

Law Offices

HOLLAND & K

315 South Calhoun Street
Suite 600
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301

850-224-7000
FAX 850-224-8832
www.hklaw.com

April 7, 1999

ORIGINAL SCANNED

Atlanta	New York
Boca Raton	Northern Virginia
Boston	Orlando
Fort Lauderdale	Providence
Jacksonville	San Francisco
Lakeland	St. Petersburg
Melbourne	Tampa
Mexico City	Washington, D.C.
Miami	West Palm Beach

D. BRUCE MAY, JR.
850-425-5607

Internet Address:
dbmay@hklaw.com

RECORDS AND
REPORTING

99 APR - 7 PM 3:09

RECEIVED--FPSC

VIA HAND DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: In re: Request for review of proposed number plan relief
for 941 area code, Docket No. 990223-TL

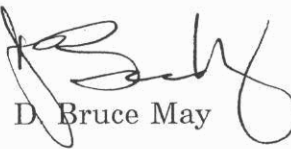
Dear Ms. Bayo:

Enclosed for filing on behalf of Florida Cellular Service, Inc. d/b/a BellSouth Mobility ("BellSouth Mobility") are the original and fifteen (15) copies of BellSouth Mobility's Motion to Substitute Witness, William H. Brown. A diskette containing this filing in Wordperfect 5.1 format has been provided.

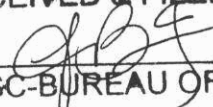
For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP


D. Bruce May

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU lleri
- CTR _____
- EAG _____
- LEG 1 DBM:kjg
- LIN 3 Enclosure
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

~~04490~~ APR-7 99

FPSC-RECORDS/REPORTING

cc: Levent Ileri (via hand-delivery)
June McKinney (via hand-delivery)
Michael Barrett (via hand-delivery)
Parties of Record (via fax)

TAL-150633

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Investigation into
telephone exchange boundary issues in
South Polk County (Fort Meade area).

Docket No. 981941-TL

In re: Investigation into boundary issues
in South Sarasota and North Charlotte
Counties (Englewood area).

Docket No. 990184-TL

In Re: Request for review of
proposed number plan relief
for 941 area code.

Docket No. 990223-TL

Filed: April 6, 1999

**MOTION BY FLORIDA CELLULAR SERVICE, INC. D/B/A BELLSOUTH
MOBILITY TO SUBSTITUTE WITNESS, WILLIAM H. BROWN**

FLORIDA CELLULAR SERVICE, INC. d/b/a BELLSOUTH MOBILITY ("BellSouth Mobility"), by and through its undersigned counsel, respectfully files this Motion to Substitute Witness, William H. Brown, for the purpose of Mr. Brown adopting the pre-filed direct and rebuttal testimony of Ronald W. Burleson in this proceeding. In support of its Motion, BellSouth Mobility states:

1. On March 18, 1999, BellSouth Mobility filed its Petition for Leave in this proceeding. By Order No. PSC-99-0565-PCO-TL, dated March 26, 1999, the Commission granted BellSouth Mobility intervenor party status.

2. In accordance with the Commission's Order Establishing Procedure, BellSouth Mobility timely pre-filed the Direct and Rebuttal Testimony of Mr. Ronald W. Burleson.

DOCUMENT NUMBER-DATE

04490 APR-7 99

FPSC-RECORDS/REPORTING

3. Mr. Burleson, due to circumstances beyond his control, is unable to attend the hearings in this proceeding now scheduled on April 8, 1999, in Sarasota, Florida, and on April 9, 1999, in Fort Myers, Florida.

4. William H. Brown, an employee of BellSouth Mobility, is familiar with the issues in this docket, is prepared to adopt as his own testimony the pre-filed direct and rebuttal testimony of Mr. Burleson, and, with the Commission's authorization, will appear and be tendered for questioning at the evidentiary hearing on April 8, 1999 in Sarasota, Florida.


5. Mr. Brown is Manager of State Regulatory for BellSouth Mobility. His office address is 1100 Peachtree Street, N.E., Suite 809, Atlanta, Georgia. Mr. Brown has a Bachelor of Science Degree in Mathematics from North Georgia College and a Master of Business Administration Degree from the University of Alabama in Birmingham (UAB). He has been employed in the telecommunications industry for thirty (30) years and in the wireless telecommunications industry for sixteen (16) years. Mr. Brown's work experience includes engineering, economic analysis, rate and tariff development and filings, and other regulatory responsibilities.

6. The substitution of Mr. Brown as a witness for Mr. Burleson will not prejudice the rights of the other parties or otherwise delay the Commission's consideration of the issues in this proceeding. The undersigned has contacted the Commission staff and all parties in this matter, and is authorized to represent that the staff and parties have no objection the substitution of Mr. William Brown as a witness for BellSouth Mobility.

WHEREFORE, BellSouth Mobility respectfully requests that the Commission:

- a) authorize the substitution of William H. Brown as a witness for BellSouth Mobility for the purpose of adopting the pre-filed direct and rebuttal testimony of Ronald W. Burleson; and,
- b) grant such other relief as the Commission deems appropriate.

Respectfully submitted,

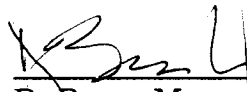


D. Bruce May
HOLLAND & KNIGHT LLP
P. O. Drawer 810
Tallahassee, Florida 32302
(850) 224-7000

Attorneys for Intervenor,
FLORIDA CELLULAR SERVICE, INC.
d/b/a BELLSOUTH MOBILITY

Certificate of Service

We hereby certify that a true and correct copy of the foregoing was furnished by hand-delivery to: Levent Ileri, Michael Barrett and June McKinney, FPSC Staff, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399; GTE Florida Incorporated Ms. Beverly Y. Menard c/o Ms. Margo B. Hammar 106 East College Avenue, Suite 810, Tallahassee, Florida 32301-7704, F. B. (Ben) Poag, P.O. Box 2214 (MS: FLTLHO0107) Tallahassee, Florida 32316-2214, Charles J. Rehwinkel, P.O. Box 2214, (MCFLTLHO0107), Tallahassee, Florida 32301, and Charles J. Beck and a copy furnished by facsimile transmission to: Kimberly Caswell, Post Office Box 110, FLTC0007, One Tampa City Center, Tampa, Florida 33601; Frank J. Heaton, Cellular One, 2100 Electronics Lane, Fort Myers, Florida 33912; Mark Carpanini, Post Office Box 9005, Drawer AT01, Bartow, Florida 33831; James A. Minix, Post Office Box 1000, Bradenton, Florida 34206; Kathleen F. Schneider, 1660 Ringling Boulevard, 2nd Floor, Sarasota, Florida 34236; Martha Young Burton, 18500 Murdock Circle, Port Charlotte, Florida 33948-1094; and, Kimberly D. Wheeler, Morrison & Foerster LLP, 2000 Pennsylvania Avenue, N.W., Washington, D.C., 20006-1888 this 7th day of April, 1999.



D. Bruce May

TAL-150573