

ORIGINAL

Legal Department

NANCY B. WHITE
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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
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August 7, 1998

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. 981012-TL
Waiver for North Dade Golden Glades Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for Waiver, 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 (KR)

Nancy B. White

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08435 AUG-7 88

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
WAIVER FOR NORTH DADE GOLDEN GLADES CENTRAL OFFICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 7th day of August, 1998 to the following:

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

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Nancy B. White (ice)
Nancy B. White

DOCUMENT NUMBER-DATE

08435 AUG -7 98

FILED IN 08435 / REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
Inc. 's Petition for Waiver for the)
North Dade Golden Glades Central)
Office)
_____) Filed: August 7, 1998

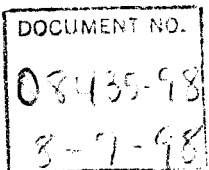
**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Waiver in accordance with the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements set forth in the Act and in the Order for the North Dade Golden Glades Central Office ("CO") located at 18400 N.E. 5th Avenue, Miami, Florida 33162². BellSouth seeks this exemption on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth does not expect to construct an addition to the building nor does BellSouth expect to retire equipment thus creating additional space within the CO in the foreseeable future.³

¹ 1996 Telecommunications Act, Section 251(c)(6); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released August 8, 1996, Paragraphs 602-607.

² BellSouth filed a Petition for Waiver for exemption from providing physical collocation for this CO with the FCC on February 16, 1993. The Petition for Waiver was granted by FCC Memorandum Opinion and Order, Released June 9, 1993.

³ Pursuant to the FCC directive, BellSouth will consider collocation requirements in any future construction undertaken.



1. The North Dade Golden Glades CO building houses DMS switches providing local dial tone, tandem toll calling, operator services as well as signal transfer equipment. 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 located in the CO provide power to the above equipment.

2. The area served by the North Dade Golden Glades CO is growing rapidly and thus the facility is under enormous space constraints. The subscriber lines and trunks in service in this CO will exceed 168,000 in 1998. To meet the demands of the expanding customer base, BellSouth currently has on order from the manufacturer an addition to the local and tandem switches, as well as additional required transmission equipment, such as fiber optic terminals, sonet multiplexers and miscellaneous circuits for alarms and monitoring.

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 North Dade Golden Glades CO, BellSouth is unable to provide physical collocation. The space limitations with which BellSouth is faced 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. BellSouth is submitting in conjunction with this Petition a floor plan evidencing both the location of current equipment and the areas set aside for defined future uses. (Exhibit 1).

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 effectively 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 physical collocation. The facility currently has 26,225 total square feet on two floors. A total of 21,801 square feet is occupied as follows:

<u>Sq. Ft.</u>	<u>DESCRIPTION</u>
<u>First Floor:</u>	
190	Stairwell
404	Air Handling Unit
1,355	Air Conditioning Room, Transformer Vault, Restrooms, Pump Room, and a Corridor
1,425	Administrative
4,170.5	Toll/Transmission Equipment
3,235	Switch
2,901	Power and Engine Room
1,434	Frame

Second Floor:

155	Stairwell
708	Air Handling Unit
285	Administrative
4,221.5	Switch
1,317	Power Room

A total of 389 square feet is considered unusable space. The unusable space contains an exit aisle which is too narrow for equipment.

7. The remaining 4,035 square feet in the facility is reserved for defined future use essential for BellSouth to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing DMS switching system, additions to power, transmission equipment and an additional Air Handling Unit. These projects will use the remaining space in the facility. As previously stated, BellSouth has provided the Commission with a detailed floor plan indicating the space constraints under which BellSouth is currently operating at the North Dade Golden Glades CO, as well as the areas designated for defined future use. (Exhibit 1).

8. The North Dade Golden Glades CO presently 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 North Dade Golden Glades 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 North Dade
Golden Glades CO.

