety codes or space
8 allocated to meet the safety and human needs of employees and vendors.

9
10 Separate and apart from the FCC's First Report and Order, the three
11 factors Mr. Ramos mentions are not appropriate because building designs
12 for BellSouth's central offices pre-dated the Telecommunications Act of
13 1996 ("Act"). As such, BellSouth's central offices were not designed with
14 consideration for physical collocation opportunities for
15 telecommunications carriers other than BellSouth.

16
17 Q. ON PAGE 16 OF HIS TESTIMONY, MR. RAMOS STATES "AT A
18 MEETING HELD ON JUNE 8, 1998, I WAS INFORMED BY BELLSOUTH
19 THAT BELLSOUTH HAS DENIED OTHER COMPANIES PHYSICAL
20 COLLOCATION IN THESE CENTRAL OFFICES [THAT IS,
21 BELLSOUTH'S GOLDEN GLADES AND PALM BEACH GARDENS
22 CENTRAL OFFICES] I INFORMED THOSE PRESENT AT THE
23 MEETING THAT IT IS UNFORTUNATE THAT THOSE COMPANIES
24 HAVE CHOSEN TO ACCEPT BELLSOUTH'S REPLY AND HAVE
25 SIMPLY WALKED AWAY." DO YOU BELIEVE THOSE OTHER

1 COMPANIES WHOM BELLSOUTH HAS DENIED PHYSICAL
2 COLLOCATION IN BELLSOUTH'S GOLDEN GLADES AND PALM
3 BEACH GARDENS CENTRAL OFFICES HAVE "SIMPLY WALKED
4 AWAY" AND DECIDED NOT TO COMPETE WITH BELLSOUTH BASED
5 ON THE UNAVAILABILITY OF SPACE IN THESE TWO CENTRAL
6 OFFICES?

7
8 A. No. Where space is not available for physical collocation, BellSouth
9 makes virtual collocation arrangements available to telecommunications
10 carriers. BellSouth also offers virtual collocation to ALECs whose first
11 choice is virtual collocation rather than physical collocation. In fact,
12 BellSouth has provided telecommunications carriers with virtual
13 collocation arrangements in both the Golden Glades and Palm Beach
14 Gardens central offices and those companies are using those
15 arrangements to compete with BellSouth.

16
17 On page 10 of my direct testimony, I discussed telecommunications
18 carriers' requests for physical collocation arrangements in the Golden
19 Glades central office. At that time, I indicated that, aside from Supra,
20 BellSouth Long Distance (BSLD) and one other telecommunications
21 carrier had requested a physical collocation arrangement in the Golden
22 Glades central office and that those requests have been denied. Upon
23 further investigation, a correction to my previous statement is in order.
24 BellSouth has found that, in addition to Supra and BSLD, four other
25 telecommunications carriers, rather than one, had requested physical

1 collocation arrangements in the Golden Glades central office and been
2 denied. Two of these ALECs were denied space prior to Supra and two
3 were denied space subsequent to Supra. Of those four
4 telecommunications carriers, three subsequently applied for virtual
5 collocation.

6

7 Q. BEGINNING ON PAGE 16 OF HIS TESTIMONY, MR. RAMOS CITES
8 PROPOSED RULEMAKING BY THE FCC REGARDING "WALK
9 THROUGH" VISITS TO BELLSOUTH'S CENTRAL OFFICES. IS
10 BELLSOUTH OPPOSED TO SUCH WALK THROUGH VISITS?

11

12 A. No. Mr. Ramos correctly notes that BellSouth and Supra, along with
13 members of the Commission staff, performed such walk through visits in
14 both these central offices on July 24, 1998. BellSouth and Supra, again
15 accompanied by members of the Commission staff, performed additional
16 walk through visits of both these central offices on September 16, 1998,
17 during which both BellSouth and Supra videotaped pertinent areas of the
18 interiors of these central offices. I would note that "Supra's request to
19 BellSouth in advance that Supra would like the walk-through filmed by a
20 video camcorder" was made at the last minute before the scheduled walk
21 through visits on July 24, 1998. BellSouth denied Supra's request only
22 until such time as both BellSouth and Supra could make arrangements to
23 simultaneously videotape the interiors of these central offices and this
24 was accomplished on September 16, 1998.

