

NANCY B. WHITE  
General Counsel - Florida

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

July 16, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 000436-TL (West Dade C.O. Request for Waiver)**

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for an Extension of the Temporary Waiver of Physical Collocation in the West Dade 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

(21)

Enclosures

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

DOCUMENT NUMBER - DATE

08666 JUL 16 2001

FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of BellSouth's Notice of Intent to Request Temporary Waiver of Physical Collocation Requirements in the West Dade Central Office was served via U.S. Mail this 16th day of July, 2001 to the following:

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

Ms. Mary Albert  
Allegiance Telecom of Florida, inc.  
1150 Connecticut Avenue, N.W.  
Suite 206  
Washington, D.C. 20036-4104

Mr. Kevin Youngblood  
Mr. Al Villani  
Allegiance Telecom, Inc.  
9201 North Central Expressway  
Dallas, TX 75231  
(469) 259-2215

  
Nancy B. White (22)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for Temporary Waiver of )  
Physical Collocation in the West Dade ) Docket No. 000436-TL  
Central Office )  
\_\_\_\_\_ ) Filed: July 16, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR AN EXTENSION OF THE TEMPORARY WAIVER  
OF PHYSICAL COLLOCATION REQUIREMENTS  
IN THE WEST DADE CENTRAL OFFICE**

BELLSOUTH TELECOMMUNICATIONS, INC. ("BellSouth"), pursuant to order No. PSC-99-1744-PA-TP, issued on September 7, 1999, hereby files its Request for an Extension of the Temporary Waiver of Physical Collocation Requirements in the West Dade central office. In support thereof, BellSouth states the following:

1. On April 11, 2000, BellSouth filed a Notice of Intent to Request Temporary Waiver of Physical Collocation Requirements in the West Dade central office. On April 24, 2000 BellSouth and the Florida Public Service Commission Staff conducted a tour of this central office. On May 1, 2000, BellSouth filed its Petition for Temporary Waiver and filed its Post-Tour Report on May 15, 2000. On July 6, 2000, the Florida Public Service Commission ("Commission") issued Order No. PSC-00-1222-FOF-TL, granting BellSouth a Temporary Waiver of Physical Collocation Requirements in the West Dade central office until June 30, 2001.

2. Due to certain zoning and permitting delays, the building addition that BellSouth estimated would be completed by June 30, 2001 will not be completed until December 30, 2001. Once the addition is complete, there will be sufficient space to provide requesting ALECs physical collocation in this office. Attached hereto as Exhibit 1 is the Affidavit of Alfredo Perez, Project Manager, Corporate Real Estate and Services that sets forth and explains the delays in connection with the addition to this office.

3. The West Dade 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.

4. The area served by the West Dade 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.

5. 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.

6. Due to space limitations and the construction delays in the West Dade CO, BellSouth is unable to provide physical collocation to additional ALECs 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.

7. 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.

8. 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 2). 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 3 are floor plans that contain the remaining information required by the PSC Order.

9. 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. BellSouth is currently building an addition to the facility that should be completed by December 30, 2001.

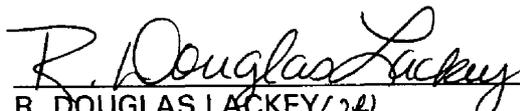
10. The West Dade CO contains no available space for physical collocation and for this reason should be excluded from the collocation requirements until the addition is completed. BellSouth will, of course, offer virtual collocation in the West Dade CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Request for an Extension of the Temporary Waiver and continue to exempt BellSouth from the obligation to offer physical collocation in the West Dade CO until such time as the building addition is completed in December 2001.

Respectfully submitted this 16th day of July, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

  
R. DOUGLAS LACKEY (ae)  
E. EARL EDENFIELD  
675 W. Peachtree Street  
Suite 4300  
Atlanta, GA 30375  
(404) 335-0763

**EXHIBIT 1**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for Temporary Waiver of )  
Physical Collocation in the West Dade ) Docket No. 000436-TL  
Central Office )  
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**AFFIDAVIT OF ALFREDO PEREZ**

Before Me, the undersigned authority, personally appeared ALFREDO PEREZ, who stated that he is currently the Project Manager for Corporate Real Estate and Services for BellSouth Telecommunications, Inc., and further states the following:

1. My title is Project Manager, Corporate Real Estate and Services. I have held that title since October, 1997.
2. My business address is 600 N. W. 79<sup>th</sup> Avenue, Room 111, Miami, FL 33126
3. My responsibilities include overseeing and coordinating the construction of new buildings, building additions, rearrangements and relocations of BellSouth property.
4. I have responsibility for the 2<sup>nd</sup> floor addition to the West Dade Central Office.
5. In March of 2000, BellSouth investigated the requirements for the addition with the Miami Planning and Zoning Commission.

