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REPLY TO TALLAHASSEE

February 25, 1997

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**Ms. Blanca Bayo, Director  
Division of Records & 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 please find the original and fifteen (15) copies of the Petition in Support of Alltel Florida, Inc.'s and Northeast Florida Telephone Company's Joint Motion for Reconsideration and Motion for Leave to Participate in Alltel Florida, Inc.'s and Northeast Florida Telephone Company's Joint Motion for Reconsideration and the City of Jacksonville's Request for Oral Argument on Motion for Leave to Participate in Alltel Florida Inc.'s and Northeast Florida Telephone Company's Joint Motion For Reconsideration.

DOCUMENT NUMBER-DATE  
02123 FEB 25 97  
FPSC-RECORDS/REPORTING

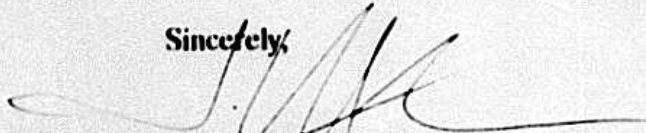
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Ms. Blanca Bayo  
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If additional information is needed, please do not hesitate to contact me.

Sincerely,



John R. Marks, III

JRM/lcg  
Enclosures

cc: Ginny Myrick



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Petition for Numbering Plan Area )  
Relief for 904 Area Code, by BellSouth )  
Telecommunications, Inc. )**

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**Docket No. 961153-TL  
Filed: February 25, 1997**

**CITY OF JACKSONVILLE REQUEST FOR ORAL ARGUMENT  
ON MOTION FOR LEAVE TO PARTICIPATE IN ALTELL FLORIDA  
INC.'S AND NORTHEAST FLORIDA TELEPHONE  
COMPANY'S JOINT MOTION FOR RECONSIDERATION**

The City of Jacksonville (Jacksonville or City) by and through its undersigned counsel and pursuant to Chapter 120, Fla. Stats., hereby files this Request for Oral Argument on its Motion for Leave to Participate in Alltel Florida Inc.'s and Northeast Florida Telephone Company's Joint Motion for Reconsideration (Motion) of Florida Public Service Commission (Commission) Order No. PSC-97-0138-FOF-TL, (Order). In support thereof, Jacksonville states:

1. Jacksonville asserts that the provisions in Chapter 120, Fla. Stats., the Administrative Procedure Act, provides a means for a party to participate in the Commission's proceedings without having to formally intervene.
2. Jacksonville is not requesting the Commission to rehear the matter, reopen the record or consider new evidence in the underlying matter, it is Jacksonville's position that §120.52(12)(c), Fla. Stats. grants authority to the Commission to allow a party to participate in its proceedings similar to *amicus curiae*.
3. The Commission's rules governing Practice and Procedure, §25-22.001, F.A.C. *et. seq.* are silent as to the Commission's authority to permit persons to participate in the

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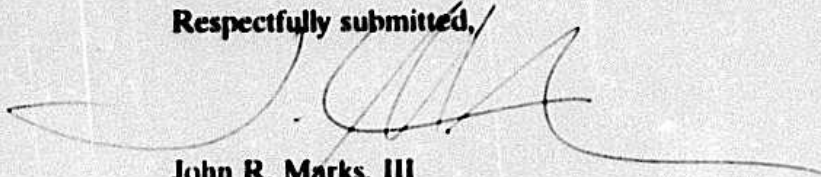
Commission's proceedings pursuant to §120.52(12)(c), Fla. Stat. or in the manner of *amicus curiae*. However, there is nothing in the Commission's rules which prohibits such participation.

4. Oral argument would aid the Commission's comprehension and evaluation of this issue, which may be an issue of first impression.

5. The underlying matter considered by the Commission in this docket directly affects Jacksonville and its citizens and has significant ramifications for their future. Oral argument will aid the Commission in understanding Jacksonville's role in this matter and why the City believes its participation will aid the Commission. Finally, oral argument will promote the exchange of information and is in the public's interest.

Dated this 25<sup>th</sup> day of February, 1997.

Respectfully submitted,



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

**I HEREBY CERTIFY** that a true copy of the foregoing has been furnished by hand delivery to Ms. Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, Mr. Charlie Pellegrini, Mr. Will Cox, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, Mr. Ralph Widell, Division of Communications, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and by U.S. Mail to the following individuals on this 25<sup>th</sup> day of February, 1997.

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