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Legal Department

NANCY B. WHITE
General Counsel - Florida

00 MAR 27 PM 4:30

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

March 27, 2000

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. 000290-TL (WPB Gardens C.O. Waiver)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver of Physical Collocation in the West Palm Beach Gardens Central Office, 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
(BW)

Nancy B. White

- AFA _____
- APP _____
- CAF _____
- CMW _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- RRR _____
- SEC _____
- WAW _____
- OTH _____

Enclosures

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

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03800 MAR 27 8

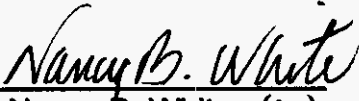
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 000290-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 27th day of March, 2000 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Ms. Ellen Richards
Mr. Ned Feldman
100 Carpenter Drive
Sterling, VA 20164
Tel. No. (703) 995-2055
Fax. No. (703) 742-7706


Nancy B. White
Nancy B. White (pw)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.: 000290-TL
Inc.'s Petition for Temporary Waiver of)
Physical Collocation In the West Palm)
Beach Gardens Central Office)
_____) Filed: March 27, 2000

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

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Temporary 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 West Palm Beach Gardens Central Office ("CO") located at 3700 RCA Boulevard, Palm Beach Garden, Florida. 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. The estimated completion date of the addition is the end of the first quarter of 2001.

1. The West Palm Beach Gardens CO building houses switches 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

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FPSC-REG. SEC./REPORTING

COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the West Palm Beach Gardens CO is growing rapidly and thus the facility is under enormous space constraints. To meet the demands of the expanding customer base, BellSouth currently has on order from the manufacturer additional Toll/Circuit and Switching equipment.

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 West Palm Beach Gardens CO, BellSouth is unable to provide physical collocation to additional ALECs. There will be no room

however 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.

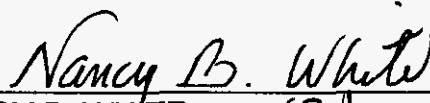
7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility.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

8. The West Palm Beach Gardens CO contains no available space for physical collocation and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the West Palm Beach Gardens 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 West Palm Beach Gardens CO until such time as the building addition is completed.

Respectfully submitted this 27th day of March, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (PW)
c/o Nancy Sims
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(305) 347-5555

R. Douglas Lackey (pd)

R. DOUGLAS LACKEY
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
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202791

