

NANCY B. WHITE
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October 16, 2000

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

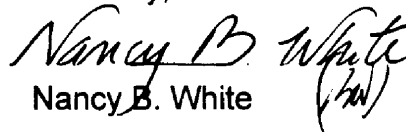
**Re: 001445-TL Waiver of Physical Collocation Requirements
in the Milton Ravine C.O.**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver of Physical Collocation Requirements in the Milton Ravine 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

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

DOCUMENT NUMBER-DATE

13114 OCT 16 8


FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 001445-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 16th day of October, 2000 to the following:

Wayne Knight
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 (pw)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,)
Inc.'s Request for Temporary Waiver of)
Physical Collocation in the Milton Ravine) Docket No. 001445-TL
Central Office)
_____) Filed: October 16, 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 Milton Ravine Central Office ("CO") located at 207 Ravine Street, Milton, Florida 32570. 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 fourth quarter of 2001.

1. The Milton Ravine 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.

2. The area served by the Milton Ravine 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 Milton Ravine CO, BellSouth is unable to provide the amount of space requested for physical collocation by the ALEC involved. There are a limited number of unenclosed 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.

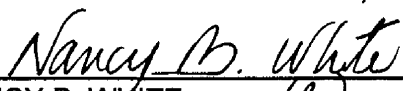
7. There is space reserved for defined future use for BellSouth to meet the growing needs of its customers through the year 2001. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility.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

8. The Milton Ravine CO contains a very limited amount of available space for physical collocation and for this reason should be excluded from the collocation requirements. The space available is insufficient to fill the request of the affected ALEC. BellSouth will, of course, offer virtual collocation in the Milton Ravine 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 Milton Ravine CO until such time as the building addition is completed.

Respectfully submitted this 16th day of October, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

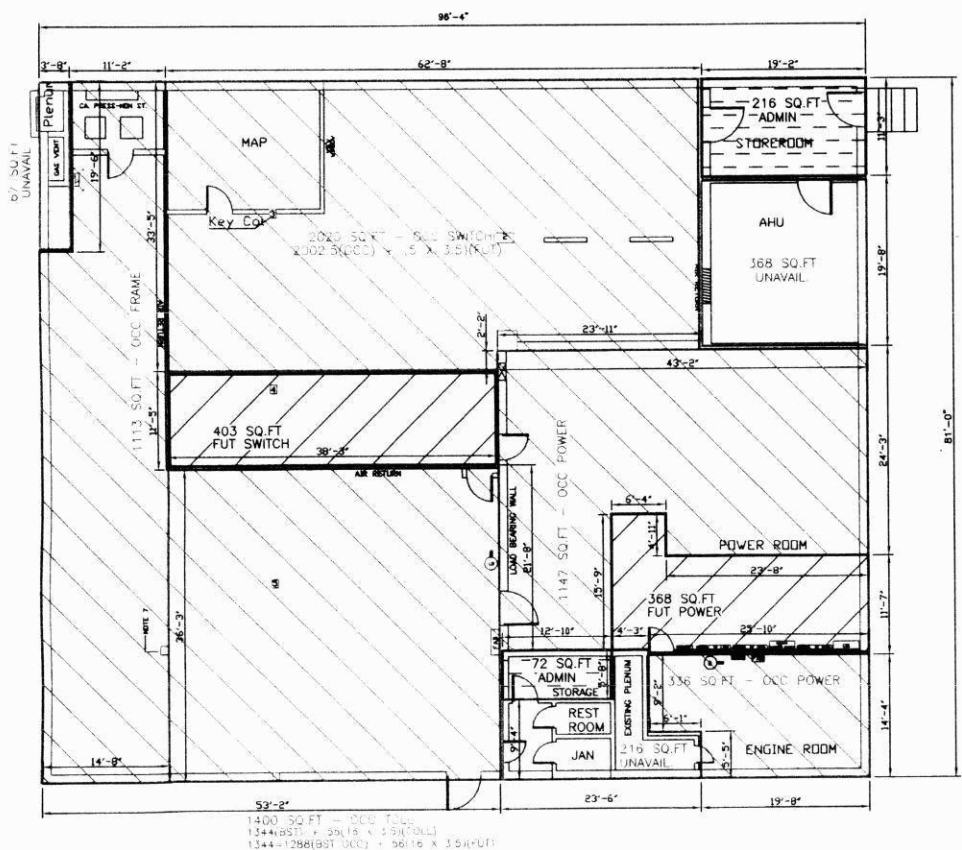


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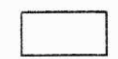
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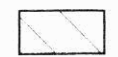
36010 MILTON RAVINE FLOOR PLAN
PSC WAIVER ITEM 4 A-F PAGE 1

OCTOBER 12, 2000

A	TOTAL GROSS SQ FT	7726
	AIR HANDLING UNIT	368
	PLENUM	57
	REST ROOM/JANITOR	216
B	TOTAL UNAVAILABLE SPACE	551
	SWITCH	2002.5
	TOLL	1280
	FRAME	1113
	POWER	1483
	COLLOCATION	56
C	TOTAL OCCUPIED SPACE	5942.5