25

1 Q. BEGINNING ON PAGE 18 OF HIS TESTIMONY, MR. RAMOS STATES
2 "A FEW DAYS AFTER THE WALK-THROUGH [THAT IS THE WALK
3 THROUGH VISIT ON JULY 24, 1998], BELL SOUTH PROVIDED
4 REVISED FLOOR PLAN LAYOUTS THAT FOR THE FIRST TIME
5 EARMARKED MUCH OF THE DISCOVERED EQUIPMENT STORAGE
6 SPACE AS FUTURE USE SPACE. CLEARLY, BELL SOUTH IS SIMPLY
7 ATTEMPTING IN BAD FAITH TO HIDE WHAT IS OBVIOUSLY USABLE
8 AND AVAILABLE SPACE THAT CAN EASILY BE USED TO SATISFY
9 SUPRA'S REQUESTS." PLEASE COMMENT.

10

11 A. First of all, while BellSouth did provide updated floorplan drawings to
12 Supra following the visit on July 24, 1998, these changes were discussed
13 with Supra and the Commission staff at the time of the visit and most
14 changes were for the purpose of clarifying to Supra and the Commission
15 staff the use of various sections of the floorspace in greater detail. In fact,
16 Supra and the Commission staff requested several such changes be
17 made to the floorplan drawings. Second, BellSouth strongly disagrees
18 with Mr. Ramos' assertions that BellSouth is acting in bad faith. I am
19 disappointed that Mr. Ramos would characterize BellSouth's attempt to
20 clarify key information to Supra and the Commission staff in such a
21 manner. I personally attended the July 24, 1998, walk through visits in
22 both central offices and what I observed differs sharply from the
23 impression Mr. Ramos' unfounded assertions would leave. BellSouth
24 provided abundant subject matter expertise to Supra and the Commission
25 staff to answer any and all questions that arose.

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Q. ON PAGE 20 OF HIS TESTIMONY, MR. RAMOS CLAIMS THAT SUPRA ESPECIALLY NEEDS TO BE PROVIDED PHYSICAL COLLOCATION ARRANGEMENTS IN THE GOLDEN GLADES AND PALM BEACH GARDENS CENTRAL OFFICES BECAUSE THESE BUILDINGS HOUSE TANDEM SWITCHES. IS HE CORRECT?

A. No. Mr. Ramos goes to great lengths to confuse the issues of collocation and network interconnection. BellSouth provides access to all its tandems, including both its access tandems and its local tandems. Mr. Ramos has apparently taken out of context a portion of this Commission's Order in Docket 97-1459-TL requiring BellSouth to provide interconnection at BellSouth's local tandems. BellSouth abides by that requirement and provides not one, but two forms of local tandem interconnection. Should Supra wish to interconnect its network to either BellSouth's access tandems or local tandems, BellSouth will accommodate such interconnection. The issue of local tandem interconnection, however, has no bearing on the issue at hand, which is the availability of space to accommodate Supra's request for physical collocation.

Q. ON PAGE 24 OF HIS TESTIMONY, MR. RAMOS STATES "SUPRA HAS SECURED 15 COLLOCATION APPROVALS FROM BELLSOUTH, BUT SUPRA CANNOT CONTINUE WITH ITS NETWORK DEPLOYMENT UNTIL THIS ISSUE IS RESOLVED." DO YOU AGREE?

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A. While it is impossible for me to know all of Supra's plans for its network, my years of experience in the planning and implementation of telecommunications networks make me wonder why Supra cannot proceed in any of the fifteen other BellSouth central offices in which Supra has requested physical collocation and where BellSouth has agreed that such collocation is feasible. As I pointed out earlier, even in those cases where space is not available for physical collocation, BellSouth makes virtual collocation available, an option which Supra apparently has chosen not to pursue.

