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September 22, 1997

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

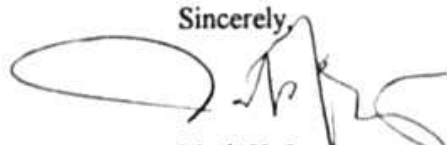
RE: Docket No. 971058

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of AT&T of the Southern States, Inc.'s Petition to Intervene and Direct Testimony of James Mertz. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Green
- CTR \_\_\_\_\_ MKL/ths
- EAG \_\_\_\_\_
- LEG 2 Enclosures
- LIN 5 cc: All parties of record
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEL 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,  
  
Mark K. Logan

DOCUMENT NUMBER - DATE

09651 SEP 22 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for review of )  
proposed numbering plan relief ) DOCKET NO. 971058-TL  
for 305 area code. )  
\_\_\_\_\_ )

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S  
PETITION TO INTERVENE

AT&T Communications of the Southern States, Inc.  
("AT&T"), pursuant to Rule 25-22.039, Fla. Admin. Code, petitions  
the Florida Public Service Commission ("Commission") to grant it  
leave to intervene in this docket and states:

1. AT&T is a regulated telecommunications carrier, duly  
authorized to provide service as an interexchange carrier  
("IXC"), as an alternative access vendor ("AAV"), and as an  
alternative local exchange company ("ALEC") in Florida. AT&T's  
full name and address is:

AT&T Communications of  
the Southern States, Inc.  
1200 Peachtree Street, NE  
Atlanta, Georgia 30309

2. All notices, pleadings and orders should be directed to  
the following:

Mark K. Logan  
Bryant, Miller &  
Olive  
201 South Monroe St.  
Suite 500  
Tallahassee, Florida 32301  
904.222.8611

Marsha Rule  
Tracy Hatch  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301  
904.425.6364

3. AT&T has customers located throughout the current  
geographic region covered by the 305 area code. Accordingly,  
AT&T's substantial interests are affected by the Commission's

DOCUMENT NUMBER-DATE

09651 SEP 22 6

FPSC-RECORDS/REPORTING

ORIGINAL

determination as to how it will provide Numbering Planning Area ("NPA") relief for the 305 area code.

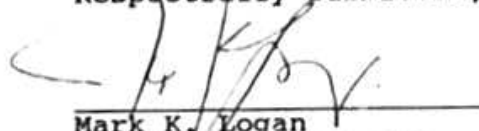
4. The principal issue of material fact at issue in this docket is how the Commission should provide NPA relief for the existing 305 area code. AT&T reserves the right to raise any additional issues or dispute issues of material fact which may develop during the course of this proceeding.

5. AT&T alleges as a concise statement of the ultimate facts, that the Commission, after hearing the parties' positions, testimony from the affected customers within the 305 area code, and applying a public interest standard, should choose a method of NPA relief that it deems in the best interest of the people living and working in the 305 area code.

6. The following statutes and rules entitle AT&T to the relief requested: Chapters 120 and 364, Florida Statutes and Rule 25-22, Part IV, Florida Administrative Code.

WHEREFORE, AT&T respectfully requests that the Commission grant this petition to intervene in this docket.

Respectfully submitted,



Mark K. Logan  
Fla. Bar No. 0494208  
Bryant, Miller & Olive  
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Tallahassee, Florida 32301  
904.222.8611

Marsha Rule  
Tracy Hatch  
101 North Monroe Street, Ste. 700  
Tallahassee, Florida 32301  
904.425.6364

ATTORNEYS FOR AT&T COMMUNICATIONS  
OF THE SOUTHERN STATES, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail to the parties listed below this 22nd day of September, 1997.

  
\_\_\_\_\_  
Mark K. Logan

Nancy B. White  
Assistant General Counsel-Florida  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, FL 32301

Mark Herron, Esquire  
Akerman Senterfitt, et al.  
216 South Monroe Street  
Suite 300  
Tallahassee, FL 32301