

ORIGINAL



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July 2, 2001

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COMMISSION
CLERK

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

Re: Docket No. 000604-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Prehearing Statement. A diskette in WordPerfect 6.1 is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of)
proposed numbering plan relief)
for the 941 area code)
_____)

Docket No. 000604-TL
Filed: July 2, 2001

CITIZENS' PREHEARING STATEMENT

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this prehearing statement.

All Known Witnesses

The Citizens filed rebuttal testimony by the following witness:

(1) R. Earl Poucher on the recommendations of the Office of Public Counsel as to the appropriate measures that the citizens request that the Commission take in providing relief for the exhaust of numbering resources within the 941 area code, should relief be required.

Prefiled Exhibits

None at this time.

Statement of Basic Position

The Commission should approve a geographic split of the 941 area code as specified in Alternative Relief Plan 4.

Issues and Positions

Issue A: What is the Commission's jurisdiction in this matter?

Citizens' Position:

The Commission is responsible for selecting the best plan to provide for NPA relief that is in the public interest.

Issue 1: Should the Commission approve the industry's consensus relief plan for the 941 area code?

Citizens' Position:

The Commission should reject the industry's consensus relief plan because it is not in the public interest.

Issue 2: If the Commission does not approve the industry's consensus relief plan for the 941 area code, what alternative relief plan should the Commission implement?

Citizens' Position:

The Commission should adopt alternative relief plan 4 and

the Commission should refrain from establishing optional and mandatory implementation dates until exhaust is eminent.

Issue 3: What number conservation measures, if any, should the Commission implement?

Citizens' Position:

The Commission should take steps to implement number pooling and code sharing. The Commission should take additional steps to investigate the feasibility of a technology specific relief plan involving cellular companies.

Issue 4: If number conservation measures are to be implemented, when should they be implemented?

Citizens' Position:

Number conservation measures should be implemented on an expedited basis.

Pending Matters

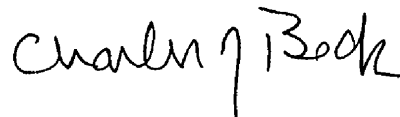
None.

Other Matters

The Citizens have complied with the requirement set forth in Order No. 0093 issued January 11, 2001.

Respectively submitted,

Jack Shreve
Public Counsel



Charles J. Beck
Deputy Public Counsel

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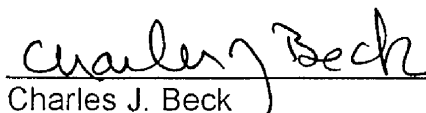
(850) 488-9330

Attorneys for the Citizens
of the State of Florida

DOCKET NO. 000604-TL
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 2nd day of July, 2001.


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