

BEFORE THE PUBLIC SERVICE COMMISSION

IN RE: REQUEST FOR REVIEW
OF PROPOSED NUMBERING
PLAN RELIEF FOR 305 AREA
CODE

DOCKET NO. 971058-TL

PREHEARING STATEMENT BY BELL SOUTH MOBILITY, INC.

This Prehearing Statement is filed pursuant to Rule 25-22.038(3), Florida Administrative Code, and pursuant to the schedule and proceedings specified in the above-referenced Docket No. 971058-TL. BellSouth Mobility Inc (BMI), having previously intervened in this proceeding, hereby files the following statement:

(a) BMI does not at this time intend to call any witnesses. BMI reserves the right to call witnesses to respond to Commission inquiries, to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on October 8, 1997,

to address issues of implementation of the relief plan selected, or for impeachment or any other purpose authorized by the rules of the Commission and the Florida Evidence Code.

(b) BMI does not intend to use any exhibits. BMI reserves the right to introduce exhibits to respond to Commission inquiries, to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on October 8, 1997,

to address issues of implementation of the relief plan selected, or for cross examination, impeachment or any other purpose authorized by the rules of the Commission and the Florida Evidence Code.

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(c) BMI's basic position in this proceeding is that it favors an overlay versus a geographic split in dealing with the exhaust of Area Code 305 in South Florida.

(d)-(f) The primary question at issue in this docket is whether an overlay is preferable to a geographic split in dealing with the 305 area code exhaust. BMI considers the overlay approach clearly preferable for a number of reasons. An overlay is the most cost-effective and least confusing manner to obtain area code relief in that customer number changes are not required. The attendant cost of number changes, such as stationery and business card changes and changes in customer premises equipment such as PBXs, alarm systems and fax machines, are avoided. Also, from BMI's perspective as a cellular service provider, an overlay avoids BMI's having to reprogram hundreds of thousands of cellular telephones for its subscribers. The cost to BMI for the reprogramming of the phones of its subscribers could easily run into millions of dollars. Presumably, this would also be the case for other cellular, PCS and wireless service providers.

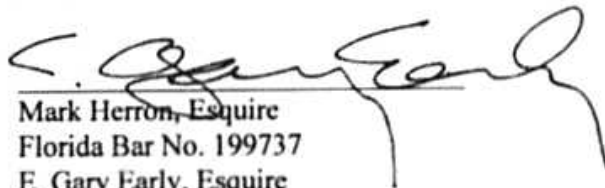
Furthermore,, BMI anticipates that with a geographic split many customers would not bring their phones in to be reprogrammed. Following the end of the permissive dialing period, regardless of the length of that period, it is likely that thousands of subscribers would suddenly find themselves with cellular telephones that no longer work. BMI is therefore very concerned about customer dissatisfaction and, ultimately, loss of business.

BMI also believes that significant confusion will result from the required change of numbers for existing customers for the affected area. With an overlay, no one would be required to change telephone numbers.

Although customers will have to become accustomed to ten-digit dialing, BMI does not believe that this adjustment will be difficult or confusing.

- (g) BMI is not a party to any stipulation of issues.
- (h) BMI is unaware of any pending motions or other matters requiring action.
- (i) BMI is unaware of any requirement set forth in the Order Establishing Procedure that can not be complied with.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this 29th day of September, 1997:

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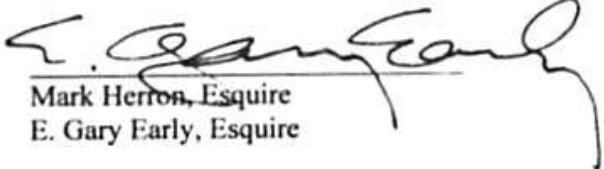
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