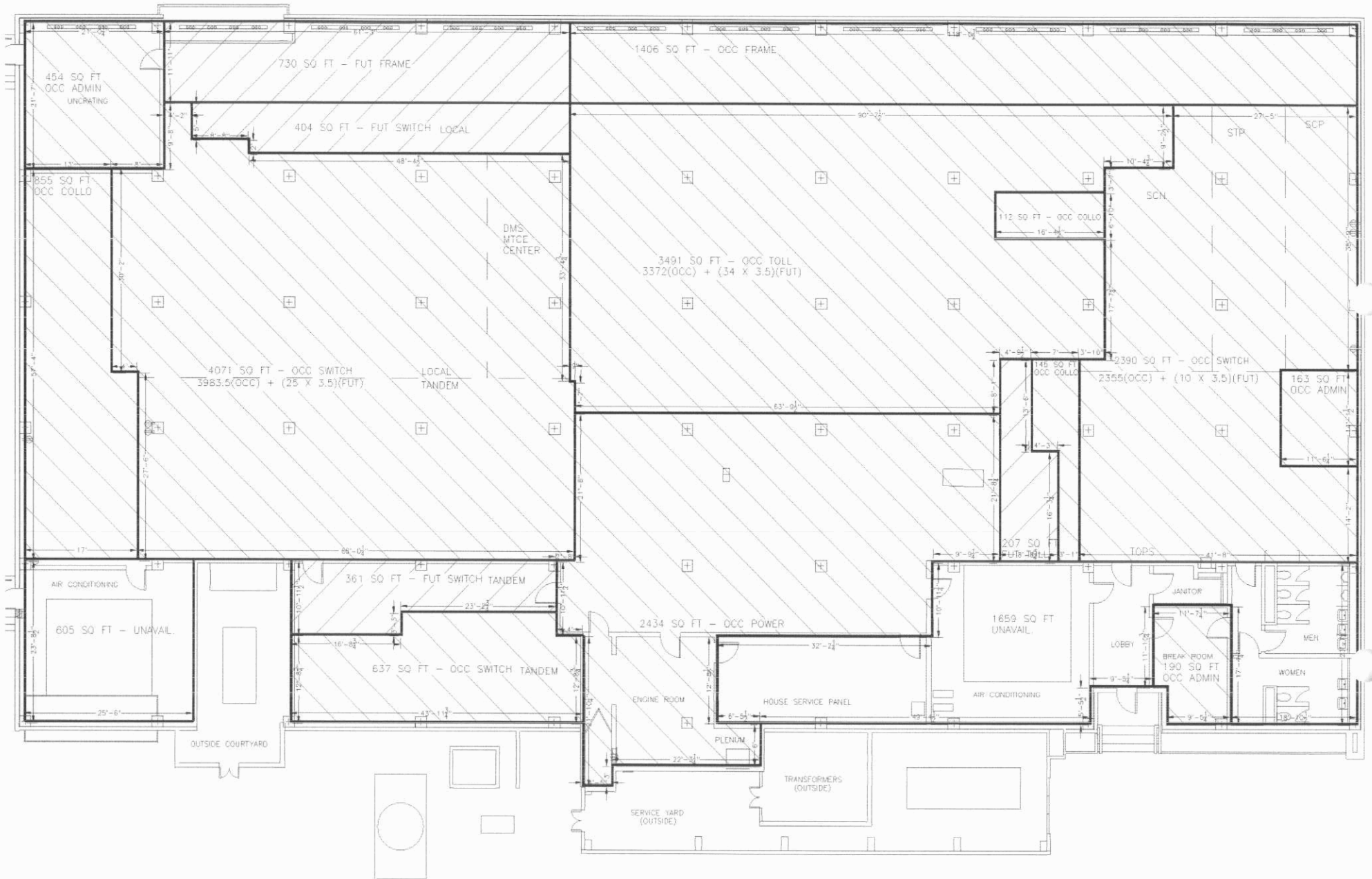
SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

