

WIRELESS ONE

NETWORK

SCANNED

APRIL 7, 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

RECEIVED
FLORIDA PUBLIC
SERVICE COMMISSION
MAILROOM
99 APR - 8 AM 8:46

Re: Docket 990223-TL

Dear Ms. Bayo

Enclosed are a LETTER OF AUTHORIZATION from Wireless One Network L.P.'s Managing Partner's Executive Vice President and an Affidavit of Qualifications for Francis J. Heaton to act as our Qualified Representative in the above-referenced proceeding.

A copy of all these materials will be Federal Expressed to you today.

Fax copies of these materials are being forwarded Staff Senior Attorney June McKinney, and to the Office of Chairman Garcia, and a duplicate original will be hand delivered for Chairman Garcia's attention at the commencement of the 10 a.m. hearing in this Docket in Sarasota tomorrow, April 8, 1999.

Thank you for your assistance with this filing.

Sincerely,



Francis J. Heaton
Director - External Affairs

cc Sr. Attorney June McKinney via Fax to 850-413-6250
Chairman Joe A. Garcia via Fax to 850-413-6395

DOCUMENT NUMBER-DATE

04518 APR-8 99

APRIL 7, 1999

CHAIRMAN, JOE A. GARCIA
PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399-0850

RE: DOCKET 99-0223 TP
QUALIFIED REPRESENTATIVE

DEAR CHAIRMAN GARCIA;

WIRELESS ONE NETWORK L. P. d/b/a CELLULAR ONE IS THE "A" SIDE CELLULAR LICENSEE IN EIGHT OF THE NINE SPRINT COUNTIES WITHIN THE 941 AREA CODE. WE BELIEVE THAT WE ARE THE SECOND LARGEST HOLDER OF NNX CODES WITHIN THE FT. MYERS LATA, AND HAVE THE SECOND MOST NUMBERS IN SERVICE WITHIN THE LATA, AND AT WORST THE FIFTH MOST NUMBERS ASSIGNED WITHIN THE ENTIRE 941 AREA CODE.

WE BROUGHT THE INITIAL COMPLAINT IN THIS DOCKET BECAUSE WE HAD NOT BEEN AWARE OF SPRINTS INTENTION TO "VOLUNTEER" ALL THE RESIDENTS OF THE FT. MYERS LATA TO UNDERGO A CHANGE IN AREA CODE UNTIL A FEBRUARY 25, 1999 FT. MYERS NEWS PRESS HEADLINE ARTICLE THREATENED A NEW AREA CODE FOR THE FT. MYERS LATA WAS SCHEDULED TO COMMENCE IN APRIL OF THIS YEAR.

SPRINT CAN NOT "VOLUNTEER" TO CHANGE THE AREA CODE OF ITS CUSTOMERS (OF WHICH WE MAY BE THE LARGEST IN THE 941 AREA CODE), ANYMORE THAN WE COULD VOLUNTEER TO CHANGE THAT OF OUR CUSTOMERS.

RATHER, WE RECOGNIZE OUR OBLIGATION AS A CARRIER TO ENDEAVOUR TO PROTECT THE CUSTOMERS FROM BEING FORCED TO CHANGE THEIR AREA CODES, AND FOR US TO TRY TO AVOID THE EXPENSES ASSOCIATED WITH CHANGING AREA CODES WHICH ULTIMATELY MUST BE RECOVERED FROM OUR CUSTOMERS.

AS OUR CELLULAR OPERATIONS ARE NOT REGULATED BY YOUR COMMISSION WITH EXCEPTION FOR OUR INTERCONNECTION AGREEMENTS WITH INCUMBENT LOCAL EXCHANGE COMPANYS WE HAVE HAD LITTLE PREVIOUS NEED FOR LEGAL REPRESENTATION FOR REGULATORY AFFAIRS. THE COUNSEL WHICH REPRESENTED US IN OUR ARBITRATION PROCEEDING BEFORE YOUR COMMISSION, AND HAD CONTINUED REPRESENTING US IN THE CONTEXT OF OUR EFFORT TO OBTAIN ALTERNATE INTERCONNECTION TERMS RECENTLY ADVISED US THEIR FIRM NOW PERCEIVES A CONFLICT OF INTEREST WITH A LOCAL EXCHANGE COMPANY CLIENT IT REPRESENTS.

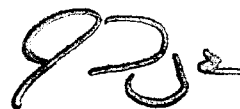
OUR VIEWS ABOUT THE CAUSES AND CURES OF NNX EXHAUST, NECESSITATING THIS PROCEEDING, STRIKE TO THE HEART OF THE CONFLICT, AND THUS SAID COUNSEL WAS UNABLE TO REPRESENT US IN THIS MATTER.

AS OF APRIL 5, 1999 WE HAVE RETAINED NEW LEGAL REPRESENTATION FOR FUTURE PURPOSES, BUT SAID COUNSEL IS UNABLE TO STEP INTO THIS DOCKET AT THIS TIME.

