

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Request for Review of Proposed
Numbering Plan Relief for the 941
Area Code

Docket 99-0223-TL

AMENDED PREHEARING STATEMENT
OF SARASOTA COUNTY, FLORIDA

Sarasota County, Florida hereby files its Amended Prehearing Statement. No statements have been deleted. Additional statements appear in bold face for convenience of the Prehearing Officer and the parties.

I. WITNESSES/ SUBJECT MATTER OF TESTIMONY:

- A. Shannon Staub, Chair, Sarasota County Board of County Commissioners – impact of area code change on citizens of Sarasota County; alternatives to the proposed Northwest/Southeast split; objection to the overlay alternative
- B. Gregg D. Feagans, Emergency Management Chief, Emergency Services Business Center, Sarasota County – impact of area code change on emergency management services; impact of multiple area codes in one county on emergency management services; alternatives to the proposed split
- C. William W. Couch, Vice President of Public Affairs, The Greater Sarasota Chamber of Commerce – impact of area code change on businesses in Sarasota County; alternatives to proposed split; objection to overlay alternative
- D. James R. Ewing, Esq., Chairman, Southwest County Alliance of Homeowners Associations – impact of area code change on citizens of Sarasota County; alternatives to the proposed Northwest/Southeast split

Sarasota County reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference on April 1, 1999 or in any other related or potentially consolidated docket.

DOCUMENT NUMBER-DATE

04159 APR-1 8

REG-RECORDS/REPORTING

II. EXHIBITS None

Sarasota County reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section I above. Sarasota County also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

III. BASIC POSITION

Issue No.1:

Frequent changes to the area code have a significant impact on the governmental emergency services as well as on the continued economic development of the County. Sarasota County's current area code was implemented only three (3) years ago. The projected exhaust period for the proposed split is 5.2 years. This limited exhaust period is contrary to the NPA Code Relief Planning & Notification Guidelines, which recommends that relief activity be implemented that prevents customers from having to undergo number changes for 8 to 10 years.

The Board of County Commissioners recommends that the area code service areas be reconfigured as smaller geographic areas so as to lengthen the exhaust period. The overlay alternative is not viable as it creates confusion for the County's significant senior population as well as the tourist industry and effectively undermines the concept of a unified, interactive business community. **Further, in light of the daily interaction of the governments and residents of Sarasota County, Charlotte County and Manatee County, these three counties should have the same area code.**

Issue No. 2:

The Commission should consider (1) any impact area code relief will have on the established EAS in Sarasota County; (2) immediate implementation of number pooling to extend the 941 exhaust period and to eliminate the jeopardy status; (3) issuing future NXX numbers in blocks of 1000 rather than 10,000; (4) maintaining the current area code in the geographic area with the greatest number of affected customers; and (5) assigning area codes dissimilar to the existing one.

IV. QUESTIONS OF FACT:

- A. Question: Whether a split of the current 941 area code service area into more than one additional geographic area code service area, while maintaining a single area code for all of Sarasota County, would alleviate

the adverse impacts of frequent area code changes on businesses, citizens, government and the tourism industry.

Sarasota County's position: A split of the current 941 area code service area into more than one additional geographic area code service area, while maintaining a single area code for all of Sarasota County, would alleviate the adverse impacts of frequent area code changes on businesses, citizens, government and the tourism industry.

Witnesses: Shannon Staub, Gregg D. Feagans, William W. Couch, James R. Ewing, Esq.

- B. Question: Whether other viable alternatives exist for the current 941 area code service area which would address Sarasota County's concerns and be in compliance with the NPA Code Relief Planning Notification Guidelines.

Sarasota County's position: Alternatives exist for the current 941 area code service area which would address Sarasota County's concerns and be in compliance with the NPA Code Relief Planning Notification Guidelines.

Witnesses: Shannon Staub, James R. Ewing, Esq.

- C. Question: Whether multiple area codes within a single county would have an adverse impact on implementation of the county's emergency services.

Sarasota County's position: Multiple area codes within a single county would have an adverse impact on implementation of the county's emergency services.

Witnesses: Gregg D. Feagans

- D. Question: Whether multiple area codes within a single county would have an adverse impact on local businesses.

Sarasota County's position: Multiple area codes within a single county would have an adverse impact on local businesses.

Witness: William W. Couch

V. QUESTIONS OF POLICY:

- A. Question: Whether NANPA should give full consideration to the concerns of local governments and their citizens, and not just to industry, in making their determinations as to area code splits and overlays.

Sarasota County's position: NANPA should give full consideration to the concerns of local governments and their citizens, and not just to industry, in making their determinations as to area code splits and overlays.

Witness: Shannon Staub

VI. STIPULATIONS: None

VII. PENDING MOTIONS OR OTHER RELATED MATTERS:

- A. Motion to Consolidate 99-0183-TL and 99-0184-TL
- B. Motion to Intervene Sarasota County, Charlotte County, BellSouth Mobility
- C. Englewood docket – 99-0184-TL

Respectfully submitted this 1st day of April, 1999.

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