

MARCH 30, 1999

VIA FAX TO 850-487-1716
& VIA FEDERAL EXPRESS

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

Re: Docket 990223-TL

Dear Ms. Bayo

Enclosed are a MOTION FOR EXTENSION OF TIME, and (an advance copy of) the pre-filed rebuttal testimony of Francis J. Heaton, with known service list on behalf of Wireless One Network L. P., a party in the above-referenced proceeding.

A copy of all these materials will be Federal Expressed to the known service list today.

Your Federal Express copy of these materials will contain an original & fifteen (15) copies of the pre-filed rebuttal testimony.

Please stamp the duplicate copy of this transmittal letter that accompanies the mail delivery of these materials "filed" and return it to me in the enclosed self addressed envelope.

Thank you for your assistance with this filing.

Sincerely,



Francis J. Heaton
Director - External Affairs

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 1
- LIN 3
- OPC _____ cc known service list
(copy enclosed)
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Motion
DOCUMENT NUMBER-DATE
04120 MAR 31 89

Testimony
DOCUMENT NUMBER-DATE
04121 MAR 31 89

99 MAR 31 10 07 20

CERTIFICATE OF SERVICE
DOCKET NO. 99-0223-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 30th day of March, 1999, to the following:

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Respectfully submitted this 30th day of March, 1999.

Wireless One Network, L.P
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E-Mail: fheaton@wirelessonenet.com

By 
Francis J. Heaton
Director of External Affairs

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

MOTION FOR EXTENSION OF TIME
FOR REBUTTAL TESTIMONY

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 rebuttal 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 and March 25, 1999 as deadline for pre-filing Rebuttal Testimony in this docket. We were unaware of said deadlines until March 17, 1999, an inadequate period of time in which to prepare and submit Pre-filed Testimony.
4. Through March 26, 1999 the only subsequent matters we received relevant to this proceeding were 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, and late filed materials received during the week ending March 26, 1999 from Charlotte and Sarasota Counties.
5. The late filed materials of 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.

DOCUMENT NUMBER-DATE

04120 MAR 31 89

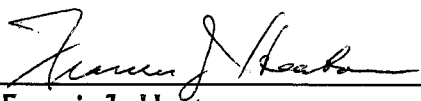
PROD-RECORDS/REPORTING

6. On March 26, 1999 we faxed to the Commission and express mail forwarded a Motion to Intervene, a Motion for Extension in Time, a pre-hearing statement, and the pre-filed Testimony of witness Francis J. Heaton. In addition, we express mailed copies of all these materials to all parties to the proceeding from the known service list.
7. On March 29, 1999 Wireless One received copies of the pre- filed Testimony of GTE witness Charles M Scobie, and Sprint witness Thomas Foley,. Wireless One takes exception to certain portions of the Testimony of GTE witness Scobie, and Sprint witness Foley,
8. Wireless One believes its rebuttal Testimony is relevant to the issues the Commission must consider in the course of its decision making in this proceeding.

WHEREFORE, for the hereinabove stated reasons, Wireless One respectfully requests that the Commission grant it an extension of time to March 31, 1999 to pre-file Rebuttal Testimony in Docket No. 99-0223- TL.

Respectfully submitted this 30th day of March, 1999

Wireless One Network L. P.
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Ft. Myers, Fl 33912
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By 
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