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Ms. Blanca S. Bayo, Director  
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Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

November 19, 1999

Re: Docket No. 981834-TP - Petition of Competitive Carriers for Commission action to support local competition in BellSouth's service territory

Docket No. 990321-TP - Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Prehearing Statement for filing in the above matters. Also enclosed is a diskette with a copy of the Prehearing Statement in WordPerfect 5.0 format. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Sincerely,

Kimberly Caswell

KC:tas

Enclosures



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**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  
Filed: November 19, 1999

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**GTE FLORIDA INCORPORATED'S PREHEARING STATEMENT**

GTE Florida Incorporated (GTE) files its Prehearing Statement in accordance with Commission Rule 25-22.038 and the Order Establishing Procedure in this case (Order No. PSC-99-1991-PCO-TP).

**A. Witnesses**

John W. Ries will be GTE's witness on all matters in this docket.

**B. Exhibits**

1. Shared Caged and Subleased Caged Collocation Guidelines and Responsibilities, attached to Mr. Ries' Direct Testimony as Exhibit A.
2. CLEC-to-CLEC Interconnect Guidelines and Responsibilities, attached to Mr. Ries' Direct Testimony as Exhibit B.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

GTE reserves the right to use or introduce additional exhibits at the hearing or other appropriate points.

### **C. GTE's Basic Position**

The Commission should approve GTE's recommendations for implementation of collocation arrangements, as set forth in detail below. GTE's practices comply with FCC requirements and appropriately balance ILEC and ALEC interests.

### **D., E., F., G. GTE's Specific Positions**

GTE believes the issues identified for resolution in this case are mixed questions of fact, law, and policy. GTE's positions follow.

**Issue 1: When should an ILEC be required to respond to a complete and correct application for collocation and what information should be included in that response?**

**GTE's Position:** GTE will provide space availability and price quote information to the ALEC within 15 days of submission of its complete and correct application. Any guidelines the Commission adopts should allow GTE to maintain this practice.

**Issue 2: If the information contained in the ILEC's initial response is not sufficient to complete a firm order, when should the ILEC provide such information or should an alternative procedure be implemented?**

**GTE's Position:** GTE's response to the application will provide all the information necessary to place a firm order. Thus, no alternative procedure is necessary as to GTE.

**Issue 3: To what areas does the term “premises” apply, as it pertains to physical collocation and as it is used in the Act, the FCC’s Orders, and FCC Rules?**

**GTE’s Position:** The FCC defines “premises” in its Rule 51.5. GTE interprets the FCC Rule to mean that any GTE location identified in the NECA #4 tariff (listing GTE sites nationwide) is available for collocation, although common sense must be used in real world applications of this definition.

**Issue 4: What obligation, if any, does an ILEC have to interconnect with ALEC physical collocation equipment located “off-premises”?**

**GTE’s Position:** The Act requires all telecommunications carriers to interconnect with the facilities of other telecommunications carriers, whether they are located on- or off-premises.

**Issue 5: What terms and conditions should apply to converting virtual collocation to physical collocation?**

**GTE’s Position:** In general, an ALEC converting from virtual to physical collocation must follow the standard process for a new physical collocation request.

**Issue 6: What are the appropriate response and implementation intervals for ALEC requests for changes to existing collocation space?**

**GTE’s Position:** It depends upon the type of change sought, but, in general, response and implementation intervals are the same for collocation change requests as for new collocation requests.

**Issue 7: What are the responsibilities of the ILEC and collocators when:**

**A. A collocator shares space with, or subleases space to, another collocator.**

**GTE’s Position:** In both the shared and sublease situations, the collocating ALECs will share space in accordance with the terms and conditions they negotiate, within the guidelines set by GTE. These detailed guidelines are included in Mr. Ries’ Direct Testimony as Exhibit A.

**B. A collocator cross-connects with another collocator.**

**GTE’s Position:** In Exhibit B to his Direct Testimony, Mr. Ries sets forth in detail the ILECs’ and ALECs’ rights and responsibilities in the cross-connect situation.

**Issue 8: What is the appropriate provisioning interval for cageless collocation?**

**GTE's Position:** The provisioning intervals for caged and cageless collocation should be the same. The presence or absence of a cage does not materially affect the time or activities needed to prepare physical collocation space.

**Issue 9: What is the appropriate demarcation point between ILEC and ALEC facilities when the ALEC's equipment is connected directly to the ILEC's network without an intermediate point of interconnection?**

**GTE's Position:** The appropriate demarcation point would be the ALEC-provided block that connects to the main distribution frame (MDF) or a digital signal cross-connect (DSX) panel.