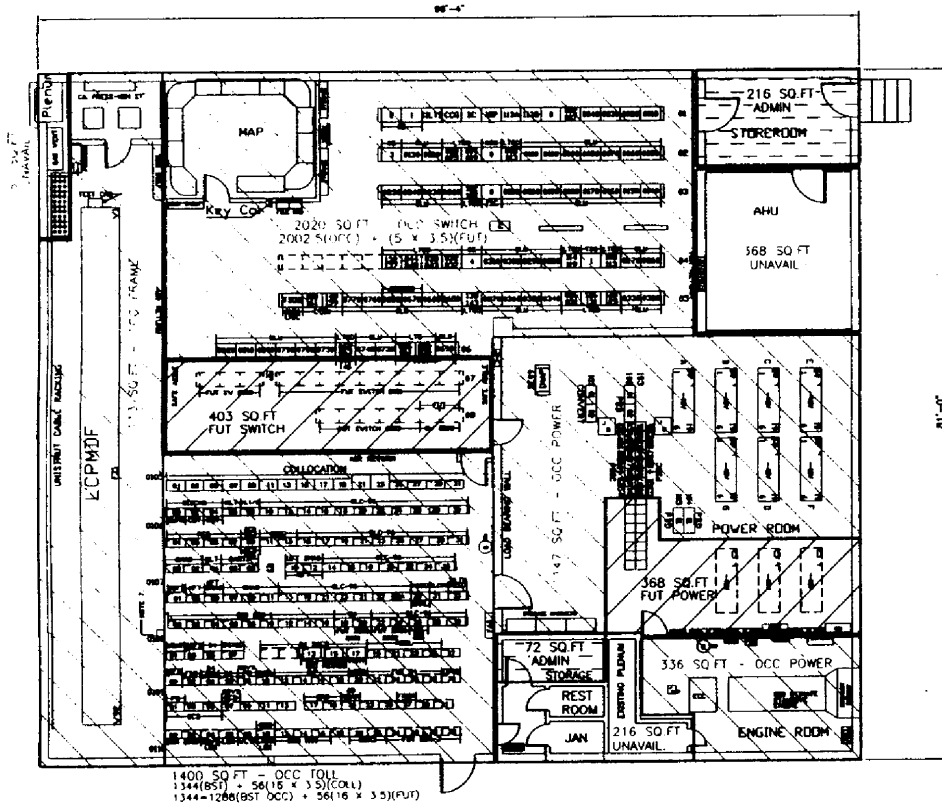


D	SWITCH	403 + (5 x 3.5) = 420.5
	TOLL	(16 X 3.5) = 56
	POWER	388
	TOTAL RESERVED SPACE	844.5



E	STOREROOM/ADMIN	216
	STORAGE/ADMIN	72
	TOTAL ADMIN SPACE	288

OCC - OCCUPIED
FUT - FUTURE
UNAVAIL - UNAVAILABLE



36010 MILTON RAVINE FLOOR PLAN
PSC WAIVER ITEM 4 A-F PAGE 2

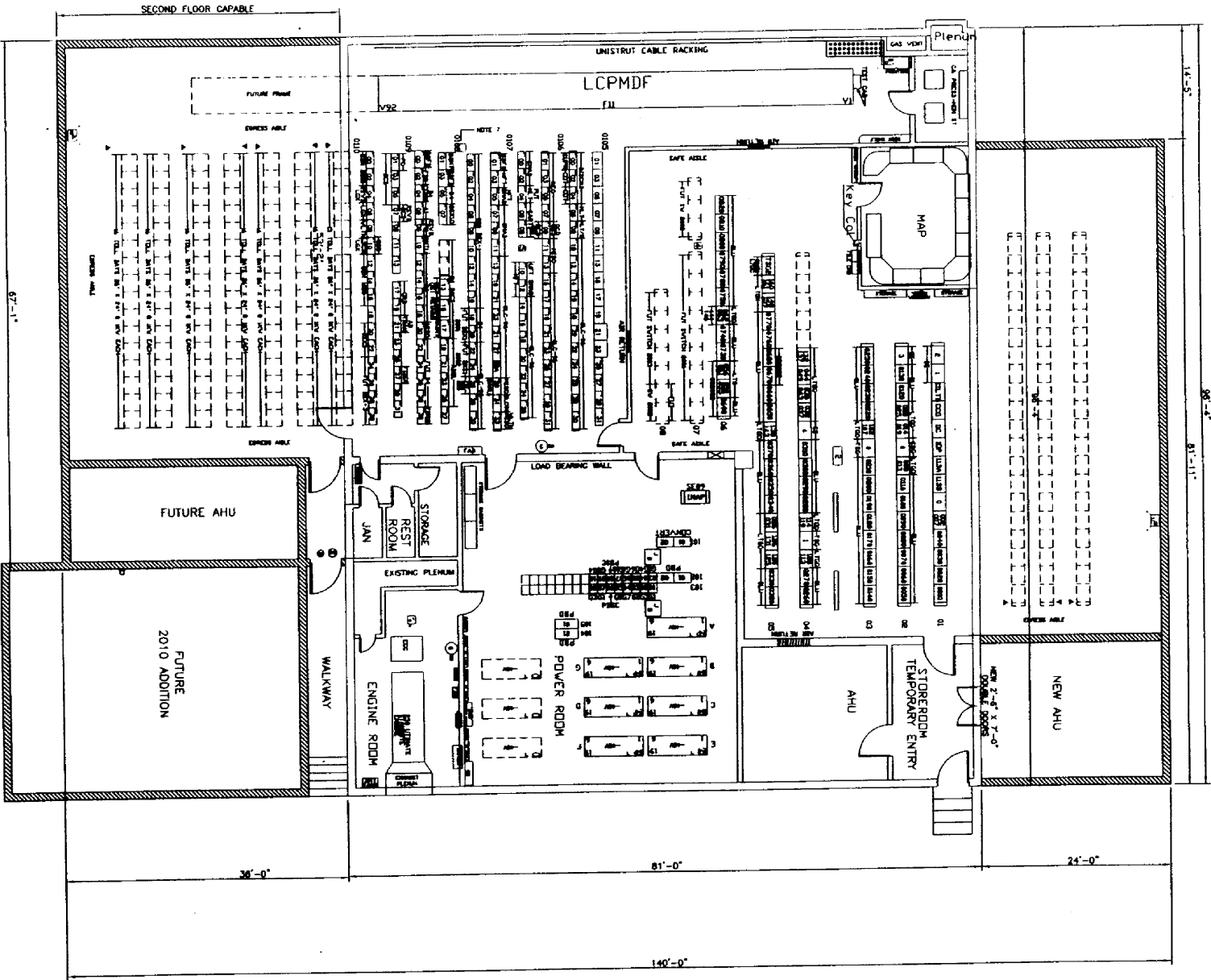
OCTOBER 12, 2000

A	TOTAL GROSS SQ FT	7726
B	AIR HANDLING UNIT	568
	PLENUM	57
	REST ROOM/JANITOR	216
TOTAL UNAVAILABLE SPACE		551
C	SWITCH	2002.5
	TOLL	1288
	FRAME	1113
	POWER	1483
COLLOCATION		56
TOTAL OCCUPIED SPACE		4942.5



SWITCH	$403 + (5 \times 3.5) = 420.5$	
TOLL	$(16 \times 3.5) = 56$	
POWER	368	
TOTAL RESERVED SPACE		844.5
STORE ROOM/ADMIN	216	
STORAGE/ADMIN	72	
TOTAL ADMIN SPACE		288

OCC - OCCUPIED
FUT - FUTURE
UNAVAIL - UNAVAILABLE



36010 MILTON RAVINE FLOOR PLAN
PSC WAIVER ITEM 4 G-H PAGE 1

- 1 FLOOR LOADING - 150 LBS/SF NOMINAL
- 2 ALL BUILDING COMPONENTS - 7'-0" - 6'-0" NOMINAL ROOF LOAD
- 3 ALL EQUIPMENT IMPROVEMENTS - 7'-0" - 6'-0" NOMINAL ROOF LOAD
- 4 NEW EQUIPMENT AND/OR LOADS - 40W/SF
- 5 ALL NEW ROOF LOADS MUST CONFORM TO BST STANDARD
- 6 ALL NEW ROOF LOADS MUST CONFORM TO BST STANDARD

Exhibit 2

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

10/12/00

