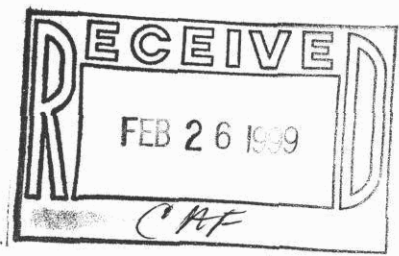


ORIGINAL
SCANNED



CELLULARONE

Wireless One Network

February 25, 1999

Via FAX TO 800-511-0809

for immediate delivery please

Beverlee DeMello
Director
Division of Consumer Affairs
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

AND EXPRESS MAIL

99 FEB 26 10:12
MAIL ROOM

Re: 941 Area Code Split

990184-TP
990223-TL

Dear Mrs. DeMello:

The reporter for the Ft. Myers News Press who authored the enclosed article in todays paper indicated PSC Staff Engineer Levent Ileri told her yesterday afternoon that the "issue" of a 941 Area Code split is to be considered by the Commission on Tuesday, March 1st. (I in turn offered her the information that the Commission generally acts on prior recommendations of its staff. I explained that meant the recommendation was already in print before my Tuesday, March 23, in person discussion of this subject with Mr. Ileri and Staff Attorney William Cox who withheld such information from me.)

THIS COMPLAINT REQUESTS THE COMMISSION TO EITHER POSTPONE CONSIDERATION OF THE ISSUE OR DECIDE TO APPROVE A SPLIT ON AN EQUITABLE BASIS THAT PROVIDES RESIDENTS OF THE GTE AND SPRINT SERVICE AREAS WITHIN THE 941 AREA CODE "EQUAL OPPORTUNITY TO AVOID A NUMBER CHANGE."

Mr. Ileri failed to advise me of the immanence of a Decision to permit an Area Code split on Tuesday, February 23 when I visited him in his office while in Tallahassee to attend a FPSC "workshop" in Docket No. 981444-TP in RE: Number Utilization Study: Investigation Into Number Conservation Measures. My visit with Mr. Ileri was strictly on the subject of a proposed 941 Area Code Split.

My pre-workshop discussion with Mr. Ileri and (subsequently) PSC Staff Attorney William Cox in Mr. Ileri's office was an inquiry into the status of the 941 Area Code split which had been casually mentioned in the regional press in fourth quarter 1998. I was unable to attend a February 5th "workshop" in Sarasota that I became aware of the preceding day. Having learned from the PSC Communications Division office the day of the Sarasota workshop that no hearing was scheduled for Ft. Myers my first question was why no Ft. Myers area workshop had been scheduled. I was dumbfounded to learn that two workshops had been held on the afternoon and evening of some day in December neither Staffer could recollect. I was not surprised that no one attended since I was unaware there had ever been any public notice of the pending "workshop."

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- OTH _____

DOCUMENT NO.
02541-99
2-26-99

Mr. Ileri hinted that a decision to force a second number change on the Ft. Myers LATA was forthcoming since Sprint had agreed to it, and the only public concern about Sprint's proposal to force numbering changes on all the Ft. Myers LATA residents concerned the prospect of ten digit toll free dialing in the interLATA boundary EAS exchanges of Cape Haze (a Sprint exchange) and Englewood (a GTE exchange) and between Sprints Fort Meade exchange and GTE's adjacent (unnamed) exchanges. When I challenged that it can not be a done deal if there has been no public input, Mr Ileri was adamant but Mr Cox conciliatory enough to agree that I could still comment for the record in the "undocketed" matter.

Mr. Ileri was surprised to learn that hands on reprogramming of every analog cellular telephone had to precede the phones ability to recognize the Area Code change. I patiently explained to him and Mr. Cox that we had spent the entire nine (9) month permissive dialing period for the last Area Code conversion (from 813) connecting with our pre-existing customers that needed number changes. The effort on our part required hiring temporary additional help, and consumed man-years of employee labor costing in excess of one million dollars then. Since that time we have acquired the Cellular One Customers in Lee County, and grown them and our pre-existing market ranks so that a new conversion will surely be more costly and labor intense.

I assured Mssrs. Cox and Ileri I (we) would file a complaint against this forced conversion, explaining I felt it inconceivable that we have 24 assigned (dedicated) 941-NNX Codes and had never been asked for input into the costs or consequences of a second Area Code Conversion in four years.

