

**FOC L**

**ORIGINAL**

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**EX PARTE OR LATE FILED**

January 26, 2001

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
455 12<sup>th</sup> Street SW, TW-A325  
Washington, DC 20554

**RECEIVED**

JAN 29 2001

**FCC MAIL ROOM**

RE: CC Docket No. 98-147 /

Dear Ms. Salsas:

On Thursday, January 25, 2000, Pamela Arluk, William Heilenbach, and the undersigned, of Focal Communications Corporation (Focal), met with Federal Communications Commission staff members William Kehoe III, Brent Olson, Kimberly Cook and Alexis Johns of the Policy and Program Planning Division and Shanti Gupta and Jerome Stanshine of the Office of Engineering and Technology. The purpose of the meeting was to discuss Focal's position on collocation. The attached material was distributed at the meeting and served as a basis for the discussion.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and two copies of this letter and the attachment are being filed with your office for inclusion in the public record of this proceeding. Acknowledgment and the date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Yours truly,

*Gale Smith Kalitsi*  
Gale Smith Kalitsi

Attachment

cc: William Kehoe III  
Brent Olson  
Kim Cook  
Alexis Johns  
Shanti Gupta  
Jerome Stanshine

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# Focal Communications Corporation Collocation *Ex Parte*

Gale Smith Kalitsi  
Pamela Arluk  
William Heilenbach

January 25, 2001

## Equipment Necessary for Interconnection or Access to UNEs

- Once a single function of a piece of multifunctional equipment is deemed “necessary”, the Commission should allow CLECs to collocate and use the equipment with all of its functions.
- Competitors should not be required to disable functions on multifunctional equipment, once a single function meets the necessary test.
- CLECs should be permitted to add ancillary panels.
- Additional functions do not require additional space.
- The equipment that Focal collocates generally takes up three racks of space.

# Equipment that Focal Needs to Collocate for Interconnection or Access to UNEs

## Equipment

- Lucent
- Nortel Access Node
- PairGain shelf
- POTS Splitter
- Cisco Catalyst
- Hendry
- Router

## Function

- DSLAM for ADSL/SDSL
- digital loop carrier for xdsl offering with voice (g.lite)
- DSLAM for HDSL/2: T1 replacement service
- splits voice and data traffic
- ethernet switch used as part of the network management system (NMS) out-of-band architecture
- fuse panel provides power
- used as part of the NMS out-of-band architecture

# Equipment that Focal Needs to Collocate for Interconnection or access to UNEs

## Equipment

- Quantumlink
- Harris Test Head
  
- TSI Block
- ASC1000
  
- Sonet Equipment

## Function

- cross-connect device
- access test head used with the Quantumlink equipment to determine loop quality
- cross-connect block
- ATM access multiplexer and switch allows for inverse multiplexing
- fiber multiplexer provides DS1 and DS3 service

# Equipment that Focal Needs to Collocate for Interconnection or access to UNEs

## Equipment

- AFC UMC 1000
- M13 equipment
- DSX1 and DSX3

## Function

- digital loop carrier
- multiplexes DS1 into DS3 and demultiplexes DS3 into DS1
- digital signal cross-connects panels for DS1 and DS3

## Cross-connects

- Cross-connects foster the pro-competitive goals of the 1996 Act and are supported by section 251.
- Cross-connects are necessary for interconnection or access to UNEs.
- Can be justified as “just, reasonable, and a nondiscriminatory term and condition” of collocation.

## Cross-connects

- The Commission has broad authority under section 201(a) to require ILECs to provide cross-connects as a tariffed service.
- The Commission should allow cross-connects to be provisioned as a UNE.

## Focal Uses Cross-connects to:

- Obtain transport. Focal connects to fiber providers within the CO.
- Provide transport. Focal lights fiber and provides transmission services to collocated carriers.
- Provide service offerings, e.g., DSL in a line sharing scenario. Focal needs to cross-connect to the collocated carrier providing voice in order to provide DSL.

## Remote Terminal Collocation

- Remote terminal collocation is required by section 251(c)(6). The word “premises” includes remote terminals.
- Both Qwest and SBC support collocation at RTs in their comments.