Q. BEGINNING ON PAGE 25 OF HIS TESTIMONY, MR. RAMOS DISCUSSES THE TIME FRAMES DURING WHICH BELLSOUTH MUST ACCOMPLISH THE PROVISIONING ACTIVITIES REQUIRED TO MAKE PHYSICAL COLLOCATION ARRANGEMENTS AVAILABLE. MR. RAMOS CONCLUDES THAT "AS NOTED EARLIER IN THIS TESTIMONY, BELLSOUTH IS IN VIOLATION OF 47 CFR, SECTION 51.323(j) BY REFUSING TO ALLOW COLLOCATORS TO PARTICIPATE IN THE PROCESS OF SELECTING CONTRACTORS TO BE USED IN CONSTRUCTING THE VERY NETWORK INFRASTRUCTURE THAT THE COLLOCATOR WILL USE. SUPRA FINDS THIS HIGHLY UNREASONABLE ON THE PART OF BELLSOUTH AND WOULD PROPOSE THAT THE COMMISSION SANCTION BELLSOUTH TO PREVENT THESE ABUSES." DO YOU AGREE?

1 A. No. First of all, Mr. Ramos fails to point out that the installation of a
2 collocator's equipment within a physical collocation arrangement is
3 performed by vendors certified by BellSouth rather than by BellSouth
4 personnel. Second, the collocator may choose from any of the BellSouth
5 certified equipment installers. Third, Mr. Ramos in no way identifies what
6 "abuses" he believes BellSouth to be guilty of, or what BellSouth positions
7 he believes to be "highly unreasonable." BellSouth uses the very same
8 certified equipment installers and contractors for its own work as are
9 available to Supra or any other collocator. Finally, if Supra chooses, it
10 could have its own personnel certified to install equipment in BellSouth's
11 central offices.

12

13 Q. ON PAGE 27 OF HIS TESTIMONY, MR. RAMOS QUOTES FROM
14 SECTION III, PARAGRAPH A OF THE COLLOCATION AGREEMENT
15 EXECUTED BETWEEN BELLSOUTH AND SUPRA ON JULY 24, 1997.
16 DO YOU AGREE THAT THE REFERENCED INTERCONNECTION
17 AGREEMENT LANGUAGE ALLOWS SUPRA TO INSTALL WHATEVER
18 EQUIPMENT SUPRA DESIRES?

19

20 A. No. As I pointed out in my direct testimony in this proceeding, BellSouth's
21 position is consistent with the relevant portions of the FCC's First Report
22 and Order. In the recently issued Memorandum Opinion and Order and
23 Notice of Proposed Rulemaking in CC Docket No. 98-147 et. al., the FCC
24 "tentatively concluded that we should decline to require collocation of
25 equipment used to provide enhanced services." FCC 98-188 at

1 paragraph 132. The language of the interconnection agreement
2 specifically states that Supra may place, maintain, and operate in the
3 collocation space any equipment that Supra is authorized by BellSouth
4 and by Federal or State regulators to place, maintain, and operate in the
5 collocation space. The FCC has specifically declined from requiring
6 BellSouth to permit the placement, maintenance, and operation of
7 equipment used to provide enhanced services. Thus, BellSouth has no
8 obligation under Federal law to accommodate Supra's request to place
9 such equipment in collocation arrangements. Further, Supra has pointed
10 to no State of Florida requirements that BellSouth accommodate such a
11 request. BellSouth has no interest in whether Supra chooses to act solely
12 as an enhanced service provider or solely as an information services
13 provider. However, when Supra acts in such a capacity, it may not use
14 collocation arrangements in BellSouth's central offices to provide such
15 services.

