

STATE OF FLORIDA



DIVISION OF THE COMMISSION CLERK & ADMINISTRATIVE SERVICES
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Public Service Commission

C O N F I D E N T I A L

DOCKET NO.: 980946 - TL

DOCUMENT NO.: 04618-99

DESCRIPTION: Intermedia (Pellegrini) -
(CONFIDENTIAL) Direct testimony of Ronald W.
Beasley with exhibits RB-1 through RB-4. [RAR
5/12/99 note: Per DN 06056-99, only Exh RB-1 is to
remain confidential, which was returned to source
on 9/8/99; remaining testimony and exhibits are being
placed in the docket file.]

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April 9, 1999

VIA HAND DELIVERY

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REPORTING

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Re: Dockets Nos. 980947-TL, 980948-TL, 981011-TL and 981012-TL

Dear Ms. Bayo:

Enclosed is one copy of the direct testimony of Intermedia Communications Inc.'s witness, Ronald W. Beasley, to be filed in Dockets Nos. 980947-TL, 980948-TL, 981011-TL and 981012-TL. This filing is made in this manner in light of BellSouth Telecommunications, Inc.'s April 2, 1999, Notice of Intent to Request Specified Confidential Classification.

Thank you for your assistance in this matter.

Sincerely,


Charles J. Pellegrini

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LI This Notice of Intent was filed with Confidential
LI Document No. 04618-99. The document
OI has been placed in the confidential files pending
RI receipt of a request for confidential treatment.

- SL _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail this 9th day of April, 1999, to the following:

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Charles J. Pellegrini

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 and the FCC's First Report and Order, for the Boca Raton Boca Teeca Central Office, by BellSouth Telecommunications, Inc.

Docket No. 980947-TL

ORIGINAL

In re: Petition waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 and the FCC's First Report and Order, for the Miami Palmetto Central Office, by BellSouth Telecommunications, Inc.

Docket No. 980948-TL

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

Docket No. 981011-TL

In re: Petition for waiver of physical collocation requirements set forth in the Telecommunications Act of 1996 and the FCC's First Report and Order, for the North Dade Golden Glades Central Office, by BellSouth Telecommunications, Inc

Docket No. 9801012-TL

INTERMEDIA COMMUNICATIONS INC.'S
DIRECT TESTIMONY OF RONALD W. BEASLEY

April 9, 1999

5/12/99 -
All pages public record
except RB-1 (see DN 06056-99).

04618-99

1 **Q. PLEASE STATE YOUR NAME, EMPLOYER, AND BUSINESS**
2 **ADDRESS.**

3 **A.** My name is Ronald W. Beasley. I am employed by Intermedia Communications
4 Inc. (“Intermedia”) as Senior Manager of Engineering and Implementation for the
5 Network Restructuring Organization. My business address is 21445 North
6 Warson Road, St. Louis, Missouri 63132.

7 **Q. WHAT ARE YOUR RESPONSIBILITIES IN THAT POSITION?**

8 **A.** I am responsible for the Incumbent Local Exchange Carrier (“ILEC”) collocation
9 process, which consists of filing physical and virtual applications, developing
10 engineering specifications, ordering equipment, and supervising installation
11 contractors. I am also responsible for the development of Intermedia’s
12 collocation standards and ensuring that those standards are followed at every
13 collocation site.

14 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND**
15 **AND PROFESSIONAL EXPERIENCE.**

16 **A.** I attended Brewer State Junior College from 1975 to 1976 and the University of
17 Alabama in 1977. I served in the U.S. Air Force from 1971 to 1974 as a
18 Communications Specialist. Early in my career in the telecommunications
19 industry, I was involved in several capacities in providing telephone systems to
20 private businesses, which included vice-president operations with Cartel
21 Communications.

22 Later, I worked for Custom Design Telephone Systems
23 (“CDTS”)/Government Branch on the INTEMP project for the U.S. Army. This

1 work involved upgrading the telecommunications equipment of army posts. In
2 this position, I installed, tested, and certified power systems for central and
3 remote offices. I supervised the installation of central office distribution frames
4 for inside and outside plant cables. I also installed, tested and programmed Nortel
5 Digital Multiplexing System (“DMS”) switches and Optical Carrier Network
6 (“OCN”) equipment. Lastly, I supervised the transfer of all special circuits (data
7 and security) from old to new outside plant (“OSP”)/inside plant (“ISP”) facilities.

