



COUNTY OF CHARLOTTE

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July 3, 2001

RENEE FRANCIS LEE
COUNTY ATTORNEY

VIA FEDERAL EXPRESS

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

Re: Docket No. 000604-TL

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Dear Ms. Bayo:

Enclosed are the original and fifteen (15) copies of "Charlotte County's Prehearing Statement" in the above-referenced proceeding.

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

Thank you for your assistance with this filing.

Sincerely,

Martha Young Burton
Assistant County Attorney

MYB/am
Enclosures

cc: Renee Francis Lee, County Attorney

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FPSC-RECORDS & REPORTING

**STATE OF FLORIDA
BEFORE THE PUBLIC SERVICE COMMISSION**

In re: REQUEST FOR REVIEW OF PROPOSED
NUMBERING PLAN RELIEF FOR THE 941
AREA CODE.

Docket No. 000604-TL

CHARLOTTE COUNTY'S PREHEARING STATEMENT

I. Witnesses and Testimony Subject Matter

Charlotte County proposes to call the following witnesses to offer testimony on all issues in this docket:

- A. Mac V. Horton, member of the Charlotte County Board of County Commissioners.
- B. Elliot Kampert, Charlotte County Planning Services Manager.

Charlotte County reserves the right to call additional witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony, and to address new issues that may be identified by the Prehearing Officer at the prehearing conference to be held on July 23, 2001.

II. Exhibits and Witnesses Sponsoring Each

A. Map(s) [some may be composites] (Kampert)

- 1. Major platted subdivisions within Charlotte County
- 2. Regional permitting activity
- 3. Existing and proposed preserves and conservation lands
- 4. Water Management District boundaries
- 5. Population data

B. Documents and Reports

- 1. Recent census data (Kampert)
- 2. Charlotte County Florida "Statistical Prospectus" 2001 Edition (Horton)

3. Charlotte County 2001 Chamber of Commerce Visitors Guide (Horton)
4. Joint County Commission meeting agenda (Horton)

Charlotte County reserves the right to file exhibits to any additional testimony that may be filed, and to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence or the Rules of this Commission.

III. Charlotte County's Basic Position

Charlotte County supports 941 NPA Relief Alternative No. 4, a geographic split between the Punta Gorda and the North Fort Myers Exchanges following the Charlotte-Lee County line. The citizens of Charlotte County strongly oppose the all services distributed overlay relief plan described as 941 NPA Relief Alternative No. 1, chosen as the industry's consensus. It is Charlotte County's position that the three northern counties described as "Area A" (Charlotte, Sarasota, and Manatee) should keep the 941 area code, with the new area code assigned to "Area B."

IV. Questions of Fact at Issue/Charlotte County's Position/Witness(es) Addressing each Issue

- A. Should the Commission approve the industry's consensus relief plan for the 941 area code?

No, the Commission should not approve the industry's consensus relief plan for the 941 area code (both witnesses).

- B. If the Commission does not approve the industry's consensus relief plan for the 941 area code, what alternative relief plan should the Commission implement?

The Commission should implement NPA Relief Alternative No. 4 (both witnesses).

V. Questions of Law at Issue/Charlotte County's Position

- A. What is the Commission's jurisdiction in this matter?

Under Federal regulations, the Commission has jurisdiction over the introduction of new area codes and may direct whether area code relief takes the form of a geographic split, an overlay area code, or a boundary realignment. The Commission may also develop the details of proposed area code relief plan(s).

In addition to the general authority described above, the Commission also has "Additional Authority to Implement Number Conservation Measures" as granted by FCC Order 99-249 (September 15, 1999).

VI. Policy Questions at Issue/Charlotte County's Position/Witness(es) Addressing each Issue

A. What number conservation measures, if any, should the Commission implement?

The Commission should implement all number conservation measures enumerated in FCC Order 99-249, including thousand-block pooling, reclaiming unused and reserved codes, setting number allocation standards, requesting number utilization data from all carriers, implementing code sharing, and implementing rate center consolidation (both witnesses).

B. If number conservation measures are to be implemented, when should they be implemented?

The Commission should implement number conservation measures as soon as possible (both witnesses).

VII. Stipulated Issues

Charlotte County is aware of no stipulations.

VIII. Pending Motions or Other Matters

Charlotte County is aware of no pending motions or other matters.

IX. Pending Requests or Claims for Confidentiality

Charlotte County is aware of no requests or claims for confidentiality.

X. Requirements that cannot be complied with, and reasons therefore

Charlotte County knows of no requirement set forth in any prehearing order with which it cannot comply.

- XI. Any decision or pending decision of the FCC or any court that has or may either preempt or otherwise impact the Commission's ability to resolve any of the issues presented or the relief requested in this matter.

The FCC has indicated a willingness for the Commission to implement and promote number conservation measures, in order to minimize consumer confusion and expenses associated with imposing new area codes too frequently.

Respectfully submitted this 3rd day of July, 2001.



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per am - County of Cherokee

**CERTIFICATE OF SERVICE
DOCKET NO. 000604-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene has been served by U.S. Mail on this 3rd day of July, 2001 to the following:

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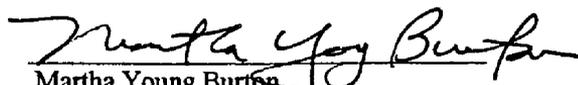
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