At the "number conservation workshop", I obtained a copy of a January 1999 PSC SPECIAL REPORT titled 941- Area Code Relief. It is almost unfathomable how we, a certificated ALEC and IXC, and a known cellular entity with a PSC authorized Interconnection Agreement with Sprint could be so divorced from any planning or discussion of number changes effecting our six figure number of customers in the Ft. Myers LATA.

Sprint has an obligation to protect its customers from unnecessary expense and inconvenience, just as we do. That is why we have filed this complaint. As one of Sprints largest customers in the Ft. Myers LATA it owes us this protection and ample notice to allow us to take further steps to protect ourselves, AND OUR CUSTOMERS.

HOW DARE THEY SINGULARLY SPEAK FOR THE ACCEPTANCE OF THIS ADDITIONAL COST AND INCONVENIENCE FOR ALL THEIR CUSTOMERS, AND COMPETITORS (WHO ARE THEIR CAPTIVE CUSTOMERS).

(Sprint Spectrum, an all digital wireless competitor in the Ft. Myers LATA can achieve conversion of an Area Code for its customers without physically having possession of the phone).

According to News Press reporter Eileen Kelley, Mr. Levent implied September 1999 would be the end of a permissive dialing period. Such an accelerated date will cause us to make substantial temporary hires to enable the manpower resources necessary to accomplish an Area Code change, and can only detract from our permanent personnels performance of their normal services to the company. Even with massive temporary hiring the number of permanent personnel required to train and supervise the temporary personnel, imports a prospective deterioration in the quality of customer service we customarily provide.

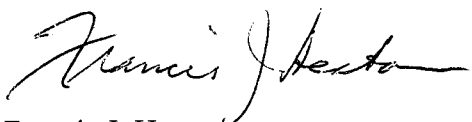
There are near equal populations in the Ft. Myers LATA, and the three GTE counties (Manatee, Polk, and Sarasota). Consequently we perceive there must be near equal numbers of phone lines (and wireless phones) in service, meaning there is really no greatest good for the greatest number type decision to be made. We ask the Commission to consider a simple "lottery" to decide which of the two areas customers must incur the costs and inconvenience of the change. We ask further that you not be sympathetic to the pleas of co-conspirators GTE or Sprint that plans are already underway to achieve this necessary split. Both GTE and Sprint spokespersons at the February 23rd number conservation workshop indicated the time to implement the changes only begins after the decision to make the change is made. Any preparations they made without full and proper input from the public was a waste of resources.

Incidentally, absent my participation in the number conservation workshop it is unlikely the word "wireless" or the impact wireless carriers have on numbering resources would have been mentioned. There was no follow-up discussion to any of the numerous points I raised effecting number conservation and the wireless industry by participants in said workshop.

If a decision was made without the Commissions consent you have the authority to unmake it. You also should feel and express a commitment that "REAL" public input to Area Code split decision making is imperative to your Staff and the ILECS.

COPIES OF THIS COMPLAINT WILL BE DISTRIBUTED TO THE MEDIA ASAP IN ORDER THAT YOU HAVE AN OPPORTUNITY TO SEE THAT OUR COMPLAINT IS NOT MERELY SELF SERVING- AND THAT THE PUBLIC IS AGGREVIED THAT THE COMMISSION STAFF AND INCUMBENT LOCAL EXCHANGE CARRIERS HAVE FAILED TO PROVIDE A VECHICLE FOR SELF EXPRESSION AND "EQUAL OPPORTUNITY" TO AVOID THE COST AND INCONVENIENCE OF A SUBSEQUENT NUMBER CHANGE.

Yours truly,



Francis J. Heaton
Director of Planning and External Affairs

cc: ~~Chairman Joe Garcia~~
Commissioner Susan F. Clark
Commissioner J. Terry Deason
Commissioner E. Leon Jacobs
Commissioner Julia L. Johnson

990184

FAX TRANSMITTAL SHEET

WIRELESS ONE NETWORK L.P.

d/b/a

CELLULAR ONE

2100 Electronics Lane

Fort Myers, Florida 33912

Phone: (941) 489-1600

DATE: 2/26/99

Fax: (941) 489-1622

FROM: Francis J. Heaton, EXT 214

Director of Planning & External Affairs

To: FLORIDA PUBLIC SERVICE COMMISSION

Fax#: 800-511-0809

ENCLOSED IS AN ARTICLE FROM THE FT. MYERS NEWS PRESS OF FEBRUARY 25, 1999 WHICH SHOULD HAVE ACCOMPANIED THE THREE PAGE COMPLAINT WE ASKED BE DISTRIBUTED TO EACH OF THE COMMISSIONERS AND DIRECTOR DeMELLO.

