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June 27, 2000

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Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

Dear Ms. Bayó:

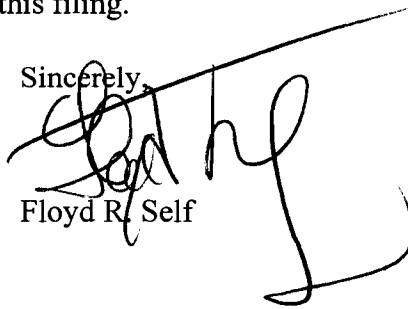
Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. and MCI WorldCom, Inc. are an original and fifteen copies of the Joint Posthearing Summary of Positions in the above referenced dockets. The Summary of Positions were inadvertently omitted from the Posthearing Brief filed on June 23, 2000. I apologize for any inconvenience this may have caused your office.

Also enclosed is a 3 1/2" diskette with the document on it in WordPerfect 9.0.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Floyd R. Self

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP 3 \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
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OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC \_\_\_\_\_  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

cc: Marsha Rule, Esq.  
Donna Canzano, Esq.  
Parties of Record

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561 NPA, since a split does not require 10 digit local dialing or introduce potential infirmities to the development of an effectively competitive market. However, there are circumstances where a geographic split may not be appropriate, such as the 305/786 and 954 NPAs, where the consensus overlay relief plans should be adopted. MCI WorldCom has not intervened in the 904 NPA relief docket.\*

## **B. SUMMARY OF POSITIONS**

**1a. Should the Commission approve the industry's consensus relief plans for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

AT&T's Position: \*The Commission should approve the consensus relief plan (identified as Alternative #1 for each NPA in the Staff exhibit) for an overlay for each of the respective NPAs.\*

MCI WorldCom's Position:

\*A. In the 305/786 NPAs, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an expanded overlay.\*

\*B. In the 561 NPA, the Commission should reject the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay and instead adopt

one of the geographic splits (Alternatives #2, #3, or #4).\*

\*C. In the 954 NPA, the Commission should approve the consensus relief plan (Identified as Alternative #1 in the Staff exhibit) for an overlay.\*

\*D. In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.\*

**1b. If the Commission does not approve the industry's consensus relief plan, what alternative plans should be approved for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T's Position: \*The industry consensus relief plan for each NPA represents the best means of relief, and each should be adopted. In the event the Commission rejects the consensus relief plan, the Commission should adopt the following:

- A. In the 305/786 NPAs, there is no other reasonable alternative.
- B. In the 561 NPA, Alternative 2 with Area A retaining 561.
- C. In the 954 NPA, there is no other reasonable alternative.
- D. In the 904 NPA, the concentrated growth overlay identified as Alternative #2. If that were not adopted, Alternatives #3 or #5, with Area A in either alternative retaining the 904 code.\*

MCI WorldCom's Position:

- \*A. In the 305/786 NPAs, there is no other reasonable alternative.\*
- \*B. In the 561 NPA, any one of the geographic splits (Alternatives #2, #3, or #4) would be appropriate.\*
- \*C. In the 954 NPA, there is no other reasonable alternative.\*
- \*D. In the 904 NPA, no position because MCI WorldCom has not intervened in this docket.\*

**2a. What number conservation measure(s), if any, should be implemented for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

AT&T and MCI WorldCom Joint Position: \*The Commission should rely upon the number conservation measures developed and implemented in Docket No. 981444-TP, consistent with the policies and rules recently set forth in FCC Order No. 00-104, released March 31, 2000. Also in Docket No. 981444-TP, the Commission should continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC.\*

**2b. If the conservation measures are to be implemented, when should they be implemented?**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T and MCI WorldCom Joint Position: \*Number pooling should be implemented pursuant to the implementation schedule and requirements contained within Order No. PSC-00-1046-PAA-TP. The other conservation measures adopted by Order No. PSC-00-0543-PAA-TP should continue to be implemented as set forth therein. The remaining number conservation measures should be worked on through the process previously agreed to for Docket No. 981444-TP.\*

**3. What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T and MCI WorldCom Joint Position: \*Dialing patterns for local, toll, EAS, and ECS calls generally should be the same today as they are after relief is implemented, with two

exceptions. For each relief plan utilizing an overlay, 10 digit dialing should be required for all landline local calls, EAS calls, and ECS calls without IXC competition, with 1+ 10 digit dialing being required for all landline toll calls and ECS calls with IXC competition. In the case of a geographic split, the area code must also be dialed when calls are placed across NPA boundaries.\*

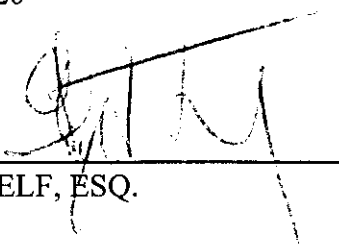
**4. What is the appropriate relief plan implementation schedule for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

AT&T and MCI WorldCom Joint Position: \*Each relief plan should be implemented as stated in the industry recommendation. These implementation schedules should be prioritized by exhaust dates, but in no event should the implementation schedule be set in a manner where the NPA would be exhausted before the relief plan is fully implemented. The start of the area code relief implementation schedule may be postponed if there is credible, reliable information that the Commission's conservation measures are proving successful, but in such case the new schedule would use the same implementation schedule beginning only at a later date. Any such later start dates will require additional industry and Commission input, planning, and coordination.\*

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Joint Posthearing summary of Positions of AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. , and MCI WorldCom, Inc. in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL has been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 27th day of June, 2000.

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