8 I subsequently worked for Metropolitan Fiber Systems (“MFS”) of St.
9 Louis as operations manager for OSP/ISP activities in St. Louis, Missouri. I was
10 responsible for supervising technicians, assigning dates for circuit installations,
11 addressing customer problems, supervising contractors, ordering equipment, and
12 maintaining and expanding of the fiber network.

13 I next worked for Brooks Fiber Properties, Inc., as an engineering manager
14 for all ILEC collocation activities, successfully turning up more than 175 ILEC
15 collocations.

16 During my career I have placed collocation equipment in central offices
17 throughout the country, and thus have had working relationships with every
18 dominant ILEC. I have a thorough understanding of the technical, practical and
19 legal collocation issues both ILECs and competitive carriers must consider in
20 addressing a request for collocation space.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?**

22 **A.** The purpose of my testimony today is to present to the Commission the
23 observations I made of collocation space availability in BellSouth

1 Telecommunications, Inc.'s ("BellSouth's") Miami Palmetto, North Dade Golden
2 Glades, Boca Raton Boca Teeca and West Palm Beach Gardens central offices.
3 What I observed was simply incompatible with BellSouth's allegations in these
4 proceedings that space for physical collocation purposes is unavailable in these
5 central offices and demonstrates that BellSouth's denial of Intermedia's requests
6 to collocate is neither reasonable nor warranted.

7 **Q. PLEASE SUMMARIZE YOUR TESTIMONY?**

8 **A.** In each of BellSouth's central offices, Miami Palmetto, North Dade Golden
9 Glades, Boca Raton Boca Teeca, and West Palm Beach Gardens, BellSouth is
10 ineffectively using space for equipment placement and other purposes resulting in
11 an unfair and anti-competitive result. There is space in all of these offices that
12 can be liberated for Intermedia's physical collocation requirements, but has not
13 been. Moreover, BellSouth's reservations of space for future growth are
14 excessive and cannot be justified by the growth projections on which they have
15 been based. There is space in these central offices that either would presently
16 accommodate Intermedia's physical collocation requirements, or, with reasonable
17 cost and effort on the part of BellSouth, could be made to accommodate those
18 requirements. To the extent that the floor space utilization in these central offices
19 may have been established prior to the Telecommunications Act of 1996, or to
20 competitive entry into long distance markets, I would not criticize it; however, in
21 significant ways, it now is a barrier to the collocation efforts of Intermedia.

22 Finally, in my testimony I will be generally discussing alternative forms of
23 collocation that might be used in specific places in these central offices. Julia

1 Strow will define and discuss, in her direct testimony, these alternatives in greater
2 detail.

3 **Q. DID YOU PARTICIPATE IN RECENT WALK-THROUGHS OF**
4 **BELLSOUTH'S CENTRAL OFFICES?**

5 **A.** Yes. On February 11, 1999, I completed walk-throughs of BellSouth's Miami
6 Palmetto and North Dade Golden Glades central offices. On February 12, 1999, I
7 completed walk-throughs of BellSouth's Boca Raton Boca Teeca and West Palm
8 Beach Gardens central offices.

9 **Q. WHAT WAS THE PURPOSE OF THE WALK-THROUGHS OF**
10 **BELLSOUTH'S CENTRAL OFFICES?**

11 **A.** The purpose of the walk-throughs of BellSouth's central offices was, as I
12 understand, to permit competitive carriers, such as Intermedia, whose requests for
13 physical collocation had been denied by BellSouth, an opportunity to inspect the
14 central offices in order to evaluate BellSouth's claim that space for physical
15 collocation was unavailable.

16 **Q. WHAT OBSERVATIONS FROM THE WALK-THROUGHS DO YOU**
17 **MAKE?**

18 **A.** I make both general observations that are common to each one of the central
19 offices I walked through and specific observations that are peculiar to each one of
20 the offices. I have made six general observations common to the four central
21 offices.

