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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	CC Docket No. 98–147
and	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	CC Docket No. 96–98

COMMENTS
of the
GENERAL SERVICES ADMINISTRATION

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Summary

GSA addresses unbundling policies as well as issues identified by the Commission to formulate its response to a remand of an order addressing the obligations of incumbent LECs to allow competitors to collocate at their facilities.

At the outset, GSA explains that a narrow reading of terms such as "required" and indispensable" would exclude much of the equipment that competitors need to serve their customers. GSA urges the Commission not to define these terms in a manner that requires competitors to incur significant penalties so that end users do not receive the benefits of additional competition as soon as possible.

In addition, GSA recommends that the Commission adopt a number of pro–competitive polices to facilitate collocation. For example, GSA urges the Commission to follow the example of a state regulatory agency in requiring incumbent LECs to allow competitors to place line cards at remote terminals. Also, GSA recommends that the Commission adopt collocation space reservation policies and specify time limits for incumbent LECs to meet collocation requests that depend on the type of facility and work–sharing activities by competitive LECs. In addition, GSA urges the Commission to allow competitive carriers to implement direct links with each other within the incumbent LECs' central offices.

GSA also recommends that the Commission take several steps to provide additional opportunities for interconnection between incumbent and competitive LECs. For example, GSA explains that competitive LECs should have options to use copper loop plant that incumbent carriers otherwise would retire. Also, incumbent LECs should allow cross–connections to their local loops at remote terminal locations. These steps will make more efficient use of the resources in place, minimize redundancies, and reduce the needs to disrupt vehicular traffic for placement of additional outside plant under public rights–of–way.

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COMMENTS
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The General Services Administration ("GSA") submits these Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Second Further Notice of Proposed Rulemaking in CC Docket No. 98–147 ("Second Further Notice") and the Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96–98 ("Fifth Further Notice"). In these notices, which were released on August 10, 2000, the Commission requests comments and replies on issues concerning collocation, sharing and access by competitive local exchange carriers ("LECs").

I. INTRODUCTION

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state

regulatory agencies. From their perspective as end users, the FEAs have consistently supported the Commission's efforts to bring the benefits of competitive markets to consumers of all telecommunications services.

On March 31, 1999, the Commission adopted the *Advanced Services First Report and Order* to address claims that incumbent LECs were impeding collocation by competitive LECs.[1] This order required incumbent LECs to expand their offerings to include cageless collocation, adjacent collocation, and other collocation arrangements.[2] In addition, the order directed incumbent LECs not to impose unreasonable minimum space requirements for collocation.[3] Several parties sought review of the Commission's findings by the Court of Appeals for the District of Columbia Circuit.[4]

Although most of the Commission's collocation requirements were affirmed on review, the court stated that the Commission's interpretation of "necessary" under section 251(c)(6) of the Telecommunications Act seemed "overly broad and disconnected" from the provision's statutory purpose.[5] Also, the court stated that the Commission would have the opportunity to refine its collocation requirements on

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1 *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98–147, First Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 4791 (1999) ("*Advanced Services First Report and Order*"), *aff'd in part and remanded in part sub nom. GTE Service Corp. v. FCC*, 205 F.3d 416 (D.C. Cir. 2000).

2 *Id.*, paras. 420–427.

3 *Id.*

4 *Id.*

5 *GTE Service Corp. v. FCC*, 205 F.3d at 422, referencing the Telecommunications Act of 1996, Pub. L. No. 104–104, 110 Stat. 56, codified at 47 U.S.C. § 151 *et seq.* ("Telecommunications Act").

remand if it stayed "within the limits of the ordinary and fair meaning of section 251(c)(6) of the legislation."[6]

On August 10, 2000, the Commission released an Order on Reconsideration to strengthen its rules concerning competitors' access to incumbent LECs' networks.[7] Concurrently with the Order on Reconsideration, the Commission released both the Second Further Notice and Fifth Further Notice to address the court's remand, and to formulate rules concerning additional collocation and unbundling issues.

In the Second Further Notice, the Commission requests comments on the appropriate steps concerning the provisions that were remanded by the court, and actions necessary to address additional collocation issues.[8] The primary goal of this notice is to ensure that the collocation rules adhere to the statutory standards and are consistent with the pro–competitive aims enunciated in section 251(c)(6) of Telecommunications Act.[9]

In the Fifth Further Notice, the Commission seeks comments on several related issues of unbundled access to network facilities, including transport, loops, and subloop elements.[10] The Commission explains in the notice that additional consideration of these issues is necessary in view of the deployment of new network technologies by incumbent carriers.[11]

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6 *GTE Service Corp. v. FCC,* para. 424.

