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June 21, 1999

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
The Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990373-TP - Establishment of a Statewide Emergency Area
Code Relief Plan.

Dear Ms. Bayo,

Enclosed for filing in the above-referenced docket is the original and fifteen
copies of MCI WorldCom's Supplemental Prehearing Statement in the above-referenced
docket.

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 in this matter.

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[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

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- CTR _____
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- OTH _____

Enclosures
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of a Statewide Emergency)	Docket No. 990373-TP
Area Code Relief Plan)	Filed: June 21, 1999
_____)		

SUPPLEMENTAL PREHEARING STATEMENT

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services (hereinafter, collectively "AT&T"), through undersigned counsel, hereby file this supplemental prehearing statement in the above-referenced docket to address the additional legal issues identified at the prehearing conference.

E. ISSUES AND POSITIONS

Legal Issue 1: Does the Commission have the jurisdiction to order carriers to assign telephone numbers sequentially?

AT&T's Position: No. The Telecommunications Act of 1996 provides in section 251(e) that the FCC "shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States." In the Pennsylvania Order (FCC 98-224, 13 FCC Rcd. 19009, September 28, 1998), the FCC retained authority over number administration except for the limited delegation to the states to engage in area code relief for NPAs in jeopardy where the industry is unable to reach consensus. The proposed statewide assignment of telephone numbers on a consecutive order basis is not part of an NPA relief plan, and so would be not authorized.

Legal Issue 2: Does the Commission have the jurisdiction to impose a consecutive number distribution requirement on CMRS providers?

DOCUMENT NUMBER-DATE

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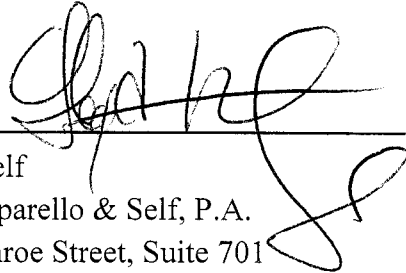
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AT&T's Position: Absent express legal authority, the Commission does not have the authority to impose a consecutive number assignment requirement on CMRS providers since CMRS providers are excluded from the definition of a "telecommunications company" in Section 364.02(12), Florida Statutes.

Legal Issue 3: Is the Commission authorized to impose consecutive number assignment requirements on all NXX code holders in Florida without adopting that requirement through formal rule making pursuant to Chapter 210, Florida Statutes?

AT&T's Position: If the Commission had the authority to require a consecutive number assignment requirement on all code holders, Florida law requires that the Commission would have to comply with the rule promulgation requirements of Chapter 120, Florida Statutes. However, any rule adopted on this subject would have to be in the form of 1000s number block management since this is a less costly alternative that would substantially accomplish the Commission's objectives.

Respectfully submitted,



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States, Inc. and AT&T Wireless Services

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Supplemental Prehearing Statement on behalf of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services in Docket 990373-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 21st day of June, 1999.

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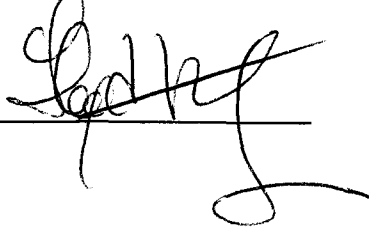
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Floyd R. Self

A handwritten signature in black ink, appearing to read "Floyd R. Self", is written over a horizontal line. The signature is stylized and cursive.