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February 21, 1997

ORIGINAL
FILE COPY

BY HAND DELIVERY

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

Re: Petition for numbering plan area relief for 904
area code, by BellSouth Telecommunications, Inc.
Docket No. 961153-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced is the original and fifteen (15) copies of the following documents:

1. ALLTEL Florida, Inc.'s and Northeast Florida Telephone Company's Request for Oral Argument on Joint Motion for Reconsideration; and
2. ALLTEL Florida, Inc.'s and Northeast Florida Telephone Company's Joint Motion for Reconsideration.

We are also submitting the Joint Motion for Reconsideration on a 3.5" high-density diskette generated on a DOS computer in WordPerfect 5.1 format.

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

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

JJW/bjm
Enclosures
cc: All Parties of Record

DOCUMENT NUMBER-DATE

01995 FEB 21 6

FPSG DIVISION-REPORTING

Joint motion
DOCUMENT NUMBER-DATE

01997 FEB 21 6

FPSG DIVISION-REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

In re: Petition for numbering plan area) DOCKET NO. 961153-TL
relief for 904 area code, by BellSouth) FILED: 2/21/97
Telecommunications, Inc.)
_____)

**ALLTEL FLORIDA, INC.'S AND NORTHEAST
FLORIDA TELEPHONE COMPANY'S REQUEST FOR ORAL ARGUMENT ON
JOINT MOTION FOR RECONSIDERATION**

ALLTEL Florida, Inc. ("ALLTEL") and Northeast Florida Telephone Company, Inc. ("Northeast"), pursuant to Rule 25-22.058, Florida Administrative Code, file this Request for Oral Argument on their Joint Motion for Reconsideration of Order No. PSC-97-0138-FOF-TL (the "Order"), and state:

1. The Joint Motion for Oral Argument raises important issues affecting a large number of telecommunications customers in Florida.

2. One of those issues is the relative jurisdiction of the Florida Public Service Commission, the North American Numbering Council and the Federal Communications Commission over NPA assignments and numbering plans generally, and the potential for a time consuming numbering dispute if the Commission does not reconsider its decision to adopt Option 4.

3. Other issues raised include the orderly administration of numbering resources nationwide and the interplay between the implementation of NPA relief and the implementation of permanent local number portability in the Jacksonville LATA in 1998, and the

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FLORIDA PUBLIC SERVICE COMMISSION

resulting burden to carriers and confusion to customers the interplay will cause.

4. The relative jurisdiction of the relevant agencies, the orderly administration of numbering resources nationwide, and the ramifications of permanent number portability are complex issues. Oral Argument will aid the Commission's comprehension and evaluation of these complex issues, which may be issues of first impression before the Commission, by enabling the parties to provide input on the issues raised in the motion.

5. This is an important docket with important ramifications for the future. Oral Argument will promote the exchange of information, is in the public interest and should be granted.

DATED this 21st day of February, 1997.



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ATTORNEYS FOR ALLTEL
FLORIDA, INC. AND NORTHEAST
FLORIDA TELEPHONE COMPANY

CERTIFICATE OF SERVICE
DOCKET NO. 961153-TL

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 21st day of February, 1997, to the following:

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