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AKERMAN, SENTERFITT & EIDSON, P.A.

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ATTORNEYS AT LAW

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September 11, 1997

Ms. Blanca S. Bayo Director, Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 97-1058-TL

Dear Ms. Bayo:

On behalf of BellSouth Mobility Inc, enclosed for filing in the above referenced docket is the original and fifteen (15) copies of the Petition for Intervention by BellSouth Mobility Inc.

If you have any questions please call me at (850) 222-3471. Thank you.

Sincerely. ark Horron

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BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Request for review of proposed numbering plan relief for 305 area code. DOCKET NO. 971058-TL Filed: September 11, 1997 Didnard

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PETITION FOR INTERVENTION BY BELLSOUTH MOBILITY INC

BELLSOUTH MOBILITY INC (BMI), pursuant to Rule 25-22.039, Florida

Administrative Code, respectfully requests that the Commission grant BMI intervention in this

proceeding. As grounds, BMI states:

1. The exact name of the Petitioner and the address of its principal business office is:

BellSouth Mobility Inc 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

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2. BMI is a management and holding company that owns and operates several cellular companies in Florida. BMI operates cellular systems in ten major metropolitan areas of the state. Some of these systems are 100% owned by BMI, while others are partnerships. BMI's systems serve a large number of subscribers in the 305 area code.

3. The purpose of this docket is to review a relief plan agreed to by the industry for the 305 area code. BellSouth Telecommunications, Inc. (BST), the numbering administrator of the North American Numbering Plan for the 305 area code, has stated that, without relief, available numbers within the 305 area code will exhaust its remaining available numbers sooner than expected.

Representatives of service providers in the 305 area code have agreed that relief

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from the imminent exhaustion should be accomplished through an overlay relief plan. Under the overlay plan, current customers would not be required to change their area code. All customers would be required to dial all local calls as ten digits, within and between area codes.

5. The proposed plan and any other plan which adds a new area code or changes the area code already assigned to BMI's subscribers will directly and materially affect BMI's substantial interests.

 All notices, pleadings, orders and other papers relating to this docket should be directed to counsel for BMI as follows:

> Mark Herron, Esquire E. Gary Early, Esquire Akerman, Senterfitt & Eidson, P.A. Post Office Box 10555 Tallahassee, Florida 32302-2555 (850) 222-3471

WHEREFORE, BellSouth Mobility Inc petitions to intervene as party in this docket.

Dated this 11th day of September, 1997.

Respectfully Submitted.

MARK HERRON, ESQUIRE FLORIDA BAR NO. 199737 E. GARY EARLY, ESQUIRE FLORIDA BAR NO. 325147 AKERMAN, SENTERFITT & EIDSON,P.A. 216 SOUTH MONROE STREET, SUITE 200 TALLAHASSEE, FLORIDA 32301 (850) 222-3471

Attorneys for BellSouth Mobility Inc

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this ## day of September, 1997:

By delivery to:

John Bowman, Esquire Martha C. Brown, Esquire Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Nancy White, Esquire c/o Nancy Sims BellSouth Telecommunications 150 South Monroe St., Suite 400 Tallahassee, Florida 32301

K HERRON, ESQUIRE

MARK HERRON, ESQUIRE E. GARY EARLY, ESQUIRE

cc: Interested Parties

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