Respectfully submitted this 7th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)
ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

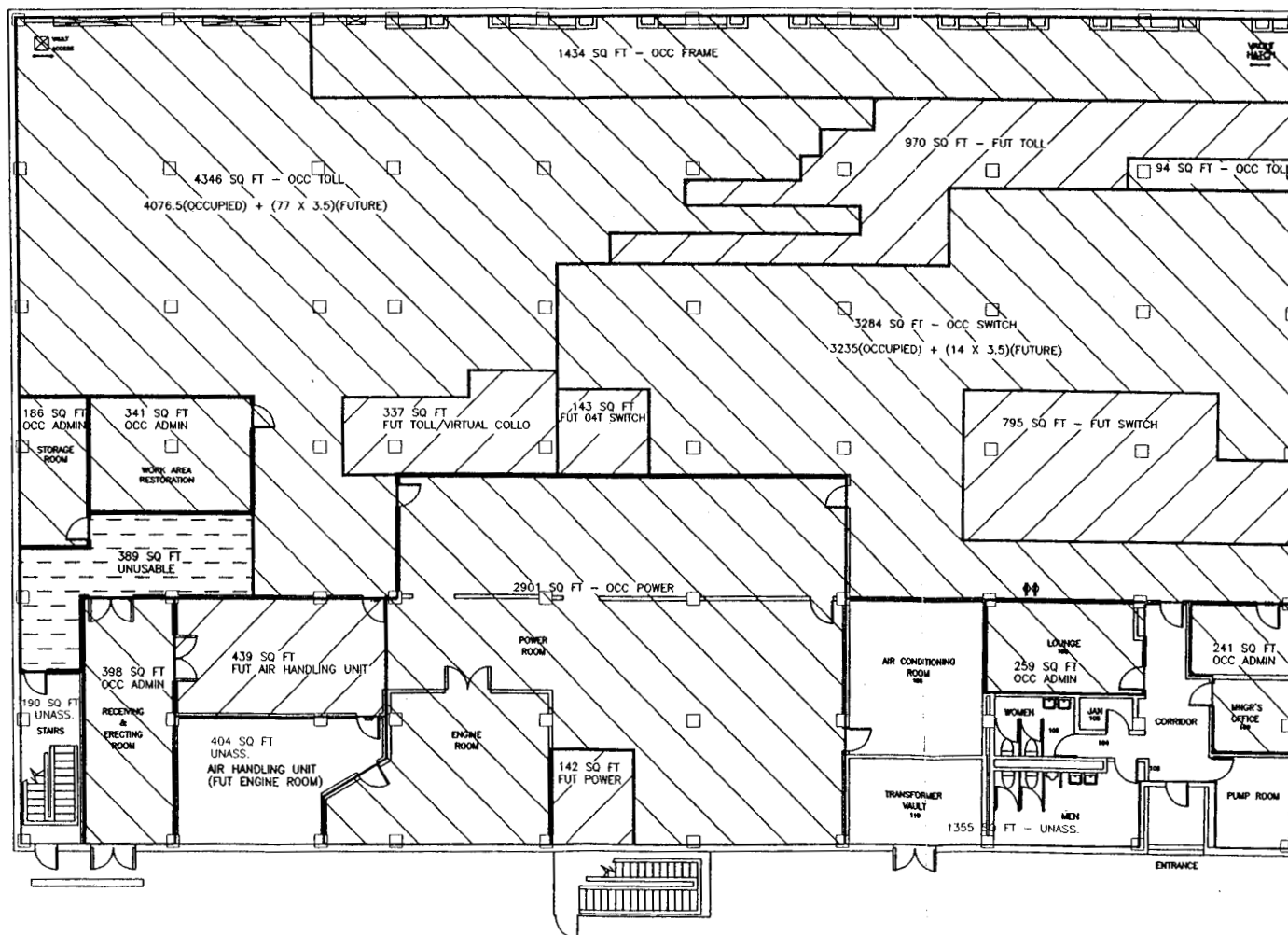
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William J. Ellenberg II (ke)
WILLIAM J. ELLENBERG II

