

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of proposed numbering plan relief for the 305/786 area code-Dade County and Monroe County/Keys Region.

DOCKET NO. 990455-TL

In re: Request for review of proposed numbering plan relief for the 561 area code.

DOCKET NO. 990456-TL

In re: Request for review of proposed numbering plan relief for the 954 area code.

DOCKET NO. 990457-TL

In re: Request for review of proposed numbering plan relief for the 904 area code.

DOCKET NO. 990517-TL

DATED: April 17, 2000

STAFF'S MOTION FOR LEAVE TO FILE DIRECT TESTIMONY OUT OF TIME

The Staff of the Florida Public Service Commission (Staff) hereby requests leave of the Prehearing Officer to file Direct Testimony of Staff, on or before April 21, 2000. As grounds therefor, Staff states:

1. In March 1999, the North American Numbering Plan Administration (NANPA) notified the Commission that the remaining NXX codes for the Monroe County/Keys region of the 305 area code (numbering plan area (NPA)) (305 Keys region) were exhausted and declared an extraordinary jeopardy situation. Docket No. 990455-TL was opened to address this matter. Thereafter, on April 23, 1999, under the direction of NANPA, the telecommunications industry NXX code holders in the 305 Keys region returned some NXX codes to

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FOSS-RECORDS/REPORTING

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NANPA and reached a consensus to institute a freeze on the distribution of the remaining NXX codes in the 305 Keys region until either further extraordinary jeopardy measures could be put in place, or the Florida Public Service Commission could approve an NPA relief plan for the 305 Keys region. Subsequently, further jeopardy measures were implemented to preserve the remaining NXX codes. A lottery system was instituted for this region, which includes the rationing of one NXX code per month. Since NPA relief for this area may include or affect the portion of the 305 area code overlaid by the 786 area code (the Dade County area), this Commission will address NPA relief for the entire 305 area code, including both the Dade County and Keys regions in this proceeding.

2. In March 1999, this Commission was informed that the 561 and 954 area codes were in extraordinary jeopardy. Thereafter, in April 1999, we were notified that the 904 area code was also in extraordinary jeopardy. Therefore, the Commission opened Dockets Nos. 990456-TL, 990457-TL, and 990517-TL to investigate the proposed numbering relief plans. Under the direction of NANPA, the telecommunications industry NXX code holders in the 561, 954, and 904 NPAs adopted Final Jeopardy Procedures and reached a consensus to institute rationing of the distribution of the remaining NXX codes in these NPAs to six codes per month, beginning May 1999 for 561 and 954, and July 1999 for the 904 area code. These rationing procedures will continue until NPA relief plans for each of these

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NPAs are approved.

3. In view of the related subject matter of these dockets and in the interest of administrative efficiency, Dockets Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL have been consolidated for hearing purposes only. A hearing is currently scheduled for May 18-19, 2000.

4. Direct Testimony was due to be filed in these Dockets on November 17, 1999. However, during the course of this proceeding, Staff has become concerned that the parties' prefiled testimony does not appear to provide an adequate record basis for comprehensive consideration of the matters at issue, and, therefore, Staff requests leave to file Direct Testimony out of time.

5. Staff seeks leave to file Direct Testimony on or before April 21, 2000. Staff suggests that it may also be appropriate to provide the parties with an opportunity to file rebuttal testimony responsive to Staff's testimony within 10 days of such filing by Staff.

6. If leave is granted, the testimony filed by Staff will likely be of a limited nature; therefore, Staff does not believe that this request will prove unduly burdensome to any party to this proceeding.


7. Staff counsel has conferred with as many parties as possible on short notice and, thus far, has received no indication

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that this request is opposed.

WHEREFORE, the Staff of the Florida Public Service Commission respectfully requests that the Prehearing Officer permit Staff to file Direct Testimony on or before April 21, 2000.

Respectfully submitted this 17th day of April, 2000.



BETH KEATING
Staff Counsel
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of STAFF'S MOTION FOR LEAVE TO FILE DIRECT TESTIMONY OUT OF TIME has been served by U.S. Mail and by hand delivery*, this 17th day of April, 2000, to the following:

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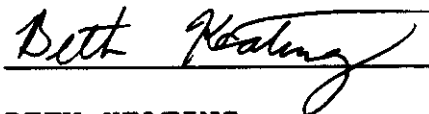
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