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February 13, 1998

**BY HAND DELIVERY**

Ms. Blanca S. Bayó  
Director, Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 980048-TL - 813 Area Code

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. ("MCI") in the above referenced docket are the original and 15 copies of MCI's Prehearing Statement.

Copies have been furnished to parties of record as indicated on the attached service list.

Very truly yours,

Richard D. Melson

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMU** \_\_\_\_\_
- CTR \_\_\_\_\_
- ENG \_\_\_\_\_
- LES 2 \_\_\_\_\_
- LES 5 \_\_\_\_\_
- CP \_\_\_\_\_
- IN \_\_\_\_\_
- SA 1 \_\_\_\_\_
- VA \_\_\_\_\_

RDM/clp  
Enclosure  
cc: Parties of Record

DOCUMENT NUMBER-DATE

**02224 FEB 13 98**

RECORDS & REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of ) Docket No. 980048-TL  
Proposed numbering plan relief )  
For 813 area code ) February 13, 1998

**MCI'S PREHEARING STATEMENT**

MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. (collectively referred to as MCI) hereby file their prehearing statement in accordance with the requirements of Order No. PSC-98-0096-PCO-TL.

A. Known Witnesses. MCI has prefiled the testimony of Kelly Paul.

B. Known Exhibits. MCI has not prefiled any exhibits. MCI reserves the right to use additional exhibits for purposes of cross-examination.

C. Basic Position. In general, geographic splits are preferable to overlays as a means of providing area code relief. Geographic splits tend to have fewer end-user impacts and fewer negative impacts on emerging competition. If the Commission nevertheless determines, due to the unique circumstances in the 813 area code that an overlay is in the public interest, it should impose several conditions to mitigate the adverse impacts on competition. These conditions include: 1) no slippage in the current schedule for permanent local number portability (LNP); 2) 10-digit dialing should be required both within and between the old and new area codes; 3) GTE should be required to analyze

and report on the feasibility of a revenue-neutral rate center consolidation plan for the 813 area; and, 4) a workshop or other process should be established to consider a number pooling mechanism for the Tampa LNP area.

D.-F. Issues. MCI's positions on the issues that have been identified in the Order Establishing Procedure are as follows:

Issue 1: Should the Commission approve the overlay plan for 813 area code relief, and if not, what relief plan should the Commission approve?

**MCI**: The Commission should not approve the overlay plan for the 813 area code. If relief is necessary, the Commission should approve a geographic split. If the Commission nevertheless determines, due to the unique circumstances in the 813 area code that an overlay is in the public interest, it should impose the following conditions to mitigate the adverse impacts on competition: 1) no slippage in the current schedule for permanent local number portability (LNP); 2) 10 digit dialing should be required both within and between the old and new area codes; 3) GTE should be required to analyze and report on the feasibility of a revenue-neutral rate center consolidation plan for the 813 area; and, 4) a workshop or other process should be established to consider a number pooling mechanism for the Tampa LNP area.

Issue 2: What should the dialing pattern be for the following types of calls?

- a. Local
- b. Toll
- c. EAS
- d. ECS

**MCI**: If the Commission approves an overlay, 10 digit dialing should be required within and between the new and old area codes for all types of calls. In addition, toll and ECS calls should be made on a 1+ 10-digit basis.

If the Commission approves a geographic split, 10 digit dialing should be required between the new and old area codes for all types of calls. In addition, toll and ECS calls should be made on a 1+ 10-digit basis. Local and EAS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, Hand Delivery(\*) or Federal Express(\*\*) this 13th day of February 1998.

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*R. O. F.*

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Attorney

calls within an area code may be on a seven digit basis.

G. Stipulations. There are no stipulations between MCI and any party at this time.

H. Pending Motions. MCI has no pending motions at this time.

I. Requirements of Order on Procedure. MCI believes that this prehearing statement complies with all the requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 13th day of February, 1998.

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