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March 18, 1999

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850-425-5607

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 RECORDS AND REPORTING

VIA HAND DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: In re: Request for review of proposed number plan relief
for 941 area code, Docket No. 990223-TL

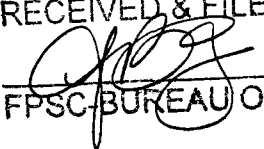
Dear Ms. Bayo:

Pursuant to the Order Establishing Procedure in this docket, enclosed for filing on behalf of Florida Cellular Service, Inc. d/b/a BellSouth Mobility are the original and fifteen (15) copies of a Notice of Filing Direct Testimony of Ronald W. Burleson, and the Direct Testimony of Ronald W. Burleson.

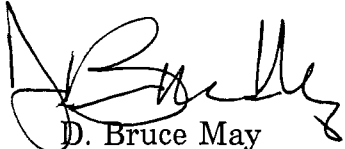
Also enclosed for filing are the original and fifteen (15) copies of Petition for Leave to Intervene by Florida Cellular Service, Inc. d/b/a BellSouth Mobility. A diskette containing these filings in Wordperfect 5.1 format has been provided.

For our records, please acknowledge your receipt of these filings on the enclosed copy of this letter. Thank you for your consideration.

- ACK _____
- AFA _____
- APP _____
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Sincerely,
HOLLAND & KNIGHT LLP


 D. Bruce May

DOCUMENT NUMBER-DATE
 03580 MAR 18 99
 FPSC-RECORDS/REPORTING

DBM:kjg

Enclosure

cc: Levent Ileri
June McKinney
Parties of Record

TAL-149418

**DIRECT TESTIMONY OF
RONALD W. BURLESON**

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 990223-TL

DOCUMENT NUMBER-DATE

03580 MAR 18 2000

CPSC-REGS-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

RONALD W. BURLESON

In re: Request for review of
proposed numbering plan relief
for the 941 area code

Docket No. 990223-TL
Filed March 18, 1999

EDUCATIONAL AND PROFESSIONAL HISTORY

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Q Please state your name and business address.

A Ronald W. Burleson, BellSouth Cellular Corp. 1100 Peachtree Street, Suite 89, Atlanta, Georgia 30309.

Q What is the relationship between BellSouth Cellular Corp. and Florida Cellular Service, Inc. d/b/a BellSouth Mobility, the intervenor in this proceeding?

A BellSouth Cellular Corp. owns, derivatively, 100% of BellSouth Mobility.

Q What is your current position with BellSouth Cellular Corp.?

A I am the Director of External Affairs and have occupied that position for the past six (6) years. I handle legislative and regulatory issues, including NPA issues, in Florida and in a number of other states.

Q Please briefly describe your educational background.

A I attended Louisiana State University from 1971-1975 where I received a Bachelors and Masters Degree in Business Administration.

ISSUE I

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Q Have you had occasion to review the "Florida 941 NPA Relief Plan" as proposed by North American Numbering Plan Administration ("NANPA").

A Yes.

Q Should the Commission approve NANPA's area code relief plan?

A Yes. The Commission should immediately approve the proposed area code split plan without modification. In its letter to the Commission of August 14, 1998, NANPA estimates that available numbers in the area code will be exhausted in the fourth quarter of 1999. It is critical that the Commission immediately implement NANPA's recommendation in order to provide sufficient time for BellSouth Mobility to modify networks, reprogram customer handsets and educate customers of the impending number changes.

Q What other geographic split plans were considered by the industry in addressing the 941 area code exhaust problem?

A The industry identified no other geographic split options as being viable.

Q Should the Commission consider other methods of splitting the 941 area code?

1 A No. NANPA's plan divides the 941 area code along LATA lines and company
2 boundaries. The plan is recommended by the industry and is the only logical way to split
3 the area code without imposing undue delays, costs, and confusion on BellSouth Mobility
4 and our customers.

5
6 Q What would be the impact if the Commission approved an area code split method that
7 materially deviated the plan submitted by the industry?

