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ORIGINAL

RECORDS AND  
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April 21, 2000

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Michael P. Goggin*  
(Bw)

Michael P. Goggin

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAP \_\_\_\_\_  
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MAS 3  
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**CERTIFICATE OF SERVICE**  
**Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 21<sup>st</sup> day of April, 2000 to the following:

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Nancy B. White 

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of proposed ) Docket No. 990455-TL  
numbering plan relief for the 305/786 )  
area code )  
\_\_\_\_\_ )

In re: Request for review of proposed ) Docket No. 990456-TL  
numbering plan relief for the 561 area )  
code )  
\_\_\_\_\_ )

In re: Request for review of proposed ) Docket No. 990457-TL  
numbering plan relief for the 954 area )  
code )  
\_\_\_\_\_ )

In re: Request for review of proposed ) Docket No. 990517-TL  
numbering plan relief for the 904 area )  
code )  
\_\_\_\_\_ )

Filed: April 21, 2000

**PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-99-2145-PCO-TL) issued on November 1, 1999, hereby submits its Prehearing Statement for Docket Nos. 990455-TL, 990456-TL, 990457-TL and 990517-TL.

**A. Witnesses**

BellSouth proposes to call the following witness to offer testimony on the issues in this docket:

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**Witness**

**Issue(s)**

Stan Greer (Direct and Rebuttal)

All

Mr. Greer has adopted the Direct Testimony filed by Daniel Baeza in this matter. If any party should object to Mr. Greer's adoption of Mr. Baeza's testimony, BellSouth reserves the right to call Mr. Baeza to testify. In addition, BellSouth 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 to be held on May 11, 2000. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

**B. Exhibits**

Stan L. Greer

Exhibit SLG-1

A table to illustrate changes in dialing patterns on BellSouth Local Routes under the various NPA relief alternatives.

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth 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.

**C. Statement of Basic Position**

BellSouth supports the consensus recommendations for relief in each of the NPA's in these consolidated dockets that resulted from meetings of the telecommunications industry in Florida. The consensus recommendation in the 904, 561 and 954 NPAs was to relieve the impending exhaust via an overlay, and in the 305/786 NPA, to extend the existing overlay to the Keys area. The overlay approach would not require customer number changes (and the resulting expense and inconvenience to customers). In addition, an overlay would result in simpler dialing patterns than the other alternatives and could be implemented more quickly and easily.

**D. BellSouth's Position on the Issues**

**Issue 1a: Should the Commission approve the industry's consensus relief plans for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

**Position: A) Yes. In the 305/786 NPA, the Commission should order that the existing overlay be extended to the Keys area.**

- B) Yes. The Commission should order an overlay for the 561 NPA.**
- C) Yes. The Commission should order an overlay for the 954 NPA.**
- D) Yes. The Commission should order an overlay for the 904 NPA.**

**Issue 1b: If the Commission does not approve the industry's consensus relief plan, what alternative plan should be approved for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**



Position: BellSouth believes that the industry's consensus relief plans for each of the four NPAs at issue will impose the least cost and inconvenience on customers and carriers alike. Accordingly, BellSouth does not believe that the Commission should approve any of the other alternatives. BellSouth does not have sufficient information on all of the remaining alternatives to determine which of them would be a next best alternative if the Commission were to decide to reject the consensus relief plans. BellSouth reserves the right to supplement its position on this issue when additional information becomes available.

**Issue 2a: What number conservation measure(s), if any, should be implemented for the following area codes:**

- A) 305/786
- B) 561
- C) 954
- D) 904

**Position:** BellSouth supports the proposal recently submitted by the Florida Code Holders for number pooling in the 954, 561 and 904 area codes. In addition, BellSouth supports the number conservation measures (except for the number pooling measures) adopted by the Commission pursuant to its March 16 PAA in Docket 981444-TP. BellSouth believes that rate center consolidation (RCC) may prove to be an effective number conservation measure in appropriate circumstances and would voluntarily agree to implement it in such circumstances provided it can be accomplished in a revenue and cost neutral manner. BellSouth believes that RCC would effect a change in its rates and that the Commission therefore lacks the authority to order it. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission Staff to examine number conservation measures before adopting any additional measures.

**Issue 2b: If conservation measures are to be implemented, when**

**should they be implemented?**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

Position: BellSouth supports the proposal recently submitted by the Florida Code Holders for number pooling in the 954, 561 and 904 area codes. In addition, BellSouth supports the number conservation measures (except for the number pooling measures) adopted by the Commission pursuant to its March 16 PAA in Docket 981444-TP. BellSouth believes that rate center consolidation (RCC) may prove to be an effective number conservation measure in appropriate circumstances and would voluntarily agree to implement it in such circumstances provided it can be accomplished in a revenue and cost neutral manner. BellSouth believes that RCC would effect a change in its rates and that the Commission therefore lacks the authority to order it. BellSouth believes that the Commission should consider the recommendations of the task force set up by the Commission Staff to examine number conservation measures before adopting any additional measures.

**Issue 3: What should be the dialing pattern for local, toll, EAS, and ECS calls for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

**Position:** Under the consensus relief plans, all local calls would require 10 digit dialing. Competitive ECS and toll calling would require 1+10 digit dialing.

**Issue 4: What is the appropriate relief plan implementation schedule for the following area codes:**

- A) 305/786**
- B) 561**
- C) 954**
- D) 904**

**Position:** Due to the number of area code reliefs being considered in the consolidated hearing and the uncertainty of the potential impact of any number conservation measure implemented in the various area codes, BellSouth recommends that the FPSC coordinate with the Industry and NANPA when establishing the permissive and mandatory dialing periods. There are limitations on how many NPAs can be converted at once. BellSouth believes it may be beneficial to establish an

implementation meeting in the future to set the specific permissive and mandatory dialing periods once the imminent exhaust is determined.

**E. Stipulations**

None.

**F. Pending Motions**

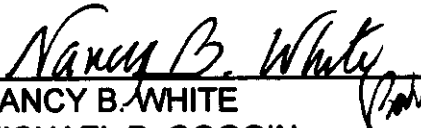
The Commission Staff has filed a motion for a protective order regarding some discovery requests BellSouth served to gather information about NPA relief alternatives developed and proposed by Staff. BellSouth believes that this issue has been resolved, and BellSouth has withdrawn its discovery requests. BellSouth is aware of no other pending motions in this matter.


**G. Other Requirements**

None.

Respectfully submitted this 21st day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
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