22 *First*, although in each of the central offices BellSouth had marked off
23 unoccupied floor space for future growth, I observed significant amounts of space

1 occupied by empty cabinets, racks and bays. *Second*, BellSouth has based the
2 allocation of space for future growth on growth projections for two to five years.
3 Growth projections that far in the future should not be considered reliable for
4 space utilization purposes. *Third*, I observed numerous racks and bays containing
5 unused space ranging from three to four square feet each that can be used for
6 equipment placement. *Fourth*, I also observed vast areas of usable space in the
7 lineups between racks and bays that is currently unused. *Fifth*, I observed out-of-
8 date relay/crossbar equipment still in place that did not appear to be functioning.
9 Even if this equipment is being used for circuit testing, BellSouth has failed to
10 take reasonable and feasible steps to consolidate circuits to efficiently utilize
11 equipment capacity and liberate space used by equipment made unnecessary by
12 consolidation. *Finally*, I observed that BellSouth had not taken old equipment out
13 of service and off the floor where new condensed bays have been installed with
14 high circuit density equipment, even though the circuits from the old equipment
15 could reasonably and feasibly be transferred to the new equipment.

16 **Q. CAN YOU SUM UP YOUR GENERAL OBSERVATIONS FROM THE**
17 **WALK-THROUGHS?**

18 **A.** Yes, I can. To sum up these general observations, it was readily apparent to me
19 that in numerous ways BellSouth has not managed space utilization in these
20 central offices to maximize operational efficiencies and to thereby create
21 collocation opportunities for competitive carriers, such as Intermedia.
22 Nevertheless, in each of these central offices, collocation space meeting

1 Intermedia's requirements exists, particularly if alternative collocation
2 arrangements are made available.

3 **Q. WHAT OBSERVATIONS DO YOU MAKE CONCERNING THE**
4 **AVAILABILITY OF PHYSICAL COLLOCATION SPACE IN**
5 **BELLSOUTH'S MIAMI PALMETTO CENTRAL OFFICE?**

6 **A.** Exhibit No. RB-1 depicts the first floor plan of BellSouth's Miami Palmetto
7 central office. In this central office, I observed five significant areas, totaling
8 approximately 2,839 square feet, that could be turned into physical collocation
9 spaces to accommodate Intermedia's requirements with negligible cost and effort.
10 The area marked "Note 1," consisting of 413 square feet, and identified as
11 "Conference Room OCC ADMIN," could be readily turned into physical
12 collocation space, or shared collocation space, if the conference room were to be
13 relocated in the Maintenance Center immediately adjacent. The area marked
14 "Note 2," consisting of approximately 650 square feet, is being used for
15 administrative purposes. With the administrative functions located elsewhere, the
16 space could be easily used for a Collocation Line of Sight Escort ("CLOSE")
17 collocation arrangement with several racks and bays. The area marked "Note 3,"
18 consisting of approximately 372 square feet, could be used to place racks and
19 bays for a Secured Collocation Open Physical Environment ("SCOPE")
20 collocation arrangement. The area marked "Note 4," consisting of approximately
21 532 square feet, is also being used for administrative purposes. With the
22 administrative functions located elsewhere, the space could be easily used for a
23 SCOPE or CLOSE collocation arrangement. The area marked "Note 5,"

1 consisting of approximately 872 square feet, is being used for storage and
2 administration. Again, with these functions located elsewhere, the space could be
3 used for a SCOPE collocation area.

4 **Q. WHAT OBSERVATIONS DO YOU MAKE CONCERNING THE**
5 **AVAILABILITY OF PHYSICAL COLLOCATION SPACE IN**
6 **BELLSOUTH'S NORTH DADE GOLDEN GLADES CENTRAL OFFICE?**

7 **A.** Exhibit Nos. RB-2.1 and RB-2.2 depict the first and second floor plans
8 respectively of BellSouth's North Dade Golden Glades central office. In this
9 central office, I observed seven significant areas, totaling approximately 3,161
10 square feet that could be turned into or could accommodate physical collocation
11 spaces with negligible cost and effort. The first floor area marked "Note 1,"
12 consisting of 795 square feet, and identified as "FUT SWITCH," the first floor
13 area marked "Note 2," consisting of 970 square feet, and identified as "FUT
14 TOLL," and the first floor area marked "Note 3," consisting of 580 square feet,
15 and identified as "FUT TOLL/VIRTUAL COLLO" and "FUT 04T SWITCH,"
16 are each capable of accommodating an Intermedia CLOSE collocation
17 arrangement. The first floor areas marked "Note 4," consisting of 916 square
18 feet in total, and identified as "STORAGE ROOM OCC ADMIN," "WORK
19 AREA RESTORATION OCC ADMIN," and "UNUSABLE," could, with
20 feasible structural modifications, be turned into space that could accommodate an
21 Intermedia SCOPE or CLOSE collocation arrangement. The second floor area
22 marked "Note 5," consisting of 661 square feet, and identified as "FUT
23 SWITCH," could accommodate an Intermedia CLOSE collocation arrangement.

