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Charles J. Rehwinkel General Attorney



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RECORDS AND REPORTING

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March 25, 1999

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. 990223-TL

Dear Ms. Bayo:

Enclosed for filing is the original and seven (7) 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,

AFA APP

Charles J. Rehwinkel

CAF CJR/th CMU CTR Enclosures EAG LEG LIN 09**0** RCH SEC WAS _____

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DOCUMENT NUMBER-DATE 0.3886 MAR 25 8 FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into telephone exchange boundary issues in South Polk County.	DOCKET NO. 981941–TL
In Re: Investigation into telephone exchange boundary issues in South Sarasota and North Charlotte Counties.	DOCKET NO. 990184-TL
In Re: Request for review of proposed numbering plan relief	DOCKET NO. 990223-TL
for the 941 area code.	FILED: March 10, 1999

PREHEARING STATEMENT OF SPRINT FLORIDA, INCORPORATED

Sprint-Florida, Incorporated (Sprint), in compliance with the Order Establishing Procedure hereby submits its Prehearing Statement for Docket No. 990223-TL.

A. <u>Witnesses</u>

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

<u>Witness</u>

1

<u>lssue(s)</u>

1

Thomas C. Foley

Sprint reserves the right to call additional witness, 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 April 1, 1999 or in

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any other related or potentially consolidated Docket.

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B. <u>Exhibits</u>

Thomas C. Foley TCF-1 Sprint Exhibit 1 & 2

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 July 8, 1998, to implement 941 NPA relief utilizing a Geographic Split plan.

D. Sprint's Position on the Issues

- <u>Issue 1:</u> Should the Commission approve the proposed geographic split plan for the 941 area code relief, and if not, what relief plan should the Commission approve?
- Position: Yes, as modified to incorporate the inclusion of the Ft. Meade exchange with the same NPA utilized for the exchanges served by GTEFL. Material modifications to the industry consensus geographic split plan could introduce uncertainty, unanticipated technical and operational difficulties and associated cost. In such an event, the Commission should consider an overlay that could be implemented quickly in light of the recently declared extraordinary jeopardy in the 941 NPA. Assignment of the 941 area code should follow NANPA guidelines and minimize customer confusion.

E. Stipulations

Sprint is aware of no stipulations.

F. Pending Motions

Sprint and GTEFL have filed a Joint Motion to Consolidate all three related dockets.

Charlotte and Sarasota Counties have filed a Joint Response in support of the Motion.

G. Other Requirements

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

Respectfully submitted, this 25th day of March 1999.

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Charles J. Rehwinkel Senior Attorney Sprint-Florida, Incorporated P.O. Box 2214 MC FLTLHO0107 Tallahassee, Florida 32301 (850) 847-0244

CERTIFICATE OF SERVICE DOCKET NO. 981941-TL, 990184-TL & 990223-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 25th day of March, 1999 to the following:

GTE Florida Incorporated Ms. Beverly Y. Menard % Ms. Margo B. Hammar 106 East College Avenue Suite 810 Tallahassee, Florida 32301-7704

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Oakview Lake Homeowners Association 300 S. Washington Ave. Fort Meade, Florida 33841

Polk County Board of Commissioners Comm. Bruce Parker 330 W. Church Street Drawer BC01 Post Office Box 9005 Bartow, Florida 33831-9005

Mike Stedem 3200 Hwy 17 N. Post Office Box 976 Fort Meade, Florida 33841

City of Ft. Meade Fritz Behring 8 West Broadway Post Office Box 856 Ft. Meade, Florida 33841-0856 Dr. Willard Coy, Vice-Chair, Area Planning Board 244 Mark Twain Lane Rotonda West, Florida 33947

Englewood Water District Post Office Box 1399 Englewood, Florida 34295-1399

Olde Englewood Village Assn. Pam Domres, President 285 Dearborn Street Englewood, Florida 34223

Shark Tees and Screenprinting Stephanie Mead 425 W. Dearborn Street Englewood, Florida 34223

Cellular One Frank Heaton 2100 Electronics Lane Fort Myers, Florida 33912

CHEETAH Technologies Gordon GreenField 2501 83rd Avenue East Bradenton, Florida 34203 Angela Green, General Counsel Florida Public Telecommunications Association 125 S. Gadsden Street, #200 Tallahassee, Florida 32301-1525

Polk County Board of Commissioners Comm. Neil Combee 330 W. Church Street Drawer BC0Post Office Box 9005 Bartow, Florida 33831-9005

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Charlotte Count Attorney's Office Martha Burton, Esq. 18500 Murdock Circle Port Charlotte, Florida 33948

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