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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) Docket No. 950737-TP
local telephone number portability)
solution to implement competition) Filed: 09/29/95
in local exchange telephone markets)
_____)

BELLSOUTH MOBILITY INC'S
PREHEARING STATEMENT

BellSouth Mobility Inc (BMI), pursuant to Order No. PSC-95-0896-PCO-TP, files this prehearing statement.

- A. Witnesses: None
- B. Exhibits: At this time, BMI does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.
- C. BMI's Basic Position: The Stipulation approved by the Commission on September 12, 1995, appropriately indicates that remote call forwarding should be the interim service provider number portability solution, in that it involves the least adverse impact to cellular customers.

Although Remote Call Forwarding appears to be the least onerous number portability solution available at this time, it negatively affects CMRS customers. Remote Call Forwarding interferes with the proper function of several services offered or contemplated by CMRS providers, such as BMI's Pro-Link, calling number identification service and the ability to identify published calling numbers on customer bills.

ACK _____
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D.

ISSUES

ISSUE 1: What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

BMI's POSITION: BMI has no objection to the service provider portability definition included in the stipulation signed by the parties and approved by the Commission in this docket (the "Stipulation").

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ISSUE 2: What technical solutions will be available by January 1, 1996, to provide temporary number portability?

BMI's POSITION: BMI agrees with the terms of the Stipulation that Remote Call Forwarding will be the only technical solution available by January 1, 1995, and also agrees that LECs should continue to negotiate other feasible options with interested parties, particularly in light of the adverse effect of remote call forwarding on CMRS services.

ISSUE 3: what are the advantages and disadvantages of each solution identified in Issue 2?

BMI's POSITION: Remote Call Forwarding interferes with the proper function of several services offered or contemplated by CMRS providers, such as BMI's Pro-Link, calling number identification service and the ability to identify calling numbers on customer bills.

ISSUE 4: What costs are associated with providing each solution identified in Issue 2?

BMI's POSITION: Although not a direct cost of providing remote call forwarding, BMI notes that there are substantial unquantifiable costs to CMRS providers associated with the adverse impact of Remote Call Forwarding on various cellular services offered by BMI and others. These include lost revenues associated with the above-mentioned services.

ISSUE 5: How should the costs identified in Issue 4 be recovered?

BMI's POSITION: LEC prices for remote call forwarding should be cost-based. BMI takes no position at this time on the appropriate price level.

ISSUE 6: What is/are the most appropriate method(s) of providing temporary number portability?

BMI's POSITION: Remote Call Forwarding appears to be the least onerous method that is technically feasible at this time.

ISSUE 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

BMI's POSITION: No position at this time.

ISSUE 8: Should this docket be closed?

BMI's POSITION: Yes.

E. QUESTIONS OF LAW: None.

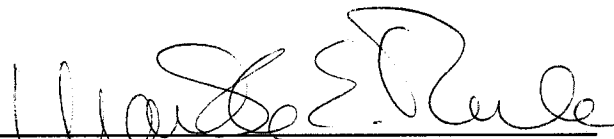
F. POLICY QUESTIONS: None.

G. STIPULATED ISSUES: The Stipulation approved by the Commission settles issues 1, 2, 6 and 7.

H. PENDING MOTIONS OR OTHER MATTERS: None.

I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 29th day of September, 1995.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of BellSouth Mobility, Inc.'s Prehearing Statement in Docket No. 950737-TP has been furnished this 29th day of September, 1995, to the following:

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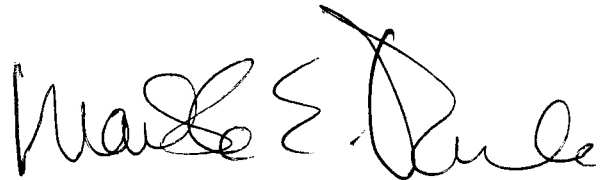
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