⇒ Law Of ces

HOLLAND & KNIGHT LLP

HECEIVED-FPSC

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

August 17, 1999

35 AUG 17 PM 3:53

REGISTAND REPORTING

ORIGINAL

Atlanta Boca Raton

New York Northern Virginia

Boston Fort Lauderdale

Orlando Providence San Francisco

Jacksonville Lakeland Melbourne

St. Petersburg
Tampa

Mexico City Miami Washington, D.C. West Palm Beach

D. BRUCE MAY 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: <u>In re: Request for review of proposed number plan relief for the 305/786 area code.</u> Docket No. 990455-TL

Dear Ms. Bayo:

On behalf of Florida Cellular Service, Inc. d/b/a BellSouth Mobility ("BellSouth Mobility") enclosed for filing in the captioned matter are the original and fifteen (15) copies of BellSouth Mobility's Petition for Leave to Intervene. A diskette containing this filing in Wordperfect format is also enclosed.

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

Sincerely,

HOLLAND & KNIGHT LLP

D. Bruce May

- RECEIVED & FILED

AL DE RECORDS

DBM:kjg Enclosure

___cc:

AFA

Vbb

EAG LEG MAS

OPO

PAI

SEC WAW Diana Caldwell

Michael Barrett

Levent Ileri

Done 8/27/99

DOCUMENT NUMBER-DATE

09797 AUG 178

FPSC-RECORDS/REPORTING

Blanca S. Bayo August 17, 1999 Page: 2

Parties of Record Beth Harber Swett Ronald W. Burleson C. Claiborne Barksdale

TAL1 #202204 v1

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Request for review of proposed number plan relief for the 305/786 area code.

Docket No. 990455-TL Filed: August 17, 1999

PETITION FOR LEAVE TO INTERVENE BY FLORIDA CELLULAR SERVICE, INC. D/B/A BELLSOUTH MOBILITY

FLORIDA CELLULAR SERVICE, INC. d/b/a BELLSOUTH MOBILITY ("BellSouth Mobility"), pursuant to Rule 25-22.039, Florida Administrative Code, respectfully requests that the Commission grant it leave to intervene in this proceeding in support of the all-services expanded overlay relief plan for the 305 Numbering Plan Area ("NPA"), that was developed through Industry consensus. In support of its petition, BellSouth Mobility states:

1. The name of the petitioner and the address of its principal business office are:

Florida Cellular Service, Inc. d/b/a BellSouth Mobility 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

2. Copies of pleadings, notices and other documents in its proceeding directed to BellSouth Mobility should be served on:

D. Bruce May, Jr. Holland & Knight LLP Post Office Drawer 810 Tallahassee, Florida 32302-0810

and

O 9 7 9 7 AUG 17 8

Gloria Johnson Associate General Counsel BellSouth Cellular Corp. 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

3. BellSouth Mobility provides commercial mobile radio service in the state of Florida and utilizes NXX codes in the 305/786 NPAs. Accordingly, any determinations made by the Commission in this docket will affect the substantial interests of BellSouth Mobility.

BellSouth Mobility respectfully WHEREFORE, requests that the Commission:

- grant BellSouth Mobility intervenor status in this proceeding as a) a real party of interest, and
 - grant such other relief as the Commission deems appropriate. b)

Respectfully submitted,

D. Bruce May

HÖLLAND & 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 Diana Caldwell, FPSC Attorney, 2540 Shumard Oak by hand-delivery to: Boulevard, Tallahassee, Florida 32399, Michael Barrett, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, Levent Ileri, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 3239; Ms. Nancy B. White, c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150- South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556; Angela Green, General Counsel, Florid public Telecommunications Association, 125 S. Gadsden Street, Suite 200, Tallahassee, Florida 32301-1525; D. Wayne Milby, Lockheed Martin IMS, Communications Industry Services, 1133 15th Street, N.W., Washington, D.C. 20005; Floyd Self, Messer Law Firm, Post Office Box 1876, Tallahassee, Florida 32302; Kimberly D. Wheeler, Morrison & Foerster Law Firm, 2000 Pennsylvania Avenue, N.W., Washington, D.C. 20006-1500, Kenneth Hoffman, Esq., OmniPoint Communications, Rutledge Law Firm, Post Office Box 551, Tallahassee, Florida 32302; Charles J. Rehwinkel, Susan Masterton, Sprint-Florida, Incorporated, Post Office Box 2214, Tallahassee, Florida 32316-2214 this 17th day of August, 1999.

D. Bruce May

TAL1 #202136 v1