7 Order on Reconsideration in CC Docket No. 98–147, released August 10, 2000 ("Order on Reconsideration").

8 Order on Reconsideration, para. 3.

9 *Id.*

10 *Id.*

11 *Id.*

II. THE COMMISSION SHOULD ADOPT RULES THAT FACILITATE COLLOCATION AT VARIOUS TYPES OF LOCATIONS.

A. The "necessary" standard should reflect difficulties competitive LECs encounter if there are limited opportunities for collocation.

The court's concerns with collocation requirements in the *Advanced Services First Report and Order* focus on the requirements for incumbent LECs to allow physical collocation of equipment that is "not directly related to and thus necessary, required, or indispensable to interconnection or access to unbundled network elements" as required by section 251(c)(6) of the Telecommunications Act.[12] Therefore, the threshold issue for comment in the Second Further Notice is the meaning of "necessary" as this part of the legislation uses the term.[13]

From its perspective as an end user, GSA urges the Commission to respond to the court's remand by prescribing "necessary" conditions in a manner that will maximize the opportunities for more competition to develop. The Industry Analysis Division's *Trends in Telephone Service* shows that incumbent LECs provided only 0.4 percent of their 167 million switched access lines to competitive LECs under UNE arrangements as of June 1999, the most recent month for which data are available.[14] These data demonstrate that there is ample potential for more competition to develop.

As the Commission acknowledges, a strict reading of terms such as "required" and "indispensable" would exclude much of the equipment that competitive LECs need to serve their customers.[15] Arguably, there is <u>some</u> way to get around nearly every asserted need for equipment or services — with cost and time <u>penalties</u> on

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12 GTE Service Corp. v. FCC at 422 citing section 251(c)(6) of the Telecommunications Act.

13 Second Further Notice, para. 74.

14 Industry Analysis Division, *Trends in Telephone Service*, March 2000, Table 9.4.

15 Second Further Notice, para. 74.

competitive carriers and consumers. GSA urges the Commission not to define "necessary" in a way that requires competitors to incur significant penalties so that end users do not receive the benefits of additional competition as soon as possible.

An affidavit filed in CC Docket No. 96–98 on behalf of AT&T demonstrates the need for a broad definition of "necessary" in establishing collocation requirements. The affiants explain that the need to obtain and prepare collocation space imposes significant costs on competitive LECs.[16] Moreover, they explain:

> [collocation] can create delays as the competitive and incumbent LECs attempt to resolve issues such as space requirements, new construction, facility access, technical specifications, power supply, and costs. In our experience, incumbent LECs have falsely claimed that no qualified space is available, put in place processes that are incapable of handling the demand for collocation that has been generated by the industry, and engaged in a variety of other tactics, such as requiring the relocation of administrative space, all of which needlessly prolong the time required to obtain collocation space.[17]

These observations show the importance of a "necessary" standard that does not place additional hurdles for competitors seeking to offer services to their customers.

The Commission previously established a definition of "necessary" in the *UNE Remand Order*.[18] In that order, the Commission concluded that a proprietary network element is "necessary" within the meaning of section 251(d)(2)(A) of the Telecommunications Act "if, taking into consideration the availability of alternative elements outside the incumbent's network, including self–provisioning by a requesting carrier or acquiring an alternative from a third–party supplier, lack of access to that

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16 CC Docket No. 96–98, Affidavit of William S. Beans, Jr., Meredith R. Harris, and M. Joseph Stith on behalf of AT&T Corp., May 26, 1999, p. 18.

17 *Id.*

18 *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96–98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 15 FCC Rcd 3696 ("*UNE Remand Order*"), para. 44.

element would, as a practical, economic, and operational matter, preclude a requesting carrier from providing the services it seeks to offer.[19]

This definition, adopted for purposes of applying section 251(d)(2)(A) of the Telecommunications Act, should apply similarly in applying section 251(c)(6) of the same legislation. From GSA's perspective, the qualifiers "practical, economic, and operational matter" are appropriate to ensure that the competitive LEC would not be required to implement impractical solutions, employ uneconomic configurations, or breach reasonable operational constraints for a ruling that collocation was "necessary." These qualifiers should be applied with due consideration to the fact that incumbent carriers approach disputes regarding needs for collocation from a position of superior market power and leverage. If the qualifiers are applied from this view, they should provide the infrastructure necessary to foster more competition through UNE arrangements.

