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August 3, 2000


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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


**By Hand**

Magalie Roman Salas
Secretary
Federal Communications Commission
Room CY-A257
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Written *Ex Parte*
Response to SBC's Requests for Interpretation Waiver or Suspension of Merger Conditions Affecting the Ownership of Plugs/Cards and OCDs,
CC Docket No. 98-141

Dear Ms. Salas:

Transmitted herewith for inclusion in the public record of the above-referenced proceeding are two copies of a written *ex parte* letter delivered this day to Carol Mattey, Deputy Chief, Common Carrier Bureau.

Sincerely,

Ruth Milkman

cc: Carol Mattey
Anthony Dale

No. of Copies rec'd 0
List A B C D E

August 3, 2000

NorthPoint Communications 303 Second Street, S. Tower, San Francisco, CA 415.403.4003 tel 415.403.4004 fax www.northpoint.net

Ms. Carol Mattey, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W.

Washington, D.C. 20554

Re: CC Docket No. 98-141, Response to SBC's Requests for Interpretation, Waiver or Suspension of Merger Conditions Affecting the Ownership of Plugs/Cards and OCDs

Dear Ms. Mattey:

In the course of our discussions regarding the request for waiver of SBC Communications, Inc. (SBC) in the above captioned proceeding, staff members of the Common Carrier Bureau have asked NorthPoint Communications to provide information relating to how much space competitors need at a remote terminal. NorthPoint considers a myriad of factors when determining where to deploy its advanced services equipment. Similarly, there are numerous factors to consider when determining the type and amount of equipment to deploy in a given location. Addressable market, anticipated take rates, cost of collocation space, cost of a loop, to name just a few, are all relevant factors in this decision. It is difficult, therefore, to predict in the abstract exactly how much space is required at a given hut, controlled environmental vault, or cabinet. To assist the FCC in its analysis, however, NorthPoint has gathered information regarding the specifications and requirements of certain equipment it would consider collocating in a remote terminal, and how many end users it can expect to serve using that equipment. This information is included in Attachment 1.

Respectfully submitted,

William Bailey
Assistant General Counsel

Attachment

cc: Mr. Anthony Dale

## Attachment 1

### RT collocation physical and spec requirements (Hut, Vault, CEV)

This describes the physical, power, and interconnection requirements for an example product, the Adtran TA3000. This product supports a variety of DSLs and is an example of the type of equipment that could reasonably be collocated in any Hut, Vault or CEV.

1. **Dimensions**

   The TA3000 system is available as a 19" (22 access module slots) or a 23" (28 access module slots) rack mount system. Both systems are 6" tall and 11" deep (12" deep with AMP Champ connectors installed). The heat baffle/fan assembly, required for DSLAM operation in a non-airconditioned RT, requires an additional 4" of rack space. So, a TA3000 system with its associated heat baffle/fan module would require a total of 10" (high) of rack space. All data below is given for a 23" system, which is a common rack size in RT cabinets.

2. **Weight**

   A 23" system, fully loaded with redundant ATM switch modules and 28 G.shdsl line cards, weighs approximately 36 pounds. The heat baffle and fan assembly weigh about 10.5 pounds together (they comprise a single 4" tall unit, with the fan module mounting on the back of the heat baffle). Therefore, a system installed with the heat baffle and fan assembly would total about 46.5 pounds.

3. **Mounting Requirements**

   The system mounts in a 23" wide rack. A system with its associated heat baffle/fan module requires 10" of rack space. The area underneath the system should provide unheated air to the system (may require a heat baffle for a system installed underneath).

4. **Power Requirements (fully "loaded" vs. empty)**

   An "empty" system (no subscriber interfaces) contains a management card, 2 ATM switch modules , and associated fan module only. Fully loaded (maximum number of subscriber interfaces installed) adds 28 access modules (23" system assumed). The same ADSL access module supports either full-rate ADSL or G.Lite ADSL on each of four ports.

   All numbers are worst case estimates with full maximum rate and maximum loop distance on each interface. Actual numbers are likely to be substantially less. All numbers are for nominal -48V power feed.

Empty system (no subscriber interfaces):
1.1 Amps consumed

Fully loaded:
224 G.shdsl ports (8-port card) 6.4 Amps consumed
112 ADSL ports (4-port card) 6.9 Amps consumed

5. **Heat dissipation requirements**

Empty system:
53 Watts dissipated

Fully loaded:
224 G.shdsl ports 307 Watts dissipated
112 ADSL ports 331 Watts dissipated

6. **Density/number of customers served by device**

For 23" rack mount system:
224 G.shdsl ports, or
112 ADSL full-rate ports, or
112 ADSL G.Lite ports

7. **Functionality of box/services**

G.SHDSL, ADSL, G.lite
The TA3000 will also support 4-port DSX-1 access modules and 8-port IDSL access modules, both of which require less power than other access modules. The IDSL access module provides FR/ATM interworking, delivering frames across the local loop.

8. **Required space between boxes for ventilation, etc.**

Other equipment can be mounted directly above the TA3000's heat baffle/fan module, which is mounted immediately above the system itself. A TA3000 system requires unheated air from below.

9. **Litespan Interface**

The TA3000 system can be connected directly to a DS3 interface on a LiteSpan DLC providing this interface (like a LiteSpan 2012).

The TA3000 also supports a direct optical connection. The TA3000 will provide support for an OC3c network uplink in the future in place of the DS3

interface available in the first release. This will be accommodated with a new OC3c ATM switch module.