

ORIGINAL
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

PETITION FOR LEAVE TO INTERVENE
BY FLORIDA CELLULAR SERVICE, INC. D/B/A
BELLSOUTH MOBILITY

FLORIDA CELLULAR SERVICE, INC. d/b/a BELLSOUTH MOBILITY
("BellSouth Mobility"), pursuant to Rule 25-22.039, Florida Administrative Code,
respectfully requests that the Commission grant BellSouth Mobility leave to intervene
in this proceeding. In support of its petition, BellSouth Mobility states:

Intervenor Information

1. The name of the petitioner and the address of its principal business office
is:

Florida Cellular Service, Inc.
d/b/a BellSouth Mobility
1100 Peachtree Street, N.E.
Suite 910
Atlanta, Georgia 30309-4599

2. Copies of pleadings, notices and other documents in its proceeding directed
to BellSouth Mobility should be served on:

D. Bruce May, Jr., Esq.
Holland & Knight LLP
Post Office Drawer 810
Tallahassee, Florida 32302-0810

and

DOCUMENT NUMBER-DATE

03581 MAR 18 99

REGISTRATION/REPORTING

C. Claiborne Barksdale
Associate General Counsel
BellSouth Cellular Corp.
1100 Peachtree Street, N.E.
Suite 910
Atlanta, Georgia 30309-4599

3. BellSouth Mobility is a licensee for providers of cellular service in a number of areas potentially affected by the proposed 941 area code relief. BellSouth Mobility is owned 100% by BellSouth Cellular Corp.

Substantial Interest Affected

4. The purpose of this docket is to review the North American Numbering Plan Administration ("NANPA") area code relief plan, which is designed to address the imminent exhaustion of available calling numbers in the 941 area code. NANPA proposes that a new area code be created by geographically splitting the existing 941 area code into North and South sectors bounded by the Northwest/Southeast LATA lines and company boundaries. Although BellSouth Mobility supports the NANPA's relief plan, the precise manner in which the 941 area code is geographically divided will affect BellSouth Mobility and its customers, as well as other wireless service providers. Not only does an area code split require BellSouth Mobility to educate its customers regarding the numbering change, it requires BellSouth Mobility to schedule an appointment with each of its affected customers and to physically reprogram its customers' equipment. Thus, the Commission's decision in this docket will directly and materially affect BellSouth Mobility's substantial interests.

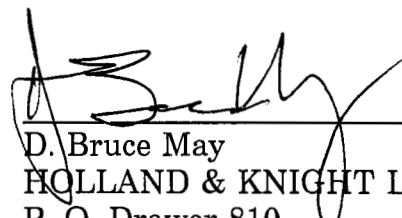
Basic Position

5. BellSouth Mobility supports NANPA's proposed 941 area code relief plan as submitted. Deviation from, or modification to, NANPA's relief plan could materially impede BellSouth Mobility's ability to implement the number changes prior to the time that available numbers are exhausted. Thus, BellSouth Mobility respectfully requests that the Commission immediately approve NANPA's relief plan, without modification. In the event that NANPA's area code relief plan is not approved as submitted, the Commission should adopt an all-services overlay relief plan which can be implemented in a matter of several months and provide immediate area code relief, with minimal confusion to customers.

WHEREFORE, BellSouth Mobility respectfully requests that the Commission:

- a) grant BellSouth Mobility intervenor status in this proceeding as a real party of interest, and
- b) grant such other relief as the Commission deems appropriate.

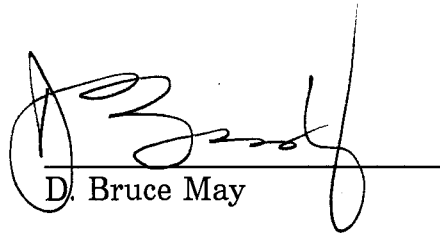
Respectfully submitted,


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