

RECEIVED - T-30

01:14 Hd

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

)

)

)

In Re: Request for review of proposed numbering plan relief for 407 area code

Docket No. 980671-TL Filed: October 23, 1998

## AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. POSTHEARING STATEMENT OF ISSUES AND POSITIONS

AT&T Communications of the Southern States, Inc. ("AT&T"), pursuant to Rule

25-22.056(3), Fla. Admin. Code and Order No. PSC-98-0767-PCO-TL, hereby files its

Posthearing Statement of Issues and Positions and states:

AT&T's Basic Position

\*\* Any NPA relief must be competitively neutral so no particular service provider is unduly favored or adversely affected. Impact on customers should be kept to a minimum while promoting the development of local competition for the long term benefit of consumers. AT&T suggests a geographic split best accomplishes these goals. \*\*

AT&T's Positions on the Issues

ISSUE 1: Should the Commission approve the industry's consensus overlay plan for the 407 area code relief, and if not, what relief plan should the Commission approve?

\*\* While there are advantages and disadvantages overlay or a geographic split, the advantages associated with the split outweigh those associated with an overlay. From a technical standpoint, AT&T will support either one. The determining factor should be what is in the best interests of the people living and working within the 407 area code. \*\*

RECEIVED & FILED C-BUREAU OF RECORDS

ACK \_\_\_\_\_

APP

CAF

ĆΜΙ

CTR \_

EAG \_

OPC \_\_\_\_\_

SEC \_\_\_\_

OTH \_\_\_\_\_

WAS \_\_\_\_\_

DOCUMENT NUMBER-DATE 1 872 OCT 23 & ISSUE 2: What should the dialing pattern be for the following types of calls?

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

**\*\*** Overlay: 10-digit dialing should be required within and between the new and old area codes for all calls; toll calls should be made on a 1+10 digit basis. Geographic Split: 10-digit dialing should be required between the new and old area dialing codes for all types of calls; toll calls should be made on a 1+10-digit basis. Local, ECS and EAS calls within an area code may be on a seven digit basis. **\*\*** 

Respectfully submitted this 23th day of October, 1998.

alliele by Kff Marsha E. Rule

AT&T 101 North Monroe Street Suite 700 Tallahassee, Florida 32301 (850) 425-6365

Attorney for AT&T Communications of the Southern States

## CERTIFICATE OF SERVICE DOCKET 980671-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished

via U.S. Mail to the following parties of record on this 23th day of October\_\_\_\_\_

1998:

William Cox Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Jeffrey Wahlen Ausley Law Firm Post Office Box 391 Tallahassee, FL 32302

Nancy Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

D. Wayne Milby Lockheed Martin IMS Communications Industry Services 1133 15<sup>th</sup> Street, N.W. Washington, DC 20005

Ben Poag Sprint-Florida, Incorporated Post Office Box 2214 Tallahassee, FL 32316-2214

James T. Schumacher Lynn B. Hall Vista-United Telecommunications Post Office Box 10180 Lake Buena Vista, FL 32830-0180 Richard D. Melson Hopping Green Sams & Smith Post Office Box 6526 Tallahassee, FL 32314

Thomas K. Bond MCI Telecommunications Corp. 780 Johnson Ferry Rd. Suite 700 Atlanta, GA 30342

Charles J. Rehwinkel Sprint-Florida Inc. Post Office Box 2214 MS: FLTH00107 Tallahassee, FL 32316

Mark Herron Mark Herron, P.A. 216 S. Monroe St., Suite 200-A Tallahassee, FL 32301-1859

E. Gary Early Akerman, Senterfitt & Edison 216 S. Monroe St., Suite 200 Tallahassee, FL 32301

Marsha Rule by Kf4