1	CENTRAL OFFICE CLLI:	<u>MLTNFLRA</u>
2	COLLOCATOR AND AMOUNT OF SPACE	<u>LUC - 200sf enclosed</u>
3.	TOTAL GROSS SQ. FT.	<u>7728</u>
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED	
a.	BST occupied equipment space	<u>5888.5 sf</u>
	Nonregulated services	<u>0 sf</u>
	Administrative offices - not related to installing, repairing, maintaining CO equipment	<u>288 sf</u>
b.	Retired equipment	<u>0 sf</u>
c.	Future BST space reservations	<u>844.5 sf</u>
	Switch	<u>420.5</u>
	Circuit	<u>56</u>
	Power	<u>388</u>
	Frame	<u> </u>
d.	Collocation space (Actual and Future**)	<u>56 sf</u>
e.	Other 3-d party space	<u>0 sf</u>
	What is the occupancy	<u> </u>
f.	Switch turnaround space	<u> </u>
	Service Yr <input style="width: 50px; height: 15px;" type="text"/>	<u>0 sf</u>
g.	Unavailable space	<u>851 sf</u>
	Unusable space (grounding and exit aisles)	<u> </u>
	Remaining space	<u>0 sf</u>
h.	Central office growth plans.	
	Forecast completion	
	Yr	
	Addition <input style="width: 50px; height: 15px; text-align: center; border: 1px solid black;" type="text" value="2001"/>	<u>TBD sf</u>
	Renovation <input style="width: 50px; height: 15px;" type="text"/>	<u>0 sf</u>
i.	Any other plans for relieving space exhaust	
5.	Floor loading	<u>150#/sf All sf</u>
	Power rooms only	<u>350#/sf sf</u>