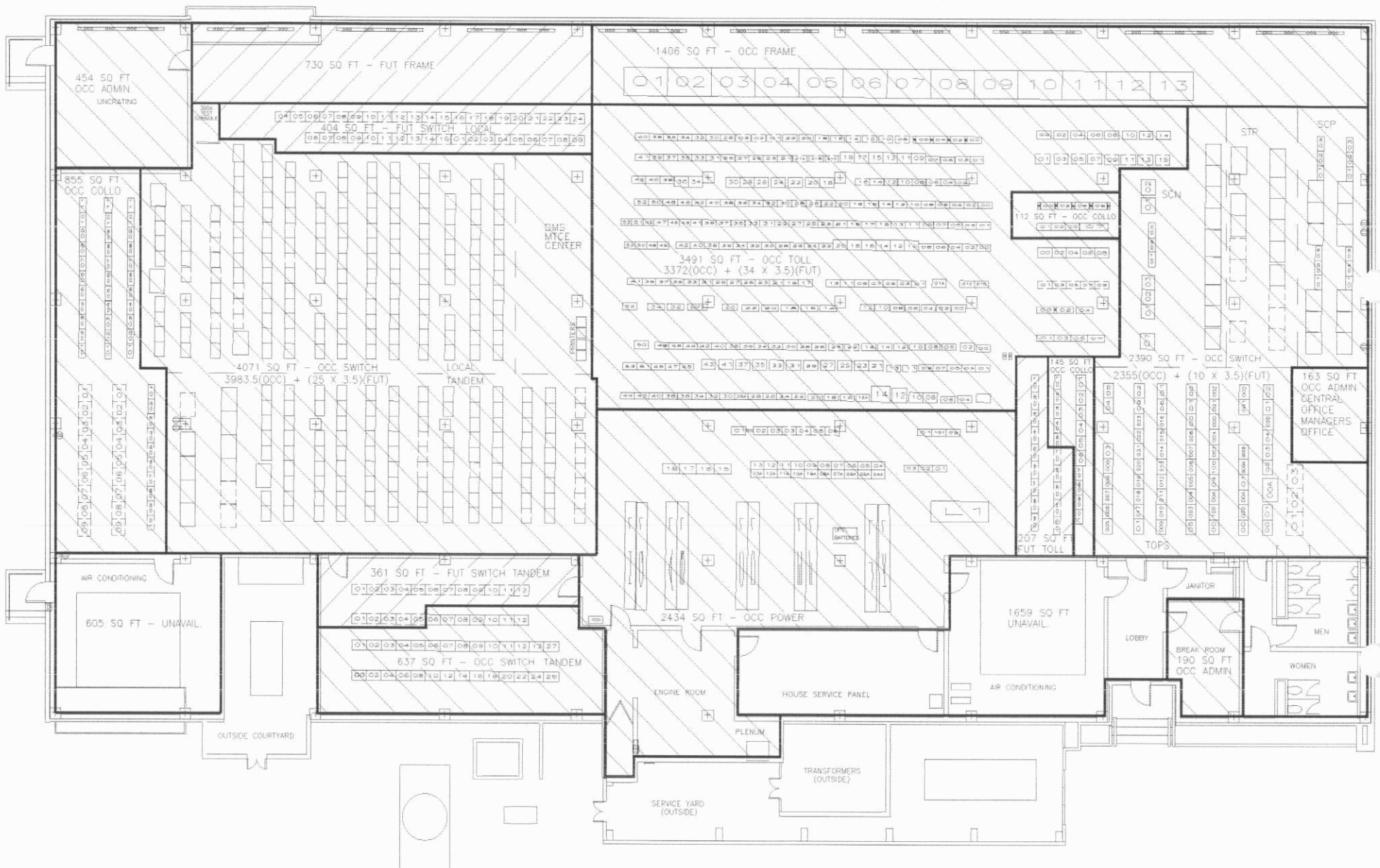
03/08/2000

1	CENTRAL OFFICE CLLI:		<u>WPBHFLGR</u>	
2	COLLOCATOR AND AMOUNT OF SPACE		<u>NAO</u>	
			<u>100sf</u>	
3.	TOTAL GROSS SQ. FT.			<input type="text" value="20314"/>
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED			
a.	BST occupied equipment space		<u>14065.5</u>	sf
	Nonregulated services		<u>0</u>	sf
	Administrative space - not related to installing, repairing, maintaining CO equipment		<u>807</u>	sf
b.	Retired equipment		<u>0</u>	sf
c.	Future BST space reservations		<u>2065.5</u>	sf
	Switch	<u>1009.5</u>		
	Circuit	<u>326</u>		
	Power	<u>0</u>		
	Frame	<u>730</u>		
d.	Collocation space		<u>1112</u>	sf
e.	Other 3-d party space		<u>0</u>	sf
	What is the occupancy			
f.	Switch turnaround space			
	Service Yr <input type="text" value=""/>		<u>0</u>	sf
g.	Unavailable space		<u>2264</u>	sf
	Remaining space		<u>0</u>	sf
h.	Central office growth plans.			
	Forecast completion			
	Yr			
	Addition <input type="text" value="2000"/>		<u>22908</u>	sf
	Renovation <input type="text" value=""/>		<u>0</u>	sf
i.	Any other plans for relieving space exhaust			
5.	Floor loading	150#sf	<u>20314</u>	sf
	Power rooms only	350#sf	<u>0</u>	sf

