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July 3, 2001

Ms. Blanca S. Bayo  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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Re: Docket No. 000604-TL  
Request for review of proposed numbering plan relief for the 941 area code

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of Verizon Florida Inc.'s Prehearing Statement. Also enclosed is a diskette with a copy of the Prehearing Statement in Word 97 format. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.


Sincerely,

  
Kimberly Caswell

KC:tas  
Enclosures

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FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of ) Docket No. 000604-TL  
proposed numbering plan relief ) Filed: July 3, 2001  
for the 941 area code )  
standards )  
\_\_\_\_\_ )

**VERIZON FLORIDA INC.'S PREHEARING STATEMENT**

Verizon Florida Inc. (Verizon) files its Prehearing Statement in accordance with Order number PSC-01-0093-PCO-TL in this docket and Commission Rule 25-22.038.

**A. Witnesses**

Verizon's witnesses for this proceeding and the issues to which they will testify are as follows:

Beverly Y. Menard: Issues 1-4.

**B. Exhibits**

Verizon reserves the right to introduce exhibits at the hearing or other appropriate points.

**C. Verizon's Basic Position**

The Commission should approve the industry's consensus plan for relief for the 941 area code. That plan, a distributed overlay, is the least disruptive and longest-term solution for the area at issue, which just had an area code split a relatively short time ago. Unlike another area code split, the distributed overlay will not require any customer number changes. While there is no one solution that will satisfy all customers, an overlay is probably inevitable in the not-too-distant future. It is better to implement this long-term solution now, rather than implementing additional splits, which cause controversy and confusion every time they occur.

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## **D., E., and F. Verizon's Positions on Specific Issues**

Verizon considers each issue in this proceeding to be a mixed question of fact, law, and policy.

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

**Verizon's Position:** The extent of the Commission's jurisdiction will depend on what type of solution it is considering for relief in the 941 area code. In any event, the Commission has the authority to order the overlay solution agreed upon by the industry.

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

**Verizon's Position:** Yes. The overlay plan that was unanimously approved by the current code holders in the 941 area code is the best long-term relief solution. Unlike another area code split, the overlay will not require any customer number changes. A split is likely inevitable in the not-too-distant future, and it is better to implement it now rather than forcing customers to undergo still more controversial and confusing area code splits.

### **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?**

**Verizon's Position:** If, contrary to the industry's recommendation, the Commission orders a geographic split instead of the overlay plan, then it should probably devise a split that keeps customers in Manatee, Sarasota and Charlotte counties in the same area code. If the overlay is implemented, all local calls would be dialed on a ten-digit basis.

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

**Verizon's Position:** The Commission should not implement any number conservation measures in this docket. Any such measures should be considered in the ongoing generic numbering docket (number 981444-TP), so all interested parties can have input and any conservation measures can be implemented uniformly statewide.

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

**Verizon's Position:** As Verizon pointed out in its response to Issue 3, this docket is not the proper forum for implementation of number conservation measures.

#### **G. Stipulated Issues**

There are no stipulated issues at this time.

#### **H. Pending Matters**

Verizon is unaware of any pending matters.

#### **I. Confidentiality Claims**

Verizon has no outstanding requests or claims for confidentiality of any information that has been submitted in this case.

#### **J. Procedural Requirements**

To the best of its knowledge, Verizon can comply with all requirements set forth in the procedural order in this case.

#### **K. Pending FCC or Court Actions**

Verizon is unaware of any pending FCC or court actions that may preempt Commission action in this docket or that may affect the Commission's ability to resolve any of the issues presented in this docket. Verizon cannot, however, definitively answer

this question without knowing what action the Commission may eventually take in this proceeding.

Respectfully submitted on July 3, 2001.

By: 

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Attorney for Verizon Florida Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Prehearing Statement in Docket No. 000604-TL were sent via U.S. mail on July 3, 2001 to the parties on the attached list.

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

Kimberly Caswell

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