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June 9, 1999

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

Re: Docket No. 990373-TP

Dear Ms. Bayo:

Enclosed are the original and copies of the Petition to Intervene and Prehearing Statement of Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS ("Sprint"). Also enclosed are the original and copies of the Prefiled Direct Testimony and Exhibit of Tom Foley. Also enclosed is a diskette containing an electronic version of these documents.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Charles J. Rehwinkel

CJR/th

Enclosures

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RPR \_\_\_\_\_
- SEC \_\_\_\_\_
- AKW \_\_\_\_\_
- OTH \_\_\_\_\_

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FPSC-RECORDS/REPORTING

*Testimony*  
DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

*Prehearing Statement*  
DOCUMENT NUMBER-DATE

071112 JUN-99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE  
DOCKET NO. 990373-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene, Prehearing Statement and Prefiled Direct Testimony of Tom Foley was served by U.S. Mail or hand-delivery this 9th of June, 1999 on the following:

Wireless One Network L.P. d/b/a  
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& Regulatory Counsel  
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Tallahassee, Florida 32301

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Telecommunications, Inc.  
Ms. Nancy B. White  
c/o Nancy H. Sims  
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Time Warner AxS of Florida, L.P.  
Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069

Swidler & Berlin  
Richard Rindler  
3000 K St. NW, #300  
Washington, D.C. 20007-5116

A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel". The signature is fluid and cursive, with a large initial "C" and "R".

Charles J. Rehwinkel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

THOMAS C. FOLEY

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23

Q. Please state your name and business address.

A. My name is Thomas C. Foley. My business address is:

Sprint  
MC FLAPKA0303  
555 Lake Border Drive  
Apopka, Florida 32703

Q. Please detail your educational background and professional experience in the telecommunications industry.

A. I hold a Bachelors Degree in Electrical Engineering from the University of Nebraska - Lincoln and a Masters of Business Administration from Roosevelt University, Chicago. I also have a Masters Certificate in Project Management from George Washington University. I have attended numerous industry schools and forums on engineering, management, and project management.

1 I have been employed in the telecommunications industry; with Sprint and  
2 its predecessor companies and subsidiaries, for twenty-six years.

3  
4 I have held positions in Engineering, Strategic Market Planning, Technology  
5 Planning, and Operations. I have held such positions as Manager of  
6 Budgets and Forecasting, District Manager, and Project Manager. In my  
7 current position with Sprint, I manage large, complex interdepartmental  
8 projects such as NPA relief activities. I have project managed Sprint's  
9 activities for NPA relief since 1988, including the implementation of  
10 interchangeable NPA/NXX Codes. I have also testified before the Florida  
11 Public Service Commission (FPSC) in several NPA relief proceedings.

12  
13 Additionally, I enjoy the privilege of being a member of the faculty at the  
14 University of Phoenix where I teach mathematics, statistics, project  
15 management, and general management courses at both the undergraduate  
16 and graduate level.

17  
18 Q. What is the purpose of your testimony?

19  
20 A. The purpose of my testimony is to provide Sprint's position on the Florida  
21 Public Service Commission's proposal in Order No. PSC-99-0606-PCO-TP  
22 to require telephone numbers to be issued sequentially within existing NXX  
23 blocks of 10,000 available numbers. I am also proposing an alternative

1 method of voluntary management of numbers that will be effective in  
2 maximizing the available number of 1000 blocks when number pooling is  
3 ordered by an agency of competent jurisdiction.

4

5 Q. Are you familiar with the FPSC's Order No. PSC-99-0606-PCO-TP?

6

7 A. Yes, I have read it.

8

9 Q. Do you agree with the proposal of the Commission to require customers'  
10 numbers to be issued sequentially within 10000 number blocks.

11

12 A. While I agree with the need for number conservation and the prudent  
13 management of numbering resources, I do not agree with the method  
14 proposed in the Order. The FPSC-proposed consecutive numbering method  
15 would impose excessive costs on both wireline and wireless service  
16 providers and hardships on customers I believe that the voluntary measures,  
17 proposed by signatories to the May 27, 1999 Stipulation and Voluntary  
18 Number Management Measures ("Stipulation") [Exhibit TCF-1] will better  
19 balance product specifications, market strategies and customer needs with  
20 conservation measures than would the FPSC-proposed consecutive  
21 numbering plan.