Two additional enclosed news articles from the February 26, 1999 Ft. Myers News Press and the Wall Street Journal should likewise be brought to their attention.

Thanks for taking appropriate action on this matter.



Tips on trapping blue crabs

■ Regulations on crabbing in SW Florida waters. **GO! / 6C**

Sheriff firm on parade mess

■ McDougall will continue to voice anti-abortion views. **L1**

FORT MYERS EDITION

NEWS-PRESS

THURSDAY, FEBRUARY 25, 1999

FORT MYERS, FLORIDA

50 CENTS

Lee to get new area code

Region to usher in 241 number in April

By EILEEN KELLEY
News-Press staff writer

Less than four years after Southwest Floridians had to learn a new area code, it's time to memorize a new one.

Ten counties in the 941 area code, including Lee, Collier and Charlotte, are tentatively scheduled to get the 241 area code in April. Those escaping the change are Sarasota, Manatee and Polk counties.

Phone users will be able to use 941 and 241 until at least September.

"Oh, that's an easy one," said Bob Johnson who lives in south Fort Myers. "241 is a good number -- 241, 941, that's not too hard to remember."

Companies ordering business cards and stationery shouldn't order too much. Southwest Floridians could see another change by 2004, said Levent Ileri, an engineer with the Florida

Public Service Commission.

Southwest Floridians got the 941 code in May 1995.

"It's getting a little sickening having to change again," said Chet Kolar, who lives on Fort Myers Beach.

The area's growing population and dependency on cellular phones, fax machines, computer modems and pagers have virtually exhausted the 7.92 million numbers in the 941 area code.

"We are running out of numbers," Ileri said.

There are less than 200 area

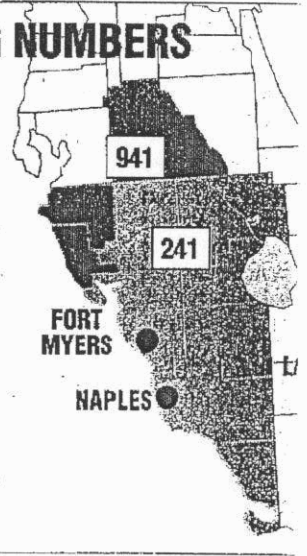
codes left for the nation to fight over, said Ileri. "That's expected to last the next 20 years. Then what?"

Five years ago, there were four area codes in Florida. By the end of the year, after Orlando and Brevard County get a new area code, there will be 13.

More than 200 people attended public hearings in Sarasota and Polk counties to protest a change, which was a major reason those counties kept the 941 code, Ileri said. No one showed up at meetings in Fort Myers and Naples.

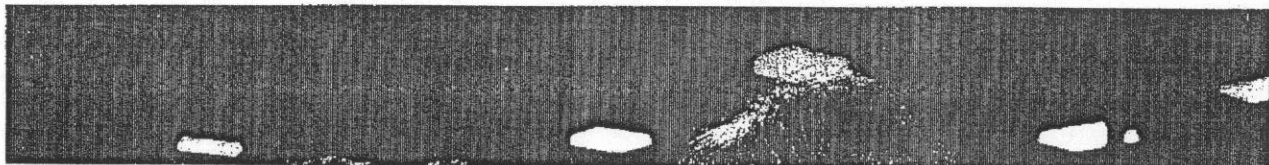
CHANGING NUMBERS

The area code for Hardee, Glades, Charlotte, Lee, Monroe, Collier, Hendry, Highlands, De Soto and Okeechobee counties is scheduled to change to 241 in April. Keeping 941 are Sarasota, Polk and Manatee counties.



Hip-hop star Hill captures 5 awards

IT'S A GIRL!



Boar prais coun

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0002

AREA CODE: Printers pleased, but others unhappy

From Page 1A

Code change sparks outrage

Many callers upset by lack of notice

By ANNE MITCHELL
News-Press staff writer

News that Southwest Florida is to change its area code in April caught many people by surprise, confused some — and angered others.

