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Marsha E. Rule
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RECORDS AND
REPORTING

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July 13, 1998

Via Hand Delivery

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

RE: Docket No. 980671-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of AT&T's Prehearing Statement.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service. Thank you for your assistance in this matter.

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[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,

[Signature]

Marsha E. Rule

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Sumner
- CTR _____
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- LEG 4
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Enclosures
MER/kfj

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for review of proposed) Docket No. 980671-TL
numbering plan relief for 407 area code)
_____) Filed: July 13, 1998

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S
PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc. ("AT&T"), pursuant to Rule 25-22.038(3), Fla. Admin. Code and Order No. PSC-98-0767-PCO-TL, hereby files its Prehearing Statement and states:

A. APPEARANCES:

Marsha E. Rule
AT&T Communications of the Southern States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301

B. WITNESSES:

None.

C. EXHIBITS:

None.

D. STATEMENT OF BASIC POSITION OF AT&T:

AT&T suggests that any NPA relief must be planned and implemented in a competitively neutral manner so that no particular service provider is unduly favored or adversely affected. The impact of area code relief on customers should be kept to a minimum while promoting the development of local competition for the long term benefit of Florida consumers. AT&T suggests a geographic split best accomplishes these goals in the 407 NPA.

E. STATEMENT OF ISSUES AND POSITIONS:

ISSUE 1: Should the Commission approve the industry's consensus overlay plan for the 407 area code relief, and if not, what relief plan should the Commission approve?

AT&T: While there are advantages and disadvantages of either imposing an overlay as proposed by Lockheed Martin IMS or a geographic split, AT&T suggests that the advantages associated with the split outweigh those associated with an overlay. From a technical standpoint, AT&T will support either one. The determining factor should be what is in the best interests of the people living and working within the 407 area code.

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

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

AT&T: 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 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 dialing codes for all types of calls. In addition, toll calls should be made on a 1+10-digit basis. Local, ECS and EAS calls within an area code may be on a seven digit basis.

F. PROPOSED STIPULATIONS:

None.

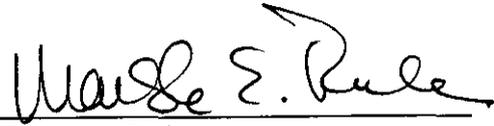
G. PENDING MOTIONS:

None.

H. RULINGS:

None.

Respectfully submitted this 13th day of July, 1998.

A handwritten signature in black ink that reads "Marsha E. Rule". The signature is written in a cursive style with a prominent initial "M" and a long, sweeping underline.

Marsha E. Rule
AT&T
101 North Monroe Street
Suite 700
Tallahassee, Florida 32301
(850) 425-6365

Attorney for AT&T
Communications of the Southern
States

**CERTIFICATE OF SERVICE
DOCKET 980671-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via U.S. Mail to the following parties of record on this 13th day of July, 1998:

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