

ORIGINAL



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

March 6, 1998

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

Re: Docket No. 980048-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Citizen's Motion to Accept Late Filed Exhibit.

Please indicate the time and date of receipt on the enclosed duplicate of this letter.

Sincerely,

Charles J. Beck  
Deputy Public Counsel

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR ~~GJB:bsr~~
- EAG \_\_\_\_\_
- LEG 3 Enclosures
- LIN 5
- OP \_\_\_\_\_
- RC \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTF \_\_\_\_\_

RECEIVED & FILED  
  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~980048-TL~~ MAR -6 98

FPSC RECORDS/REPORTING

**ORIGINAL**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Request for review of )  
proposed numbering plan relief )  
for the 813 Area Code. )  
\_\_\_\_\_ )

Docket No. 980048-TL

Filed: March 6, 1998

**MOTION TO ACCEPT LATE FILED EXHIBIT**

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, move the Florida Public Service Commission to accept the attached letters from Senator Jack Latvala and Pasco County Administrator John Gallagher as late filed exhibits. In support of this motion, the Citizens submit the following:

1. At the evidentiary hearing held in Tampa on February 24, 1998, GTE submitted four possible scenarios for providing numbering relief in the 813 area code. One of those scenarios was an overlay plan, and the other three scenarios were different ways to implement a geographic split. The Commission asked a number of witnesses which of the three proposed geographic split alternatives they would prefer if the Commission were to adopt a geographic split.

2. The attached letters show that the Pasco County Board of County Commissioners, like Senator Latvala, prefer the "Option Three" discussed at the hearing.

DOCUMENT NUMBER-DATE

02947 MAR-68

FPSC RECORDS/REPORTING

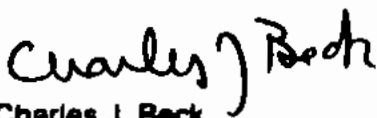
3. The Citizens believe that the Commission would want to consider this information when it decides the case.

4. Counsel for the Citizens has contacted attorneys for AT&T and MCI, and neither opposed the Commission accepting these letters as late filed exhibits. Counsel for the Citizens also attempted to contact counsel for GTE, but no response was received in time to be included in this motion.

**WHEREFORE**, the Citizens respectfully request the Florida Public Service Commission to accept the attached letters from Senator Jack Latvala and Pasco County Administrator John Gallagher as late filed exhibits.

Respectfully submitted,

JACK SHREVE  
Public Counsel  
Fla. Bar no. 73622

  
Charles J. Beck  
Deputy Public Counsel  
Fla. Bar No. 217281

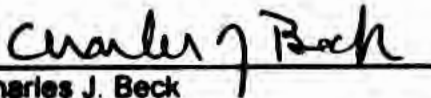
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

(850) 488-9330

**DOCKET NO. 980048-TL  
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 6th day of March, 1998.

  
Charles J. Beck

John Bowman  
Division of Legal Services  
Fla. Public Service Commission  
2740 Shumard Oak Blvd.  
Tallahassee, FL 32399-0863

Kimberly Caswell  
GTE Florida Incorporated  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

Norman Horton  
Messer, Caparello & Self  
P.O. Box 1876  
Tallahassee, FL 32302

Jack Latvala, Senator  
19th District  
35111 U.S. Highway 19, N.  
Suite 105  
Palm Harbor, FL 34684

Mark K. Logan  
Bryant, Miller & Olive  
201 South Monroe St.  
Suite 500  
Tallahassee, FL 32301

Marsha Rule  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301

Thomas K. Bond  
MCI Telecommunications Corp.  
780 Johnson Ferry Rd., Ste. 700  
Atlanta, GA 30342

Richard D. Melson  
Hopping, Green, Sams & Smith  
Post office Box 6526  
Tallahassee, FL 32314

**ATTACHMENT**



# THE FLORIDA SENATE

Tallahassee, Florida 32305-1140

**SENATOR JACK LATVALA**  
10th District

March 5, 1998

Mr. Jack Shreve  
Public Council  
813 Pepper Building  
111 West Madison St.  
Tallahassee, FL 32399-1400

Dear Mr. Shreve:

In relation to GTE Corporation's proposal to overlay the present 813 area code with a new area code, the Pasco County Board of County Commissioners advised me through the County Administrator on March 4 that it favors "Option Three" of the four area code options GTE presented at its workshop and at the technical hearing February 24. A copy of County Administrator John Gallagher's letter is enclosed here.

I believe the Public Service Commission desires to know the opinions of county governments about this issue, and I request that your office formally bring this significant expression of opinion to the attention of Chairman Johnson and the Commissioners.

Thank you for your kind assistance in this matter.

Sincerely,

Jack Latvala  
Senator  
10th District

Enclosure

REPLY TO

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TONI JENNINGS  
President

ROBERTO CASAS  
President Pro Tempore



PADE CITY  
LAKE O'LAKEE  
WEST PASCO  
RAJ

(813) 821-4129  
(813) 908-7341  
(813) 807-6111  
(813) 847-8831

COUNTY ADMINISTRATOR'S OFFICE  
WEST PASCO GOVERNMENT CENTER, S-348  
7530 LITTLE ROAD  
NEW POST ROCKY, FL 34444

**VIA TELETYPE**

March 4, 1988

The Honorable Jack Labate  
Senator, District 19  
302 Senate Office Building  
Tallahassee, FL 32399-1100

Re. GTE Area Code Proposal


Dear Senator Labate:

This is to advise that last night the Pasco County Board of County Commissioners discussed the GTE Area Code Proposal outlined in Ron Ogden's memorandum to me dated February 29, 1988.

The Board, like you, favors Option Three.

If you need any additional information, please do not hesitate to contact me.

Sincerely,



John J. Gallagher  
County Administrator

JJG:mrm:md/cvrl:kar:sto-vo:oc:nc: labate ge area code proposal

cc: Board of County Commissioners