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December 14, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 991761-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Waiver, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (kk)
Nancy B. White

NBW:jn

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

APR _____
APP _____
CDE _____
CIR Bayó
CTR _____
EAG _____
LEG 1
MAS _____
OPC _____
RRR _____
SEC 1
VAW _____
OTH _____

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CERTIFICATE OF SERVICE
Docket No. 991761-TL

I hereby certify that a true and correct copy of the foregoing has been served by U. S. mail this 14th day of December, 1999 to:

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Tallahassee, FL 32399-0850

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Nancy B. White (KR)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.: 991761-TL
Inc.'s Petition for Waiver of collocation)
In the Mandarin-Loretto Central Office)
_____) Filed: December 14, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Waiver in accordance with Order No. PSC-99-1744-PAA-TP, issued on September 7, 1999 ("PSC Order"), the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order"). Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements as set forth in the Act, in the Order and in the PSC Order for the Mandarin-Loretto Central Office ("CO") located at 11498 Old St. Augustine Road, Jacksonville, Florida 32257. BellSouth seeks this exemption from the Florida Public Service Commission ("FPSC") on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth expects to construct an addition to the building.

1. The Mandarin-Loretto CO building houses a 5ESS switch providing local dial tone. Circuit equipment also located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross-connect panels and provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

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2. The area served by the Mandarin-Loretto CO is growing rapidly and thus the facility is under enormous space constraints. This CO currently serves 42,291 access lines and 8,880 TI circuits.

3. Under the Act, Incumbent Local Exchange Companies (“ILECs”) have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

47 U.S. § 251(c)(b). Thus, an ILEC is required to provide physical collocation unless it is “not practical...because of space limitations.” Id. The term “space limitations” encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to “retain a limited amount of floor space for defined future uses” (Order, Par. 604). Without the latter element, competitive entrants “could prevent incumbent LECs from serving their customers effectively.” Id.

4. Due to space limitations in the Mandarin-Loretto CO, BellSouth is unable to provide physical collocation to additional ALECs. There will be no space for additional physical collocation until the addition is completed. The space limitations faced by BellSouth are the result of the use of space by the amount of existing

BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers.

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and
6. BellSouth determined available collocation space by subtracting Items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for additional physical collocation until the addition is completed. Attached hereto is the space assessment worksheet that details the procedure set forth above. (Exhibit 1). This exhibit also identifies the central office language identifier, the identity of the requesting ALEC and the amount of space sought, the total amount of space at the premises and floor loading requirements. Also attached hereto as Exhibit 2 are floor plans that contain the remaining information required by the PSC Order.

7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth currently has plans to build an addition to the facility.

8. The Mandarin-Loretto CO will contain no available space for physical collocation until the addition is completed and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Mandarin-Loretto CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Mandarin-Loretto CO until such time as the building addition is completed.

Respectfully submitted this 14th day of December, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White (CR)
NANCY B. WHITE
c/o Nancy Sims
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R. Douglas Lackey (CR)
R. DOUGLAS LACKEY
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Atlanta, Georgia 30375
(404) 335-0747

SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

12/8/99

1	CENTRAL OFFICE CLLI:	<u>MNDNFLO</u>			
2	COLLOCATOR AND AMOUNT OF SPACE NA - Paperwork filed at PSC request	<u>NONE</u> <u>0</u> sf			
3	TOTAL GROSS SQ. FT.	<u>8680</u> sf			
4	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED				
a.	BST occupied equipment space	<u>7341</u> sf			
	Nonregulated services	<u>0</u> sf			
	Administrative offices - not related to installing, repairing, maintaining CO equipment	<u>562</u> sf			
b.	Retired equipment	<u>0</u> sf			
c.	Future BST space reservations	<u>147</u> sf			
	Switch	<u>66.5</u>			
	Circuit	<u>80.5</u>			
	Power	<u> </u>			
	Frame	<u> </u>			
d.	Collocation space (There is virtual but no physical)	<u>0</u> sf			
e.	Other 3rd party space	<u>0</u> sf			
	What is the occupancy	<u> </u>			
f.	Switch turnaround space				
	Service Yr <input type="text" value=""/>	<u>0</u> sf			
g.	Remaining space	<u>630</u> sf			
	Unavailable space	<u>630</u>			
	Space available for Collocation	<u>0</u>			
h.	Central office growth plans.				
	Forecast completion				
	Yr				
	Addition	<table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td style="width: 50px; text-align: center;">2000</td><td style="width: 50px;"></td></tr></table>	2000		<u>6148</u> sf
2000					
	Renovation	<table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td style="width: 50px;"></td><td style="width: 50px;"></td></tr></table>			<u>0</u> sf
i.	Any other plans for relieving space exhaust				
5.	Floor loading	All space	<u>150#sf</u> <u>8680</u> sf		
		Power rooms only	<u>350#sf</u> <u>0</u> sf		

NAME OF PERSON FILLING OUT FORM:

James D Bloomer - Manager - Facility Planning
(PRINT NAME AND TITLE)

TEL. NO. 904-350-3428

AUTHORIZED BY:

SameTEL. NO. Same

Exhibit 1

PRIVATE

THE INFORMATION CONTAINED HEREIN SHOULD NOT BE DISCLOSED TO UNAUTHORIZED PERSONS. IT IS MEANT SOLELY FOR USE BY AUTHORIZED BELL SOUTH EMPLOYEES