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October 23, 1998

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RECORDS AND REPORTING

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

Re: Docket No. 980671-TL

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Vista-United Telecommunications' Posthearing Statement.

We are also submitting the Posthearing Statement on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Stephanell W. Redham, for
J. Jeffrey Wahlen

ACK _____
AFK _____
JAW _____

Enclosures

cc: All parties of record

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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of
proposed numbering plan relief
for 407 area code

Docket No. 980671-TL
Filed: October 23, 1998

VISTA-UNITED TELECOMMUNICATIONS' POSTHEARING STATEMENT

Pursuant to Order Nos. PSC-98-0767-PCO-TL and PSC-98-1009-PHO-TL, VISTA-UNITED TELECOMMUNICATIONS ("Vista" or the "Company") files this Posthearing Statement:

I.

Introduction

This proceeding began on April 22, 1998, when Lockheed Martin IMS ("LM") notified the Florida Public Service Commission ("FPSC" or "Commission") that the 407 area code would exhaust its remaining supply of telephone numbers by approximately the fourth quarter of 1999. In its letter, LM presented the alternatives considered by the industry and requested that the FPSC approve a single overlay as the relief plan for the 407 NPA.

The Commission held two sets of public hearings in this docket in both Orlando and Melbourne. In addition, on August 7, 1998, the FPSC held a technical hearing in Orlando. Vista sponsored one witness during the technical hearing, Robert P. Merrick. Mr. Merrick's prepared direct testimony was inserted into the record at Tr. 245. His exhibit (RPM-1) was identified as exhibit No. 6 and admitted into evidence at Tr. 126. Mr. Merrick had one late-filed exhibit (No. 10), which was filed on August 21, 1998.

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II

Basic Position

The single overlay (alternative 1) has many advantages and should be considered by the Commission along with alternatives 4 and 7.

III

Issues and Positions

Vista's position on the issues in this docket and related discussion are set forth below. Vista's position for publication in the staff recommendation is designated with an asterisk (*).

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

Position: * The single overlay (Alternative 1) has many advantages and should be considered by the Commission along with Alternatives 4 and 7.

Discussion: Vista's position in this issue is supported in the record at TR 252. As noted by Mr. Merrick during his cross examination, Vista does not advocate one of the three plans over the other two, but is equally in favor of Alternatives 1, 4 and 7. [Tr. 253.] This is true even though Alternative 7 would split Vista's territory from the area code serving Orange and Seminole Counties. [Id.] The Commission should not approve Alternative 2, because that alternative would divide Vista's relatively small service territory into tow parts. [Tr. 252]

If the public testimony in this docket is any indication, it appears that most of the customers in the 407 NPA want the same thing – to keep the 407 NPA and have an NPA associated with the Orlando area. The only way for all existing customers in the 407 NPA to avoid an NPA change is Alternative 1, the single overlay. [Tr. 230, Foley.] However, adopting an overlay would require a change to ten digit dialing for local calls [id.], a prospect not favored by some customers. Of

course, even under Alternatives 4 and 7, a large number of customers would be required to use ten digit dialing for calls that are on FPSC-approved EAS or ECS routes. [See LF Exhibits 8, 9 and 10.]

Vista believes that the FPSC should approve the alternative that does the best job preserving the 407 NPA for existing customers, grants the longest period of NPA relief and complies with the INC Guidelines. [Tr. 252] Doing so will advance the public interest by minimizing the long term affect NPA changes have on customers and carriers. [Id.] Alternative 1, 4 and 7 are the best of the alternatives presented to the Commission. One of them should be approved.

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

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

Position: *The dialing patterns for these types of calls depends on the relief plan adopted. Under either alternative 4 or 7, a significant number of EAS/ECS calls that are now seven digit dialed will require ten digit dialing.

Discussion: Please see discussion under Issue No. 1, above, and LF Exhibit Nos. 8, 9 and 10.

DATED this 23rd day of October, 1998.

Handwritten signature of Stephanie W. Redfern in cursive script, appearing to read "Stephanie W. Redfern for".

LBE L. WILLIS

J. JEFFRY WAHLEN

Ausley & McMullen

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ATTORNEYS FOR VISTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 23rd day of October, 1998, to the following:

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