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DEPARTMENT OF MANAGEMENT
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December 23, 1996

Suite 260

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

Re Docket No: 961153-TL
904 Area Issues/BellSouth Telecommunications, Inc

Dear Ms. Bayo:

Enclosed for filing in the above docket are an original and 15 copies of the Department's Post-Hearing Brief with our attached certificate of service.

Sincerely,

ACK _____
AFA _____
APP _____
CAF _____
CMU _____

Stephen S. Mathues
Assistant General Counsel

CTR _____
EAG _____
LEG 3 SSM/cs
3 Enclosure
LIN _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____



DOCUMENT NUMBER-DATE
13635 DEC 23 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for numbering plan)
area relief for 904 area code by)
BellSouth Telecommunications, Inc.)
_____)

Docket No. 961153-TT.

Filed: December 23, 1996

DEPARTMENT OF MANAGEMENT SERVICES'
POST-HEARING BRIEF

Pursuant to Rule 25-22 056, Florida Administrative Code, the Department of Management Services, Division of Communications (DMS), files this Post-hearing Brief and statement of position on the issues

PRELIMINARY STATEMENT
AND SUMMARY OF POSITION

DMS has the statutory responsibility to oversee telecommunications needs for state agencies. DMS responds to the post-hearing statement requirement by setting out a summary of its position on each issue identified in the Commission's Prehearing Order dated December 5, 1996, in this proceeding. DMS' argument on each issue will follow its summary of position. Reference to the transcript of record will be "Tr." followed by the appropriate page number(s). References to exhibits will be "Ex." followed by the appropriate number.

A change in the 904 area code for the Tallahassee Market Area will fiscally impact state agencies and affect their ability to provide quality service by confusing not only Florida's citizens who have a high community of interest with the State's capital, but also the general public outside Florida who are likely to retain outdated Florida information and be unfamiliar with Florida's area code changes. The DMS bases its position on state agency concerns, as well as its experience with dialing plan changes for the SUNCOM Network.

DOCUMENT NUMBER DATE

13635 DEC 23 96

FPSC REPORTING

SUMMARY OF POSITION AND ARGUMENT

Issue 1: What geographic split plan for 904 area code relief should be ordered by the Commission?

Summary of Position: *** DMS supports Option 1A, Option 2, or any split plan that would keep the 904 area code in the Tallahassee Market Area and therefore not disrupt the public's calling into the State's capital.***

ARGUMENT

Changing the area code for the Tallahassee Market Area would have two negative impacts on the state agencies located within that geographic market. Cost and confusion for the dialing public. Tr. 135, 142-43. Although considerable, cost is the lesser factor. Tr. 135, 142. While a worst-case estimate places the cost impact at several million dollars, (Tr. 137, 157-58, Ex. 13) this is expected to diminish based on the length of any permissive dialing period. Tr. 158-59. The longer-lasting, greater, pernicious impact is on the community of interest of citizens interacting with their government. Tr. 137-38, 143-44, 168.

Some 14 million Florida citizens and the general public comprise the community of interest for Tallahassee. Tr. 137-38, 143-44. External, non-800, calls to state agencies exceed 110,000 per business day, or some 2.2 million per month. Tr. 138, 144. DMS' own experience with changing a dialing pattern showed that changing even a single digit is very disruptive. Tr. 139-40, 144-45, 164-66, 167. Mistakes in dialing persist long after such a change. Tr. 140. Reports from Montgomery, Alabama, a state capital which was assigned a new area code, are not encouraging. Tr. 140, Ex. 13.

Issue 2: How and when should the area code relief be implemented?

Summary of Position: *** DMS supports the implementation timetable for area code

relief as set forth in BellSouth's petition with permissive dialing beginning on February 24, 1997, and mandatory dialing beginning on February 23, 1998.***

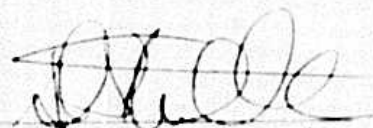
ARGUMENT

Because longer permissive dialing periods tend to lessen costs by spreading them out or avoiding them altogether, DMS believes the year-long permissive period will benefit customers in any geographic area which changes area codes.

CONCLUSION

DMS believes the Florida Public Service Commission should select a numbering plan which retains area code 904 for the Tallahassee area, thereby causing the least inconvenience for those persons having a need to call state government offices

Respectfully submitted,



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**CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL**

I HERBY CERTIFY that a true and correct copy of the foregoing has been sent by prepaid U. S. Mail to following parties this 23 day of December, 1996.

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