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ORIGINAL

May 29, 1998

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

Re: Docket No. 971058-TP (305 NPA)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Permissive Dialing Period, which we ask that you file in the above-captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
(Bul)

Nancy B. White

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

NBW/vf

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED

*[Signature]*  
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**CERTIFICATE OF SERVICE  
DOCKET NO. 971058-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
by U.S. Mail this 29th day of May, 1998 to the following:

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Nancy B. White (BW)

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of ) DOCKET NO. 971058-TL  
proposed numbering plan relief )  
for 305 area code. )  
\_\_\_\_\_ ) FILED: May 29, 1998

**MOTION FOR EXTENSION OF  
PERMISSIVE DIALING PERIOD**

NOW COMES, BellSouth Telecommunications, Inc. ("BellSouth"), and files its Motion for Extension of the Permissive Dialing Period for the 305 area code. In support of its Motion, BellSouth states the following:

1. On July 15, 1997, BellSouth Telecommunications, Inc. ("BellSouth"), the numbering administrator for the 305 area code at that time, notified the Florida Public Service Commission ("Commission") that the 305 area code would exhaust its remaining available NXXs sooner than expected. The Commission opened Docket No. 971058-TL to address what would be the appropriate relief method for the area code. The Commission conducted service hearings in Miami and Key West on October 1 and 3, 1997, and a technical hearing in Tallahassee on October 13, 1997.

2. On January 6, 1998, the Commission issued Order No. PSC-98-0040-FOF-TL approving a concentrated growth overlay to provide numbering plan relief for the 305 area code. In its Order, the Commission established a 10-digit permissive dialing period beginning on March 1, 1998 and ending on July 1, 1998.

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3. Although there was considerable testimony given at the service technical hearings concerning the appropriate relief method for the 305 area code, little if any, testimony was associated with the problems the alarm industry incurs when it is required to convert to 10-digit dialing. Therefore, the Commission did not establish any special considerations at that time. However, after the Commission's vote on the staff's recommendation addressing the relief for the area code, various alarm companies expressed concern to BellSouth and to the Commission staff regarding the relatively short permissive dialing period. Alarm companies are required to reprogram a customer's alarm equipment in their home to dial 10-digits rather than 7-digits in order to reach the monitoring location of the alarm company. If the reprogramming is not completed, monitoring stations will not be able to receive signals from the customer's premise.

4. Initially, the alarm industry wanted to extend the permissive dialing period, but it was unclear, at that time, whether there would be sufficient codes available. Therefore, in an effort to minimize the alarm industries' problems /concerns, BellSouth and the Commission staff worked together to develop an implementation schedule that would convert BellSouth's offices to beginning of the permissive dialing on March 1, 1998. Based on the schedule, most of BellSouth's offices were converted by the end of December of 1997. These efforts provided additional time for the alarm companies to complete the reprogramming necessary to recognize 10-digit dialing.

5. Some alarm companies have notified BellSouth they will be unable to complete the conversion by the July 1, 1998 deadline. BellSouth is concerned about the potential adverse effect to its customers if the alarm industry has not completed its reprogramming of the customer's security equipment. As noted earlier, BellSouth's original concern with extending the permissive dialing period was due to the projected lack of NXX codes to handle such an extension. However, the projected code demand has not materialized as expected. Therefore, there appears to be approximately 100 NXX codes available to be used to extend the permissive dialing period.

6. Currently, the industry has adopted jeopardy measures that provide for the assignment of 10 codes a month. Theoretically, under this scenario, the Commission could extend the permissive dialing for 10 months. However, due to the potential increase in code usage for this area and the need to reserve at least one NXX in the existing area code to every telecommunications carrier authorized to provide telephone exchange, BellSouth would request the Commission only extend the permissive dialing period for three (3) months or until October 1, 1998.

WHEREFORE, BellSouth requests that the Commission grant its Motion and extend the permissive dialing period until October 1, 1998.

Respectfully submitted this 29th day of May, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty (PW)*

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