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RECORDS AND
REPORTING

June 9, 1999

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. 990373-TP (Area Code Relief Plan)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunication, Inc.'s Prehearing Statement, which we ask that you file in the above-referenced 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,

Michael P. Goggin
Michael P. Goggin (M)

- AFA _____
- APP _____
- CAF _____
- CMU _____
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- EAG _____
- LEG _____
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- RRR _____
- SEC _____
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cc: All Parties of Record
Marshall M. Criser III
William J. Ellenberg II

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 990373-TP

Filed: June 9, 1999

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-99-0761-PCO-TP, issued on April 20, 1999), and Order Granting in Part Motion to Extend Testimony Scheduled, Order No. PSC-99-1012-PCO-TP, issued on May 20, 1999), hereby submits its Prehearing Statement for Docket No. 990373-TP.

A. Witnesses

BellSouth proposes to call the following witness to offer testimony on the issues in this docket:

Witness

Issue(s)

Marleen John (Direct and, if needed, Rebuttal)

All

William G. Shaughnessy, Jr. (Direct and, if needed, Rebuttal)

All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on June 16, 1999. BellSouth has listed

the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

B. Exhibits

Marleen John	None at this time.
William G. Shaughnessy, Jr.	None at this time.

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

BellSouth contends that the Commission lacks the jurisdictional authority to order telecommunications service providers to implement sequential number assignment. Jurisdiction over matters related to NXX Code administration lies with the Federal Communications Commission ("FCC"). BellSouth contends that the manner in which numbers within an NXX Code are assigned by a carrier is a form of NXX Code

administration. The FCC may delegate to the states the authority to administer or allocate NXX Codes, but it has not done so.

Even if the Commission had the authority to order carriers to assign telephone numbers sequentially, it should not do so. Such an order would require changes to number assignment and administration systems that would result in unjustified costs to customer and carriers and delay in implementing national number conservation measures. In addition, complex business customers may be forced to accept the assignment of numbers that would impair the functions of their PBX equipment, and all customers would be denied the convenience of requesting specific numbers.

More importantly, the purpose to be served by the imposition of consecutive number assignment can be accomplished through other means that would not impose such steep costs and inconveniences on customers and carriers. BellSouth and many other carriers are willing voluntarily to adopt internal number administration practices that would preserve, to the extent possible, uncontaminated blocks of one thousand numbers within NXXs. This thousand block number management would make it possible for carriers who are LNP capable to donate such uncontaminated thousand number blocks to an industry pool in the event that number pooling were implemented in Florida. These voluntary measures are set forth in a stipulation submitted jointly by

BellSouth and other carriers in this docket on May 27, 1999, together with a motion requesting that the Commission accept the stipulation and issue a temporary stay of all proceedings in this docket in the meantime.

D. BellSouth's Position on the Issues

Staff Issue 1: Should the Commission order on a statewide basis that the distribution of telephone numbers be made consecutively within area codes, beginning with the lowest assignable telephone number?

Position: No. (See BellSouth's General Statement of Position above) (BellSouth witnesses John and Shaughnessy will address this issue. As noted above, BellSouth reserves the right to call additional witnesses).

E. Issues of Fact

BellSouth Fact Issue 1: Is the imposition of consecutive number assignment the most effective, lowest cost manner to preserve uncontaminated blocks of telephone numbers in the event that number pooling is later implemented?

Position: No. (See BellSouth's Statement of Basic Position above.) (BellSouth witnesses John and Shaughnessy will address this issue. As noted above, BellSouth reserves the right to call additional witnesses.)

F. Issues of Law

BellSouth Law Issue 1: Does the Commission have the jurisdiction to order carriers to assign telephone numbers sequentially?

Position: No. (See BellSouth's Statement of Basic Position above.)

G. Issues of Policy

BellSouth believes that Staff Issue 1 above states the relevant policy issue to be decided in this docket.

H. Stipulations

As noted above in BellSouth's General Statement of Position, BellSouth, together with a number of other carriers, submitted a stipulation on May 27, 1999 under which each would agree voluntarily to implement thousand block number management procedures.

I. Pending Motions

BellSouth has joined in a motion with a number of other carriers, filed May 27, 1999, in which the carriers request that the Commission approve the joint stipulation and issue a temporary stay of all proceedings in this docket in the meantime.

J. Other Requirements

None.

Respectfully submitted this 9th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 990373-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 9th day of June, 1999 to the following:

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