16
17 Q. ON PAGE 31 OF HIS TESTIMONY, MR. RAMOS STATES
18 "BELLSOUTH'S DENIAL OF PHYSICAL COLLOCATION FOR THE
19 ASCEND SWITCHES IS INAPPROPRIATE FOR TWO REASONS.
20 FIRST, BELLSOUTH ASSUMES THAT 47 CFR SECTION 51.100(b)
21 MUST BE READ SO NARROWLY AS TO MEAN THAT EACH ITEM OF
22 EQUIPMENT PLACED IN THE CENTRAL OFFICE MUST PHYSICALLY
23 BE ABLE TO PERFORM BASIC TELECOMMUNICATIONS SERVICES
24 BEFORE BELLSOUTH IS OBLIGATED TO ALLOW COLLOCATION OF
25 THAT PARTICULAR PIECE OF EQUIPMENT." HE FURTHER STATES

1 "ACCORDINGLY, THIS COMMISSION SHOULD REJECT BELLSOUTH'S
2 INTERPRETATION OF 47 SECTION 51.100(b) AND INTERPRET THAT
3 SECTION TO REQUIRE PHYSICAL COLLOCATION OF AN ALEC'S
4 NETWORK, WITHOUT REGARD TO EACH PARTICULAR ITEM OF
5 EQUIPMENT, SO LONG AS THE ENTIRE PHYSICALLY COLLOCATED
6 NETWORK PROVIDES BOTH TELECOMMUNICATIONS SERVICES
7 AND INFORMATION SERVICES." DO YOU AGREE?
8

9 A. No. Mr. Ramos apparently wishes to re-write the rules to accommodate
10 his request without any regard for the apparent intent of those rules. For
11 example, Mr. Ramos' interpretation would allow that even if only one half
12 of one percent of the equipment physically collocated is actually used to
13 provide telecommunications services, Supra would be entitled to use
14 BellSouth's central offices for such purposes. He is incorrect. Such
15 obvious "gaming" of the process should not be allowed. I should repeat
16 what I stated in my direct testimony that BellSouth will permit the
17 placement of equipment in the physical collocation arrangement where
18 such equipment is utilized for the purposes of providing
19 telecommunication services through interconnection or through access to
20 unbundled network elements. Where that equipment can also provide
21 information services, the telecommunications carrier may offer information
22 services through the same arrangement, so long as it is also offering
23 telecommunications services through the same arrangement. BellSouth
24 is not required to provide for collocation of equipment that can only
25 provide enhanced services or information services. In addition, BellSouth

1 will not permit collocation of equipment that will be used only to provide
2 enhanced services or information services.

3
4 The FCC has not espoused any predominant use theory regarding the
5 types of equipment it requires be collocated. Instead, the FCC clearly
6 states that in no case is there a requirement that BellSouth allow the
7 collocation of equipment used to provide enhanced services. BellSouth is
8 consistent with the FCC's Rules and has voluntarily agreed to the
9 collocation of such equipment so long as the collocator is also using such
10 equipment for telecommunications services. BellSouth believes its
11 position is clear and unambiguous such that collocators will know what
12 equipment may or may not be installed within BellSouth's central offices
13 and thus plan their network deployments accordingly.

14
15 Q. ON PAGE 32 OF HIS TESTIMONY, MR. RAMOS STATES "THE
16 ASCEND EQUIPMENT FOR WHICH BELLSOUTH HAS DENIED SUPRA
17 PHYSICAL COLLOCATION WILL ENABLE CONCENTRATION OF BOTH
18 VOICE AND DATA AND THUS WILL REDUCE THE TOTAL NUMBER
19 OF TRUNK CONNECTIONS WITH BELLSOUTH'S EQUIPMENT,
20 THEREBY REDUCING THE POTENTIAL FOR NETWORK BLOCKAGE
21 AND HELPING TO ALLEVIATE BELLSOUTH'S PROFESSED LACK OF
22 AVAILABLE TRUNK CONNECTIONS." IS HE CORRECT?

