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July 13, 1998

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Ms. Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: 407 Area Code -- Docket No. 980671-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, "MCI") are the original and fifteen copies of its Prehearing Statement.

By copy of this letter, this document is being furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of) Docket No. 980671-TL
Proposed numbering plan relief)
For 407 area code) July 14, 1998

MCI'S PREHEARING STATEMENT

MCI Telecommunications Corporation and MCI Metro Access Transmission Services Inc. (collectively referred to as MCI) hereby file their prehearing statement in accordance with the requirements of Order No. PSC-98-0767-PCO-TL.

A. Known Witnesses. MCI has prefiled the direct and rebuttal testimony of Suzanne Brooks.

B. Known Exhibits. MCI has not prefiled any exhibits. MCI reserves the right to use additional exhibits for purposes of cross-examination.

C. Basic Position. In general, geographic splits are preferable to overlays as a means of providing area code relief. Geographic splits tend to have fewer end-user impacts and fewer negative impacts on emerging competition. If the Commission nevertheless determines due to the unique circumstances in the 407 area code that an overlay is in the public interest, it should impose several conditions to mitigate the adverse impacts on competition. These conditions include: (1) no slippage in the current schedule for permanent local number portability; (2) requiring 10-digit dialing within and between all old and new area codes (consistent with FCC order); and (3) establishing a workshop or other appropriate process to make recommendations to

the Commission for further number conservation mechanisms (e.g. Rate Center Consolidation, Unassigned Number Porting and Number Pooling) for the Orlando area, to ensure full utilization of the current numbering resource and to further extend the life of this NPA relief option.

D.-F. Issues. MCI's positions on the issues that have been identified in the Order Establishing Procedure are as follows:

Issue 1: Should the Commission approve the industry's consensus overlay plan for 407 area code relief, and if not, what relief plan should the Commission approve?

MCI: The Commission should not approve the overlay plan for the 407 area code. If relief is necessary, the Commission should approve a geographic split. If the Commission nevertheless determines, due to the unique circumstances in the 407 area code that an overlay is in the public interest, it should impose the following conditions to mitigate the adverse impacts on competition: (1) no slippage in the current schedule for permanent local number portability; (2) requiring 10-digit dialing within and between all old and new area codes (consistent with FCC order); and (3) establishing a workshop or other appropriate process to make recommendations to the Commission for further number conservation mechanisms (e.g. Rate Center Consolidation, Unassigned Number Porting and Number Pooling) for the Orlando area, to ensure full utilization of the current numbering resource and to further extend the life of this NPA relief option.

Issue 2: What should the dialing pattern be for the following types of calls?

- a. Local
- b. Toll
- c. EAS
- d. ECS

MCI: If the Commission approves an overlay, 10 digit dialing should be required within and between the new and old area codes for all types of calls. In addition, toll and ECS calls should be made on a 1+ 10-digit basis.

If the Commission approves a geographic split, 10 digit

dialing should be required between the new and old area codes for all types of calls. In addition, toll and ECS calls should be made on a 1+ 10-digit basis. Local and EAS calls within an area code may be on a seven digit basis.

G. Stipulations. There are no stipulations between MCI and any party at this time.

H. Pending Motions. MCI has no pending motions at this time.

I. Requirements of Order on Procedure. MCI believes that this prehearing statement complies with all the requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 13th day of February, 1998.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. mail or Hand Delivery (*) this 13th day of July, 1998.

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