

BellSouth Telecommunications, Inc. 850 224-5139  
Suite 400 Fax 850 222-8640  
150 South Monroe Street  
Tallahassee, Florida 32301

Stan L. Greer  
Manager - Regulatory Relations

April 25, 2001

Mrs. Blanca Bayó  
Directory, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RE: Docket Nos. 990455-TL and 990457-TL

Dear Mrs. Bayó:

On April 10, 2001, the Local Exchange Companies' filed a notice with the Florida Public Service Commission (FPSC) to establish implementation schedules for the 305-Monroe County and 954-Broward County area code relief plans pursuant to Order No. PSC-00-1937-PAA-TL. Although the FPSC only required the local exchange companies to file a notice, it should be clear that, at the time of filing, the proposal was supported by all of the industry members that have worked with the Commission over the past year and half on numerous other numbering issues.

The notice recommended the Commission implement two options. Option 2 recommended the implementation of a Phased Overlay approach to minimize the technical difficulties associated with the given area and make numbers available for carriers, if needed during the permissive dialing period. The proposal would implement 7/10 digit permissive dialing for the 954 area while making the new area code (754) mandatory dialing at the beginning of the permissive for 954. Since the filing of the notice, some concern has been expressed about the perceived conflict of the proposal with FCC's Rule 52.19(c)(3)(ii), which states:

No area code overlay may be implemented unless there exists, at the time of implementation, mandatory ten-digit dialing for every telephone call within and between all area codes in the geographic area covered by the overlay area code.

As the Commission is well aware, this rule was established to guide the state commissions in implementing area code relief. The underlying rationale behind the FCC's ten digit dialing rule was to ensure that competitive carriers were not placed at a competitive disadvantage. BellSouth believes that the industry's proposal (Option 2) is

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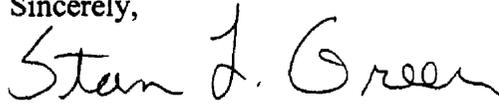
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appropriate due to the unique circumstances associated with the 954 area code. In addition, BellSouth believes that adoption of Option 2 by the FPSC is justified given that the industry itself has proposed this relief mechanism instead of the Commission ordering such relief. However, because it is unclear whether the industry can agree to waive the application of the above-referenced rule, the Commission may need to seek a waiver from the FCC to implement Option 2.

BellSouth continues to support the Commission's efforts on various numbering issues. However, BellSouth wanted to clarify to the Commission that it does not believe that the industry proposal conflicts with the FCC's rule given that the proposed relief mechanism was recommended by the industry rather than ordered by the Commission.

Sincerely,

A handwritten signature in black ink that reads "Stan L. Greer". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Stan L. Greer

Manager, Regulatory Relations