

NANCY B. WHITE
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
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ORIGINAL

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RECORDS AND REPORTING

July 17, 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. 000779-TL (Petition for Waiver - Perdido Bay Central Office)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver for Physical Collocation in the Perdido Bay Central Office which we ask that you file in the above-referenced 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
Nancy B. White (BN)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

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CMP *Engelwood*
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08601 JUL 17 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,)
Inc.'s Request for Temporary Waiver of)
Physical Collocation in the Perdido Bay) Docket No. 000779-TL
Central Office)
_____) Filed: July 17, 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 Perdido Bay Central Office ("CO") located at 5575 Larimer Avenue, Pensacola, 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 will attempt to construct an addition to the building but may not receive the necessary permits due to the presence of wetlands on the property. If allowed to build, the estimated completion date of such an addition would be the end of the fourth quarter of 2002.

1. The Perdido Bay 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 COs and local customers. Rectifiers and battery strings provide power to the above equipment.

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FPSC-RECORDS/REPORTING

2. The area served by the Perdido Bay 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 Perdido Bay CO, BellSouth is unable to provide the amount of space requested for physical collocation by the ALEC involved. There are approximately 4 to 5 bays available for physical collocation. There will be no room for additional physical collocation once these bays are filled 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.

CERTIFICATE OF SERVICE

Docket No. 000779-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 17th day of July, 2000 to the following:

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

Mr. Rob Sauser
Mr. Milton Milford
LEC Unwired, LLC.
1 Lakeshore Drive
Suite 1900
Lake Charles, LA 70629
(337) 436-9000



Nancy B. White (su)

SPACE ASSESSMENT WORK SHEET

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

07/12/2000

| | | | |
|----|--------------------------------------------------------------------------------------------|--------|---------------------------|
| 1 | CENTRAL OFFICE CLLI: | | PNSCFLPB |
| | | | Pensacola Perdido Bay DMS |
| 2 | COLLOCATOR AND AMOUNT OF SPACE | | NA |
| | | | |
| 3. | TOTAL GROSS SQ. FT. | | 3752 |
| 4. | FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED | | |
| a. | BST occupied equipment space | 2776 | sf |
| | Nonregulated services | 0 | sf |
| | Administrative offices - not related to installing, repairing, maintaining CO equipment | 531 | sf |
| b. | Retired equipment | 0 | sf |
| c. | Future BST space reservations | 139 | sf |
| | Switch | 21 | |
| | Toll | 49 | |
| | Power | 69 | |
| | Frame | | |
| d. | Collocation space (Actual and Future**) | | sf |
| e. | Other 3-d party space | 0 | sf |
| | What is the occupancy | | |
| f. | Switch turnaround space | | |
| | Service Yr <input style="width: 80px;" type="text"/> | 0 | sf |
| g. | Unavailable space | 306 | sf |
| | Unusable space (grounding and exit aisles) | | |
| | Remaining space | 0 | sf |
| h. | Central office growth plans. | | |
| | Forecast completion | | |
| | Yr | | |
| | Addition <input style="width: 80px;" type="text" value="N/A"/> | | sf |
| | Renovation <input style="width: 80px;" type="text" value="2000"/> | 0 | sf |
| i. | Any other plans for relieving space exhaust | | |
| | Relocate maintenance center to entry, relocate bath room | | |
| | Remove wall | | |
| | No building addition possible at moment | | |
| 5. | Floor loading | 150#sf | sf |
| | Power rooms only | 350#sf | sf |

SPACE ASSESSMENT WORK SHEET

NAME OF PERSON FILLING OUT FORM:

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

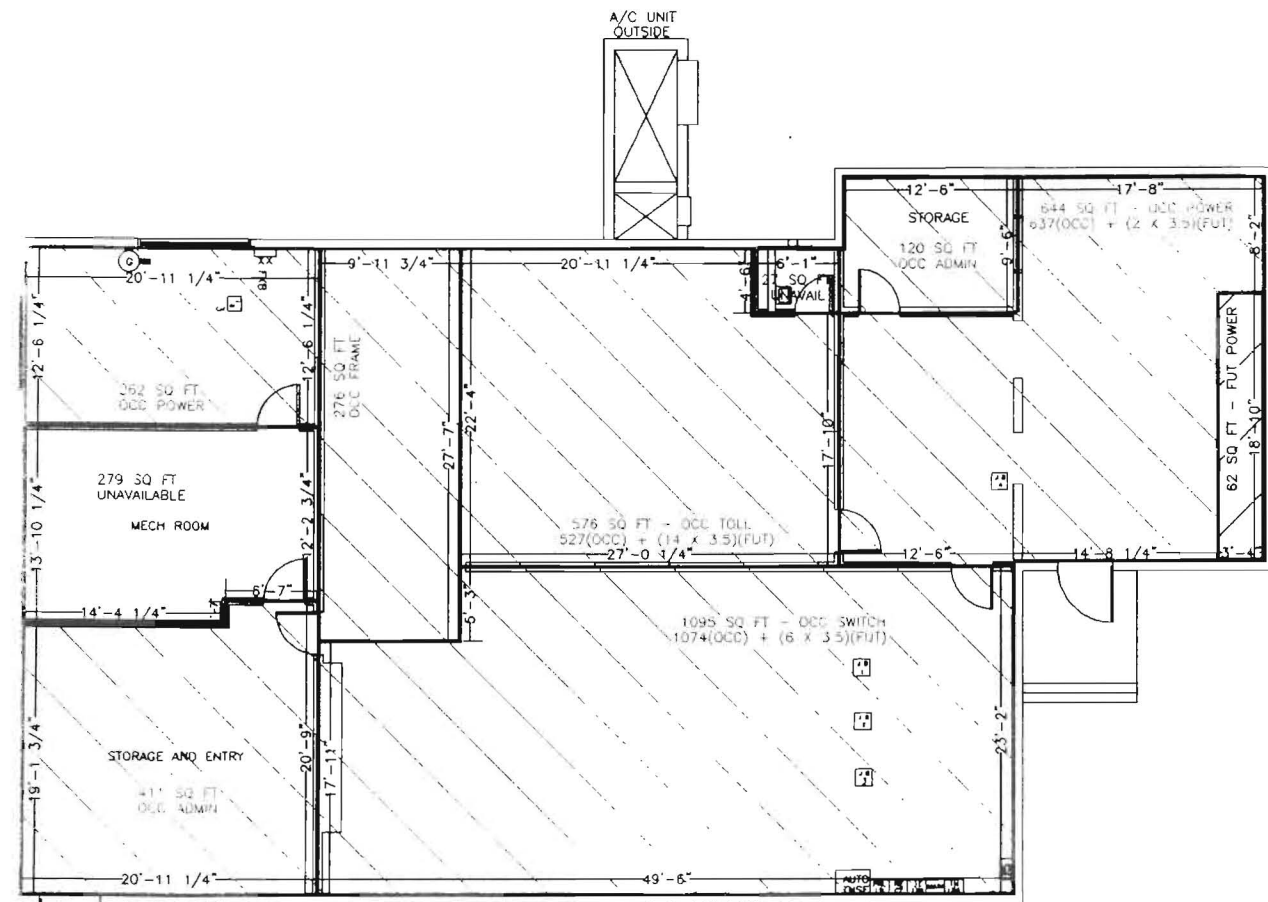
TEL. NO. _904-350-3428

AUTHORIZED BY:

