## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for Review of Proposed Numbering Plan Relief for the 941 Area Code Docket No 99-0223-TL

ORIGINAL

## MOTION FOR EXTENSION OF TIME

COMES NOW Wireless One Network L. P. (Wireless One), a cellular carrier serving Charlotte, Collier, Desoto, Hardee, Hendry, Highlands, Glades, and Lee Counties within Sprints Ft. Myers LATA within the 941 NPA, by and through its undersigned representative, and hereby request that it be granted an extension of time within which to pre-file testimony in the above referenced docket. In support hereof, movant states:

- 1. This docket was opened on March 1, 1999, ostensibly as a result of our February 25, 1999, complaint of inadequate notice of the evolution of an Area Code relief plan.
- 2. Wireless One has no record of being advised of the CASR, it's only file correspondence being a March 8, 1999 dated reply to its complaint which was received March 11,1999
- 3. The Case Assignment and Scheduling Record (CASR) for this docket was apparently established March 5, 1999 setting March 18, 1999 as deadline for pre-filing Testimony in this docket. We were unaware of said deadline until March 17, 1999, an inadequate period of time in which to prepare and submit Pre-filed Testimony.
- 4. Through this week the only subsequent matter we received relevant to this proceeding was a Joint Sprint-GTE motion to consolidate Docket Nos. 98-1941-TL, 99-0184-TL, and 99-0223-TL we received on March 16, 1999.
- 5. The late filed materials received this week from Charlotte and Sarasota Counties alerted us to the prospect of obtaining an Extension in Time whereby we might prepare and file the necessary documents to become a full participant in this matter.

- 6. Wireless One will be able to file its prefiled testimony in this docket no later than Monday, March 29, 1999.
- 7. Wireless One believes its testimony is relevant to the cause and effects of NPA exhaust warnings, and possible mitigating measures that could delay the need to implement a 941 Area Code split, and that if and when a split is necessary, that the effected public should have a lengthy permissive dialing interval to reduce the hardship of such change, and that the decision of who is forced to make a change should be based on an accurate evaluation of the greatest good for the greatest number, or lacking such criteria a decision system which gives customers an equal opportunity to avoid a number change.

WHEREFORE, for the hereinabove stated reasons, Wireless One respectfully requests that the Commission grant it an extension of time to March 29, 1999 to pre-file testimony in Docket No. 99-0223- TL.

Respectfully submitted this 26<sup>th</sup> day of March, 1999

Wireless One Network L. P. 2100 Electronics Lane Ft. Myers, Fl 33912 (941)-489-1600

FAX (941)-489-1622

у \_

Francis J. Heaton

Director - External Affairs e-mail fheaton@wirelessonenet.com