22

23

1 Q: What are the technical and operational problems that the FPSC-proposed  
2 consecutive numbering would cause?  
3  
4 A: If "true" sequential numbering within an NXX code was required on a "flash-  
5 cut" basis, some customer-owned equipment, such as PABXs, would be  
6 unable to process calls properly if internal extensions with Direct-in-Dial  
7 (DID) service were to begin with 0, 8, or 9. These digits are used throughout  
8 the PABX industry as operator access and for outgoing calls. These  
9 thousands blocks, and sometimes hundreds blocks of numbers, that begin  
10 with these digits are not assigned to these types of customers. Also, some  
11 carriers like Sprint PCS, use specific number groups for specific classes of  
12 service. These are used for both billing and call processing reasons. Sprint  
13 PCS already assigns numbers sequentially, and it discourages the  
14 assignment of vanity numbers. Sprint PCS, however, usually reserves 1,800  
15 numbers within a 10,000 block NXX for assignment to pre-paid subscribers.  
16 (Sprint PCS assigns numbers sequentially to pre-paid subscribers within that  
17 1,800 line number range and sequentially to post-billed subscribers within  
18 the remainder of the NXX block. "Pre-paid" subscribers are subscribers who  
19 purchase blocks of minutes for use, and who may replenish their accounts  
20 through additional payments. "Post-Billed" means those subscribers who  
21 use service, incur charges, and then are billed for those services.) Sprint  
22 PCS uses an outside vendor to perform account status verification on pre-  
23 paid accounts. Calls to or from a number within the 1,800 line range are

1 routed through the vendor, which verifies the account balance and which  
2 maintains a cut off if the account balance is exceeded. It is Sprint PCS's  
3 understanding that the vendor's account status verification systems also  
4 work on the basis of line range. Sprint PCS could not offer pre-paid services  
5 in Florida if it were required to eliminate the pre-paid subscribers line range  
6 and assign numbers consecutively. Even assuming that Sprint PCS and its  
7 vendor could make the necessary technical changes to their systems – while  
8 making them work with the treatment of pre-paid services in other states  
9 where Sprint PCS would still identify prepaid services with a line range  
10 (Sprint PCS provides service nationwide) – it would be costly and time  
11 consuming to change them. Other wireless carriers, too, reserve numbers for  
12 pre-paid subscribers for billing and call processing reasons, but some may  
13 reserve entire NXXs exclusively for prepaid subscribers. Sprint PCS  
14 believes that its practice of only reserving 1,800 numbers within an NXX over  
15 the whole of an NPA, or larger area, generally results in a more efficient use  
16 of NXX codes than if Sprint PCS were to reserve entire NXX blocks  
17 exclusively for pre-paid subscribers. Moreover, if there is not sufficient  
18 demand for all 1,800 numbers within an NXX, that line range of numbers can  
19 be reduced and numbers assigned to Sprint PCS post-billed subscribers,  
20 which Sprint PCS has done in extraordinary circumstances, although that is  
21 very costly. . Additionally, there are valid customer requests received that  
22 will be honored for tariff, contractual, or customer service reasons. For  
23 example, tariffs for vanity number may exist in some sectors of the industry,



1 as well as tariffs for reserving sequential, consecutive blocks for future  
2 needs of existing customers.

3

4 Q. Please briefly describe the major points of the Stipulation.

5

6 A. The Stipulation implements a voluntary industry plan to preserve 1000s  
7 number blocks already assigned to carriers, until such time as there is a  
8 lawful plan for number pooling or number conservation. The parties to the  
9 Stipulation believe that the prudent internal management of 1000s number  
10 blocks will promote the efficient use of available numbering resources  
11 according to current applicable industry directions and guidelines and will  
12 help preserve these blocks in the event that 1000s number block pooling is  
13 implemented. The Stipulation addresses carriers' internal management of  
14 numbering resources assigned to them and does not address assignment of  
15 central office codes to carriers by the central office code administrator,  
16 except that carriers applying for central office codes must certify that they  
17 have complied with this Stipulation. (See Paragraph No. 1). Under the  
18 Stipulation, carriers will set aside uncontaminated 1000s number blocks  
19 internally from the central office codes assigned to them. Carriers may only  
20 move a 1000s block of telephone numbers at a time from those 1,000 blocks  
21 that have been set aside to maintain a 9 month inventory of telephone  
22 numbers for assignment to subscribers. Stated another way – having set  
23 aside uncontaminated 1000s blocks internally – when a carrier's inventory