THEREFORE, WE ASK THAT FRANCIS J. HEATON , OUR DIRECTOR-EXTERNAL AFFAIRS, AN EMPLOYEE WITH OVER THIRTY YEARS OF TELECOMMUNICATIONS REGULATORY EXPERIENCE, BE ADMITTED AS OUR QUALIFIED REPRESENTATIVE IN THIS DOCKET.

MR. HEATON IS THE AUTHOR OF OUR INITIAL COMPLAINT IN THIS DOCKET. HE HAS PARTICIPATED AS OUR REPRESENTATIVE IN THE PREHEARING CONFERENCES OF MARCH 8, 1999 AND APRIL 1, 1999. HE HAS REVIEWED THE TESTIMONY OF THE WITNESSES IN THIS DOCKET, AND IS FAMILIAR WITH AND CAPABLE OF REPRESENTING OUR POSITION IN THIS DOCKET.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'JAD', with a small flourish at the end.

JAMES A. DWYER III
EXECUTIVE VICE-PRESIDENT
MANAGING GENERAL PARTNER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET 99-0223-TL

AFFIDAVIT

I, FRANCIS J. HEATON, A WIRELESS ONE NETWORK L. P. EMPLOYEE SERVING AS REGULATORY LIAISON FOR OUR FLORIDA CELLULAR INTERESTS SINCE THEIR INITIAL ACQUISITION TESTIFY AS FOLLOWS:

I HAVE B.S. AND MBA DEGREES FROM SYRACUSE UNIVERSITY AND FAIRLEIGH DICKENSON UNIVERSITY RESPECTIVELY.

I HAVE OVER THIRTY YEARS EXPERIENCE IN TELECOMMUNICATIONS REGULATORY AFFAIRS, INCLUDING POSITIONS OF COMMERCIAL SUPERVISOR, TARIFFS AND RATES WITH THE FORMER CONTINENTAL TELEPHONE COMPANY'S NORTHEAST DIVISION, COMMUNICATIONS RATE ANALYST WITH THE NEW YORK PUBLIC SERVICE COMMISSION, DIRECTOR OF REVENUE REQUIREMENTS, AND SUBSEQUENTLY DIRECTOR-REGULATORY AFFAIRS WITH AIRSIGNAL INTERNATIONAL, AND DIRECTOR-EXTERNAL AFFAIRS WITH INDEPENDENT CELLULAR NETWORK, A PREDECESSOR CELLULAR CARRIER THE CURRENT WIRELESS ONE NETWORK MANAGEMENT OPERATED.

I HAVE SUPERVISED ALL THE STATE REGULATORY WORK REQUIRED OF MY EMPLOYERS CONTINUOUSLY SINCE DEPARTING THE NYSPSC IN 1979. IN ADDITION I HAVE SUPERVISED THE PREPARATION OF FCC CERTIFICATION AND APPLICATIONS FOR WIRELESS AND MICROWAVE LICENSING.

I HAVE CONDUCTED ALL ILEC AND IXC INTERCONNECTION NEGOTIATIONS AND SUPERVISED ALL THE ILEC AND IXC TELECOMMUNICATIONS ORDERING BILLING VERIFICATION ACTIVITY FOR MY EMPLOYER FOR OVER A DECADE, INCLUDING THE DETERMINATION OF RATE CENTERS WE WOULD USE, AND THE ORDERING OF NNX CODES

I PREPARED AND PROCESSED OUR ALTERNATE LOCAL EXCHANGE CARRIER (ALEC) AND INTEREXCHANGE CARRIER (IXC) CERTIFICATION APPLICATIONS WITH THE FLORIDA PUBLIC SERVICE COMMISSION. I SUPERVISED OUR INTERCONNECTION NEGOTIATIONS WITH SPRINT IN FLORIDA AND THE SUBSEQUENT ARBITRATION PROCEEDING.

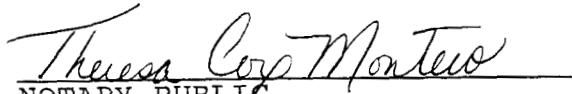
I PREPARED AND SUBMITTED THE INITIAL COMPLAINT IN THIS DOCKET, AND HAVE FOLLOWED ITS RAPID DEVELOPMENT TO THIS TIME, INCLUDING PARTICIPATION IN THE PREHEARING CONFERENCES OF MARCH 8 AND APRIL 1, 1999. I HAVE REVIEWED THE TESTIMONY OF THE WITNESSES IN THIS DOCKET AND THE COMMISSION'S RULES (OF PROCEDURE).

I SEEK TO BE ADMITTED INTO DOCKET 99-0223-TL AS WIRELESS ONE NETWORK L. P.'S QUALIFIED REPRESENTATIVE.



FRANCIS J. HEATON
DIRECTOR-EXTERNAL AFFAIRS
WIRELESS ONE NETWORK L. P.
2100 ELECTRONICS LANE
FT. MYERS, FL. 33912

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS SEVENTH DAY OF APRIL,
1999


NOTARY PUBLIC

