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Legal Department

NANCY B. WHITE  
General Counsel - Florida

00 APR -4 PM 4:41

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

RECORDS AND  
REPORTING

April 4, 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. 000320-TL (Lake Mary CO Waiver Request)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver of Physical Collocation Requirements in the Lake Mary 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

Enclosures

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

pc docs 201197

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
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*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04128 APR-48

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.: 000320-TL  
Inc.'s Petition for Temporary Waiver of )  
Physical Collocation In the Lake Mary )  
Central Office )  
\_\_\_\_\_ ) Filed: April 4, 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 Lake Mary Central Office ("CO") located at 365 International Drive, Lake Mary, Florida 32746. 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 if granted certain relief in a timely fashion. Provided Seminole County grants BellSouth relief from certain setback requirements, the estimated completion date of the addition is the end of the second quarter of 2001.

1. The Lake Mary 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

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FPSC-RECORDS/REPORTING

digital cross-connect panels and provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Lake Mary 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 Lake Mary CO, BellSouth is unable to provide physical collocation to additional ALECs. There will be no room 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.

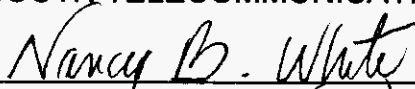
7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility.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

8. The Lake Mary 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 Lake Mary 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 Lake Mary CO until such time as the building addition is completed.

Respectfully submitted this 4th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

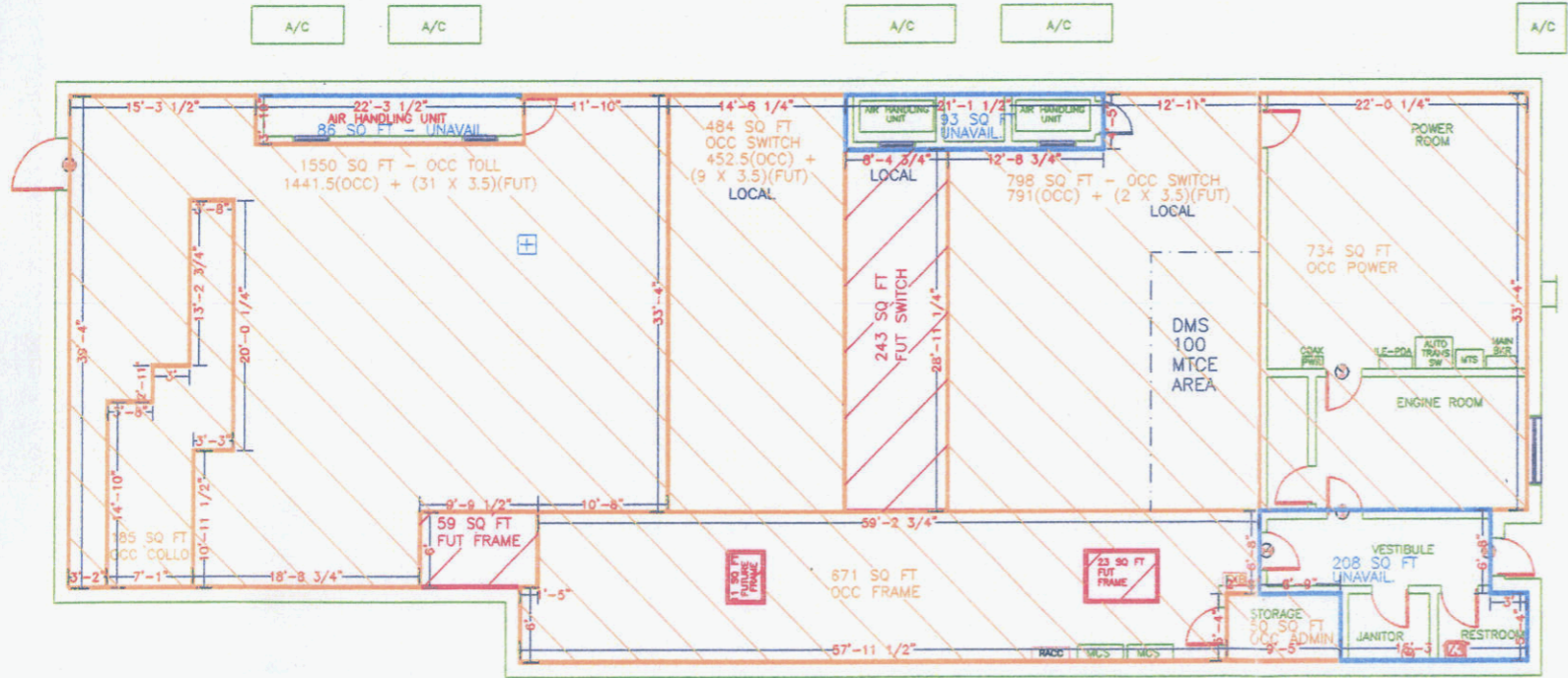
  
\_\_\_\_\_  
NANCY B. WHITE (PW)  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5555