1 of numbers for assignment to subscribers falls below a 9 month inventory,  
2 the carrier may draw numbering resources a 1000s block at a time from the  
3 blocks that were set aside to bring its inventory back up to a 9 month supply.  
4 Carriers are responsible for their own internal management of 1,000 blocks.  
5 The 9 month period is consistent with the 9 month period provided for in the  
6 Industry Numbering Committee Thousand Block (NXX-X) Pooling  
7 Administration Guidelines, although those Guidelines apply to the  
8 assignment of 1,000 blocks by a pooling administrator and not to internal  
9 management of numbering resources in the event pooling may be required.  
10 If number pooling is implemented, uncontaminated 1000s blocks (or  
11 otherwise qualified contaminated blocks) may be contributed to an industry  
12 number pool as provided in national pooling guidelines. Again, the  
13 Stipulation is designed to preserve 1000s number blocks already assigned  
14 to carriers, until such time as there is a lawful plan for number pooling or  
15 number conservation.

16

17 Q: If the Stipulation is voluntary, how can it provide the Commission and the  
18 public with assurance that it will be effective, since the Commission cannot  
19 enforce compliance with it?

20

21 A: The Stipulation represents a good faith commitment by Sprint in recognizing  
22 the need for efficient allocation and utilization of numbers and is a good faith  
23 effort to voluntarily work with the Commission in addressing a problem, even

1 if the Commission lacks authority to order consecutive number assignment  
2 at this time. Sprint believes that number pooling, if ordered, should proceed  
3 along national standards and guidelines. The Stipulation will be effective  
4 because it represents a public commitment that the parties will continue to  
5 responsibly manage the issuance of numbers within 1000s blocks in a way  
6 that will facilitate number pooling if ordered. The Stipulation also provides  
7 that signatories will provide NXX utilization reports twice per year at the  
8 1000 block level for jurisdictional carrier carriers, except for wireless carriers  
9 who will provide utilization reports at the NXX level Submission of utilization  
10 reports will allow the Commission to monitor the utilization of numbers more  
11 frequently than today. The Stipulation does not represent "business as  
12 usual." Instead it represents a model for all service providers to follow in  
13 making progress toward the preservation of 1000s number blocks.

14

15 Q: What other considerations support adoption of the Stipulation?

16

17 A: Recall that on March 30, 1999, in this Docket, even as the Commission  
18 considered attempting a comprehensive number management and  
19 conservation regime in voting to (1) petition the FCC to grant the  
20 Commission additional authority and (2) require sequential issuance of  
21 numbers, the Commissioners urged companies to work together to propose  
22 voluntary measures that would help with a growing numbering crisis. A  
23 handful of companies present at the Agenda Conference that day has grown

1 to over a dozen service providers representing a majority of the code holders  
2 in Florida. The leading technical experts from these companies evolved into  
3 a working group that met numerous times in an effort to address the  
4 Commission's concerns. Mindful of the operational and business needs of  
5 providing continuing service to customers, and aware of the legitimate  
6 concerns of the Commission and the public , the working group developed  
7 the provisions that make up the Stipulation. This voluntary codification of  
8 internal number management practices will help set the stage for  
9 implementation of number pooling when ordered by an agency of competent  
10 jurisdiction. At the same time, it balances market demands with technical  
11 limitations.

12

13 Q: Does this conclude your testimony?

14

15 A: Yes.

CERTIFICATE OF SERVICE  
DOCKET NO. 990373-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene, Prehearing Statement and Prefiled Direct Testimony of Tom Foley was served by U.S. Mail or hand-delivery this 9th of June, 1999 on the following:

Wireless One Network L.P. d/b/a  
Cellular One  
Frank Heaton  
2100 Electronics Lane  
Fort Myers, Florida 33912

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May 27, 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 are an original and fifteen copies of the Joint Motion to Accept Stipulation and Voluntary Number Conservation Measures, Issue a Temporary Stay, and Request for Expedited Ruling in the above referenced docket.

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 with this filing.

