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February 15, 1998

Ms. Blanca S Bayo Director, Division of Records and Reporting Florida Public Service Commission 2450 Shumard Oak Blvd. Tallahassee, Florida 32399

Re: Docket No.: 980048-TL

Dear Ms. Bayo:

Burnett Plaza, Buist 1265 101 East Kammdy Boulevard Tarryu, Plorida 33602 (013) 273-4677

FAX BID 223-2705

Please find enclosed an original and fifteen copies of the Amended AT&T Communications of the Southern States, Inc.'s Petition to Intervene for filing in the above referenced docket

I have enclosed a copy of this letter. Please mark it to indicate that the original was filed and return the copy to me.

ACK	Please contact me if you have any questions	Thank you for your assistance in the matter
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EAG ————————————————————————————————————		Mark K Logan
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OPCCC:	All parties of record	
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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION IS

In Re: Request for review of proposed numbering plan relief por 813 area code.

DOCKET NO. 980048-TL Filed: February 5, 1998

## AMENDED ATET COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S PETITION TO INTERVENE

AT&T Communications of the Southern States, Inc.

("AT&T"), pursuant to Rule 25-22.039, Fla. Admin. Code, petitions
the Florida Public Service Commission ("Commission") to grant it
leave to intervene in this docket and states:

1. AT&T is a regulated telecommunications carrier, duly authorized to provide service as an interexchange carrier ("IXC"), as an alternative access vendor ("AAV"), and as an alternative local exchange company ("ALEC") in Florida. AT&T's full name and address is:

AT&T Communications of the Southern States, Inc. 1200 Peachtree Street, NE Atlanta, Georgia 30309

2. All notices, pleadings and orders should be directed to the following:

Mark K. Logan
Bryant, Miller &
Olive, P.A.
201 South Monroe Street
Suite 500
Tallahassee, Florida 32301
850.222.8611

Marsha Rule AT&T Communications of the Southern States, Inc. 101 North Monroe Street Suite 700 Tallahassee, Florida 32301 850.425.6364

Page 1 of 3

- 3. AT&T has customers located throughout the current geographic region covered by the 813 area code. Accordingly, AT&T's substantial interests are affected by the Commission's determination as to how it will provide Numbering Planning Area ("NPA") relief for the 813 area code.
- 4. The principal issue of material fact at issue in this docket is how the Commission should provide NPA relief for the existing 813 area code. AT&T reserves the right to raise any additional issues or dispute issues of material fact which may develop during the course of this proceeding.
- 5. AT&T alleges as a concise statement of the ultimate facts, that the Commission, after hearing the parties' positions, and testimony from the affected customers within the 813 area code, should determine that, given that the NPA is close to exhaust, the public interest is best served by an NPA split.
- 6. The following statutes and rules entitle AT&T to the relief requested: Chapters 120 and 364, Florida Statutes and Rule 25-22, Part IV, Florida Administrative Code.

WHEREFORE, AT&T respectfully requests that the Commission grant this petition to intervene in this docket.

Respectfully submitted,

Mark K. Logan

Fla. Bar No. 0494208 \
Bryant, Miller & Olive

201 South Monroe Street, Ste. 500 Tallahassee, Florida 32301

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ATTORNEYS FOR ATET COMMUNICATIONS OF THE SOUTHERN STATES, INC.

## CERTIFICATE OF SERVICE

I MERESY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail to the parties listed below this to day of February, 1998.

Mark K. Logan

Anthony P. Gillman Kimberly Caswell GTE Plorida Incorporated P.O. Box 110 Tampa, PL 3360:-011

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Norman Horton Messer Law Firm P.O. Box 1876 Tallahassee, PL 32302

Office of Public Counsel c/o The Plorida Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400

Senator Jack Latvala 19<sup>th</sup> District 3511 US Highway 19N, #105 Palm Harbor, FL 34684

Angela Green
Florida Public Telecommunications
Assoc.
125 S. Gadmden St., #200
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