B. Incumbent LECs should allow competitors to place line cards at remote terminals.

In a recent forum on competitive access, Rhythms NetConnections ("Rhythms") proposed that the Commission require incumbent LECs to permit competitors to place line cards within the incumbents' digital loop carrier ("DLC") systems at the incumbents' remote terminals if this approach is necessary for interconnection or access to UNEs.[20] In the Second Further Notice, the Commission seeks comments on this proposal.[21]

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19 *Id.*

20 *Public Forum: Competitive Access to Next–Generation Remote Terminals*, CC Docket No. 98–98, *et al.*, May 10, 2000, Transcript pp. 16–21.

21 Second Further Notice, para. 109.

GSA urges the Commission to require incumbent LECs to allow competitors to place their own line cards at remote terminals. In the *UNE Remand Order*, the Commission directed incumbent LECs to offer unbundled access to portions of the local loop wherever that approach is technically feasible.[22] Other regulators have found that this requirement should not be restricted to copper loops.

The Illinois Commerce Commission ("ICC") recently addressed issues concerning line sharing in a consolidated arbitration proceeding pursuant to section 252(b) of the Telecommunications Act.[23] SBC Communications ("SBC") claimed that the requirement for "line sharing" did not extend to "next generation" DLC systems that the company was implementing to give broadband access capabilities to more than 80 percent of its customer locations.[24]

In addressing SBC's claims, the ICC stated that if incumbent carriers were not required to provide line sharing wherever it was technically feasible, incumbent carriers would "retain monopoly control over a bottleneck facility" as technology improved.[25] Thus, to ensure that the incumbent carrier did not retain monopoly control, competitors must be able to place line cards at remote terminals whenever this procedure is feasible.[26]

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22 *UNE Remand Order*, para. 205.

23 Illinois Commerce Commission, Consolidated Petitions for Arbitration between Covad Communications Co. and Ameritech Illinois, and Rhythms Links, Inc. and Ameritech Illinois., Docket Nos. 00–0312 and 00–0313, Arbitration Decision, August 17, 2000, pp. 27–32; and *Telecommunications Reports Daily*, August 28, 2000, p. 4. "Ameritech Illinois" was the participant in that proceeding, because the acquisition of this firm by SBC Communications had not been consummated.

24 "'Project Pronto' Neighborhood Gateway Information," February 15, 2000, at www.sbc.com/PublicAffairs/PublicPolicy/pronto_gateways/Home.html, Issue 1, General Description.

25 Arbitration Decision, p. 31.

26 *Id.*, pp. 27–32.

GSA urges the Commission to adopt a similar requirement to benefit consumers throughout the nation.

C. A shorter provisioning interval is appropriate if competitive LECs share in the work to prepare the collocation site.

In the Order on Reconsideration, the Commission states that an incumbent LEC must provide all forms of physical collocation, including caged collocation, within 90 calendar days after receiving an application by a competitive LEC.[27] This time limit applies in all cases if local regulators have not set their own standards or the competitive and incumbent LECs have not agreed to a different schedule.[28]

In the Second Further Notice, the Commission seeks comments on whether it should adopt an interval shorter than 90 days as the general standard.[29] In addition, the Commission seeks comments on whether shorter intervals should be employed for particular types of collocation arrangements.[30]

From GSA's perspective, the shortest possible maximum interval would be preferable, because a shorter limit would help to ensure that end users receive the benefits of collocation more expeditiously. A period of 90 days should be ample to accommodate nearly any contingency. Moreover, even shorter limits should be established for circumstances where less time is likely to be necessary. For example, cageless collocation arrangements can usually be implemented more quickly. Also, if the requesting carrier is willing to participate in preparing the collocation arrangement, it should receive the benefit of an accelerated schedule.

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27 Order on Reconsideration, paras. 11–39.

28 *Id.*

29 Second Further Notice, para. 114.

30 *Id.*

The Commission reports that the Public Utility Commission of Texas ("Texas Commission") recently established rules concerning provisioning requirements.[31] The Texas Commission stated that a requesting carrier is entitled to obtain caged physical collocation within 90 days and cageless physical collocation within 70 days after a price quotation by SBC for collocation, if readily usable space is available. The requesting carrier may reduce the waiting period to 55 days by agreeing to install its own bays and racks. However, if only "inactive" space is available, SBC is allowed 140 days to provide collocation.

