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June 9, 1999

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
The Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990373-TP - Establishment of a Statewide Emergency Area Code Relief Plan.

Dear Ms. Bayo,

Enclosed for filing in the above-referenced docket is the original and fifteen copies of the pre-filed direct testimony of Suzanne Brooks on behalf of MCI WorldCom, Inc.. Also enclosed for filing in the same docket is the original and fifteen copies of MCI WorldCom's Prehearing Statement. Also enclosed is a 3 1/2" diskette with the Prehearing Statement on it in WordPerfect 6.0/6.1 format.

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 in this matter.

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[Signature]
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Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

Enclosures
cc: Parties of Record

- AFA _____
- APP _____
- CAF _____
- CRU _____
- CTR _____
- EAG _____
- LEG 2
- MAS orig + 5
- OPC _____
- RRR _____
- SEC 1
- WAV _____
- OTH _____

Prehearing Statement
DOCUMENT NUMBER DATE

~~07104~~ JUN -9 9

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Testimony
DOCUMENT NUMBER DATE

~~07105~~ JUN -9 9

FPSC-RECORDS/REPORTING

In re: Establishment of a Statewide Emergency)
Area Code Relief Plan)
_____)

Docket No. 990373-TP
Filed: June 9, 1999

PREHEARING STATEMENT

MCI WorldCom, and its operating subsidiaries, (MCI WorldCom) through undersigned counsel, hereby files this its prehearing statement in the above-referenced docket.

A. APPEARANCES

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

B. WITNESSES

Suzanne Brooks	Direct and	Issue 1
	Rebuttal, if filed,	

C. EXHIBITS

_____ (SB-1)	Stipulation and Voluntary Number Management Measures
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MCI WorldCom reserves the right to introduce additional exhibits, if necessary, as may be required by cross-examination, rebuttal testimony, or new issues identified at the prehearing conference.

D. BASIC POSITION

The Florida Public Service Commission should not require code holders to distribute numbers consecutively, beginning with the lowest assignable telephone numbers. The Federal Communications Commission has specifically declined to delegate to the state commissions NXX code allocation or assignment. Numerous members of the industry, however, have entered into a Stipulation and Voluntary Number Management Measures, which we respectfully request the Commission to accept.

E. ISSUES AND POSITIONS

ISSUE 1: Should code holders be required to distribute telephone numbers consecutively, beginning with the lowest assignable telephone number? If not, what alternative interim mechanism for number administration would be appropriate?

MCI WORLDCOM'S POSITION: No. Code holders should not be required to distribute telephone numbers consecutively, beginning with the lowest assignable telephone number. The Federal Communications Commission has specifically declined to delegate to the state commissions NXX code allocation or assignment. Numerous members of the industry, however, have entered into a Stipulation and Voluntary Number Management Measures, which we respectfully request the Commission to accept.

ISSUE 2: Should this docket be closed?

MCI WORLDCOM'S POSITION: Yes.

F. PENDING MOTIONS

The Joint Motion to Accept Stipulation and Voluntary Number Conservation Measures is pending at this time.

G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

All requirements of the procedural orders can be met by MCI WorldCom.

Dated this 9th day of June, 1999.

Respectfully submitted,

A handwritten signature in cursive script, reading "Donna Canzano McNulty", is written over a horizontal line.

Donna Canzano McNulty
Counsel for
MCI WorldCom, Inc., and
its operating subsidiaries
325 John Knox Road,
The Atrium, Suite 105
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Prehearing Statement of MCI WorldCom, Inc. in Docket 990373-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 9th day of June, 1999.

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