

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

OF COUNSEL:
CHARLES F. DUDLEY

GOVERNMENTAL CONSULTANTS:
PATRICK R. MALOY
AMY J. YOUNG

ORIGINAL

April 21, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

RECORDS AND
REPORTING

00 APR 21 AM 11:59

RECEIVED-FPSC

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Omnipoint Communications MB Operations LLC d/b/a Omnipoint Communications ("Omnipoint") are the original and fifteen copies of Omnipoint's Motion for Extension of Time to File Prehearing Statement.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

AFA
APP
CAR
GMW
CTR
EAG
LEG
MAS
OPC
PRR
SEC
VAVW
CCH

1 Enclosures

3 Trib. 3

1

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04938 APR 21 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Request for review of) Docket No. 990455-TL
proposed numbering plan relief)
for the 305/786 area code - Dade)
County and Monroe County/Keys)
Region.)
_____)

In re: Request for review of) Docket No. 990456-TL
proposed numbering plan relief)
for the 561 area code.)
_____)

In re: Request for review of) Docket No. 990457-TL
proposed numbering plan relief)
for the 954 area code.)
_____)

In re: Request for review of) Docket No. 990517-TL
proposed numbering plan relief)
for the 904 area code.)
_____)
Filed: April 21, 2000

**OMNIPPOINT'S MOTION FOR EXTENSION
OF TIME TO FILE PREHEARING STATEMENT**

Omnipoint Communications MB Operations LLC d/b/a Omnipoint Communications ("Omnipoint"), by and through its undersigned counsel, and pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby files this Motion for an Extension of Time of seven days to file its Prehearing Statement in the above-referenced dockets. In support of its Motion, Omnipoint states as follows:

1. Omnipoint is an Intervenor in Docket Nos. 990455-TL, 990456-TL and 990457-TL.

Omnipoint does not intend to call a witness in this proceeding.

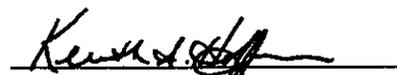
DOCUMENT NUMBER-DATE
04938 APR 21 8
FPSC-RECORDS/REPORTING

2. Omnipoint does intend to take positions on the issues in this proceeding, participate in the final hearing, and file a post-hearing brief. However, Omnipoint personnel involved in area code relief and number resource utilization issues have not had sufficient time to review and analyze the alternatives for area code relief for the 954, 561 and 305/786 area codes. In addition, Omnipoint wishes to review the testimony filed by the staff witness on April 21, 2000, to assist in its evaluation of the alternatives for area code relief.

3. Accordingly, Omnipoint requests an extension of time of seven days to allow Omnipoint additional time for analysis of the alternatives for area code relief for the 954, 561 and 305/786 area codes and analysis of the staff testimony prior to articulating positions in its prehearing statement. Omnipoint maintains that no party will be prejudiced by the extension of time requested herein.

WHEREFORE, for the foregoing reasons, Omnipoint requests an extension of time of seven days up to and until April 28, 2000, to file its prehearing statement in the above-referenced dockets.

Respectfully submitted,



Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Telecopier)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Omnipoint Communications' Motion for Extension of Time to File Prehearing Statement was furnished by U. S. Mail and hand delivery(*) this 21st day of April, 2000, to the following:

C. Lee Fordham(*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Beth Keating, Esq.(*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

Richard H. Brashear
ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, Florida 32060-3357

Gwen Azama-Edwards
City of Daytona Beach
Post Office Box 2451
Daytona Beach, FL 32115-2451

Comm. Wayne Gardner
City of Deltona
P. O. Box 5550
Deltona, FL 32728-5550

Michael A. Gross, Esq.
FCTA
310 N. Monroe Street
Tallahassee, FL 32301

Angela Green, Esq.
FPTA
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301-1525

Bruce May, Esq.
Holland Law Firm
P. O. Drawer 810
Tallahassee, FL 32302

Deborah L. Nobles
Northeast Fla. Tel. Co., Inc.
P. O. Box 485
Macclenny, Florida 32063-0485

F. B. (Ben) Poag
Sprint-Florida, Inc.
P. O. Box 2214 (MC FLTLH00107)
Tallahassee, FL 32316-2214

Robert M. Weiss
Volusia County
123 W. Indiana Ave. Room #205
DeLand, FL 32720

Carole Joy Barice, Esq.
James A. Fowler, Esq.
Fowler, Barice, Feeney & O'Quinn, P.A.
28 West Central Boulevard
Orlando, FL 32801

Fitz Behring, City Manager
City of Deltona
P. O. Box 5550
800 Deltona Boulevard
Deltona, FL 32728

Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Inc.
P. O. Box 2214 (MC FLTLH00107)
Tallahassee, FL 32316-2214

Joe Assenzo
Sprint PCS
Legal Department
49000 Main Street, 11th Floor
Kansas City, Missouri 64112

Cheryl A. Tritt
Kimberly D. Wheeler
Morrison & Foerster, LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, Florida 32060

J. Jeffrey Wahlen
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302

Peter M. Dunbar, Esq.
Karen M. Camechis, Esq.
Pennington, Moore, et al.
P. o. Box 10095
Tallahassee, FL 32302

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876

Tracy Hatch, Esq.
Marsha Rule, Esq.
AT&T Communications of the Southern
States, Inc.
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

Gloria Johnson
General Attorney
BellSouth Cellular Corp.
1100 Peachtree Street, N.E.
Suite 910
Atlanta, GA 30309-4599

Kimberly Caswell
GTE Florida, Inc.
Post Office Box 110, FLTC0007
Tampa, FL 33601-0110

Donna Canzano McNulty, Esq.
MCI WorldCom, Inc.
327 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Daniel H. Thompson
Berger David & Singerman
215 S. Monroe Street - Suite 705
Tallahassee, FL 32301

Michael P. Goggin, Esq.
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Lockheed Martin IMS
D. Wayne Milby
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005

By: 
KENNETH A. HOFFMAN, ESQ.

F:\users\roxanne\Omni\extension