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May 17, 1999

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 990373-TP

Dear Ms. Bayo:

Enclosed for filing is an original and fifteen copies of Joint Motion to Extend Testimony Schedule and Request for Expedited Hearing in the above referenced dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Thomas A. Suter

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cc: Parties of Record

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of a Statewide Emergency)	Docket No. 990373-TP
Area Code Relief Plan)	Filed: May 17, 1999
)	
_____)	

**JOINT MOTION TO EXTEND TESTIMONY SCHEDULE
AND REQUEST FOR EXPEDITED RULING**

AT&T Communications of the Southern States, AT&T Wireless Services, Florida Cellular Service, Inc. d/b/a BellSouth Mobility, BellSouth Telecommunications, Inc., Cox Communications, Florida Cable Telecommunications Association, GTE Florida, Inc., GTE Wireless, Intermedia Communications, Inc., MediaOne, MCI WorldCom, Inc., Network Plus, Inc., Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications, Sprint Corporation, Time Warner AxS of Florida, L.P. d/b/a Time Warner Telecom, and Supra Telecommunications & Information Systems, Inc. (hereinafter, collectively, the "Joint Movants"), pursuant to Rule 28-106.204, F.A.C., hereby respectfully request ("Joint Motion") that the schedule for the filing of testimony and prehearing statements in this docket be extended as indicated herein so as to provide the Joint Movants with additional time to prepare and submit a stipulation that they believe would resolve the issue set forth for hearing in this docket. The Joint Movants further request that this Joint Motion be handled on an expedited basis. In support of this Joint Motion, the Joint Movants state:

1. In response to the North American Numbering Plan Administration's ("NANPA") notification that a number of Florida NPAs are in jeopardy of premature exhaustion, the Florida Public Service Commission ("Commission") issued Order Number PSC-99-0606-PCO-TP and set for hearing the issue of statewide sequential or consecutive distribution of telephone numbers by telephone number code holders as a means of facilitating telephone number conservation.

2. Since the Commission first considered the matters that are the subject of this docket, the Joint Movants have been working to prepare a stipulation that would, they believe, address the issue now set for hearing on July 7 and 8, 1999. However, drafting a stipulation that properly meets the concerns of the Commission and the industry, which by necessity involves many telephone number code holders, has taken more time to prepare than the Commission's fast track schedule for these proceedings allows. Accordingly, the Joint Movants are requesting a brief extension only in the filing of testimony and prehearing statements. It is the sincere hope of the Joint Movants that such an extension will afford them time to conclude and file the stipulation without being distracted by the preparation of direct testimony that is now due on May 21, 1999.

3. The revised schedule proposed by the Joint Movants is as follows:

Direct Testimony, change from May 21 to June 4.
Staff Direct Testimony, change from May 28 to June 11.
Prehearing statements, change from June 3 to June 4.
Rebuttal Testimony, change from June 3 to June 18.

4. While prehearing statements are usually filed with rebuttal testimony or later, the Joint Movants believe that given the limited scope of this proceeding, and the presence of a single issue, parties to the docket will be able to file prehearing statements with their direct testimony. Further, filing prehearing statements at that time will enable the Commission to retain its June 16 prehearing conference date and the July 7 and 8 hearing dates, while still affording the Commission, its Staff, and the parties with sufficient time between June 16 and July 7 to conclude discovery and otherwise prepare for the hearing.

5. The Joint Movants believe that this is an appropriate request that will not adversely affect any party, the Commission, or its Staff and will, hopefully, enable the submission of a stipulation

that would resolve the issue set for hearing and eliminate the need for the scheduled July hearings. Moreover, in the event the Joint Movants are unable to conclude their stipulation prior to May 21st, there will still be adequate time to prepare for the July hearing.

6. In view of the short time remaining until the original direct testimony due date, the Joint Movants respectfully request that this Joint Motion be handled on an expedited basis.

7. The Office of the Public Counsel has been consulted regarding this Joint Motion, and OPC has authorized undersigned counsel to represent that OPC has no objection to this Joint Motion.

8. Undersigned counsel has the permission of each of the Joint Movants indicated above to represent that they join in this Joint Motion and have authorized undersigned counsel to submit this Joint Motion on their collective behalf.

WHEREFORE, the Joint Movants respectfully request that the Commission grant the revised testimony and prehearing statements schedule outlined herein, and that the Commission handle this motion on an expedited basis.

Respectfully submitted, this 17th day of May, 1999 on behalf of the Joint Movants.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery on this 17th day of May, 1999, to the following:

Diana Caldwell
Florida Public Service Commission
Gunter Building, 3rd Floor
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I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by regular U.S. mail on this 17th day of May, 1999, to the following:

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