



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of	)	DOCKET NO. 010743-TL
proposed numbering plan relief	)	
for the 407/321 area codes by	)	
Neustar, Inc., as North American	)	
Numbering Plan Administration (NANPA),	)	
on behalf of Florida telecommunications	)	
industry	)	FILED: Aug. 31, 2001
_____)		

VERIZON WIRELESS' PETITION FOR LEAVE TO INTERVENE

Verizon Wireless, by and through its undersigned counsel, and pursuant to rules 25-22.039 and 28-106.205, *Florida Administrative Code*, files its petition for leave to intervene in the above-referenced docket. As grounds supporting its petition to intervene, Verizon Wireless states as follows:

1. The name and address of Petitioner is:

Verizon Wireless  
180 Washington Valley Road  
Bedminister, NJ 07921

2. Verizon Wireless is a commercial mobile radio services provider authorized by the Federal Communications Commission ("FCC") to provide wireless telecommunications services in the State of Florida. Verizon Wireless holds a substantial number of NXX codes in the State of Florida and provides facilities-based wireless services in every numbering plan area ("NPA") in Florida, including the 407/321 NPAs.

3. As a provider of wireless communications services and a holder of a substantial number of NXX codes in Florida, including NXX codes in the NPAs at issue in this proceeding, Verizon Wireless' substantial interests are affected by determinations the Commission will make concerning area code relief for the 407/321 NPAs.

4. Verizon Wireless' substantial interest in the outcome of this proceeding cannot adequately be represented by any other party. Verizon Wireless' interest is of a type this administrative proceeding is designed to protect.

5. Please direct all pleadings, notices, staff recommendations, orders and other documents filed or served in these proceedings to the following persons on behalf of Verizon Wireless:

Anne E. Hoskins  
Regulatory Counsel  
Lolita D. Smith  
Associate Director Regulatory Matters

DOCUMENT NUMBER-DATE  
10891 AUG 31 2001  
FPSC-COMMISSION CLERK

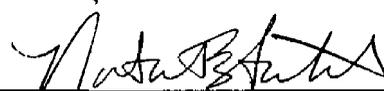
1300 I Street, N.W., Ste. 400 West  
Washington, D.C. 20005

Patrick K. Wiggins  
Natalie B. Futch  
Katz, Kutter, Haigler, Alderman, Bryant & Yon, P.A.  
106 East College Avenue  
Tallahassee, Florida 32301  
(850) 224-9634 (telephone)  
(850) 222-0103 (facsimile)

Wherefore, Verizon Wireless respectfully requests that the Commission grant its Petition for Leave to Intervene in this docket.

Respectfully submitted this 31st day of August, 2001.

**VERIZON WIRELESS**

By:   
Patrick K. Wiggins  
Natalie B. Futch  
Katz, Kutter, Haigler, Alderman,  
Bryant & Yon, P.A.  
106 East College Avenue  
Tallahassee, Florida 32301  
(850) 224-9634 (telephone)  
(850) 222-0103 (facsimile)

**Its Attorney**

CERTIFICATE OF SERVICE  
DOCKET NO. 010743-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 31st day of August, 2001 to the following:

Patricia A. Christensen  
Mary Ann Helton  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Volusia County  
Frank Gummey, III, Robert M. Weiss  
123 W. Indiana Avenue  
DeLand, FL 32720-4613

Kimberly D. Wheeler  
Morrison & Foerster Law Firm  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006-1888

Fowler, Barice Law Firm  
Carole J. Barice/James A. Fowler  
28 W. Central Boulevard  
Orlando, FL 32801

Time Warner Telecom of Florida, L.P.  
Carolyn Marek  
% Time Warner Telecom  
Franklin, TN 37069-4002

City of Deltona  
Fritz Behring, City Manager  
P. O. box 5550  
Deltona, FL 32728-5550

Pennington Law Firm  
Peter Dunbar/Karen Camechis  
P. O. Box 10095  
Tallahassee, FL 32301

BellSouth Telecommunications, Inc. (Mia)  
James Meza III/Nancy B. White  
150 West Flagler St., Suite 1910  
Miami, FL 33130

NeuStar, Inc.  
Thomas C. Foley  
820 Riverbend Blvd.  
Longwood, FL 32779

  
\_\_\_\_\_  
Natalie B. Futch