Sincerely,

  
Floyd R. Self

FRS/amb  
Enclosure

cc: 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: May 27, 1999
<hr style="width: 40%; margin-left: 0;"/>		
	)	

**JOINT MOTION TO ACCEPT STIPULATION  
AND VOLUNTARY NUMBER CONSERVATION MEASURES,  
ISSUE A TEMPORARY STAY,  
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rule 28-106.204, F.A.C., the carriers that have executed (hereinafter, collectively, the "Joint Movants") the attached Stipulation and Voluntary Number Conservation Measures ("Stipulation and Measures"), hereby respectfully request that the Florida Public Service Commission take the following actions: (a) approve such Stipulation and Measures according to its terms, (b) until such time as the Commission has the opportunity to rule on the Stipulation and Measures that the Commission or Prehearing Officer, as appropriate, issue a temporary stay of the requirements to file testimony and prehearing statements and, as necessary, the hearing scheduled for July 7 and 8, 1999, and (c) that such requests be handled on an expedited basis. In support of this Joint Motion, the Joint Movants state:

1. In response to the North American Numbering Plan Administration's ("NANPA") notification that a number of Florida NPAs are in jeopardy of premature exhaustion, the Florida Public Service Commission ("Commission") issued Order Number PSC-99-0606-PCO-TP and set for hearing the issue of statewide sequential or consecutive distribution of telephone numbers by telephone number code holders as a means of facilitating telephone number conservation.



2. Since the Commission first considered the matters that are the subject of this docket, numerous members of the industry and other interested persons have been working to prepare a document that would address the single issue now set for hearing on July 7 and 8, 1999.

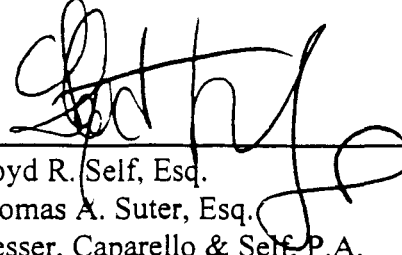
3. Attached to this Joint Motion is the Stipulation and Voluntary Number Conservation Measures that have been prepared to resolve this docket. The Joint Movants believe that when implemented pursuant to its terms, the actions identified in the Stipulation and Measures will be in the public interest.

4. Because of the nature of such an undertaking, the Joint Movants have not been able to obtain the participation or agreement of every Florida NPA code holder. However, the Joint Movants believe that the Stipulation and Measures address eventual inclusion of such other code holders through other industry or regulatory processes. The Joint Movants contemplate that additional code holders will eventually add their signatures to the attached Stipulation and Measures or that the parties to this docket that have not executed the Stipulation and Measures will separately advise the Commission of their position regarding the Stipulation and Measures.

5. Undersigned counsel has the permission of each of the Joint Movants to represent that they join in this Joint Motion and have authorized undersigned counsel to submit this Joint Motion on their collective behalf.

WHEREFORE, the Joint Movants respectfully request that the Commission approve the attached Stipulation and Voluntary Number Conservation Measures according to its terms, grant the requested temporary stay so as to enable consideration of the Stipulation and Measures, and that the Commission handle these matters on an expedited basis.

Respectfully submitted, this 27<sup>th</sup> day of May, 1999 on behalf of the Joint Movants.

A handwritten signature in black ink, appearing to read 'F. Self', is written over a horizontal line.

Floyd R. Self, Esq.  
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Counsel for AT&T Communications of the Southern  
States, Inc. and AT&T Wireless Services

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Establishment of a Statewide Emergency )	Docket No. 990373-TP
Area Code Relief Plan )	Filed: May 27, 1999
_____ )	

**STIPULATION AND VOLUNTARY NUMBER MANAGEMENT MEASURES**

WHEREAS, in response to the North American Numbering Plan Administration's ("NANPA") notification that a number of Florida NPAs are in jeopardy of premature exhaustion, the Florida Public Service Commission ("FPSC") established this docket to address emergency, interim number conservation measures;

WHEREAS, the FPSC issued Order Number PSC-99-0606-PCO-TP setting for hearing the issue of statewide consecutive distribution of telephone numbers by code holders;

WHEREAS, in *Memorandum Opinion and Order and Order on Reconsideration*, FCC 98-224 (Sept. 28, 1998), the Federal Communications Commission ("FCC") delegated limited authority to state commissions to order NXX Code rationing only in conjunction with the adoption of an area code relief plan and only if the industry is unable to reach consensus on a rationing plan;