1 The second floor area marked “Note 6,” consisting of 93 square feet, and
2 identified as “CBT TRAINING OCC ADMIN,” with the training function located
3 elsewhere, could be turned into a physical collocation space. The second floor
4 area marked “Note 7,” consisting of approximately 349 square feet, could
5 accommodate an Intermedia CLOSE collocation arrangement.

6 **Q. WHAT OBSERVATIONS DO YOU MAKE CONCERNING THE**
7 **AVAILABILITY OF PHYSICAL COLLOCATION SPACE IN**
8 **BELLSOUTH’S BOCA RATON BOCA TEECA CENTRAL OFFICE?**

9 **A.** Exhibit Nos. RB-3.1 and RB-3.2 depict the first and second floor plans
10 respectively of BellSouth’s Boca Raton Boca Teeca central office. In this central
11 office, I observed five significant areas, totaling approximately 18,179 square
12 feet, that could be turned into or could accommodate physical collocation spaces
13 to meet Intermedia’s requirements with negligible cost and effort. The first floor
14 area marked “Note 1,” consisting of approximately 314 square feet, within the
15 space identified as “OCC FRAME” and reserved for future frame growth, and the
16 first floor area marked “Note 2,” consisting of 1,756 square feet, and identified as
17 “FUT SWITCH,” could each accommodate an Intermedia CLOSE collocation
18 arrangement. The first floor area marked “Note 3,” consisting of 1,721 square
19 feet, and identified as “FUTURE + OCCUPIED,” is being used for administrative
20 functions. It could be readily used for an Intermedia CLOSE or SCOPE
21 collocation arrangement. The first floor area marked “Note 4,” consisting of
22 approximately 1,442 square feet, within the space identified as “OCC SWITCH +
23 OCCUPIED + FUTURE,” is being used for Maintenance Administration Panel

1 (“MAP”) workstations. Those workstations could be readily condensed to
2 provide space for an Intermedia CLOSE collocation arrangement. The second
3 floor area marked “Note 5,” the entire second floor, consisting of 12,946 square
4 feet, is being used for OSP administration with about 16 employees. This
5 function could be removed off-site, liberating the second floor for collocating
6 carriers, such as Intermedia, and avoiding the need to disrupt the first floor
7 equipment layout for immediate collocation purposes.

8 **Q. WHAT OBSERVATIONS DO YOU MAKE CONCERNING THE**
9 **AVAILABILITY OF PHYSICAL COLLOCATION SPACE IN**
10 **BELLSOUTH’S WEST PALM BEACH GARDENS CENTRAL OFFICE?**

11 **A.** Exhibit No. RB-4 depicts the first floor plan of BellSouth’s West Palm Beach
12 Gardens central office. In this central office, I observed five significant areas,
13 totaling approximately 4,539 square feet, that could be turned into or could
14 accommodate physical collocation spaces to meet Intermedia’s requirements with
15 negligible cost and effort. The area marked “Note 1,” consisting of approximately
16 475 square feet, within the space identified as “OCC SWITCH,” is being used as
17 a MAP workstation that could be consolidated elsewhere, liberating this space for
18 an Intermedia CLOSE collocation arrangement. The area marked “Note 2,”
19 consisting of approximately 875 square feet, within spaces identified as “OCC
20 FRAME” and “FUT SWITCH,” has a large overhead door, almost one-third of
21 the horizontal length of this area, that limits the number of frames the area can
22 accommodate; thus, the area could be used for either an Intermedia SCOPE or
23 CLOSE collocation arrangement. The area marked “Note 3,” consisting of

1 approximately 1,186 square feet, within the space identified as “OCC SWITCH
2 OCC + FUT,” is being used as an administrative work area. It is well suited,
3 however, for an Intermedia SCOPE collocation arrangement. The area marked
4 “Note 4,” consisting of approximately 1,279 square feet, within spaces identified
5 as “OCC TOLL OCC + FUT,” “FUT TOLL,” and “OCC POWER,” could
6 accommodate at the same time an Intermedia CLOSE collocation arrangement.
7 The area marked “Note 5,” consisting of approximately 724 square feet, within
8 spaces identified as “FUT POWER” and “FUT SWITCH,” could also
9 accommodate an Intermedia CLOSE collocation arrangement.