**Issue 10: What are the reasonable parameters for reserving space for future LEC and ALEC use?**

**GTE's Position:** GTE and ALECs alike should be able to reserve the amount of space they can support with documented, funded business plans. ALECs reserving space should be charged for the space reserved, just as GTE is required to pay for utilities, taxes, and maintenance on vacant space in its central offices.

**Issue 11: Can generic parameters be established for the use of administrative space by an ILEC, when the ILEC maintains that there is insufficient space for physical collocation? If so, what are they?**

**GTE's Position:** No. Every central office is different, so that uniform parameters would be unworkable. The ILEC's use of administrative space should be evaluated on a case-by-case basis, as it is today.

**Issue 12: What types of equipment are the ILECs obligated to allow in a physical collocation arrangement?**

**GTE's Position:** Under FCC Rules, the ILECs must permit collocation of all equipment that is necessary for interconnection or access to unbundled elements.

**Issue 13: If space is available, should the ILEC be required to provide price quotes to an ALEC prior to receiving a firm order for space in a central office (CO)?**

**GTE's Position:** GTE will provide price quotes prior to receiving a firm order.

**Issue 14: Should an ALEC have the option to participate in the development of the ILEC's price quote, and if so, what time frames should apply?**

**GTE's Position:** GTE's tariff approach moots the issue of the ALEC "participating" in the development of the price quote.

**Issue 15:** Should an ALEC be permitted to hire an ILEC-certified contractor to perform space preparation, racking and cabling, and power work?

**GTE's Position:** An ALEC can hire an ILEC-certified contractor, but GTE must retain control of all scheduling and other coordination of work done on behalf of collocators.

**Issue 16:** For what reasons, if any, should the provisioning intervals be extended without the need for an agreement by the applicant ALEC or filing by the ILEC of a request for an extension of time?

**GTE's Position:** The ILEC should not need to seek a waiver in all cases where it and the ALEC agree to an extension of the provisioning interval. Also, no waiver should be required where delays are out of the ILEC's control (such as delays in delivery of the ALEC's equipment and delays in issuance of building permits); where the ALEC materially changes its application; and where the ALEC fails to complete work items for which it is responsible within the designated time frame.

**Issue 17:** How should the costs of security arrangements, site preparation, collocation space reports, and other costs necessary to the provisioning of collocation space, be allocated among multiple carriers?

**GTE's Position:** GTE's tariff will generally determine these costs; there is no need for a separate allocation mechanism.

**Issue 18:** If insufficient space is available to satisfy the collocation request, should the ILEC be required to advise the ALEC as to what space is available?

**GTE's Position:** It is GTE's policy to do so.

**Issue 19:** If an ILEC has been granted a waiver from the physical collocation requirements for a particular CO, and the ILEC later makes modifications that create space that would be appropriate for collocation, when should the ILEC be required to inform the Commission and any requesting ALECs of the availability of space in that office?

**GTE's Position:** The ILEC should inform interested parties by means of a posting on its website within 10 days of the space becoming available.

**Issue 20:** What process, if any, should be established for forecasting collocation demand for CO expansions and additions?

**GTE's Position:** GTE does not believe any process should be mandated. Rather, the ILECs should be able to consider all market and historical collocation demand information that will aid in the forecasting process. Above all, ILECs should not be required to undertake additions based on ALEC forecasts of space needs.

**Issue 21: Applying the FCC's "first-come, first-served" rule, if space becomes available in a central office because a waiver is denied or a modification is made, who should be given priority?**

**GTE's Position:** The fairest and most efficient approach would be to give priority to the first ALEC submitting a firm order for the space.

#### **H. Stipulated Issues**

GTE is unaware of any stipulations at this time.

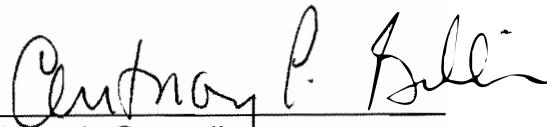
#### **I. Pending Matters**

GTE is unaware of any pending matters.

#### **J. Procedural Requirements**

To the best of its knowledge, GTE can comply with all requirements set forth in the procedural order in this case.

Respectfully submitted on November 19, 1999.

By:   
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Attorney for GTE Florida Incorporated

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Prehearing Statement in Docket Nos. 981834-TP and 990321-TP were sent via U. S. mail on November 19, 1999 to the parties on the attached list.

*Anthony P. Zullin*  
on Kimberly Caswell



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