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October 28, 1996

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

Re: Docket No. 96-1153-TL

Dear Ms. Bayo:

On behalf of BellSouth Mobility Inc., enclosed for filing in the above docket is the original and 15 copies of the Petition For Intervention by BellSouth Mobility, Inc.

Also enclosed for filing is the disc with the Petition For Intervention by BellSouth Mobility, Inc. The disc is a double density disc. The operating system is IBM compatible. The software format is Wordperfect 6.0.

If you have any questions, please give me a call.\

MARK HERRON E. GARY FARLY

Sincerely,

ce: Parties of Record MI //EGE/clt Enclosures 15495-76100

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN Re: Petition of BellSouth Telecommunications, Inc. For Approval of Numbering Plan Area Relief For 904 Area Code.

Docket No.: 96-1153-TL Filed: October 25, 1996

PETITION FOR INTERVENTION BY BELLSOUTH MOBILITY INC

BELLSOUTH MOBILITY INC (BMI), pursuant to Rule 25-22.039, Florida Administrative Code, respectfully requests that the Commission grant BMI intervention in this proceeding. As grounds, BMI states:

 The exact name of the Petitioner and the address of its principal business office is:

> BellSouth Mobility Inc 1100 Peachtree Street, N.E. Suite 14-E06 Atlanta, Georgia 30309-4599

- 2. BMI is a management and holding company that owns and operates several wireline cellular companies in Florida. BMI operates cellular systems in ten major metropolitan areas of the state. Some of these systems are 100% owned by BMI, while others are partnerships. BMI's systems serve a large number of subscribers in the 904 area code.
- 3. The purpose of this docket is to approve a relief plan for the 904 area code. Bellsouth Telecommunications, Inc. (BST), the designated central office code administrator for the 904 area code, has stated that, without relief, available numbers within the 904 area code will be exhausted by May of 1998. In its petition, BST has identified three forms of relief options available for the 904 area code: geographical, NPA overlay, and NPA realignment.
- 4. BST's petition states that the industry has reached consensus that the 904 area code should be split along LATA boundaries, although there is no consensus as to which LATAs should be removed from the 904 area code. Three proposed geographical DOCUMENT SOLONG REDIGIES.

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split options were set forth in BST's petition. BST has requested that the Commission review these as well as other proposed options for a geographical split of the 904 area code to determine which option will best serve the public interest.

- The proposed plans and any other plan which adds a new area code or changes the area code already assigned to BMI's subscribers will directly and materially affect BMI's substantial interests.
- 6. All notices, pleadings, orders and other papers relating to this docket should be directed to counsel for BMI as follows:

Mark Herron, Esquire E. Gary Early, Esquire Akerman, Senterfitt & Eidson, P.A. Post Office Box 10555 Tallahassee, Florida 32302-2555 (904)222-3471

WHEREFORE, BellSouth Mobility Inc petitions to intervene as party in this docket.

Dated this day of October, 1996.

Respectfully submitted,

MARK HEJRON, ESQUIRE FLORIDA BAR NO. 199737 E. GARY EARLY, ESQUIRE FLORIDA BAR NO. 325147 AKERMAN, SENTERFITT & EIDSON, P.A. 216 SOUTH MONROE STREET, SUITE 200 TALLAHASSEE, FLORIDA 32301 (904)222-3471

Attorneys for BellSouth Mobility Inc

CERTIFICATE OF SERVICE

1 HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this 28th day of October, 1996:

By delivery to:

Charles J. Pellegrini Martha C. Brown Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Robert G. Beaty, Esquire J. Phillip Carver, Esquire Steven M. Klimacek, Esquire c/o Nancy Sims BellSouth Telecommunications 150 South Monroe St., Suite 400 Tallahassee, Florida 32301

Department of Management Services Bob David/Sam Houston 4050 Esplanade Way Tallahassee, Florida 32399-0950

> MARK HERRON, ESQUIRE E. GARY EARLY, ESQUIRE