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GTE SERVICE CORPORATION

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February 13, 1998

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

Re: Docket No. 980048-TL

Request for review of proposed numbering plan relief for 813 area code

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Prehearing Statement for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

**BOCUMENT NUMBER-DATE** 

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## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of	)	Docket No 980048-TL
proposed numbering plan relief	)	Filed: February 13, 1998
for 813 area code	)	
	)	

# **GTE FLORIDA INCORPORATED'S PREHEARING STATEMENT**

GTE Florida Incorporated (GTEFL) files its Prehearing Statement in accordance with Commission Rule 25-22.038(3) and Order number PSC-98-0096-PCO-TL in this docket.

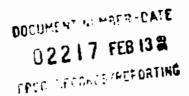
### A. Witnesses

GTE will sponsor two witnesses, Beverly Y. Menard and Sergin J. Gancarz Ms.

Menard will testify to designated Issues 1 and 2. Mr. Gancarz will also testify to Issue 1, with regard to the general nature of the number exhaust problem and the process through which the overlay method was chosen.

#### **B.** Exhibits

There is a 5-page exhibit, labeled BYM-1, that is attached to Ms. Menard's Direct Testimony. GTEFL will introduce that exhibit at the hearing. Attached to Mr. Gancarz's Direct Testimony is an exhibit labeled SJG-1, which will also be introduced at the hearing GTEFL reserves the right to introduce other exhibits as appropriate during the course of this proceeding.



#### C. GTEFL's Basic Position

The Commission should affirm the geographic overlay as the most appropriate solution to the number exhaust problem in the Tampa Bay area. This method of relief was unanimously approved by the current code holders in the 813 area code. The overlay is the least disruptive and most long-term solution for the area at issue. There is no geographic split that makes sense and that will not cause confusion about dialing patterns. Even if it is not implemented now, an overlay, along with ten-digit dialing, will likely become inevitable.

### D., E., and F. GTEFL's Specific Positions

GTEFL considers each issue in this case to be a mixed question of fact, law, and policy. GTEFL's positions on the issues follow

Issue 1: Should the Commission approve the overlay plan for 813 area code relief, and if not, what relief plan should the Commission approve?

Position: Yes, the Commission should approve the overlay plan, which was unanimously approved as the best solution by current code holders in the telecommunications industry. The overlay is the least disruptive and most long-term solution, and recognizes that Tampa Bay is a single metropolitan area. In contrast, there is no rational geographic split, and the area would, in any case, be facing an overlay solution in the not-too distant future.

Issue 2: What should the dialing pattern be for the following types of calls?

- a. Local
- b. Toll
- c. EAS
- d. ECS

Position: a. Local: Upon implementation of the overlay local calls will be ten-digit dialed. Even with a geographic split, certain local calls should be dialed on a ten-digit basis, as detailed in Ms. Menard's Exhibit BYM-1. There is no dividing line that will not split some local calling area.

b. Toll: Dialing on the toll routes at issue (shown in Exhibit BYM-1) will continue
 to be 1+10 digits, regardless of the relief plan implemented

c. EAS: Upon implementation of the overlay EAS calls would be dialed on a tendigit basis. Even if a geographic split is used, certain EAS calls should be dialed on a tendigit basis, as shown in Exhibit BYM-1

d. ECS Upon implementation of the overlay ECS calls would be ten-digitdialed. Even if a split is implemented, certain ECS calls should be dialed on a ten-digit basis, as detailed in Exhibit BYM-1

# G. Stipulated Issues

No issues have been stipulated

### H. Pending Matters

GTEFL has no pending motions or other matters upon which it seeks action

# I. Procedural Compliance

At this time, there is no requirement in the procedural order in this case with which GTEFL cannot comply.

Respectfully submitted on February 13, 1998

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Attorneys for GTE Florida Incorporated

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of GTE Florida incorporated's Prehearing Statement in Docket No. 980048-TL were sent via U. S. Mail on February 13, 1998 to the parties on the attached list.

Kimberly Casivell

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