

ORIGINAL
FILE COPY

Robert G. Beatty
General Counsel-Florida

Southern Bell Telephone
and Telegraph Company
60 Regulatory Department
Suite 400
150 S. Monroe Street
Tallahassee, Florida 32301
Phone (305) 347 5555

November 21, 1996

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

Re: Docket No. 961153-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Robert G. Beatty (RB)

Robert G. Beatty

cc: All parties of record
A. M. Lombardo
Nancy B. White
William J. Ellenberg II

ACK _____
ATA _____
APP _____
CAC _____
CMA *Wickell*
CTR _____
EAC _____
LIT *1*
LIT *5*
OP _____
RUC _____
SEC *1*
WAS _____
OTH _____

DOCUMENT NUMBER DATE
12504 NOV 21 1996
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 27th day of November, 1996 to the following:

Stephen S. Mathues, Esq.
Office of General Counsel
State of Florida
Department of Management Services
4050 Esplanade Way, Suite 260
Tallahassee, FL 32399

Mark Herron, Esq.
E. Gary Early, Esq.
Akerman, Senterfitt & Eidson, P.A.
P.O. Box 10555
Tallahassee, FL 32302
Attorneys for BellSouth Mobility, Inc.

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Lee L. Willis
J. Jeffrey Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
Attorneys for Sprint/United, Sprint/Centel,
Central, Northeast Florida, and ALLTEL.

David B. Erwin
Young, van Assenderp & Varnadoe
225 S. Adams Street, #200
Tallahassee, FL 32301
Attorneys for Gulf, St. Joseph,
Floralis and Quincy

Robert A. Leatty (BL)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for numbering plan)
area relief for 904 area code, by)
BellSouth Telecommunications,)
Inc. _____)

Docket No. 961153-TL

Filed: November 21, 1996

BELLSOUTH TELECOMMUNICATIONS, INC.'s
PREHEARING STATEMENT

BELLSOUTH TELECOMMUNICATIONS, INC., ("BellSouth") hereby files this Prehearing Statement pursuant to Order No. PSC-96-1324-PCO-TL, in the above-captioned docket.

A. **WITNESS:** Daniel M. Baeza - All Issues

B. **EXHIBITS:** BellSouth intends to offer the following exhibits:

Exhibit - (DMB - 1) - Geographic Split Chart No. 1, 1-A, and 2.

Exhibit - (DMB - 2) - NPA Code Relief Planning Guidelines.

BellSouth reserves the right to use additional exhibits for the purpose of cross examination.

C. **BASIC POSITION:** The three forms of relief options available for the 904 NPA are a geographic split, NPA overlay, and NPA boundary realignment. The industry code-holders and various other telecommunications providers operating in the 904 area code, reached a consensus that the most appropriate form of relief for 904 NPA is the geographic split along LATA boundaries. The industry developed three principal LATA boundary relief options, of which only Option 1 complies with the applicable NPA guidelines: Option 1, assigns a new NPA to Pensacola, Panama City, and Tallahassee.

DOCUMENT NUMBER - DATE

12504 NOV 21 96

FPSC-RECORDS/REPORTING

This option provides relief for the longest amount of time for both the new and old NPAs. The 904 NPA is expected to need relief again in September, 2002. The new NPA, 850, will require relief approximately in November, 2006. Option 1A, assigns a new NPA to Jacksonville and Daytona. This option actually circumvents a goal of the industry guidelines to minimize the impact of an NPA split by assigning the new NPA to areas with the greatest number of subscribers and NXXs. The impact on future NPA exhaust dates, however, would be the same as Option 1. Option 2, assigns a new NPA to Pensacola and Panama City. While this option has the advantage of affecting fewer subscribers and NXXs than Option 1 and 1A, it provides a shorter relief interval than either of those two. The 904 NPA is expected to exhaust under this option in October, 2000.

D. ISSUES. BellSouth's position on the issues identified in the Order Establishing Procedure are as follows:

Issue 1: What geographic split plan for 904 area code relief should be ordered by the Commission?

BellSouth's Position: Of the three available options identified in paragraph 1C above, Option 1, which assigns a new NPA to Pensacola, Panama City, and Tallahassee, is the only option that meets the criteria set forth in the industry guidelines for NPA relief.

Issue 2: How and when should the area code relief be implemented?

BellSouth's Position: The 904 NPA relief should be implemented through a transition plan which would allow permissive dialing to begin within three to six months

of the Commission's final decision and mandatory dialing to commence in the second quarter, 1998.

QUESTIONS OF LAW: None:

POLICY QUESTIONS: None

STIPULATED ISSUES: BellSouth is not aware of any issues that have been stipulated at this time.

PENDING MOTIONS: BellSouth has no pending motions at this time.

OTHER REQUIREMENTS: BellSouth knows of no requirements set forth in the Prehearing Order with which it has not complied.

Respectfully submitted this 21ST day of November, 1996.

BellSouth Telecommunications, Inc.

Robert G. Beatty, Esq. (BL)
Robert G. Beatty, Esq.

J. Phillip Carver, Esq.

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5555

William J. Ellenberg II, Esq. (BL)
William J. Ellenberg II, Esq.

Nancy B. White, Esq.

675 W. Peachtree Street, Suite 4300

Atlanta, GA 30375

(404) 335-0710