WHEREAS, the undersigned Florida NXX code holders recognize the need for efficient number resource management;

WHEREAS, this Stipulation and Voluntary Number Management Measures are consistent with the directions and definitions in the Industry Numbering Committee (INC99-0127-23) 1000s Block (NXX-X) Pooling Administration Guidelines ("Guidelines") and follow the administration techniques and facilitate the efficient use of numbers as reflected in Section 2.7 of the Guidelines which provides that service providers shall establish internal policies and practices that provide for the efficient use and assignment of numbers to end users, that the policies and practices shall balance product specifications, market strategies and customer needs with conservation principles to ensure best practices and number utilization, and that service providers should attempt to assign telephone numbers out of a given block before making assignments out of another block;

WHEREAS, the undersigned Florida NXX code holders, without conceding jurisdiction to the FPSC to order specific number conservation and resource management measures in this docket, desire to implement a voluntary industry plan to preserve 1000s number blocks until such time as there is a lawful plan for number pooling or number conservation;

WHEREAS, the undersigned Florida NXX code holders believe that the prudent management of such 1000s number blocks will promote the efficient use of available numbering resources according to current applicable industry directions and guidelines and will help preserve these blocks in the event that 1000s number block pooling is implemented;

WHEREAS, the undersigned Florida NXX code holders believe that their voluntary 1000s number block management measures will provide a superior and more timely means of accomplishing the FPSC's objectives for this docket than the hearings scheduled for July 7-8, 1999; and,

WHEREAS, the undersigned Florida NXX code holders believe that the voluntary 1000s number block management measures detailed herein will alleviate the need for any further proceedings in this docket on consecutive numbering;

NOW, THEREFORE, the undersigned hereby request that the Commission issue an order closing this docket and the undersigned Florida NXX code holders do hereby agree to implement the following telephone number management measures:

1. Service Providers will set aside, within their telephone number ("TN") administration systems, uncontaminated 1000s number blocks. Each Service Provider will maintain no greater than nine (9) months of 1000s block TN resources to be used to meet customer demand. This type of variable demand analysis allows for the different telephone number demand patterns inherent in different geographic areas (e.g., rural central office versus urban central office) and is consistent with current Industry Numbering Committee ("INC") Thousand Block (NXX-X) Pooling Administration Guidelines and Central Office Code Administration Guidelines which employ similar threshold concepts (e.g., months to exhaust). Numbering resources will be moved a 1000s block of TNs at a time as required by the Service Provider in order to maintain the nine (9) months of TN inventory or to meet a specific customer requirement. If and when telephone number pooling is implemented in a specific rate center, LRN-LNP capable Service Providers will analyze their inventory of vacant 1000s blocks, as well as any qualified contaminated blocks, for potential contribution to an industry telephone number inventory pool. This would be done in accordance with procedures outlined in the final INC national telephone number pooling guidelines.
2. Service Providers will continue to operate within the existing national Central Office (CO) Code Assignment Guidelines and/or any Code Jeopardy procedures agreed to by the industry. This includes, but is not limited to, a Service Provider's ability to request additional NPA-NXX codes from the Code Administrator when projected customer demand will exhaust the Service Provider's existing TN inventory within the applicable months to exhaust in a code jeopardy situation, the preparation of the required

supporting documentation (i.e., Appendix B), and the certification that an NXX code request is in compliance with all requirements outlined in the Central Office Code Assignment Guidelines and Code Jeopardy procedures, as well as the TN Assignment Principles included herein.