*R. Douglas Lackey (MD)*

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R. DOUGLAS LACKEY  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0747

202997



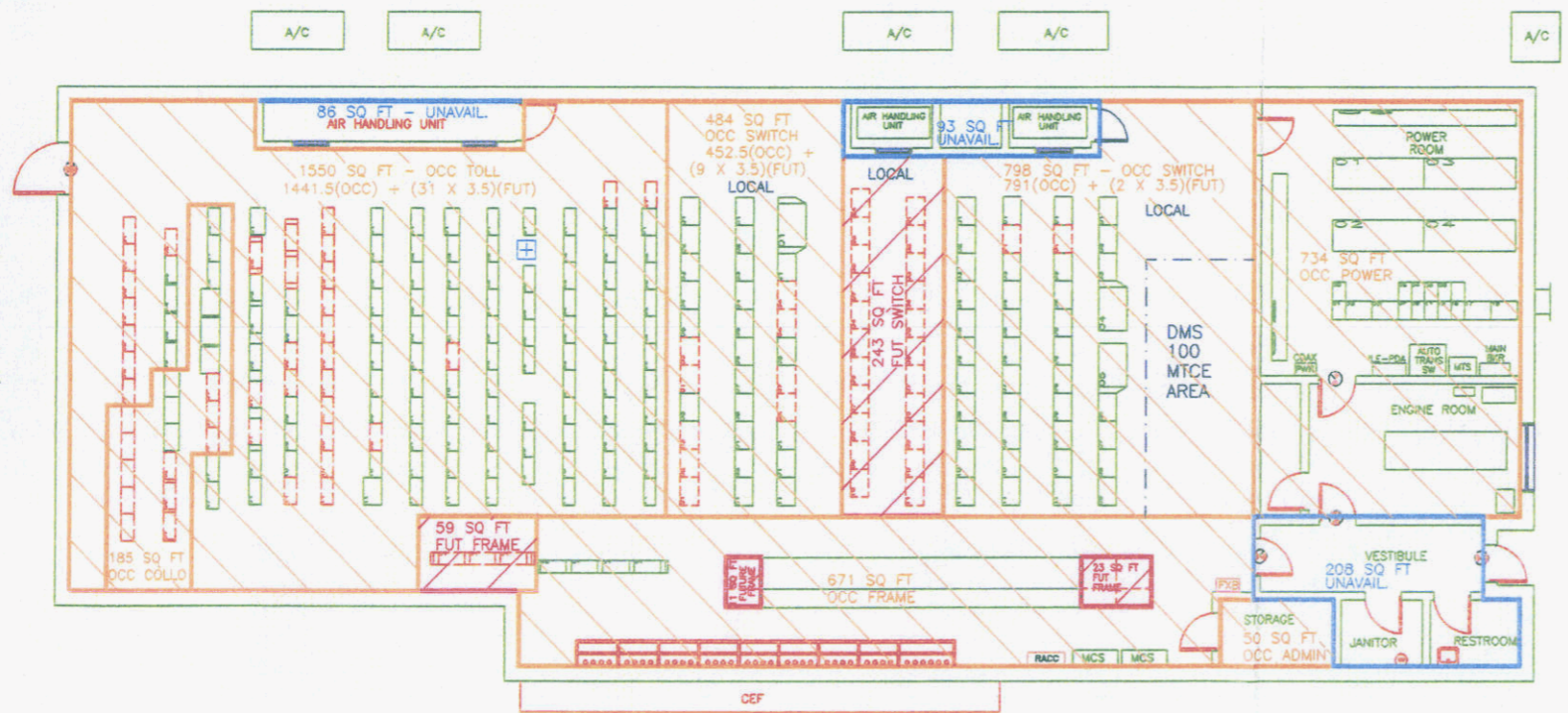
MARCH 13, 2000

<b>A</b>	<b>TOTAL GROSS SQ FT</b>	<b>5195</b>
	AIR HANDLING UNIT	86
	AIR HANDLING UNITS	93
<b>B</b>	<b>VESTIBULE, JANITOR &amp; RESTROOMS</b>	<b>208</b>
	<b>TOTAL UNAVAILABLE SPACE</b>	<b>387</b>
	COLLO	185
	SWITCH	452.5 + 791 = 1243.5
	TOLL	1441.5
	FRAME	671
	POWER & ENGINE	734
	ADMIN	50
<b>C</b>	<b>TOTAL OCCUPIED SPACE</b>	<b>4325</b>
	SWITCH	243 + (11 X 3.5) = 281.5
	TOLL	(31 X 3.5) = 108.5
	FRAME	11 + 23 + 59 = 93
<b>D</b>	<b>TOTAL RESERVED SPACE</b>	<b>483</b>