10 **Q. CAN YOU SUM UP YOUR OBSERVATIONS FROM THE WALK-**
11 **THROUGHS THAT ARE PECULIAR TO EACH OF THE BELLSOUTH**
12 **CENTRAL OFFICES?**

13 **A.** Yes. In BellSouth’s Miami Palmetto central office, there are five areas that can
14 accommodate Intermedia collocation arrangements of one kind or another. In
15 BellSouth’s North Dade Golden Glades central office, there are seven such areas.
16 In BellSouth’s Boca Raton BocaTeeca central office, there are five such areas,
17 including the entire second floor. In BellSouth’s West Palm Beach Gardens
18 central office, there are five such areas. Some of these areas can be turned into
19 physical collocation space by relocating displaceable administrative functions and
20 storage. Others can accommodate collocation arrangements such as SCOPE and
21 CLOSE without substantial disruption to BellSouth’s present use. Still others can
22 be turned into physical collocation space by consolidating or redistributing
23 present functions. Where I have described spaces in these central offices as

1 suitable for specific collocation arrangements, I have done so only by way of
2 illustration, not meaning at all to suggest that the space is necessarily unsuitable
3 for other collocation arrangements.

4 **Q. BASED ON YOUR OBSERVATIONS DURING THE WALK-THROUGHS,**
5 **ARE BELLSOUTH'S CHARACTERIZATIONS OF CENTRAL OFFICE**
6 **SPACE USAGE IN ITS PETITIONS FOR WAIVER OF PHYSICAL**
7 **COLLOCATION REQUIREMENTS IN THESE PROCEEDINGS**
8 **ACCURATE?**

9 **A.** No. As I have observed, BellSouth identifies no space at all in any of these
10 central offices that is available for physical collocation. In fact, it was apparent to
11 me - based on my extensive experiences with carrying out collocation
12 arrangements – that in each of them a significant amount of space suitable for
13 physical collocation does exist or can be readily prepared by various means.

14 **Q. IS THERE SPACE OUTSIDE THESE CENTRAL OFFICE BUILDINGS,**
15 **BUT WITHIN BELLSOUTH'S PROPERTY, THAT COULD BE**
16 **ALLOCATED FOR ADJACENT ON-SITE COLLOCATION?**

17 **A.** Yes. At each of these BellSouth central offices, except for West Palm Beach
18 Gardens, space exists within BellSouth's external premises to accommodate what
19 is sometimes referred to as adjacent on-site (or "parking lot") collocation. At the
20 Miami Palmetto central office, such space exists on a grassed area at the rear of
21 the building. At the North Dade Golden Glades central office, some space exists
22 in a parking lot to the left of the building. At the Boca Raton Boca Teeca central
23 office, space exists in an area to the rear of the building used partially for parking.

1 **Q. IS THERE SPACE OUTSIDE THESE CENTRAL OFFICE BUILDINGS,**
2 **AND EXTERNAL TO BELLSOUTH'S PROPERTY, THAT COULD BE**
3 **USED FOR ADJACENT OFF-SITE COLLOCATION?**

4 **A.** Yes, there is. At each of these BellSouth central offices, except for North Dade
5 Golden Glades, space exists within reasonable proximity to BellSouth's central
6 offices to accommodate adjacent off-site collocation. At the Miami Palmetto
7 central office, such space exists in a BellSouth building to the right of the central
8 office and in the parking lot that serves that building. At the Boca Raton Boca
9 Teeca central office , such space exists in a large parking lot to the left of the
10 central office. At the West Palm Beach Gardens central office, such space exists
11 on open land all around the central office, which is not, however, BellSouth
12 property.

13 **Q. WHEN DID INTERMEDIA SUBMIT ITS REQUESTS FOR PHYSICAL**
14 **COLLOCATION IN EACH OF THESE BELLSOUTH CENTRAL**
15 **OFFICES?**

16 **A.** Intermedia submitted a request for physical collocation in BellSouth's Miami
17 Palmetto central office on September 22, 1998. Intermedia submitted a request
18 for physical collocation in BellSouth's North Dade Golden Glades central office
19 on September 24, 1998. Intermedia submitted a request for physical collocation
20 in BellSouth's Boca Raton BocaTeeca central office on September 24, 1998.
21 Intermedia submitted a request for physical collocation in West Palm Beach
22 Gardens central office on September 24, 1998.