3. Where practicable, Service Providers will set aside (i.e., restrict from assignment in their TN Assignment/Administration systems) all uncontaminated 1000s blocks. An uncontaminated 1000s block is defined as a block within which all TNs are available for assignment. As defined in the resolution statement of INC Issue 134, Common Number Status (Resolution date 4/26/99), telephone numbers unavailable for assignment include Assigned Numbers, Administrative Numbers, Aging Numbers, and Reserved Numbers. An Administrative Number is defined as any one of the following: 1) a number used for internal business or official purposes, 2) identical to a Location Routing Number (LRN), 3) a test number, 4) a Temporary Local Directory Number (TLDN), or 5) a Wireless E911 ERSD/ESRK Number.
4. Service Providers will not add to their inventory of available TNs for each rate center or switch, in case of a multiple switch rate center, until there is insufficient inventory to meet nine (9) months of projected customer demand. The nine (9) months of projected customer demand will be determined by analyzing the historical demand trends for business and residential customers, seasonal requirements, and volatile growth patterns of certain products and services (e.g., DID, Centrex, new services, Type 1 wireless interconnection).
5. Service Providers will release numbering resources in 1000s number blocks as required in order to maintain the nine (9) month inventory supply or to meet a specific customer requirement. Examples of a specific customer requirement would be the need for sequential 1000s blocks, a particular number series, or a bona fide customer request for a specific number.
6. Each NXX code holder shall submit utilization reports upon written request of the FPSC, but not exceeding twice per year. Reports submitted in response to the March 22, 1999, FPSC data request would be considered part of the semiannual request described in this paragraph. For code holders other than commercial mobile radio service ("CMRS") providers, the reports shall be on the basis of 1000s number blocks and no greater detail shall be required. The reports would measure adherence to these voluntary number administration proposals. These reports will continue to be submitted until actual number pooling is implemented or until such time as NANPA assumes this responsibility and provides aggregate data to the FPSC. Any such reports submitted to the FPSC will be submitted as confidential and proprietary information and should be considered as such by the FPSC under section

364.183(1), Florida Statutes. Because section 364.02(12), Florida Statutes, expressly exempts CMRS providers from the definition of "telecommunications company" for purposes of the FPSC's jurisdiction and because CMRS providers utilize NXX codes in a substantially different manner from landline carriers, CMRS providers will submit voluntary reports to the FPSC on an NXX basis, rather than a 1000s number block basis, with the understanding that such reports should be treated as confidential by the FPSC in view of their proprietary and trade secrets contents.

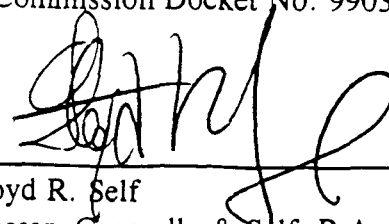
7. Not all Florida NXX code holders have taken part in this stipulation and its voluntary 1000s number block management measures. Therefore, the undersigned Florida NXX code holders agree that they will advocate the adoption of the voluntary 1000s number block management measures contained herein by all such other Florida NXX code holders.
8. This stipulation and the voluntary number management measures contained herein are entered into for purposes of settlement only. This document shall be valid and binding on the undersigned parties only to the extent it is adopted in its entirety as presented to the FPSC and only upon closure of the docket. Further, by virtue of the voluntary nature of the 1000s number block management measures agreed to herein, the issues set for hearing in this matter have been fully and completely resolved.
9. By agreeing to the voluntary 1000s number block management measures described herein, the undersigned Florida NXX code holders are not conceding that the FPSC has jurisdiction over numbering matters beyond the authority specifically delegated to the States by the FCC, that the FPSC has jurisdiction to implement number pooling, or that the FPSC has jurisdiction over CMRS providers. Accordingly, this document shall not be used by any person to assert that the undersigned have conceded jurisdiction on such issues or that they have waived any rights with respect to such jurisdictional issues.
10. This stipulation and its associated voluntary 1000s number block management measures shall take effect on the date that the FPSC closes this docket. Each undersigned NXX code holder shall implement the voluntary 1000s number block management measures described herein as quickly as possible, but in no event later than 60 days from the date the FPSC closes this docket.
11. If the Commission accepts this document and closes the docket, the undersigned shall not request reconsideration or appeal of the order of the Commission accepting this document in accordance with its terms.

12. Each undersigned Florida NXX code holder shall continue with the voluntary number management measures described herein until such time as there is a number pooling or 1000s number block conservation plan that includes Florida NXX code holders, whereupon such plan shall supersede the voluntary 1000s number block management measures described herein.
13. In the event that the FPSC does not accept this document in its entirety, this document shall not be admissible in the final hearing on the matters established by this docket, or in any other docket or forum. Moreover, no party waives any position on any issue that it could have otherwise asserted in the final hearing if this document had never been developed.

Respectfully submitted, this 27th day of May, 1999.

[Separate signature pages follow.]

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP

A handwritten signature in black ink, appearing to read "F. Self", written over a horizontal line.