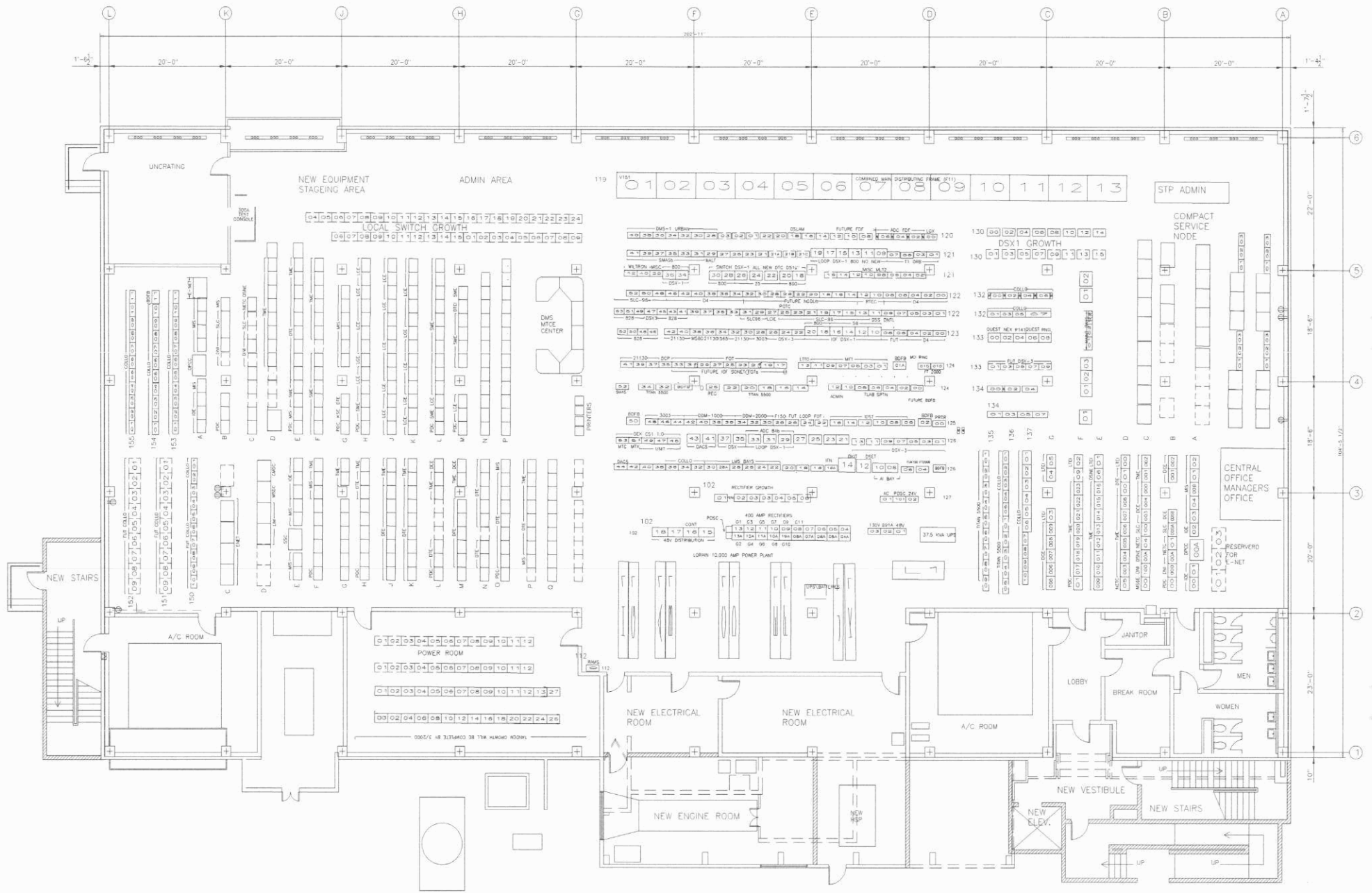
ATTACHMENT 1



E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN
 PSC WAIVER ITEM 4 A-F PAGE 1



E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN
PSC WAIVER ITEM 4 A-F PAGE 2



E8519 WEST PALM BEACH GARDENS FIRST FLOOR PLAN
 YEAR 2000 BUILDING ADDITION
 PSC WAIVER ITEM 4 G-H PAGE 1



E8519 WEST PALM BEACH GARDENS SECOND FLOOR PLAN
 YEAR 2000 BUILDING ADDITION
 PSC WAIVER ITEM 4 G-H PAGE 2

SCALE: 1/8"=1'-0"