1 **Q. IN ITS REQUESTS FOR PHYSICAL COLLOCATION IN EACH OF**
2 **THESE BELLSOUTH CENTRAL OFFICES, WHAT SPACE AND**
3 **INTERCONNECTION ARRANGEMENT DID INTERMEDIA REQUEST?**

4 **A.** In its request for physical collocation in BellSouth's Miami Palmetto central
5 office, Intermedia requested 200 square feet of space. In its request for physical
6 collocation in BellSouth's North Dade Golden Glades central office, Intermedia
7 requested 200 square feet of space. In its request for physical collocation in
8 BellSouth's Boca Raton Boca Teeca central office, Intermedia requested 200
9 square feet of space. In its request for physical collocation in BellSouth's West
10 Palm Beach Gardens central office, Intermedia requested 200 square feet of
11 space.

12 As I have testified, the amount of physical collocation space that is or could be
13 made available for, or that could accommodate, physical collocation in each of
14 these central offices is more than a magnitude greater than the physical
15 collocation space Intermedia has requested.

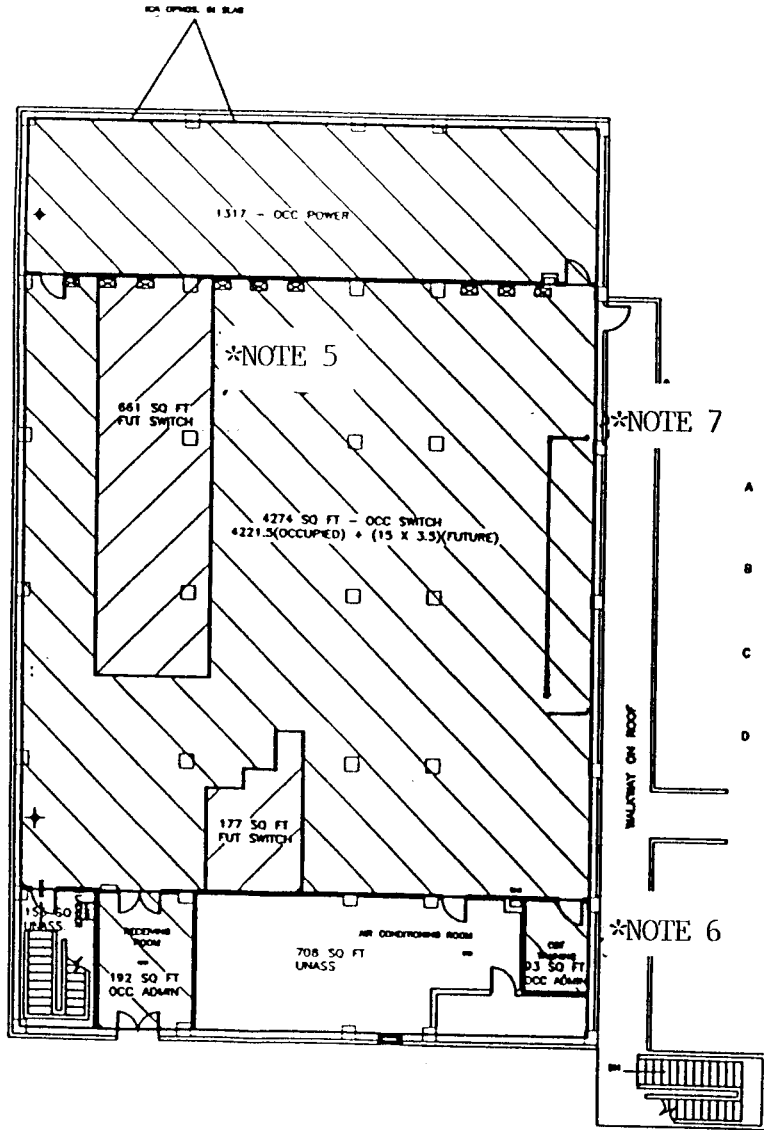
16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 **A.** Yes. I reserve the right, however, to amend or modify my testimony, as
18 appropriate.

