ORIGINAL



RECEIVED-FPSC

98 JUL 17 PM 3: 14

Charles J. Rehwinkel General Attorney P.O. Box 2214 Tallahassee, FL 32316 Mailstop FLTLH00107 Voice 850 847 0244 Fax 850 599 1458

RECONDS AND REPORTING

July 17, 1998

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

Re: Docket No. 980671-TL

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Inc.'s Prehearing Statement.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

		Sincerely,	J. Redwanteel / JK H
	V		,
ACK		Charles J.	Rehwinkel
AFA	<u> </u>	CJR/th	RECEIVED & FILED
APP			CA P
CAF		Enclosures	
CMU) Della	nni	FPSC-CUREAU OF RECORDS
CTR			
EAG			
LEG	4		
LIN	5_		
OP.)			

RCH _____

WAS _____

OTH _____

SEC __

DOCUMENT IN FOLS-DATE

U 7550 JUL 178

The state of the s

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of)	DOCKET NO. 980671-TL
Proposed Numbering Plan)	
Relief for the 407 Area Code)	FILED: July 17, 1998
)	-

PREHEARING STATEMENT OF SPRINT-FLORIDA, INCORPORATED

Sprint-Florida, incorporated (Sprint), in compliance with the Order Establishing Procedure (Order No. PSC-98-0767-PCO-TL), issued June 4, 1998, hereby submits its Prehearing Statement for Docket No. 980671-TL.

A. Witnesses

Sprint proposes to call the following witnesses to offer testimony on the issues in this docket:

<u>Witness</u>	<u>lssue(s)</u>
Thomas C. Foley	1 - 2
Sandra A. Khazraee	1

Sprint reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on July 22, 1998.

B. Exhibits

Thomas C. Foley

TCF-1

Sprint Exhibit 1, 2 & 3

Sprint reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. Sprint also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

Sprint agrees with the consensus Industry Recommendation resulting from the Industry Meeting held March 31, 1998, to implement 407 NPA relief utilizing a single overlay plan. For local and EAS/ECS calls, a 10-digit dialing pattern would be mandatory with the overlay solution. Toll calls should be dialed on a 1+10 digit dialing pattern.

D. Sprint's Position on the Issues

<u>Issue 1:</u> Should the Commission approve the industry's consensus overlay plan for 407 area code relief, and if not, what relief plan should it approve?

<u>Position</u>: Yes. The overlay plan in this particular case is a rational solution which will provide the most long term benefits and make it easier to add future area codes which will clearly be needed in this high growth area.

<u>Issue 2:</u> What should the dialing pattern be for the following types of calls? A. Local b. Toll c. EAS d. ECS

<u>Position:</u> A 10-digit dialing pattern is mandatory for local and EAS/ECS calls with the overlay solution. Toll calls should be dialed on a 1+10-digit dialing pattern.

E. Stipulations

Sprint is aware of no stipulations.

F. Pending Motions

Sprint has concurrently filed a Motion to accept Late-Filed Prehearing Statement.

G. Other Requirements

Subject to Ruling on "G" above, Sprint knows of no requirement set forth in any prehearing order with which it cannot comply.

Respectfully submitted this 17th day of July, 1998.

Charles J. Rehwinkel

General Attorney

Sprint-Florida, Incorporated

Post Office Box 2214

MS: FLTLHO0107

Tallahassee, Florida 32301

850/847-0244

CERTIFICATE OF SERVICE DOCKET NO. 980671-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 17^h day of July, 1998 to the following:

Will Cox Division of Legal Services Florida Public Service Comm. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Nancy H. Sims BellSouth Telecommunications 150 S. Monroe St., Suite 400 Tallahassee, FL 32301

James T. Schumacher
Lynn B. Hall
Vista-United Telecommunications
Post Office Box 10180
Lake Buena Vista, FL 32830

Lee L. Willis
J. Jeffry Wahlen
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302

Angela Green Florida Public Tele. Assoc. 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525 Richard Melson P. O. Box 6526 Tallahassee, FL 32314

Steve Brown
Intermedia Comm. of Florida, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

D. Wayne Milby Lockheed Martin IMS Communications Industry Svcs. 1133 15th Street, N.W. Washington, DC 20005

Thomas K. Bond MCI Telecommunications/ MCI Metro Access 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342 Tony Key Sprint 3100 Cumberland Circle, #802 Atlanta, GA 30339 Jill Butler Time Warner Communications 2251 Lucien Way, Suite 320 Maitland, FL 32751-7023

. . . .

Tracy Hatch, Esq.
AT&T
Suite 700
101 North Monroe Street
Tallahassee, Florida 32301
(850) 425-6364

Rhonda P. Merritt AT&T Communications 101 N. Monroe Street, Ste. 700 Tallahassee, FL 32301-1549

William J. Ellenberg II Mary K. Keyer 675 West Peachtree Street #4300 Atlanta, Georgia 30375

Charles J. Rehwinkel JKH

Attorney for

Sprint-Florida, Inc.

P.O. Box 2214 MC FLTLH00107 Tallahassee, FL 32316-2214 850/847-0244