

B. WITNESSES

Witness

Richard Guepe
(Direct and Rebuttal Testimony)

Issues

1a, 1b, 2a, 2b, 3, and 4

C. EXHIBITS

AT&T does not intend to present any exhibits, but reserves the right to introduce exhibits, if necessary, as may be required by cross examination, later filed testimony, completion of discovery, or new issues identified at the prehearing conference.

D. BASIC POSITION

The Commission should adopt the consensus relief plan for each of the NPAs that are subject to area code relief in these consolidated dockets.

E. ISSUES AND POSITIONS

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

AT&T's Position: The Commission should approve the consensus relief plan (identified as Alternative #1 for each NPA in the Staff exhibit) for an overlay for each of the respective NPAs.

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

A) 305/786

B) 561

C) 954

D) 904

AT&T's Position: The industry consensus relief plan for each NPA represents the best means of relief, and each should be adopted. In the event the Commission rejects the consensus relief plan, the Commission should adopt the following:

A. In the 305/786 NPAs, there is no other reasonable alternative.

B. In the 561 NPA, we recommend Alternative 2 with Area A retaining 561.

C. In the 954 NPA, there is no other reasonable alternative.

D. In the 904 NPA, our first recommended alternative would be the concentrated growth overlay identified as Alternative #2. If that were not adopted, we would

recommend Alternatives #3 or #5, with Area A in either alternative retaining the 904 code.

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

AT&T's Position: The Commission should rely upon the number conservation measures developed and implemented in Docket No. 981444-TP, consistent with the policies and rules recently set forth in FCC Order No. 00-104, released March 31, 2000. Such measures should immediately include adoption of the Revised Plan for number pooling submitted in Docket No. 981444-TP on April 13, 2000 (as amended) and implementation of the non-protested provisions of FPSC Order No. PSC-00-0543-PAA-TP, issued March 16, 2000. Also in Docket No. 981444-TP, the Commission should continue to work on number pooling plans for the other NPAs in Florida, rate center consolidation, and those other measures delegated by the FCC.

2b. If the conservation measures are to be implemented, when should they be implemented?

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

AT&T's Position: Number pooling should be implemented pursuant to the implementation schedule and requirements contained within the Revised Plan (as amended) for number pooling submitted on April 13, 2000, in Docket No. 981444-TP. The non-protested provisions of the FPSC Order No. PSC-00-0543-PAA-TP should continue to be implemented now. The remaining number conservation measures should be worked on through the process previously agreed to for Docket No. 981444-TP.

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

AT&T's Position: For each relief plan utilizing an overlay, 10 digit dialing should be required for all landline local calls, EAS calls, and ECS calls, with 1+ 10 digit dialing being required for all landline toll calls. These actions would be consistent with prior Commission decisions and

the FCC's requirements.

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

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

AT&T's Position: Each relief plan should be implemented as stated in the industry recommendation, but in no event later than the anticipated exhaust date for each NPA. If the Revised Plan for number pooling is adopted, number pooling in the 561, 954, and 904 NPAs combined with the recall of unused and reserved codes may serve to extend the current projected exhaust dates for these three NPAs. In such a situation, the start of the area code relief implementation schedule for these three NPAs may be postponed if there is a credible, reasonable basis to extend such that the new schedule would use the same implementation schedule beginning only at a later date.

F. PENDING MOTIONS

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. do not have any currently pending motions.

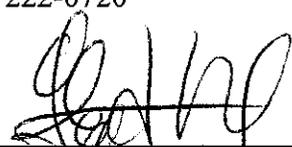
G. REQUIREMENTS THAT CANNOT BE COMPLIED WITH

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc.
know of no requirements that cannot be complied with.

Dated this 21st day of April, 2000.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720



FLOYD R. SELF, ESQ.

Attorneys for AT&T Communications of the Southern
States, Inc. and AT&T Wireless Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. in Docket Nos. 990455-TL, 990456-TL, 990457-TL, and 990517-TL has been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 21st day of April, 2000.

Beth Keating, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Lee Fordham, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Tim Vaccaro, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Donna Clemons, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Angela Green, Esq.
Florida Public Telecommunications
Association
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Charles J. Rehwinkel
Susan Masterton
F. Ben Poag
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Telecommunications Association, Inc.
310 North Monroe St.
Tallahassee, FL 32301

Donna McNulty, Esq.
MCI WorldCom
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303

Mr. Richard H. Brashear
ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060-3357

Ms. Gwen Azama-Edwards
City of Daytona Beach
P.O. Box 2451
Daytona Beach, FL 32115-2451

Mr. Fritz Behring
City of Deltona
P.O. Box 5550
Deltona, FL 32728-5550

Carole Baris
James Fowler
Fowler, Barice Law Firm
28 W. Central Blvd.
Orlando, FL 32801

Bruce May, Esq.
Holland & Knight
P.O. Drawer 810
Tallahassee, FL 32302

Mr. Bob Koslow
News-Journal Corp.
Southwest Volusia Bureau
1107 Saxon Blvd.
Orange City, FL 32763

Ms. Deborah L. Nobles
Northeast Florida Telephone Company, Inc.
P.O. Box 485
Macclenny, FL 32063-0485

Mr. Robert Weiss
Volusia County
123 W. Indiana Ave. Room #205
DeLand, FL 32720

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Harriet Eudy
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Marsha Rule, Esq.
Tracy Hatch, Esq.
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Mr. D. Wayne Milby
Lockheed Martin IMS
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005

Omnipoint Communications
600 Ansin Blvd.
Hallandale, FL 33009

Kimberly D. Wheeler
Morrison & Foerster Law Firm
2000 Pennsylvania Avenue, NW
Washington, DC 20006-1888

Joe Assenzo
Sprint PSC
Legal Department
49000 Main Street, 11th Floor
Kansas City, MO 64112

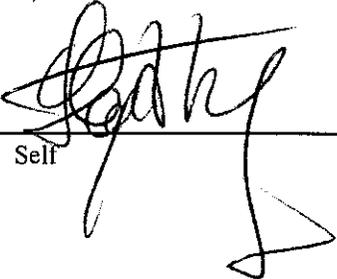
Mr. Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Gloria Johnson
Associate General Counsel
BellSouth Cellular Corp.
1100 Peachtree Street, N.E., Suite 910
Atlanta, GA 30309-4599

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Charles Beck, Esq.
Office of Public Counsel
111 West Madison St., Room 812
Tallahassee, FL 32399-1400

Daniel H. Thompson
Berger Davis & Singerman
215 S. Monroe St., Suite 705
Tallahassee, FL 32301


Floyd R. Self