19 **END OF TESTIMONY**

20

21

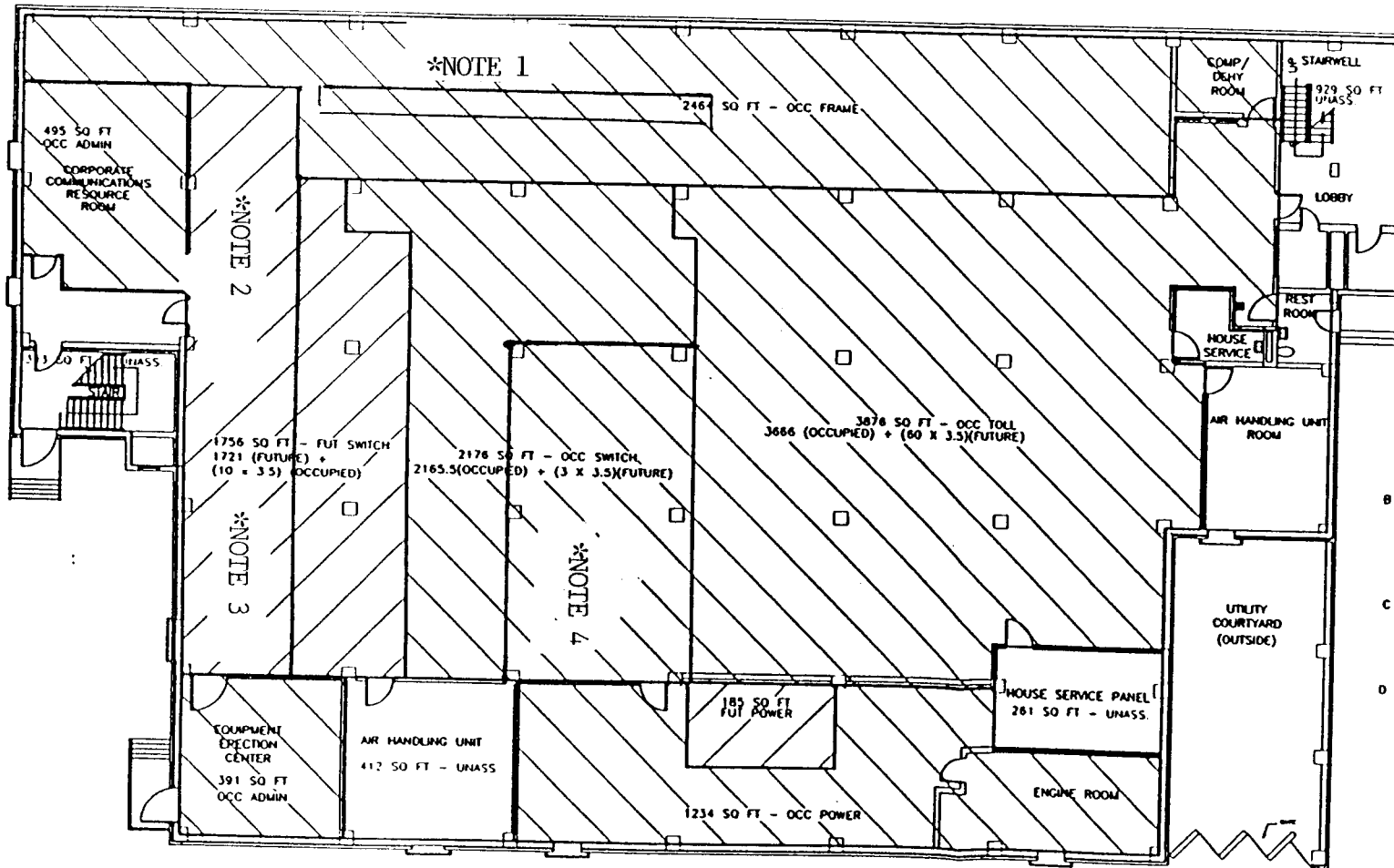


*NOTE 7

A	TOTAL GROSS SQ FT	7577	
B	STAIRWELL	155	[Empty Box]
	AIR CONDITIONING ROOM	708	
	TOTAL UNASSIGNABLE SPACE	863	
C	SWITCH	4221.5	[Diagonal Box]
	POWER	1417	
	ADMIN	192 + 93 = 285	
	TOTAL OCCUPIED SPACE	5823.5	
D	SWITCH	881 + 177 + (15 X 3.5) = 920.5	[Diagonal Box]
	TOTAL RESERVED SPACE	880.5	