GSA recommends that the Commission adopt a similar variable standard. The 90–day limit set forth in the Commission's Order on Reconsideration would be maintained for caged collocation. Following the Texas pattern, the limit would be reduced to 70 days for cageless collocation, or reduced to 55 days with significant work in preparing the collocation space by the requesting carrier. To extend these limits, the incumbent carrier would have the burden of demonstrating that only inactive space is available, and a specified period (up to 140 days) would be necessary to make the extra space ready for collocation arrangements.

D. The Commission should prescribe guidelines for procedures concerning reservation of collocation space.

In the Order on Reconsideration, the Commission explains that several state regulatory agencies have taken steps to limit the length of time during which either incumbent or competitive LECs can reserve space that might be used for future collocation.[32] In view of these initiatives and the value of local expertise in addressing this topic, the Commission declined to prescribe specific reservation periods as a

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31 Order on Reconsideration, para. 17.

32 *Id.*, para. 51.

national requirement.[33] Thus, in the Second Further Notice the Commission seeks comments on the need for a national space reservation policy that would apply if a state does not set its own standards.[34] Also, the Commission requests comments from parties supporting a national policy on specific standards that should be adopted.[35]

Carriers report very active competition for collocation space in some locations.[36] With this competition for space, it is important that regulations ensure that space resources are not left idle for unreasonable periods, awaiting use that is slow to materialize. Thus, GSA urges the Commission to issue rules that would be effective if state regulators do not establish their own standards. Moreover, these regulations would have the additional benefit of providing a model for state commissions that decide to develop or modify their own rules.

Turning to the specific rules, previous comments indicate that different limits are appropriate for different types of telecommunications equipment.[37] Incumbent LECs argue forcefully that short limits on space reservation periods make long–term planning extremely difficult.[38] The Commission outlines rules recently adopted in California, Texas and Washington.[39] Considering the rules adopted in these states, limits of one–year for transport equipment, three years for digital cross–connect systems and switching equipment, and five years for power equipment and main distribution frames would be reasonable.

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33 *Id.*, para. 52.

34 Second Further Notice, para. 117.

35 *Id.*

36 Order on Reconsideration, paras. 46–49.

37 *Id.*, para. 51.

38 *Id.*, n. 131.

39 *Id.*

E. Incumbent LECs should allow direct links between multiple competitors collocated in their offices.

In the Second Further Notice, the Commission raises issues concerning the potential need for incumbent LECs to link the facilities of multiple competitors that are collocated in the same central office. The threshold issue is whether the requirements for "interconnection" in section 251(c)(6) of the Telecommunications Act should be construed to encompass interconnection between two of more collocated carriers.[40] If parties believe that this interconnection should be required, the Commission inquires whether the regulations should "encompass both direct interconnection (*i.e.*, direct physical links between the collocators' facilities or equipment) and indirect interconnection (*i.e.*, links through the incumbent's facilities or equipment).[41] Also, the Commission asks whether direct physical links between collocators facilities are "necessary" if the incumbent LEC offers indirect interconnections or if the collocators are able to interconnect directly or indirectly outside of the premises.[42] Moreover, the Commission seeks comments on the magnitude and appropriate responsibility for the costs that may be incurred in implementing and maintaining these links.[43]

From GSA's perspective, requirements to provide links derive from the Telecommunications Act. Section 251(c)(6) of the legislation addresses the requirements for incumbent LECs to provide for "collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier."[44]

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40 Second Further Notice, para. 88.

41 *Id.*

42 *Id.*, para. 90.

43 *Id.*

44 Telecommunications Act, section 251(c)(6).

The legislation stops short of requiring incumbent LECs to link competitors through their own facilities. Therefore, GSA urges the Commission to find that incumbent LECs should allow multiple collocators to interconnect directly with each other within their central offices, but incumbent LECs should not be generally required to provide interconnections through their own facilities or equipment. If it is not practical to provide direct physical links because of space limitations or other factors, competitive carriers should be permitted to interconnect through the incumbent's facilities. Generally, incumbent LECs should bear the burden of showing that some type of interconnection is not feasible, with appropriate cost reimbursement, but they should not be required to provide links if the collocators have opportunities to interconnect with each other elsewhere without significant delays or extra costs.