675 West Peachtree Street, #4300

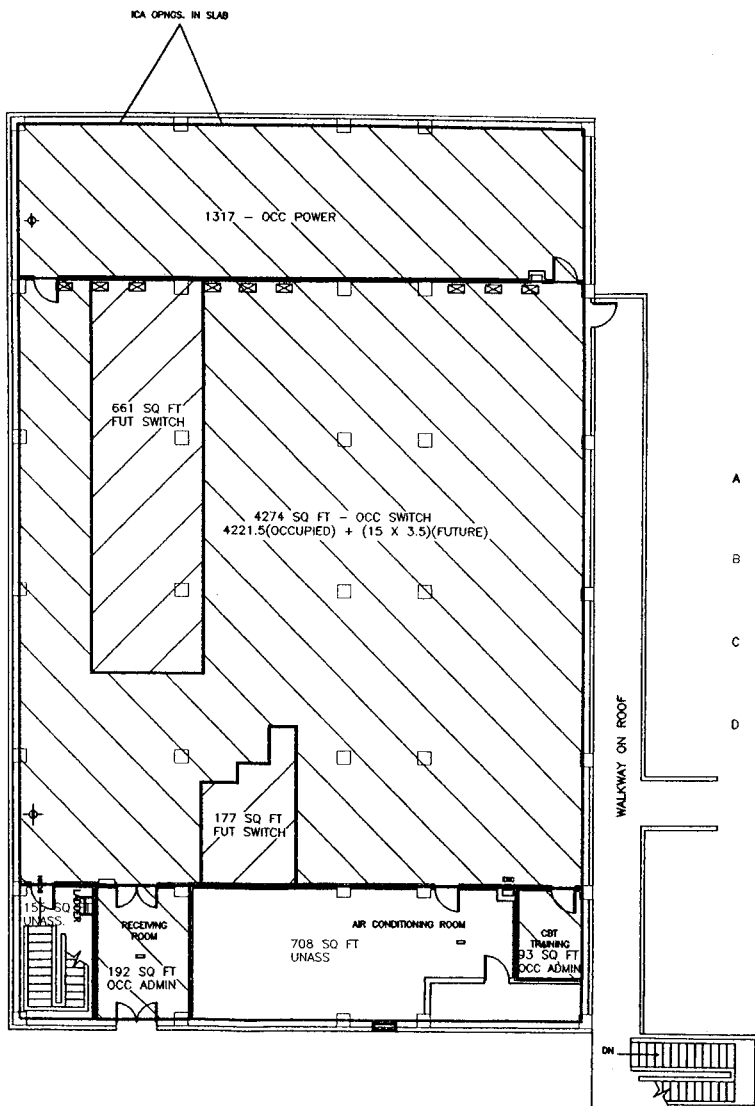
Atlanta, Georgia 30375

(404) 335-0711



M6506 NORTH DADE GOLDEN GLADES FIRST FLOOR PLAN

A	TOTAL GROSS SQ FT		18,648
	STAIRWELL		190
	AIR HANDLING UNIT		404
	PUMP ROOM, CORRIDOR, JANITOR, RESTROOMS		
	TRANSFORMER VAULT & AIR CONDITIONING ROOM		1,355
B	TOTAL UNASSIGNABLE SPACE		1,949
	SWITCH		3,235
	TOLL	4076.5 + 94 =	4,170.5
	POWER AND ENGINE		2,901
	FRAME		1,434
	ADMIN	186 + 341 + 398 + 259 + 241 =	1,425
C	TOTAL OCCUPIED SPACE		13,165.5
	SWITCH	795 + 143 + (14 X 3.5) =	987
	TOLL	970 + 337 + (77 X 3.5) =	15,76.5
	POWER		142
	AIR HANDLING UNIT		439
D	TOTAL RESERVED SPACE		31,44.5
E	TOTAL UNUSABLE SPACE		389



NOTES:

1. 10'-0" CLEAR CEILING HEIGHT MINIMUM.
2. PROVIDE LIGHTING IN MCC AREA BOUNDED BY COL'S B10, C10, C7, C10. RECEIVING AREA WILL BE WECO EQUIPMENT FRAME MOUNTED LIGHTING.
3. ⚡ EMERGENCY LIGHT.
4. CEILING INSERTS ARE NOT TO BE PLACED IN AHU ROOM OR STAIRWELL.
5. FHC - FIRE HOSE CABINET.
6. Ⓢ FIRE EXTINGUISHER
7. Ⓜ CEILING MOUNTED JUNCTION BOX WITH 9-115V AC CIRCUITS FUSED AT 15 AMPS ON ESSENTIAL BUS.
8. Ⓜ CEILING MOUNTED JUNCTION BOX WITH 9-115V AC CIRCUITS FUSED AT 15 AMPS ON ESSENTIAL BUS.
9. Ⓜ CEILING MOUNTED JUNCTION BOX WITH 3-115V AC CIRCUITS FUSED AT 15 AMPS ON ESSENTIAL BUS.

A	TOTAL GROSS SQ FT	7577	
B	STAIRWELL	155	
	AIR CONDITIONING ROOM	708	
	TOTAL UNASSIGNABLE SPACE	863	
C	SWITCH	4221.5	
	POWER	1317	
	ADMIN	192 + 93 = 285	
	TOTAL OCCUPIED SPACE	5823.5	
D	SWITCH	661 + 177 + (15 X 3.5) = 890.5	
	TOTAL RESERVED SPACE	890.5	

M6506 NORTH DADE GOLDEN GLADES SECOND FLOOR