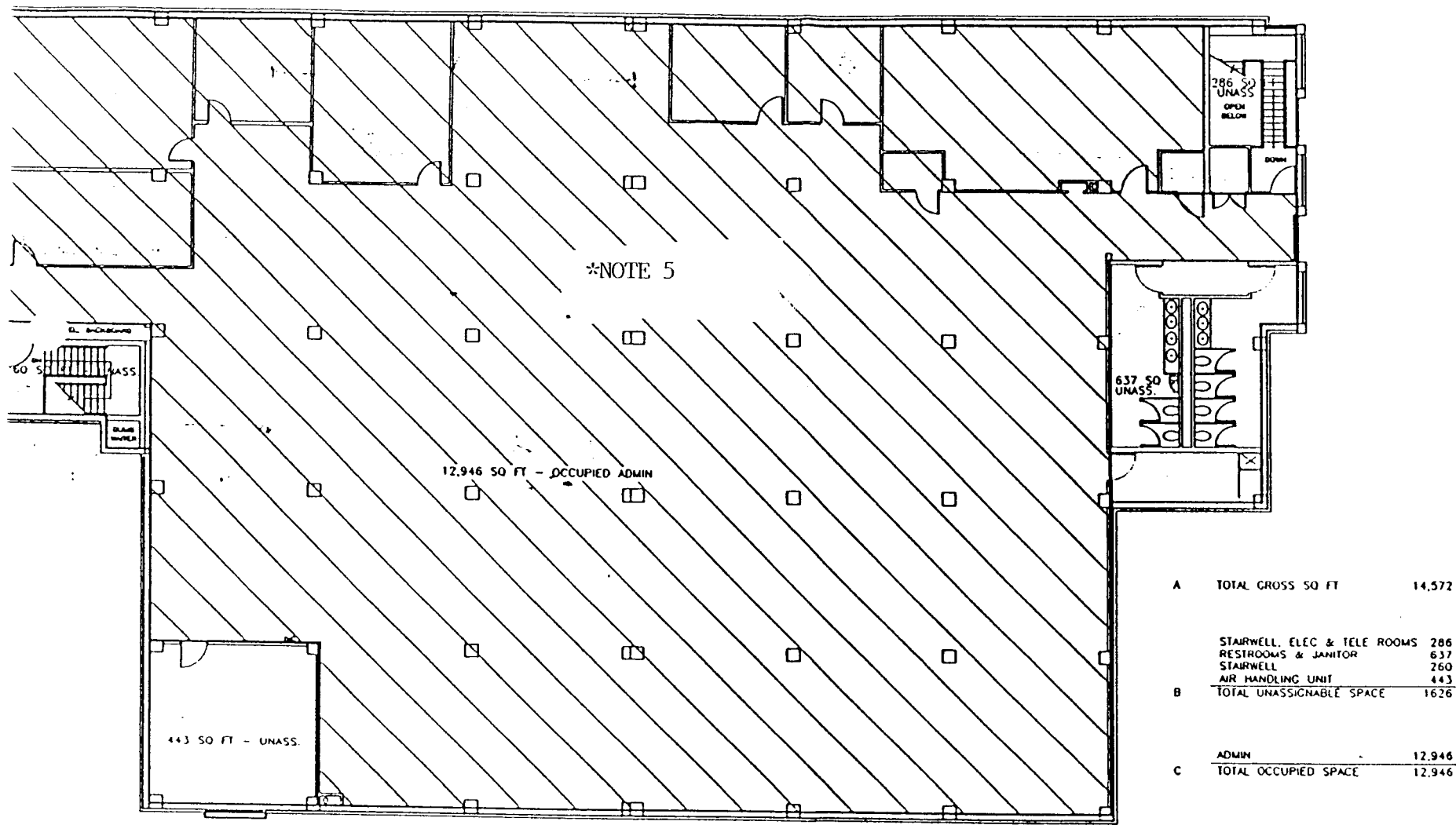
*NOTE 6

NORTH DADE GOLDEN GLADES SECOND FLOOR



	STAIRWELL	393	
	AIR HANDLING UNIT	412	
	HOUSE SERVICE PANEL	261	
	STAIRWELL, RESTROOMS, LOBBY	929	
	HOUSE SERVICE RM & AIR HANDLING UNIT	929	
B	TOTAL UNASSIGNABLE SPACE	1995	
	SWITCH	2165.5 + (10 X 3.5) = 2200.5	
	TOLL	3686	
	FRAME	2464	
	POWER AND ENGINE	1234	
	ADMIN	495 + 391 = 886	
C	TOTAL OCCUPIED SPACE	10,450.5	
	SWITCH	1721 + (3 X 3.5) = 1731.5	
	TOLL	60 X 3.5 = 210	
	POWER	189	
D	TOTAL RESERVED SPACE	2126.5	

BOCA RATON - BOCA TEECA FIRST FLOOR PLAN



BOCA RATON - BOCA TEECA SECOND FLOOR PLAN

