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RECORDS AND REPORTING

June 9, 1999

#### BY HAND DELIVERY

Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket Nos. 990373-TP

Dear Ms. Bayo:

Enclosed for filing in the above captioned docket are an original and fifteen copies of the following documents:

1. AT&T Communications of the Southern States, Inc.'s and AT&T Wireless Services' Prehearing Statement and a 3 1/2" diskette with the document on it in WordPerfect 6.0 format; and

2. The Direct Testimony of Richard Guepe on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services. An electronic copy of this testimony also is available on our Internet web site at <a href="https://www.lawfla.com/website/documents.html">www.lawfla.com/website/documents.html</a>.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

| AFA<br>APP   | *************************************** | Thank you for your assistance with this filing. |                          |  |  |
|--|---|---|--------------------------|--|--|
| CAF<br>CMU<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR<br>CAR |   | FPSC-BUREAU OF RECORDS                          | Sincerely, Floyd R. Self |  |  |
| RRR<br>SEC<br>WAV  | FRS/a<br>Enclos                         |   | 2                        |  |  |
| OTH  | ce:                                     | Tracy Hatch, Esq. Parties of Record             |                          |  |  |

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Establishment of a Statewide Emergency | ) | Docket No. 990373-TP |
|---|---|----------------------|
| Area Code Relief Plan                         | ) | Filed: June 9, 1999  |
|   | ) |                      |

#### PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services (hereinafter, collectively "AT&T"), through undersigned counsel, hereby file this prehearing statement in the above-referenced docket.

#### A. APPEARANCES

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#### B. WITNESSES

Witness Issue
Richard Guepe 1

#### C. EXHIBITS

AT&T does not intend to present any exhibits, but reserve the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

#### D. BASIC POSITION

The Commission should not attempt to require the assignment of telephone numbers on a consecutive order basis. Alternatively, in order to better conserve number resources and maximize the number of 1000s number blocks available for number pooling when pooling is implemented, the voluntary 1000s number block management measures in the proposed industry stipulation on number management should be allowed to take effect. Because such voluntary industry actions represent the efforts of many different carriers and different types of carriers, including participation by many wireless carriers, potentially contentious jurisdictional questions that would distract us all from the promotion of efficient number management can be avoided. Finally, these voluntary measures, when combined with the ongoing efforts of the industry and FCC, will provide a superior and more timely means of achieving a permanent national solution that better preserves and utilizes telephone numbers.

#### E. ISSUES AND POSITIONS

Issue 1: Should code holders be required to distribute telephone number consecutively, beginning with the lowest assignable telephone number?

If no, what alternative interim mechanism for number administration would be appropriate?

AT&T's Position: No, the Commission should not attempt to require the assignment of telephone numbers on a consecutive order basis. Alternatively, in order to better conserve number resources and maximize the number of 1000s number blocks available for number pooling when pooling is implemented, the voluntary 1000s number block management measures in the proposed industry stipulation on number management should be allowed to

take effect. Since such voluntary industry actions represent the efforts of many different carriers and different types of carriers, including participation by many wireless carriers, potentially contentious jurisdictional questions that would distract us all from the promotion of efficient number management can be avoided. Finally, these voluntary measures, when combined with the ongoing efforts of the industry and FCC, will provide a superior and more timely means of achieving a permanent national solution that better preserves and utilizes telephone numbers.

#### 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 AT&T.

Respectfully submitted,

Tracy Hatch

AT&T Communications of the Southern

States, Inc.

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Attorneys for AT&T Communications for the Southern States, Inc. and AT&T Wireless Services

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of AT&T Communications of the Southern States, Inc.'s and AT&T Wireless Services' Prehearing Statement 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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