Moreover, GSA recommends that the Commission authorize incumbent LECs to recover the incremental costs that they incur to implement and maintain direct or indirect links between collocating carriers. In general, the LECs should divide the costs among collocating carriers in proportion to their respective responsibilities, or as the carriers agree. Also, LECs' charges for collocation arrangements should be established through the same vehicles used to determine other interconnection fees, including Statements of Generally Available Terms and Conditions, negotiations between carriers, and if necessary, formal proceedings before state regulatory agencies.

III. THE COMMISSION SHOULD TAKE STEPS THAT OPEN ADDITIONAL OPPORTUNITIES FOR INTERCONNECTION.

A. Competitive LECs should have options to use copper loop plant that incumbents plan to retire.

In the Fifth Further Notice, the Commission states that a number of changes in technology have transpired since release of the *UNE Remand Order*, which requires

incumbent LECs to provide access to loops and dedicated transport facilities on an unbundled basis.[45] For example, some incumbent LECs are starting to overlay or replace their existing network architecture with remote terminals, fiber feeder subloops, and "next generation" DLC systems.[46] The copper facilities that remain in place are unused capacity that is usually capable of providing service. Thus, in the Fifth Further Notice, the Commission seeks comments on whether loop plant that is being replaced should be considered "available" to competitive LECs as a UNE, and the conditions under which incumbent LECs should be permitted to remove plant that competitors may wish to employ.[47]

GSA urges the Commission to find that copper loop plant that has been overlaid with fiber facilities, but is nevertheless capable of providing service, should be considered as a UNE available for use by competitors. Competitive LECs should reimburse incumbent LECs for use of such copper loops at rates that reflect the incumbents' costs to continue to maintain the plant in service, as for any other UNE. This procedure acknowledges that, from a competitive LEC's standpoint, the overlaid plant has the same functionalities as the copper plant on the routes that have not been converted to fiber. Also, the procedure efficiently uses a resource that is currently "dark" but may have substantial productive life. Moreover, the procedure is consistent with the Commission's finding that dark fiber should be unbundled pursuant to sections 251(d)(2) and 251(c)(3) of the Telecommunications Act.[48]

Along with rights of access as a UNE, competitive LECs should be given the opportunity to purchase the copper plant. This procedure will provide an additional

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45 Fifth Further Notice, para. 120., citing *UNE Remand Order*, para. 174.

46 *Id.*, para. 118.

47 *Id.*, para. 130.

48 *Id.*, para. 129.

option to allow competitors without substantial resources to expand their networks. Purchase prices should reflect the fact that the cooper facilities will be substantially or even fully depreciated, and the fact that the incumbent carrier will be avoiding all removal costs.

Incumbent LECs may be motivated to remove outside plant rather than allow competitive LECs to use the copper in serving a share of the market. However, GSA recommends that incumbent carriers not be permitted to remove cooper loop resources immediately, particularly along routes where limited facilities are available to competitors. Options to buy the facilities or obtain them as UNEs should be open for reasonable periods of time and affirmatively disclosed to competitors that are likely to have needs for plant in the region.

B. Incumbent LECs should permit cross–connections to their local loops at remote terminal locations.

In the *UNE Remand Order*, the Commission required incumbent LECs to provide cross–connect facilities at any technically feasible point where a carrier requests access to the local loop.[49] In view of the network architecture that incumbent LECs are deploying, the Commission seeks comments on the need to require access at remote terminal locations.[50] For example, the Commission seeks views on whether incumbent LECs should be allowed to access the elements of the subloop at remote locations if this procedure is technically feasible.[51]

GSA urges the Commission to find that the requirement for incumbent LECs to provide cross–connect facilities at "any technically feasible point" encompasses remote terminals. As discussed previously, Illinois regulators have recognized the

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49 *UNE Remand Order*, para. 179.

50 Fifth Further Notice, para. 132.

51 *Id.*, para. 133.

importance of allowing competitors to access incumbent carriers' remote terminals. A requirement to permit cross-connections for subloop functions would be an additional pro-competitive step by the Commission.

Interconnections between competitive and incumbent LECs at remote terminals will ease the need for collocation at central offices, where space may be at a premium, particularly if there are many competitors in an area. Moreover, the availability of more potential interface locations will lead to more efficient use of the resources in place, minimize redundancies, and reduce the needs to disrupt vehicular traffic for placement of additional outside plant under public rights–of–way.

IV. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Comments.

Respectfully submitted,

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