

**ORIGINAL**

STATE OF FLORIDA  
BEFORE THE PUBLIC SERVICE COMMISSION

In re: REQUEST FOR REVIEW  
OF PROPOSED NUMBERING  
PLAN RELIEF FOR THE 941 AREA CODE

DOCKET NO. 990223-TL

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WIRELESS ONE NETWORK L. P.'S PRHEARING STATEMENT

(a) Witness

FRANCIS J. HEATON, DIRECTOR - EXTERNAL AFFAIRS  
Addressing the cause of the prospective need for numbering plan relief, the severity of the perceived need for relief, measures that would deter and delay the need for numbering plan relief, the hardship of an expedited permissive dialing period, and the fairness of giving all telecommunications customers, geographically split between the GTE and Sprint service areas within the 941 area code equal opportunity to avoid a number change

(b) Exhibits

None

(c) Basic Position

The Incumbent Local Exchange Company (ILEC) imposed requirement for competing carriers to have telephone numbers rate centered within the local calling area of an ILEC in order for the ILEC customer to be able to call the other carriers customer fee free is the principal cause of the perceived prospective exhaust of available NNX codes for use in the 941 Numbering Plan Area(NPA). There is no prospective number exhaust within the 941 Area Code. The Commission should explore carriers willingness to voluntarily share NNX codes; if necessary the Commission should require the sharing of NNX codes. An expedited permissive dialing period is costly to all customers required to make number changes and inconvenient to them and everyone they do business with. If there is no clear evidence of a split in area code which provides the greatest good for the greatest number the Commission should decide who is forced to incur a number change based of an method which provides all users and equal opportunity to avoid a number change.

DOCUMENT NUMBER-DATE

03979 MAR 29 88

FPSC-RECORDS/REPORTING

(d) Questions of Fact at Issue

1. Is the 941 Area Code running out of NNX codes?
2. Is the 941 Area Code running out of non working numbers?
3. Will Carriers assigned 941 Area Code NNX's voluntarily implement measure to permit more efficient number utilization with the 941 NPA?
4. Can and will the Public Service Commission require Carriers within the 941 NPA to utilize numbers more efficiently?
5. Can voluntarily or Commission ordered measures delay the need for a NPA split?
6. When a determination of the need to split the NPA is reached how long should customers have to implement the change?
7. Lacking evidence of an obvious greatest good for the greatest number proposed NPA split how should the Commission decide which customers are forced to change numbers?

(e) Questions of Law at Issue

1. Are the ILEC's permitted to deny recognition of alternative descriptions of local calling areas by other carriers?
2. Does the Commission have the authority to require alternative number conservation measures that promote more efficient number utilization -and competition

(f) Policy Questions at Issue

1. Must would be competitors to the ILEC's obtain discrete NNX codes rate centered in every ILEC local calling area to be able to let ILEC customers call its customers fee free?
2. Should the Commission recognize the disastrous consequences of the current inefficient assignment(s) of NNX codes, and instigate measures requiring greater utilization of available non- working phone numbers?
3. If/when numbering changes are inevitable how long an implementation(permissive dialing) period should be permitted to serve the public interest.

(g) Stipulated Issues

None that Wireless One is aware of.

(h) Pending Motions or Other Matters

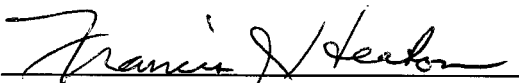
1. Wireless One Network L. P.'s Motion to Intervene dated March 26, 1999
2. Wireless One Network L. P.'s Motion for Extension of Time dated March 26, 1999

(i) Requirements that cannot be complied with and reasons therefore

Controlling date of March 18, 1999 for submitting Prefiled Testimony because Wireless One Network L. P. , a known Interested Person in Docket 990223, only became aware of the extremely expedited schedule in this matter on March 17, 1999 which was inadequate time for preparation and submission of materials as a Party of Record, and only realized it's right to request an Extension of Time as a result of other late filers Motions and (late filed) Prefiled Testimony.

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

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