

ORIGINAL

PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A.
ATTORNEYS AT LAW

BARBARA D. AUGER
SAMUEL P. BELL, III
DOUGLAS S. BELL
ROBERT CINTRON, JR.
KEVIN X. CROWLEY
MARK K. DELEGAL
MARC W. DUNBAR
PETER M. DUNBAR
MARTHA J. EDENFIELD
WILLIAM H. HUGHES, III
JOHN J. MATTHEWS

EDGAR M. MOORE
E. MURRAY MOORE, JR.
BRIAN A. NEWMAN
JOHN C. PELHAM
CARL R. PENNINGTON, JR., P.A.
C. EDWIN RUDE, JR.
GARY A. SHIPMAN
CYNTHIA S. TUNNICLIFF
WILLIAM E. WHITNEY
BEN H. WILKINSON
CATHI C. WILKINSON

OF COUNSEL
R. STUART RUFF, P.A.
Coral Gables, Florida
CHRISTOPHER W. KANAGA
(Admitted in Massachusetts & Colorado Only)
BARBARA J. STAROS
SPECIAL CONSULTANTS
RANDY MILLER
*NOT A MEMBER OF THE FLORIDA BAR

215 SOUTH MONROE STREET
2ND FLOOR
TALLAHASSEE, FLORIDA 32301

(850) 222-3533
FAX (850) 222-2126
E-Mail:

REPLY TO:
P.O. BOX 10095
TALLAHASSEE, FL 32302-2095

June 3, 1998

via Hand Delivery

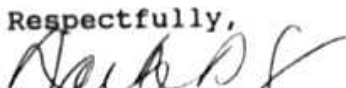
Ms. Blanco Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: IN RE: Request for review of
proposed numbering plan relief
for 305 area code.
DOCKET NO. 971058-TL

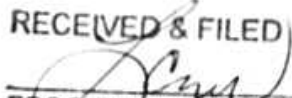
Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of the Emergency Request for Temporary Variance. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was filed and return a copy to me.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

Respectfully,

Barbara D. Auger

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Suriani
- CTR _____ BDA/kab
- EAG _____ Enclosures: As noted
- LEG 1 cc: Counsel of record w/enclosures
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

RECEIVED & FILED

FRSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05970 JUN-3 88
FRSC-RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION

IN RE: Request for review of
proposed numbering plan relief
for 305 area code.

DOCKET NO. 971058-TL

FILED: June 3, 1998

EMERGENCY REQUEST FOR TEMPORARY VARIANCE

SecurityLink from Ameritech, Inc. ("SecurityLink"), pursuant to 28-104.001, et. seq., Florida Administrative Code, by and through its undersigned counsel, does hereby file its Emergency Request for Temporary Variance and in support thereof states as follows:

1. SecurityLink is a Delaware Corporation authorized to do business in Florida. SecurityLink operates in Florida as an alarm company with its principal place of business located at Oakbrook Terrace, Illinois.

2. The names and addresses of the persons to whom copies of all correspondence, notices, orders and other documents in this proceeding should be sent are as follows:

Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
(850) 222-3533
(850) 222-2126 (facsimile)

3. SecurityLink requests a temporary variance from this Commission's Order number 98-0040-FOF-TL in the nature of an extension of the mandatory ten (10) digit dialing established in that Order for a period of six (6) months (i.e. January 1, 1999).

4. SecurityLink is an alarm services company with

DOCUMENT NUMBER-DATE

05970 JUN-3 98

FPSC-RECORDS/REPORTING

approximately 30,000 customers in the Miami-Dade County area, seventy-five percent (75%) of which are residential customers.

5. Once activated or tripped many of SecurityLink's customer's alarm systems send an electronic signal via the telephone lines to one of SecurityLink's central monitoring stations. Presently, the alarms in the Miami-Dade County area dial a local seven digit phone number. In order to continue to provide alarm service to our existing customers, SecurityLink must reprogram the alarm panels in each business or residence to allow for the mandatory ten-digit local dialing.

6. On December 29, 1997, SecurityLink was notified by facsimile that ten-digit dialing would become mandatory. A copy of the Order was received by certified mail on March 18, 1998. Since receipt of notification that the ten-digit dialing would become mandatory, SecurityLink has taken all necessary and reasonable steps to complete the conversion by the deadline. SecurityLink has, however, been unable to complete the necessary conversion.

7. SecurityLink's customer base is comprised substantially of original customers of ten to twelve companies, which companies or their assets were later acquired by SecurityLink. The majority of these customers have different technologies, which require a site visit to make the necessary conversion. Since the majority of the site visits are residential, an appointment must be made to gain entry. SecurityLink has discovered that approximately 10-15% of the site visits require a total replacement of the equipment before the conversion can be made.