The state Public Service Commission wants 241 to replace 941 for 10 counties. The number will be decided Tuesday at a PSC meeting in Tallahassee.

That's when the administrator of the North American Numbering Plan announces the new area code, said Kevin Bloom, a regulatory consultant with the commission.

Frank Heaton of Cellular One in Fort Myers said he felt railroaded — not just by the decision, but by the speed with which it could be implemented.

The last time the area code was changed, in March 1996, he said it cost his company more than \$1 million to repro-

Carol Montalbano, a Cape Coral Realtor with Century 21 Birchwood Realty Inc., has \$10,000 worth of brochures and stationery literally on the presses waiting to be printed.

Sprint, the local telephone service provider, was telling callers Thursday that the decision was not final.

To say Sprint had received a lot of calls from customers Thursday "is an understatement," said Mildred Graham, spokeswoman for Sprint in Altamonte Springs.

Heaton questioned the commission's procedure for notifying the public about planned changes after learning that no one showed up at public workshops in Fort Myers Dec. 9 and and Naples Dec. 17.

"We have had no shred of formal notice" Heaton said, calling it unethical.

June McKinney, a senior attorney with the commission, said the legal requirement is to give notice of public meetings in the Florida Administrative Weekly, a state publication, which she said it did.

The agency is not required, as some governmental agencies are, to run paid legal advertisements in local newspapers, she said.

The agency also sends out public service announcements to the media. "It's up to them to publish them. We can't make them," McKinney said.

See AREA CODE / 18A

Bloom said the media in Fort Myers and Naples were notified of the workshops. "We faxed to every media outlet we could identify in the 941 area." Legislators and local government officials also were notified, he said.

Heaton maintains no one knew about the public workshops.

Phil Croke of The Information Network in Fort Myers, a telephone voice mail specialist, said it came as a complete surprise to him, too.

"The reason no one was at

the Fort Myers meeting was that it was not made public," Croke said.

An 18-page list furnished by McKinney of more than a hundred people who got separate notification from the commission's legal department contained one Fort Myers address — an executive with a home building company — and none in Naples.

Heaton, as director of external affairs for Cellular One, said he was at a commission workshop on telephone number conservation in Tallahassee on Tuesday, yet none of the officials he talked with

mentioned the coming change for Southwest Florida.

Heaton faxed a letter to the commission Thursday complaining that procedures were not followed and asking for the opportunity to argue the case.

The proposed new area code is only one digit different from the current one. But it means new cards and stationery for hundreds of firms — and extra business for some.

"It's naturally good news for printers — there's no disputing it," said Michael Goody, at Insta-Print in Fort Myers. He's expecting a boost as people scramble to change 941 to 241

by September. That's when 941 would expire for this area. Instead of waiting until they run out of stationery, people will reorder sooner.

But he doesn't think there will be a stampede for new stationery right away.

"People will realize we have between now and September to make the changes," Goody said.

New business card, letterhead and envelope sets start at around \$150 per 1,000, Goody said — more if the changes involve invoices, purchase orders and brochures, as many do.

"It's just a bullet they have to bite," Goody said. "For small to mid-size companies, these are the essentials of life. And more progressive, serious companies spend that much more on their letterhead because that's their promotional literature."

There's no cheaper option for making the changes on stationery, he said. "It's almost as expensive to get labels to stick over and it never gives a good appearance."

But in the case of brochures, "very attractive labels can be stuck over the existing phone numbers" without spoiling their appearance, he said.

WALL STREET JOURNAL

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FRIDAY, FEBRUARY 26, 1999

Guess Who Decides New Area Codes— Lockheed Martin Does

* * *
It Grants a 'Vanity' Number
To Kennedy Space Center;
It's 321, as in Blast Off

By STEPHANIE N. MEHTA

Staff Reporter of THE WALL STREET JOURNAL

Robert Osband is counting down the days until Brevard County, Fla., gets a new area code.

That's because Mr. Osband, a space-program buff, successfully lobbied for the nation's first "vanity" area code for the communities surrounding the Kennedy Space Center. The digits: 3-2-1.

The new number, which is to be launched later this year, has been embraced by central Florida residents and business owners, despite certain inconveniences, like having to print up new business cards. "We were all secretly rooting for this new area code," says Bruce Buckingham, in a familiar, authoritative voice. Mr. Buckingham, a spokesman for NASA at the Kennedy Space Center, does the countdowns for the Space Shuttle.