23
24 A. No. Mr. Ramos attempts here to mix in the altogether unrelated issue of
25 trunk blockage on the switched network. Any trunk blockage occurring

1 would be the result of an insufficient quantity of trunk connections
2 between and among BellSouth's and other service providers' switches.
3 The type connections possible through the Ascend equipment Mr. Ramos
4 refers to are unrelated to calls processed by BellSouth's switches. My
5 understanding of Supra's intended use of Ascend equipment is that such
6 connections will use only transport elements rather than switching to
7 aggregate and route traffic over particular interoffice transport facilities.
8 Thus, the use of the equipment Mr. Ramos refers to will have no effect on
9 the efficiency of the interoffice switched trunk network and certainly will
10 not reduce network blockage as asserted by Mr. Ramos. As a result, the
11 elaborate discussion in Mr. Ramos' testimony regarding the topics of
12 network blockage and end office trunking, local tandem interconnection
13 and two way trunking and percent local usage factors, which he discusses
14 on pages 32 through 34 of his testimony, have no bearing on the matters
15 before this Commission in this docket.

16
17 Q. ON PAGE 32 OF HIS TESTIMONY, MR. RAMOS STATES "IT IS
18 BELIEVED THAT BELL SOUTH ITSELF HAS USED REMOTE ACCESS
19 CONCENTRATORS OF ANOTHER BRAND IN ITS
20 TELECOMMUNICATIONS NETWORK." PLEASE COMMENT.

21
22 A. It may be that Mr. Ramos is confused as to BellSouth's obligation to
23 provide for physical collocation to Supra and others. There are no
24 provisions in the Computer III Docket No. 85-229; the Expanded
25 Interconnection Docket No. 91-141; the Local Interconnection Docket No.

1 96-98; nor the Telecommunications Act of 1996 ("Act") that require
2 BellSouth to provide collocation of equipment for companies that provide
3 enhanced services or information services. BellSouth provides physical
4 collocation in compliance with Section 251 of the Act to
5 telecommunications carriers that are certified ALECs. At present,
6 BellSouth has no plans to expand the availability of CO space beyond the
7 requirements under the Act.

8
9 FCC rules permit Bell Operating Company (BOC) enhanced service
10 operations to be in BellSouth's central offices as long as the BOC
11 complies with the FCC's Open Network Architecture (ONA) rules and
12 Computer III nonstructural safeguards, including charging enhanced
13 service operations for tariffed services as though they are physically
14 located outside of the central office.

15
16 Q. ON PAGE 35 OF HIS TESTIMONY, MR. RAMOS STATES "THE
17 COMMISSION SHOULD FURTHER ORDER BELLSOUTH TO REMOVE
18 ALL UNNECESSARY DESKS, TABLES AND STORAGE SPACE IN ITS
19 CENTRAL OFFICES AND PERMIT SUPRA TO UTILIZE SOME OF THIS
20 WASTED SPACE IN BELLSOUTH'S CENTRAL OFFICES." DO YOU
21 AGREE WITH MR. RAMOS?

22
23 A. No. It should be apparent that desks and tables are needed for the
24 personnel assigned to work in BellSouth's central offices to effectively
25 perform their assigned duties. It should also be apparent that machines

1 as complex as switching and transmission systems require a large array
2 of spare parts to be on hand for maintenance and repair requirements
3 and that such equipment must be stored and protected adequately.
4 BellSouth strongly disagrees with Mr. Ramos' assertion that BellSouth
5 has intentionally wasted space in its central offices simply to deny Supra
6 access to space for physical collocation. Mr. Ramos' testimony is replete
7 with baseless charges that BellSouth has acted in bad faith, has
8 attempted to thwart Supra's entry into the local market and has interfered
9 with Supra's ability to compete with BellSouth on an equal footing. To the
10 contrary, BellSouth has worked long and hard with Supra in an attempt to
11 accommodate Supra's requests. In two out of seventeen BellSouth
12 central offices in which Supra has requested physical collocation, Supra's
13 request unfortunately cannot be granted. No amount of rhetoric from Mr.
14 Ramos will change the simple reality that these two central offices are out
15 of floorspace.

16
17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18
19 A. Yes.