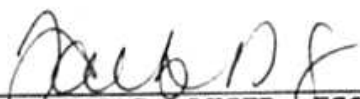
8. SecurityLink will be unable to complete the conversion

process until January 1, 1999. If an extension of time is not granted, approximately 18,000 customers will be without monitoring service for a period of time up to six (6) months. The inability to provide service to those customers could expose SecurityLink's customers to potential life threatening situations.

9. SecurityLink requests a temporary variance and/or extension of time of the mandatory ten (10) digit dialing for those phone exchanges where SecurityLink has affected customers for a period of six (6) months. A denial of SecurityLink's request would create a substantial hardship on SecurityLink and its customers. Additionally, a denial could expose SecurityLink's customers to significant and unintended harm.

10. Inasmuch as the pertinent Order requires mandatory ten digit dialing on July 1, 1998, emergency relief is requested and necessary.

This Emergency Request for Variance is respectfully submitted this 13rd day of June, 1998.



BARBARA D. AUGER, ESQ.
Fla. Bar No. 946400
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302-2095
(850) 222-3533
(850) 222-2126 (fax)

Counsel for: SecurityLink from
Ameritech

CERTIFICATE OF SERVICE
DOCKET NO. 971058-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 3rd day of June, 1998, to the following parties of record:

ABC Paging
Paul Klugerman
16500 NW 52nd Ave.
Hialeah, FL 33014

ACSI of AL
Bill Stipe
131 National Bus Pkwy., #100
Annapolis Junction, MD 20701

AirTouch Cellular
Chris Horton
4151 Ashford Dunwoody Road
Atlanta, GA 30319

AirTouch Paging
Birtwistle/Jim Cigler
6420 Congress Ave., #1800
Boca Raton, FL 33487

AirTouch Paging
Jeffy Sutton
12221 Merit Dr., #800
Dallas, TX 75251

Akerman, Senterfitt & Eidson
Mark Herron
216 S. Monroe St., #200

Ameripage, Inc.
Doug Thompson
5043 NW 167th St.
Hialeah, FL 33015

AT&T Communications of the
Sothern States, Inc.
Ms. Rhonda P. Merritt
101 North Monroe Street
Suite 700
Tallahassee, FL 32301-1549

AT&T Wireless Services
Richard Cahall
1920 Corporate Dr.
Boynton Beach, FL 33426

AT&T Wireless Services
John Giannella
11760 North US Highway 19th Fl.
West Palm Beach, FL 33408

AT&T Wireless Services, Inc.
Char Meins/HQ External Affairs
5000 Carillon Point
Kirkland, WA 98033

ATC Long Distance
Bubba Phillips
2315 Salem Road
Conyers, GA 30208

ATC Long Distance
Dave Elchelkraut
2121 E. 63rd St.
Kansas City, MO 64130

Beep-Net
Julian Gonzalez
236 SW 22nd Ave.
Miami, FL 33135

BellSouth Cellular Corp.
Susan Israel/Ron Burtleson
1100 Peachtree St., NE, #809
Atlanta, GA 30309

BellSouth Long Distance, Inc.
Melvin McCowan
32A Perimeter Center East
Atlanta, GA 30346

BellSouth Mobility, Inc. (Atl)
1100 Peachtree St., NE, #910
Atlanta, GA 30309-4599

BellSouth Telecommunications,
Inc.
Ms. Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556

BellSouth Telecommunications,
Inc., (Mia)
Judy Childers
150 W. Flagler St., #1801
Miami, FL 30375

BellSouth-IFP
Terry Bell
6451 N. Federal Hwy.
Fort Lauderdale, FL 33308

BellSouth-IFP
Larry Whipple
18560 NW 27th Ave., #330
Miami, FL 33056

BellSouth-Ind. Rel.
Gene Lunceford
600 N. 19th St., 3rd Fl.
Birmingham, AL 35203

BellSouth-IT
Charles Lewis
675 W. Peachtree St., 13C55BSC
Atlanta, GA 30375

BellSouth-NPA
Stan Washer
3535 Colonnade Pkwy., North W1C
Birmingham, AL 35243

Bryant Law Firm
Mark Logan
201 S. Monroe St., #500
Tallahassee, FL 32301

City of Key West
Commissioner Merili McCoy
Post Office Box 1409
Key West, FL 33041-1409

Continental Florida
Telecommunications, Inc.
Bill Hopfer
4455 Bay Meadows Rd.
Jacksonville, FL 32257

CONXUS Network, Inc.
Mazie Robinson
15 S. Main St.
Greenville, SC 29601

Dept. of Management
Services(ITP)
Carolyn Mason
Information technology Program
4050 Esplanade Way, Bldg. 4030
Rm. 180L
Tallahassee, Florida 32399-0950

Florida Public
Telecommunications Assoc.
Angela Green
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Hopping Law Firm
Richard Melson
Post Office Box 6526
Tallahassee, Florida 32314