Floyd R. Self  
Messer, Caparello & Self, P.A.  
215 S. Monroe Street, Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720

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



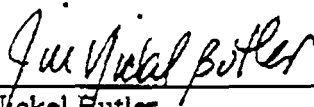
The following hereby agrees to the Stipulation and Voluntary Number  
Management Measures submitted in Florida Public Service Commission Docket  
No. 990373-TP.



---

Nancy B. White  
Michael P. Goggin  
Counsel for  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
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(305) 347-5558

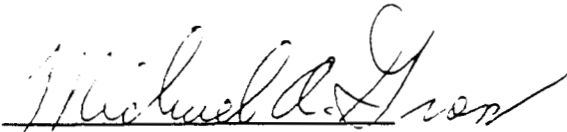
The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 99-373-TP.



---

Jill Nickel Butler  
State Regulatory Director  
Cox Florida Telecom, L.P. d/b/a Cox  
Communications

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

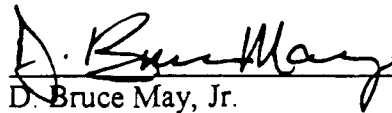


Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association\*  
310 N. Monroe Street  
Tallahassee, FL 32310  
850/681-1990  
850/681-9676 (fax)

\*The following certificated telecommunications companies represented by FCTA take no position on this issue: Comcast MH Telephony Communications of Florida, Inc.; Comcast Telephony Communications of Florida, Inc.

The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

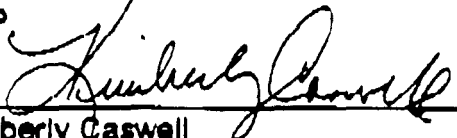
Dated this 26<sup>th</sup> day of May, 1999.

A handwritten signature in black ink, appearing to read "D. Bruce May, Jr.", written over a horizontal line.

D. Bruce May, Jr.  
Florida Bar No.: 354473  
HOLLAND & KNIGHT LLP  
Post Office Drawer 810  
Tallahassee, Florida 32302

Attorneys for Florida Cellular Service, Inc.  
d/b/a BellSouth Mobility

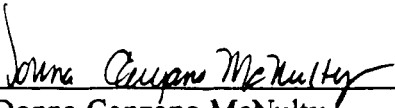
The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



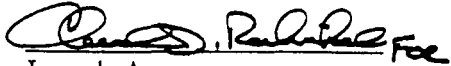
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Kimberly Caswell  
Counsel for GTE Service Corporation  
GTE Florida Incorporated  
GTE Wireless Incorporated

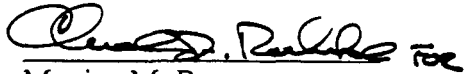
The following hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

  
\_\_\_\_\_  
Donna Canzano McNulty  
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(850) 422-1254

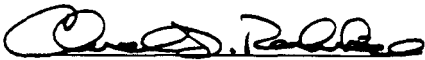
The following hereby agree to the Stipulation and Voluntary Number Management measures submitted in Florida Public Service Commission Docket No. 990373-TP:



Joseph Assenzo  
Counsel for  
Sprint PCS

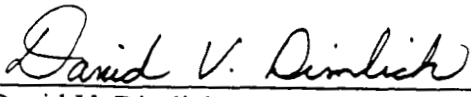


Monica M. Barone  
Counsel for  
Sprint Communications Company  
Limited Partnership



Charles J. Rehwinkel  
Counsel for  
Sprint-Florida, Incorporated

The following hereby agrees to the Stipulation and Voluntary Management  
Measures submitted in Florida Public Service Commission Docket No. 990373-TP.

  
\_\_\_\_\_  
David V. Dimlich  
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2620 S.W. 27 Avenue  
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(305) 476-4236

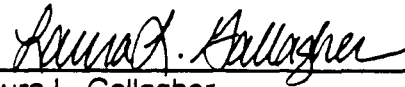
On Behalf of Supra Telecommunications &  
Information Systems, Inc.



*Laura L. Gallagher, P.A.*

ATTORNEY AT LAW

Time Warner Telecom hereby agrees to the Stipulation and Voluntary Number Management Measures submitted in Florida Public Service Commission Docket No. 990373-TP.



Laura L. Gallagher  
Attorney for Time Warner Telecom  
Dated: May 26, 1999

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Joint Motion to Accept Stipulation and Voluntary Number Conservation Measures, Issue a Temporary Stay, and Request for Expedited Ruling in Docket 990373-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 27th day of May, 1999.

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Floyd R. Self