Area codes have always been status symbols of sorts. The numbering plan was created by AT&T Corp. in the 1940s as an internal numbering system to help telephone operators route long-distance calls, according to Sheldon Hochheiser, AT&T's corporate historian. Later, the phone giant used the system to allow customers to make long-distance calls without operator assistance.

The cities that got the most calls got the best digits. New York City was given 212 because that was the easiest, fastest code to dial on an old rotary phone. Similarly, Los Angeles ended up with the easy-to-spin 213. Others were consigned to the telephone equivalent of Siberia: Alaskans, for example, had to live with 907.

AT&T successfully oversaw the nation's area codes until the company was broken up by the Justice Department in 1984. The task then shifted to Bellcore, a research-and-development outfit then owned by the Baby Bells. As new competitors began to transform the phone industry, however, some grew increasingly edgy over the role of the local phone companies in the delegation of new area codes.

The Launching of Area Code 321

Continued From First Page

Eventually the process was opened up to competitive bidding. Last year, a unit of Lockheed Martin Corp., the defense contractor, became the administrator of the North American Numbering Plan.

It's not as easy as 1-2-3.

The dozens of local telephone companies that have entered the fray since the telecommunications industry was deregulated in 1996 complicate things. Every competitor, no matter how small, is entitled to request telephone numbers for its customers, starting with a minimum block of 10,000 seven-digit numbers.

One result is a lot of new area codes, dividing the country into ever narrower slices. Last year, 27 new area codes were assigned in North America, including new toll-free codes; so far this year, five new area codes have been assigned. Each area code can accommodate 7.92 million seven-digit phone numbers.

For many suburbanites, a new area code means they can no longer delude themselves or fool other people, though some try. Elizabeth O'Toole of Wilmette, Ill., a Chicago suburb, says her husband retains a cell phone with downtown's 312 area code as a way of clinging to their days of city living.

"You know you're very urbane if you have 312," quips Ms. O'Toole. "If you're 847, forget about it." Wilmette is 847.

An area code is an identification badge. For example, rural residents of northern Virginia were pleased to be assigned a new area code, 540, that distinguishes them from the beltway-bound city slickers of

Please Turn to Page A9, Column 1

Alexandria and Arlington, who retained the 703 area code.

Cultural references are ubiquitous. In the Gen-X movie "Swingers," the protagonist, a struggling comedian who moves to Los Angeles from New York, finally works up the nerve to ask a young woman for her telephone number. "818?" asks one of his hipster cronies, referring to the area code of the Valley. His reply, "310," elicits grunts and nods of approval from his friends. The 818 area code includes Burbank, which is in the San Fernando Valley, while the 310 area code includes Beverly Hills.

Lockheed Martin and the phone companies have tried to ease some the pain associated with new phone numbers. The introduction of the 718 area code in 1985 for residents of Brooklyn, Queens and Staten Island was memorably traumatic to many New Yorkers and abetted Manhattan snobbery because the island retained the 212 area code that had embraced the whole city. The 212 code is once again under attack, but local phone company Bell Atlantic Corp. this time is being subtle about it. The island won't be divided up and set against itself; rather, new customers, starting in July, will be assigned the area code 646.

Whether this will offer comfort remains to be seen. In an episode of the now-departed television show "Seinfeld," Elaine, one of the main characters, tries to give her new phone number with the "646" area code to a would-be suitor.

He balks. "It's a new area code," she insists.

"What area?" he replies. "New Jersey?"

Sometimes an area code can be a badge of honor. Rap-rock fusion artists 2 Skinnee J's pay homage to affordable Brooklyn living in "(718)": "I spent my rent so I vent/ across the bridges to emigrate/ from 212/ to 718." Jamie Denton, an actor who lives in Chatsworth, Calif., says he seeks out

businesses and services in the 818 area code. "If it is 310 or 213, it just means I have to drive an hour to get there."

In the case of Florida's Brevard County, the 321 "blast off" area code had already been reserved for some other, unspecified part of North America. But after listening to pleas that the Brevard County area is sometimes known as the Space Coast, the area code gatekeepers were won over. "People were clearly emotionally involved in wanting this area code," says Ron Connors, director of the numbering plan for Lockheed Martin.

Still, he doesn't want to create a sort of area-code envy. "This was a very special situation," he says. "I shudder to think what the consequences would be if people thought some numbers are more desirable than others."