Intelcom Group Access
Joe Klein
9605 E. Maroon Circle
Englewood, CO 80112

Interlink Paging
Andy Fredlund
401 W. Linton Blvd., #300
Delray Beach, FL 33444

Interstate Fibernet/Deltacom
Steven Brownworth
206 W. 9th St.
West Point, GA 31833

Joe Denty & Assoc.
2044 Prairie Ave.
Miami, FL 33139

Marvin Kaleky
466 Briarwood Circle
Hollywood, FL 33024-1392

Key West Chamber of Commerce
Virginia Panico
402 Wall St.
Key West, FL 33040

Lifetime Dock & Lumber Co.
Pete Braisted
24536 Overseas Hwy.
Summerland Key, FL 33042-0794

Linda Lowry
10175 Collins Ave.
Bal Harbour, FL

MCI Long Distance
Frederick Williams
2270 Lakeside Blvd.
Richardson, TX 75082

MCI Telecommunications Corp.
Thomas K. Bond
780 Johnson Ferry Rd., 5th Fl.
Atlanta, GA 30342

MCIMetro
Karen Harvey
8521 Leesburg Pike
Vienna, VA 22182

Messer Law Firm
Floyd Self
Post Office Box 1876
Tallahassee, FL 32302

Metro-Dade County (Security)
Edward Hllander
200 NW 1st St., #102
Miami, FL 33128

MobileComm
Anita Amos
1800 E. County Line, #300
Ridgeland, MS 39157

MPC
Wendy Hauk
1301 W. Copans Rd., #F1
Pompano Beach, FL 33064

NANPA
Jim Deak
6 Corporate Place
PYA 1G-278
Piscataway, NJ 08840-4157

Nextel Communications, IN.c
Gus Roby
851 Trafalgar Court, #430E
Maitland, FL 32751

PageMart
Arlene Charity
6688 N. Central Expwy., #800
Dallas, TX

PageNet
Bill Wiggins
4965 Preston Park Blvd., #600
Plano, TX 75093

PageNet Florida
Dennis Grant
2 Oakwood Blvd., #100
Hollywood, FL 33020

PageNet of America
Garey Merritt
1000 Legion Place, #100
Orlando, FL 32801

Paging Network, Inc.
Eric Beissert
3500 Pkwy. Blvd., #450
Norcross, GA 30092

Payphone Consutlants, Inc.
John Murray
3431 NW 55th St.
Fort Lauderdale, FL 33309

Primco PCS, LP.
Janet Pierre
225 Westmonte Dr., Rm. 2080
Altamonte Springs, FL 32714

Primeco Personal Communications
Jeremy Asif
6 Campus Circle, j#6421
Westlake, TX 76262

Priority Communications
John Prefer
1499 W. Palmetto Park Rd., #405
Boca Raton, FL 33434

Rainbow Paging
Ed Lezcano
8337 NW 12th St.
Miami, FL 33126

Sprint
Mr. Tony H. Key
3100 Cumberland Circle, #802
Atlanta, GA 30339

Spring PCS(MO)
Angela Webster
8140 Ward Pkwy.
Mailstop: MOKCMO 0501
Kansas City, MO 64114

Sprint PSC(TN)
Beth Marsie-Hazen
444 Metroplex Dr.
Bldg. B, #102
Nashville, TX 37211

Sprint Spectrum L.P. (FL)
Steven Valenzi
1250 N. University Dr., #200
Planation, Fl, MO 33322

Sprint(Altamonte Spgs)
Tome Foley
850 E. Altamonte Spgs., Dr.
Altamonte Springs, FL 32716

Spring(KS)
Kathy Elchholz
9350 Metcalf
Mailstop: KSOPKC 0601
Overland Park, KS

Dr. & Mrs. Takeshita
7605 SW 133 St.
Miami, FL 33156

TCG(NY)
John Krug
2 Teleport Dr., 3rd Fl.
Staten Island, NY 10311

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
Post Office Bo.. 551
Tallahassee, FL 32302-0551

Teleport Communications Group,
Inc.
TCG-Washington
2 Lafayette Centre
1133 Twenty-First St., NW #400
Washington DC 20036

Times Warner AXS of
Florida, L.P.
Mr. Richard Gerstemeier
2251 Lucien Way, Suite 320
Maitland, FL 32751-7023

Time Warner Communications (CO)
Dana Hunter
5680 Greenwood Plaza Blvd.
Englewood, CO 80111

United States Cellular (FL)
Larry Reuter
6110 NW 4th Place
Gainesville, FL 32607

Worldcom, Inc. (OK)
Sherita Roberts
One Williams Center
MD27-2
Tulsa, OK 74172

Worldcom, Inc. (NJ)
Pamela Kenworthy
3 Wing Dr., #200
Cedar Knolls, NJ 07927


BARBARA D. AUGER, ESQ.