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RECORDS AND  
REPORTING

December 22, 1998

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

**Re: Docket No. 980671-TL (407 Area Code)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Modification of Implementation Schedule, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White (ke)*  
Nancy B. White

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*[Signature]*  
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- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

NBW:jn

cc: All parties of record  
A. M. Lombardo  
William J. Ellenberg II

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 980671-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
U.S. Mail this 22nd day of December, 1998 to the following:

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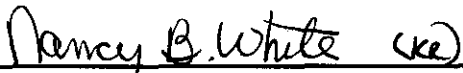
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\_\_\_\_\_  
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of  
proposed numbering plan relief  
for 407 area code

) DOCKET NO. 980671-TL  
)  
)

) FILED: December 22, 1998

**MOTION FOR MODIFICATION OF  
IMPLEMENTATION SCHEDULE**

NOW COMES, BellSouth Telecommunications, Inc. ("BellSouth"), and files its Motion for Modification of Implementation Schedule for the 407 area code. In support of its Motion, BellSouth states the following:

1. On April 22, 1998, Lockheed Martin, IMS. ("Lockheed"), the administrator of the North American Numbering Plan (NANP) for the 407 area code, notified the Florida Public Service Commission ("Commission") that the 407 area code would exhaust its remaining available NXXs by approximately the fourth quarter of 1999. The Commission opened Docket No. 980671-TL to address what would be the appropriate relief method for the area code. The Commission conducted four service hearings in Orlando and Melbourne on August 6, 7 and September 24, 1998, and a technical hearing in Orlando on August 7, 1998.

2. On December 1, 1998, the Commission voted approving a split/overlay relief method to provide numbering plan relief for the 407 area code. In its decision the Commission established an implementation schedule of April 1, 1999 for the beginning of permissive dialing and December 1, 1999 for the beginning of mandatory dialing.

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3. Although there was considerable testimony given at the service and technical hearings concerning the appropriate relief method for the 407 area code, little if any, testimony was associated with problems that may be associated with the implementation of such a relief method. Therefore, the Commission did not establish any special considerations at that time. However, after the Commission's vote on the staff's recommendation addressing the relief for the area code, it became apparent that BellSouth would have difficulty implementing the proposed relief mechanism by the dates specified by the Commission.

4. For implementation purposes, the proposed relief mechanism has the characteristics of two different types of area code relief methods, an overlay and a geographic split. Since BellSouth is the only incumbent local exchange company impacted by both types of relief methods, the operational support system modifications required from BellSouth are more complex than those required from other incumbent local exchange companies affected by the change.

5. The implementation schedule proposed by the Commission will not provide BellSouth sufficient time to implement and test the proposed relief mechanism due to numerous other system modifications scheduled for the April time frame.

6. BellSouth requests the Commission modify its implementation schedule to allow the telecommunications industry to stagger the implementation

schedule. As stated earlier, considerable operational support systems modifications must be accomplished concurrently with permissive dialing in an NPA split. At this time, BellSouth already has two NPA splits (601/662 in Mississippi to be permissive on 6/19/99 and 502/270 in Kentucky to be permissive on April 5, 1999) scheduled for the same general time frame. In addition, BellSouth is also implementing Y2K system modifications in the 1Q99. BellSouth believes adding another NPA split to the workload would significantly diminish the chances for a successful conversion to permissive dialing.

7. BellSouth proposes to implement the overlay portion of the 407 relief mechanism per the Commission's schedule. Beginning April 1, 1999, end users in all of 407, including Brevard County, would be able to dial local calls with either 7 or 10-digits. Mandatory 10-digit dialing of local calls would commence for end users outside Brevard County on November 29, 1999. Soon after November 29, 1999, the first CO codes (NXXs) in the new NPA would become effective. Most of the NXXs in the new NPA would be available at that time to serve end users in the overlay areas.

8. The NPA split portion of the 407 relief plan would follow a separate implementation schedule. A permissive dialing period of almost an entire year would commence on October 11, 1999 and would continue through October 8, 2000. During the permissive dialing period, end users would be able to reach telephone numbers in Brevard County using the old NPA, 407, or the new NPA not yet assigned. Implementation of the new NPA relief will be complete on October 9, 2000 at which time the new NPA will be required for calls from

outside Brevard County to telephone numbers in Brevard County. Calls within Brevard County will continue to be completed on a 7-digit basis as it is today as well as a 10-digit permissive basis.

9. Although this staggered implementation proposal may complicate the administration of the CO code assignments, BellSouth will continue to work with NANPA to ensure that no code assignment problems arise.

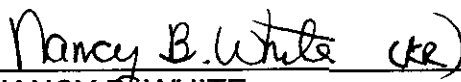
10. In addition to providing BellSouth the time necessary to minimize implementation problems, BellSouth believes this proposal will also minimize any customer confusion that may be associated with the implementation of the Commission proposed relief mechanism.

11. BellSouth presented this proposal to the other incumbent local exchange companies affected by the Commission proposed relief mechanism, as well as the telecommunications industry during a recent NANPA implementation conference call, staggered implementation schedule was not opposed by any company.

WHEREFORE, BellSouth requests that the Commission grant its Motion for Modifications of Implementation schedule as soon as possible.

Respectfully submitted this 22<sup>nd</sup> Day of December, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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