



09-131
ORIGINAL
COUNTY OF CHARLOTTE

OFFICE OF THE COUNTY ATTORNEY

18500 Murdock Circle
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March 18, 1999

RENEE FRANCIS LEE
COUNTY ATTORNEY

VIA FEDERAL EXPRESS

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

Re: Docket No. 990184-TL
Investigation into boundary issues in South Sarasota & North Charlotte
Counties (Englewood area).

Dear Ms. Bayo:

Enclosed are the original and fifteen (15) copies of Charlotte County's Motion to Intervene in the above-referenced docket.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to me at your convenience. Thank you for your assistance in this matter.

ACK _____

AFA _____

APP _____

CAF _____

CMU Barnett

CTR _____

EAG _____

LEG 1 MYB/am

LIN 3 Enclosures

OPC _____ cc: Renee Francis Lee, County Attorney

RCH _____

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WAS _____

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Sincerely,

Martha Young Burton
Assistant County Attorney

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03603 MAR 19 99

FPSC-RECORDS/REPORTING

STATE OF FLORIDA
BEFORE THE PUBLIC SERVICE COMMISSION

ORIGINAL

In re: INVESTIGATION INTO TELEPHONE
EXCHANGE BOUNDARY ISSUES IN SOUTH
SARASOTA AND NORTH CHARLOTTE
COUNTIES (Englewood area).

Docket No. 990184-TL

MOTION TO INTERVENE

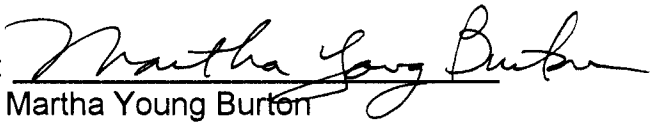
CHARLOTTE COUNTY, FLORIDA, a political subdivision of the State of Florida, pursuant to Rule 25-22.039, Florida Administrative Code, hereby requests the Florida Public Service Commission to grant intervenor status to Charlotte County in the above-referenced proceeding, and in support thereof states that:

1. The proposed telephone exchange boundary between Sarasota County and Charlotte County bifurcates the community of Englewood, which is uniquely divided between both counties.
2. Both Charlotte and Sarasota County governments have worked diligently to promote and maintain a unified sense of community for Englewood area citizens.
3. Local government and private businesses are investing hundreds of thousands of dollars in the community of Englewood to redevelop and revitalize the downtown area for all the citizens of Englewood.
4. Imposing two different area codes in a community the size of Englewood would be unnecessarily cumbersome and confusing to the citizens of Englewood, and costly to the businesses within the bi-county area which depend on the unified Englewood identity for their livelihood.
5. Dividing the community into two different area codes would necessitate ten-digit dialing for some residents to call local schools, medical facilities and commercial businesses.

THEREFORE, for the reasons above stated, Charlotte County, Florida, through its undersigned counsel, respectfully requests the Commission to grant full-party intervenor status to Charlotte County, Florida.

Respectfully submitted this 18th day of March, 1999.

Charlotte County Attorney's Office
Reneé Francis Lee, County Attorney
Martha Young Burton, Assistant County Attorney
18500 Murdock Circle
Port Charlotte, FL 33948-1094
Telephone: (941) 743-1330
FAX: (941) 743-1550

By: 
Martha Young Burton
Assistant County Attorney
Fla. Bar No. 398179

CERTIFICATE OF SERVICE
DOCKET NO. 990184-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 18th day of March, 1999, to the following:

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

June McKinney, Esq.
Division of Legal Services
Public Service Commission
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Charles J. Rehwinkel, Esq.
Mr. F.B. (Ben) Poag
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P. O. Box 2214
Tallahassee, FL 32301

Kimberly Caswell, Esq.
GTE-Florida, Inc.
P. O. Box 110, FLTC0007
One Tampa Center
Tampa, FL 33601

Ms. Beverly Y. Menard
c/o Ms. Margo B. Hammar
GTE Florida Inc.
106 East College Ave., Ste. 810
Tallahassee, FL 32301-7704

Ms. Pam Domres, President
Olde Englewood Village Assn.
285 Dearborn St.
Englewood, FL 34223

Dr. Willard Coy, Vice-Chair
Area Planning Board
244 Mark Twain Lane
Rotunda West, FL 33947

Englewood Water District
P. O. Box 1399
Englewood, FL 34295-1399

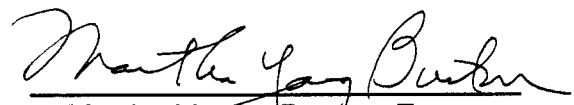
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Martha Young Burton, Esq.