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RECORDS AND REPORTING

June 21, 1999

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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-TL Supplement to Prehearing Statement Of Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS

Dear Ms. Bayo:

Enclosed for filing is the original and seven (7) copies of Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS, Supplement to Prehearing Statement in Docket No. 990373-TL.

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

- Sincerely,

<u>AE</u> CMU CTR EAG LEG MAS 020 RRR SEC WAW

OTH

AFA APP

Charles J. Rehwinkel

RECEIVED & FILED **UOF RECORDS** 

DOCUMENT NUMBER-DATE

## ORIGINAL.

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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Docket No. 990737-TL Filed: June 21, 1999

## SUPPLEMENT TO PREHEARING STATEMENT OF SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP, SPRINT-FLORIDA INCORPORATED AND SPRINT PCS

Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS (collectively referred to as "Sprint") by and through its undersigned attorneys, and pursuant to Rule 25-22.038, Florida Administrative Code, and order of the Florida Public Service Commission ("Commission"), supplements its Prehearing Statement dated June 9, 1999 as follows:

During the course of the Prehearing Conference conducted June 16, 1999 in the above proceeding two of the six issues contained in the draft Prehearing Order were withdrawn and a slight modification was made to one of the remaining four issues to have it pertain to all CMRS providers as opposed to only BellSouth Mobility. The parties were requested to submit their positions on these four issues to the Commission by Monday, June 21, 1999.

Set forth below are the four remaining issues, consecutively renumbered, along with Sprint's position on each issue:

- **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?
- <u>SPRINT</u>: No. Code holders should not be required nor can they be required under current law to distribute telephone numbers consecutively, beginning with the lowest telephone number. The Commission should accept the

DOCUMENT NUMBER-DATE

07506 JUN 21 8 HORD - ALCORDS/REPORTING <u>Stipulation and Voluntary Number Management Measures</u> as the interim mechanism for number management at this time.

- **ISSUE 2**: Does the Commission have the jurisdiction to order carriers to assign telephone numbers sequentially? (Law)
- **SPRINT:** No. Sprint concurs with the rationale set forth in BellSouth's Statement of Basic Position as reflected in its Prehearing Statement.
- **ISSUE 3**: Does the Commission have jurisdiction to impose a consecutive number distribution requirement on CMRS providers? (Law)
- **<u>SPRINT</u>**: No, for the same reasons stated by BellSouth Mobility in its response to this issue in its Prehearing Statement.
- **ISSUE 4**: Is the Commission authorized to impose consecutive number assignment requirements on all NXX code holders in Florida without adopting that requirement through formal rule making pursuant to Chapter 120, Florida Statutes? (Law)
- **<u>SPRINT</u>**: No, for the same reasons cited by BellSouth Mobility in its response to this issue in its Prehearing Statement.

It is also Sprint's understanding if this matter proceeds to hearing, Sprint's witness Mr.

Thomas C. Foley will be the second witness called, after Ms. Arvanitas.

WHEREFORE, Sprint submits the foregoing information to supplement its June 9, 1999

Prehearing Statement in this proceeding.

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Respectfully submitted this 21<sup>st</sup> day of June 1999.

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Charles Rehwinkel Sprint-Florida Incorporated P.O. Box 2214 Tallahassee, Florida 32399-2214 MC FLTLHO0107 (850) 847-0244

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A. Fandade For

Monica M. Barone Sprint Communications Company Limited Partnership Sprint PCS 3100 Cumberland Circle Atlanta, Georgia 30339 (404) 649-6225

## CERTIFICATE OF SERVICE DOCKET NO. 990373-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 21st of June, 1999 to 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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