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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for temporary waiver of physical collocation requirements set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the Daytona Beach/Port Orange Central Office, by BellSouth Telecommunications, Inc.

DOCKET NO.: 980946-TL
FILED: October 5, 1998

RECORDS AND REPORTING

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INTERMEDIA COMMUNICATIONS INC.'S
COMMENTS ON BELL SOUTH'S PETITION FOR WAIVER

Intermedia Communications Inc. (Intermedia) hereby submits in the above-referenced matter its initial comments as requested by the staff.

COMMENTS

Intermedia plans to serve discovery on BellSouth Telecommunications, Inc. to more fully develop its position regarding this matter. Intermedia's preliminary comments are set forth below.

The Telecommunications Act of 1996 (Act) in Section 251(c)(6) requires incumbent local exchange carriers (ILECs) to provide physical collocation unless the carrier demonstrates to the state

commission that physical collocation is not practical for technical reasons or because of space limitations. Moreover, the ILEC is required to submit to the state commission detailed floor plans or diagrams of any premises when the ILEC claims that physical collocation is not practical because of space limitation. (47

U.S.C. §51.323)

Intermedia believes that it is essential to allow competing providers that may seek physical collocation at BellSouth's premises to tour the premises. Allowing competitors to "walk

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through" BellSouth's premises would allow competitors, such as Intermedia, to identify space that could be used for providing physical collocation. Moreover, this Commission would be in a better position to evaluate BellSouth's petition if competitors viewed BellSouth's premises and present their positions to the Commission.

Intermedia respectfully requests that it be permitted to tour BellSouth's facility that is the subject matter of the above-referenced docket, and reserves the right to file additional comments after the walk-through and completion of discovery.

Respectfully submitted, this 5th day of October, 1998.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand delivery (*) this 5th day of October, 1998, to the following:

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