Same as above

TEL. NO. _Same as Above

EXHIBIT 2



JUNE 28, 2000

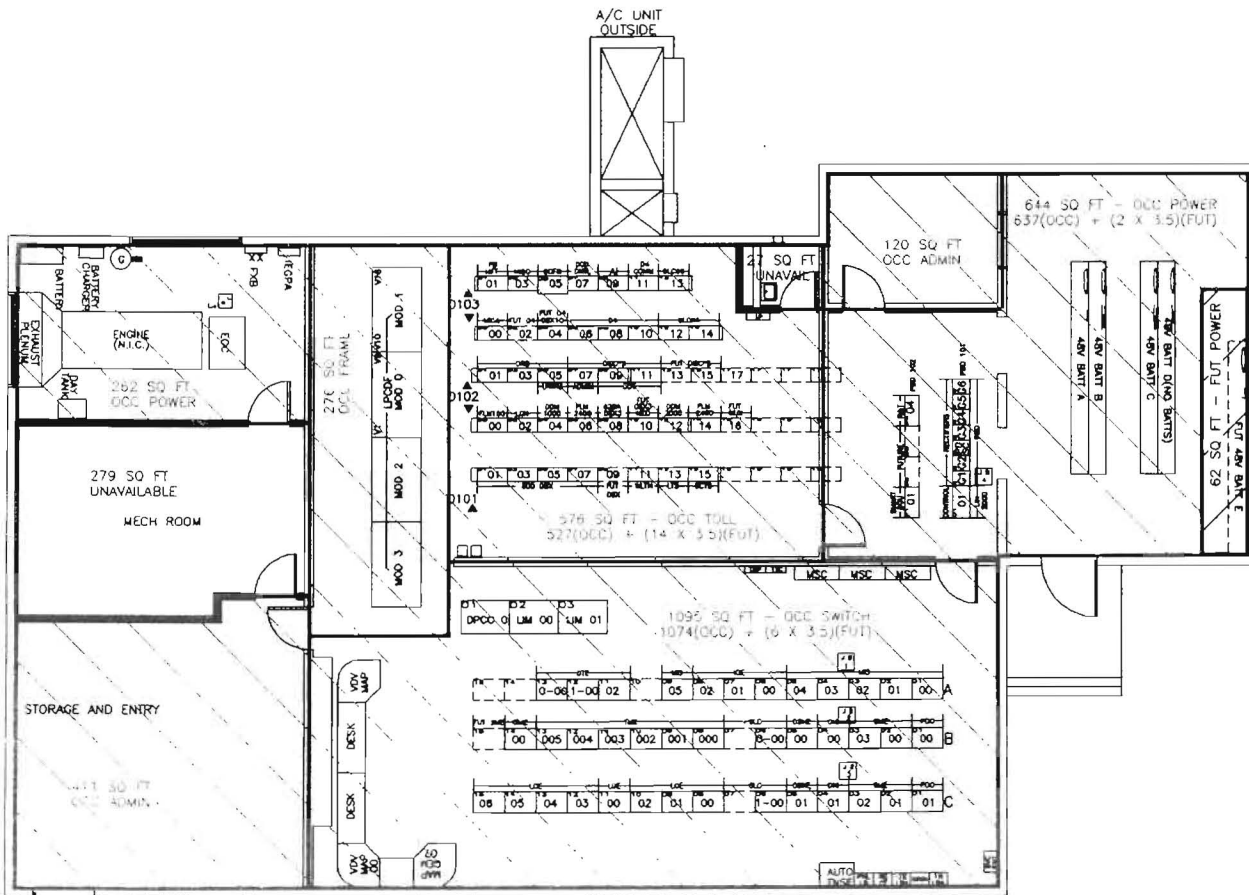
A TOTAL GROSS SQ FT 3752

B MECHANICAL ROOM 279
RESTROOM 27
TOTAL UNAVAILABLE SPACE 306

C SWITCH 1074
TOLL 252
FRAME 278
POWER & ENGINE 292 + 637 = 929
ADMIN 411 + 130 = 541
TOTAL OCCUPIED SPACE 3507

D SWITCH 6 x 3.5 = 21
TOLL 14 x 3.5 = 49
POWER (2 x 3.5) + 62 = 69
TOTAL RESERVED SPACE 139

OCC - OCCUPIED
FUT - FUTURE
UNAVAIL - UNAVAILABLE

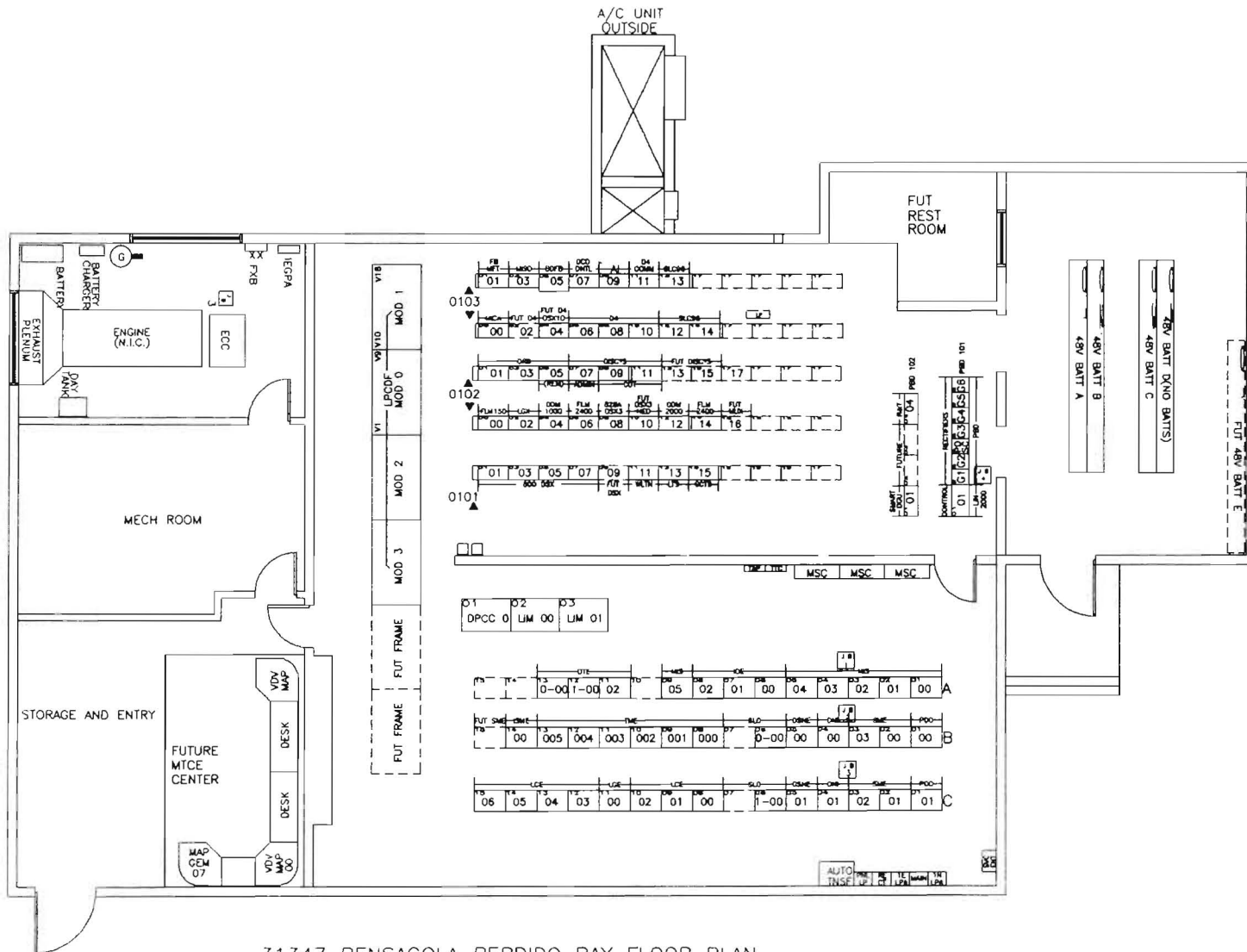


JUNE 28, 2000

| | | |
|---|----------------------------------------------------|-------------------------------------------------------|
| A | TOTAL GROSS SQ FT | 3752 |
| B | MECHANICAL ROOM RESTROOM | 279 27 |
| | TOTAL UNAVAILABLE SPACE | 306 |
| C | SWITCH TOLL FRAME POWER * ENGINE ADMIN | 1074 62 14 282 + 637 = 919 11 + 150 = 161 |
| | TOTAL OCCUPIED SPACE | 1307 |
| D | SWITCH TOLL POWER (2 X 3.5) + 62 | 6 X 3.5 = 21 14 X 3.5 = 49 62 + 21 + 49 = 132 |
| | TOTAL RESERVED SPACE | 139 |



OCC - OCCUPIED
FUT - FUTURE
UNAVAIL - UNAVAILABLE



31347 PENSACOLA PERDIDO BAY FLOOR PLAN
 PSC WAIVER ITEM 4 G-H PAGE 1 (FUTURE)