6. The original building and site plan was approved as a condition Use in Residential RU-TH zoning. The addition required a public hearing.

BellSouth applied for a Dade County building permit on August 1, 2000.

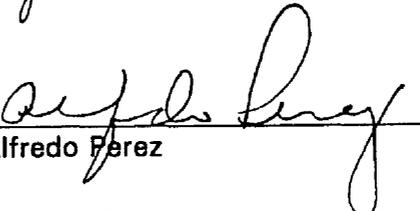
7. The public hearing took place on September 12, 2000 and BellSouth received approval from the Community Zoning Appeals Board.

8. On November 15, 2000, BellSouth applied for a waiver from the accessibility requirements from the State of Florida, Department of Community Affairs. On December 11, 2000, BellSouth appeared before the State of Florida Building Commission and on January 9, 2001, BellSouth received the final order on the accessibility waiver.

9. BellSouth received the Dade County building permit on January 26, 2001 and construction began on February 2, 2001. It is estimated that construction will be completed no later than December of 2001.

10. Further Affiant Sayeth not.

Dated this 16<sup>th</sup> day of July, 2001.

  
Alfredo Perez

Sworn to and subscribed July  
before me this 16<sup>th</sup> day of 2001.

  
NOTARY PUBLIC



JoAnne S. Nadeau  
Commission # CC 794907  
Expires DEC. 16, 2002  
BONDED THRU  
ATLANTIC BONDING CO., INC.

PETITION FOR WAIVER OF COLLOCATION REQUIREMENTS

7/16/2001

1	CENTRAL OFFICE CLLI:	MIAMFLWD						
<hr/>								
2	COLLOCATOR AND AMOUNT OF SPACE	None						
			<hr/> sf					
3.	TOTAL GROSS SQ. FT.		<hr/> 13433					
<hr/>								
4.	FLOOR PLANS - INCLUDING DIMENSIONS - ATTACHED							
a.	BST occupied equipment space	9035.5	sf					
	Nonregulated services	<hr/> 0	sf					
	Administrative space - not related to installing, repairing, maintaining CO equipment	<hr/> 430	sf					
b.	Retired equipment	<hr/> 0	sf					
c.	Future BST space reservations	<hr/> 882.5	sf					
	Switch	125						
	Circuit	<hr/> 472.5						
	Power	<hr/>						
	Frame	<hr/> 285						
	Collocation	<hr/> 0						
d.	Existing Collocation space	<hr/> 966	sf					
e.	Other 3-d party space	<hr/> 0	sf					
	What is the occupancy	<hr/>						
f.	Switch turnaround space							
	Service Yr <input type="text"/>	<hr/> 0	sf					
g.	Remaining space	<hr/> 2119	sf					
	Unavailable space	<hr/> 2119	sf					
	Space available for collocation	<hr/> 0						
h.	Central office growth plans.							
		Forecast completion						
		Yr						
	Addition	<table border="1" style="display: inline-table; vertical-align: middle;"><tr><td style="width: 50px; text-align: center;">2001</td><td style="width: 50px;"></td></tr><tr><td></td><td></td></tr></table>	2001				<hr/> 19673	sf
2001								
	Renovation	<table border="1" style="display: inline-table; vertical-align: middle;"><tr><td style="width: 50px;"></td><td style="width: 50px;"></td></tr><tr><td></td><td></td></tr></table>					<hr/> 0	sf
i.	Any other plans for relieving space exhaust							
<hr/>								
5.	Floor loading	All Space 150#sf	<hr/> 19673 sf					
		Power rooms only 350#sf	<hr/> 0 sf					
			<hr/>					