8
9 A When an area code is split, wireless service providers like BellSouth Mobility bear a
10 burden unlike that of other telecommunications service providers. Not only must a
11 wireless provider contact and educate its customers, it must schedule an appointment with
12 all affected customers and physically reprogram the customer's equipment with a new
13 calling number. BellSouth Mobility has determined that it can implement the required
14 notification and reprogramming of customers' equipment within the critical time frame
15 identified by NANPA, if NANPA's proposal is approved immediately. However, if the
16 Commission orders a different geographic split, such action could significantly expand
17 the number of wireless customers affected and, hence, the number of the telephones that
18 would need to be reprogrammed. Depending on this expanded number, BellSouth
19 Mobility very likely would be unable to reprogram all customer equipment before the
20 projected NPA exhaust date.

21
22 Q Are there other area code relief plans available to address the 941 area code exhaust
23 problem?

24
25

1 A As I have said, BMI supports the area code split plan proposed by NANPA. However,
2 if NANPA's plan is not approved as submitted, BMI would support an all-services
3 overlay relief plan as the only alternative to NANPA's recommended geographic split.
4

5 Q What are the benefits of an all services overlay plan?
6

7 A An all-services overlay is the relief option that has the least impact on consumers, has
8 the least impact on service providers' networks and provides the longest period for relief.
9 In addition, an overlay plan allows a current customer to keep its existing number. This
10 minimizes customer confusion and does not require existing customers to change business
11 cards, stationery and signage. Moreover, an overlay plan can be implemented in a matter
12 of several months which is important in this instance where exhaustion of available
13 numbers in the 941 area code is imminent. The only preparations required for an overlay
14 plan are notification to the public of the new area code, customer education on dialing
15 patterns, and translations in telecommunications carriers' switches so that the new area
16 code will be recognized.
17

18 Q Do you have any final comments?
19

20 A Yes. BellSouth Mobility respectfully urges the Commission to immediately adopt the 941
21 area code split plan recommended by NANPA and the industry.
22
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25 TAL-149401

BEFORE THE PUBLIC SERVICE COMMISSION

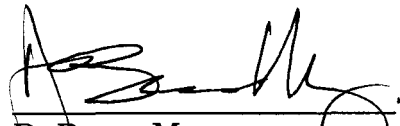
In Re: Request for review of
proposed number plan relief
for 941 area code.

Docket No. 990223-TL
Filed: March 18, 1999

NOTICE OF FILING
DIRECT TESTIMONY OF RONALD W. BURLESON

FLORIDA CELLULAR SERVICE, INC. d/b/a BELLSOUTH MOBILITY
("BellSouth Mobility"), by and through its undersigned counsel, hereby files this Notice
of Filing of the Direct Testimony of Ronald W. Burleson in the above-referenced
proceeding.

Respectfully submitted,




D. Bruce May
HOLLAND & KNIGHT LLP
P. O. Drawer 810
Tallahassee, Florida 32302
(850) 224-7000

Attorneys for Intervenor,
FLORIDA CELLULAR SERVICE, INC.
d/b/a BELLSOUTH MOBILITY

Certificate of Service

We hereby certify that a true and correct copy of the foregoing was furnished by hand-delivery to: Levent Ileri, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, June McKinney, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, GTE Florida Incorporated Ms. Beverly Y. Menard c/o Ms. Margo B. Hammar 106 East College Avenue, Suite 810, Tallahassee, Florida 32301-7704, F. B. (Ben) Poag, P.O. Box 2214 (MS: FLTLHO0107) Tallahassee, Florida 32316-2214, Charles J. Rehwinkel, P.O. Box 2214, MCFLTLHO0107, Tallahassee, Florida 32301, and a copy furnished by U.S. Mail to: Kimberly Caswell, Post Office Box 110, FLTC0007, One Tampa City Center, Tampa, Florida 33601 this 18th day of March, 1999.



D. Bruce May

TAL-149359