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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION R 25 PM 4: 45

In Re: Request for review of proposed number plan relief

Docket No. 990223-TL Filed: March 25, 1999

RECURS AND REPORTING

for 941 area code.

FLORIDA CELLULAR SERVICE, INC. D/B/A BELLSOUTH MOBILITY'S PREHEARING STATEMENT

Florida Cellular Service, Inc. d/b/a BellSouth Mobility ("BellSouth Mobility"), by and through its undersigned counsel, and pursuant to Rule 25-22.038(3), Florida Administrative Code, and Order No. PSC-997-0441-PCO-TL, hereby submits its Prehearing Statement in this proceeding. BellSouth Mobility reserves the right to supplement and revise the matters contained in this Prehearing Statement.

A. Witnesses

BellSouth Mobility intends to call as its witness, Ronald W. Burleson, Director of External Affairs with BellSouth Cellular Corp.

B. Exhibits Identified At This Time

The prefiled direct and rebuttal testimonies of Ronald W. Burleson are the only exhibits that BellSouth Mobility intends to introduce at this time.

C. Basic Position

There is a pressing need for immediate numbering relief to prevent the exhaust of numbering resources in the 941 area code. To address this problem, the Commission

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should immediately approve an all-services overlay area code relief plan. The overlay relief plan can be implemented in a matter of several months and provide immediate area code relief with far less confusion and disruption to customers than would be the case with the previously proposed geographic code split.

D. Questions of Fact

There are no purely factual issues to be addressed by Mr. Burleson.

E. Questions of Law

There are no purely legal issues to be addressed by Mr. Burleson.

F. Mixed Questions of Fact, Law, and Policy

The following is a mixed question of fact, law and policy to be addressed by Mr.

Burleson:

Question: 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?

BellSouth Mobility's Position: The Commission should not approve the proposed geographic split plan for 941 area code relief. In order to provide expeditious area code relief and minimize customer confusion and disruption, the Commission should adopt an all-services overlay area code relief plan.

G. Issues Stipulated To By the Parties

None at this time.

H. Pending Motions or Matters on Which Action is Sought

BellSouth Mobility seeks action upon its Petition for Leave to Intervene that it filed with the Commission on March 18, 1999.

I. Requirements With Which BellSouth Mobility Cannot Comply

At this time, BellSouth Mobility can comply with all of the requirements set forth in Order No. PSC-997-0441-PCO-TL.

Respectfully submitted,

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CERTIFICATE OF SERVICE

We hereby certify that a true and correct copy of the foregoing was furnished by by Hand-delivery to: Levent Ileri, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, June McKinney, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, GTE Florida Incorporated Ms. Beverly Y. Menard c/o Ms. Margo B. Hammar 106 East College Avenue, Suite 810, Tallahassee, Florida 32301-7704; and a copy was furnished by U.S. Mail to: Frank Heaton, Cellular One, 2100 Electronics Lane, Fort Myers, Florida 33912; F. B. (Ben) Poag, P.O. Box 2214 (MS: FLTLHO0107) Tallahassee, Florida 32316-2214, Charles J. Rehwinkel, P.O. Box 2214, MCFLTLHO0107, Tallahassee, Florida 32301; Kimberly Caswell, Post Office Box 110, FLTC0007, One Tampa City Center, Tampa, Florida 33601 this 25th day of March, 1999.

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