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RECORDS AND REPORTING

April 21, 2000

ORIGINAL

**VIA HAND DELIVERY**

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

Re: Docket No. 990517-TL

Dear Ms. Bayo:

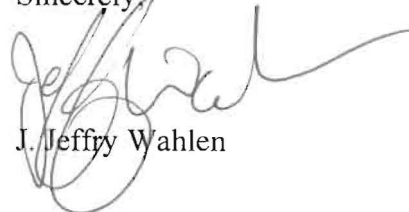
Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL's Prehearing Statement.

Also enclosed is a diskette containing the above Prehearing Statement originally typed in Microsoft Word 97 format, which has been saved in Rich Text format for use with Word Perfect.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

SP  
CAF  
AMU  
OTR  
EAG  
LEG  
WAS  
OPC  
RRR  
SEC  
WAW  
OTH

JW/csd

Enclosures

cc: All Parties of Record

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Men  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04939 APR 21 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Request for Review of Proposed  
Numbering Plan for the 904 Area Code

DOCKET NO. 990517-TL  
FILED: April 21, 2000

ALLTEL'S PREHEARING STATEMENT

ALLTEL Florida, Inc. ("ALLTEL" or the "Company"), pursuant to Order No. PSC-99-2145-TL, submits the following Prehearing Statement:

A. **WITNESS:** ALLTEL will sponsor the direct testimony of Harriet Eudy, who will testify on all issues in the 904 docket. ALLTEL reserves the right to file rebuttal testimony after it reviews Staff's direct testimony.

B. **EXHIBITS:** ALLTEL's witness, Harriet Eudy, has a composite exhibit (HEE-1) attached to her direct testimony.

C. **BASIC POSITION:** ALLTEL supports Alternative 1, which is an all services distributed overlay and was the consensus recommendation of the industry. If the Commission declines to adopt Alternative 1, ALLTEL recommends Alternative 5, which is a geographic split with Duval and Nassau Counties as Area A and the remaining counties in the 904 NPA as Area B.

**D-G. ISSUES AND POSITIONS:**

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

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

**Position:** Yes.

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**Issue 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) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

**Position:** If the Commission declines to adopt Alternative 1, ALLTEL recommends Alternative 5, which is a geographic split with Duval and Nassau Counties as Area A and the remaining counties in the 904 NPA as Area B.

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

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

**Position:** Number pooling may provide an opportunity for extending the life of the 904 area code. To implement number pooling in the 904 area code, software release 3.0 should be used and should be limited to Local Number Portability (LNP) capable central offices.

**Issue 2b: If conservation measures are to be implemented, when should they be implemented?**

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

**Position:** The Commission should allow a reasonable time for the implementation of any number conservation measures, and they should only be applied prospectively.

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

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

**Position:** If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls.

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

A) – C) ALLTEL is not a party in the 305, 561 and 954 cases, so it has no position.

D) 904

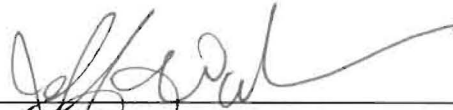
**Position:** Once the FPSC approves the recommended relief plan, NANA can assign the new NPA within 14 days. The transitional dialing period, which permits customers to dial service on ten digits, should begin 90 days after the NPA is assigned and should continue for 180 days.

H. **STIPULATIONS:** The Company is not aware of any pending stipulations at this time.

I. **PENDING MOTIONS:** Except for Staff’s Motion to File Direct Testimony Out of Time, the Company is not aware of any pending motions at this time.

J. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** The Company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 21<sup>st</sup> day of April, 2000.



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850/425-5471

ATTORNEYS FOR ALLTEL FLORIDA, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 21<sup>st</sup> day of April, 2000, to the following:

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