↓ Law Offices

HOLLAND & KNIGHT LLP

315 South Calhoun Street Suite 600 P.O. Drawer 810 (ZIP 32302-0810) Tallahassee. Florida 32301

850-224-7000 FAX 850-224-8832 www.hklaw.com

April 23, 1999

ORIGINAL

Atlanta Boca Raton New York Northern Virginia

Boston Fort Lauderdale Jacksonville Orlando Providence San Francisco

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Lakeland Melbourne Mexico City

Tampa Washington, D.C. West Palm Beach

Miami Wes **D. BRUCE MAY, JR.**

850-425-5607

Internet Address: dbmay@hklaw.com

VIA HAND DELIVERY

Blanca S. Bayo Director, Division of Records & Reporting Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re:

In re: Request for review of proposed number plan relief

for 941 area code, Docket No. 990223-TL

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida Cellular Service, Inc. d/b/a BellSouth Mobility ("BellSouth Mobility") are the original and fifteen (15) copies of: (i) BellSouth Mobility's Post Hearing Statement of Issues and Positions; and (ii) BellSouth Mobility's Post Hearing Brief. A diskette containing these filings in Wordperfect 5.1 format has been provided.

For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

HOLLAND & KNIGHT LLP

D. Bruce May

P-H BULF DATE DOCUMENT HUMBER-DATE USEST HPR 23 5

DBM:kjg Enclosure

AFA

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WAW

P-H Statement DOCUMENT NUMBER-DATE

05200

cc: Levent Ileri (via hand-delivery)
June McKinney (via hand-delivery)
Michael Barrett (via hand-delivery)
Parties of Record

TAL-150633

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Investigation into telephone exchange boundary issues in

South Polk County (Fort Meade area).

Docket No. 981941-TL

Docket No. 990184-T

In re: Investigation into boundary issues in South Sarasota and North Charlotte Counties (Englewood area).

In Re: Request for review of proposed number plan relief for 941 area code.

Docket No. 990223-TE

Filed: April 23, 1999

23 P# 7: IO

BELLSOUTH MOBILITY'S POST HEARING STATEMENT OF ISSUES AND POSITIONS

Florida Cellular Service, Inc. d/b/a BellSouth Mobility ("BellSouth Mobility")

hereby files its post hearing statement of issues and positions.

ISSUE 1: Should the Commission approve the proposed geographic split for the 941 area code relief and, if not, what relief plan should the Commission approve?

BELLSOUTH MOBILITY:

The Commission should immediately adopt an all-services overlay relief plan. Compared to other relief alternatives involving geographic splits, an overlay provides the most expeditious and least costly numbering relief plan available.

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DOCUMENT NUMBER-DATE

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<u>ISSUE 2</u>: What implementation issues, if any, should be addressed by the Commission?

BELLSOUTH MOBILITY:

The relief plan must be capable of immediate activation in order to address the current exhaust emergency and minimize code rationing. An overlay is the only plan capable of immediate activation. If a geographic split is ordered, the Commission must provide for an adequate permissive dialing period.

Respectfully submitted,

D Bruce May

HOLLAND & KNIGHT LLP

P. O. Drawer 810

Tallahassee, Florida 32302

(850) 224-7000

Attorneys for Intervenor, FLORIDA CELLULAR SERVICE, INC. d/b/a BELLSOUTH MOBILITY

Certificate of Service

We hereby certify that a true and correct copy of the foregoing was furnished by hand-delivery to: Levent Ileri, Michael Barrett and 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, 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, and Charles J. Beck, Citizens for the

State of Florida, The Capitol, Tallahassee, Florida, and a copy furnished by U.S. Mail to: Kimberly Caswell, Post Office Box 110, FLTC0007, One Tampa City Center, Tampa, Florida 33601; Frank J. Heaton, Cellular One, 2100 Electronics Lane, Fort Myers, Florida 33912; Mark Carpanini, Post Office Box 9005, Drawer AT01, Bartow, Florida 33831; James A. Minix, Post Office Box 1000, Bradenton, Florida 34206; Kathleen F. Schneider, 1660 Ringling Boulevard, 2nd Floor, Sarasota, Florida 34236; Martha Young Burton, 18500 Murdock Circle, Port Charlotte, Florida 33948-1094; and, Kimberly D. Wheeler, Morrison & Foerster LLP, 2000 Pennsylvania Avenue, N.W., Washington, D.C., 20006-1888 this 23rd day of April, 1999.

D. Bruce May

TAL-151382