OCC - OCCUPIED  
 FUT - FUTURE  
 UNAVAIL - UNAVAILABLE  
 ⊕ - BUILDING COLUMN

39280 LAKE MARY FIRST FLOOR PLAN  
 PSC WAIVER ITEM 4 A-F PAGE 1





MARCH 13, 2000

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AIR HANDLING UNIT 86  
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 VESTIBULE, JANITOR & RESTROOMS 208  
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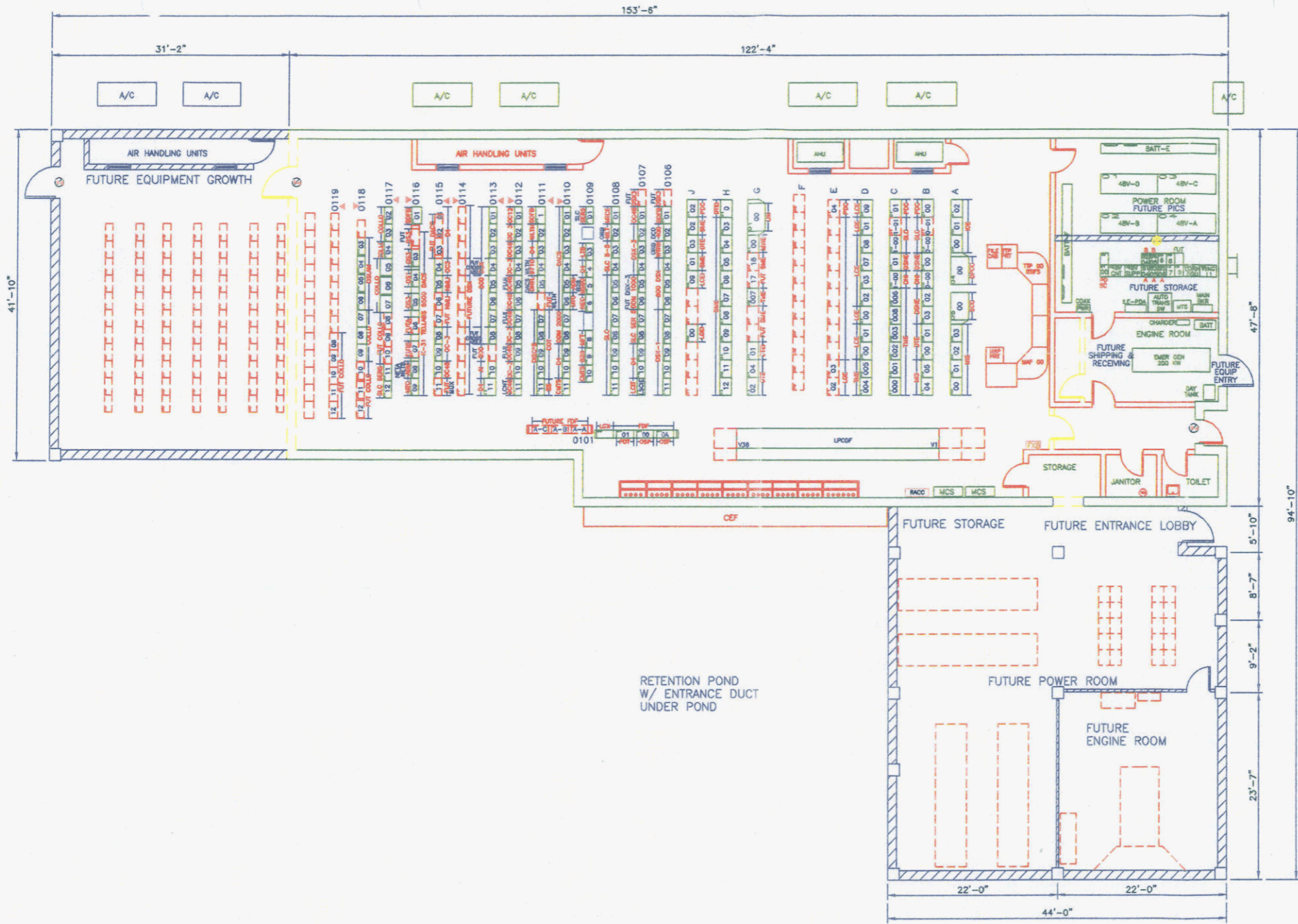
COLLO 185  
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39280 LAKE MARY FIRST FLOOR PLAN  
 PSC WAIVER ITEM 4 A-F PAGE 2





39280 LAKE MARY FIRST FLOOR PLAN  
 2001 BUILDING ADDITION  
 PSC WAIVER ITEM 4 G-H