

ORIGINAL



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April 26, 1999

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

ORIGINAL

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RECORDS AND REPORTING

Re: Docket No. 990517-TL Sprint's Motion to Accept
Late-Filed Prehearing Statement and Sprint's Prehearing
Statement

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of Sprint's
Communications Company Limited Partnership, Sprint-Florida
Incorporated and Sprint PCS, Motion to Accept Late-Filed Prehearing
Statement and Sprint's Prehearing Statement.

Please acknowledge receipt and filing of the above by stamping the
duplicate copy of this letter and returning the same to this writer.

Sincerely,

Charles J. Rehwinkel

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- APP _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of)
Proposed numbering plan relief)
for the 904 area code.)

DOCKET NO. 990517-TL

FILED: April 26, 2000

MOTION TO ACCEPT LATE-FILED PREHEARING STATEMENT

COMES NOW, Sprint and files this Motion requesting that the Commission accept the late filing of the Prehearing Statement of Sprint. In support, Sprint states as follows:

1. Sprint requests that the Commission accept the Prehearing Statement of Sprint. The Order on Prehearing Procedure required that Direct Testimony be filed with the Commission by Friday April 21, 2000. Undersigned counsel overlooked the due date and did not realize that the due date had come and gone until receiving the Staff's Prehearing Statement on Monday.

2. Due to heavy workload, Sprint was unable to complete preparation of the Prehearing Statement until Wednesday and has submitted it concurrent with this Motion. Sprint submits that no party will be materially harmed by the delay in filing. Furthermore, the interests of justice will be not served if Sprint's participation in this docket is not allowed or is impaired

by the absence of a Prehearing Statement.

WHEREFORE, for the above reasons, Sprint requests that the Commission accept the late filing of Sprint's Prehearing statement.

RESPECTFULLY SUBMITTED this 26th day of April 2000.

A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", is written over a horizontal line.

Charles J. Rehwinkel
Susan Masterton
P.O. Box 2214
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ATTORNEYS FOR SPRINT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of)
Proposed numbering plan)
relief for the 904 area code.)

DOCKET NO. 990517-TL

FILED: April 26, 2000

SPRINT'S PREHEARING STATEMENT

Sprint-Florida, Inc. and Sprint Communications Company Limited Partnership, Sprint PCS (collectively "Sprint"), pursuant to Order No. PSC-99-2145-TL, submits the following Prehearing Statement:

A. WITNESSES:

Sprint will sponsor the direct testimony of Scott Ludwikowski, who will testify on all dockets and the rebuttal testimony of Sandra Khazraee (904 NPA docket only). Sprint reserves the right to file responsive testimony after review of Staff's direct testimony.

B. EXHIBITS:

Sprint has identified no pre-filed exhibits at this time.

C. BASIC POSITION:

Sprint supports the industry consensus alternatives for all NPAs. As demonstrated in the testimony of Sandra Khazraee, Sprint does not support alternatives 4, 6 & 16B (904 NPA).

D-G: ISSUES & POSITIONS:

ISSUE 1- A: Should the Commission approve the industry's consensus relief plans for the following area codes:

(A) - (D):

Sprint Position: Yes.

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

(A) - (C):

Sprint Position: No Position at this time.

(D):

Sprint Position: Sprint has no position on the alternative plans for the 904 NPA, except that, as proposed, Alternatives 4, 6 & 16B should not be adopted for the reasons stated in witness Khazraee's testimony.

ISSUE 2-A: What number conservation measure(s), if any, should be implemented for the following area codes:

(A) - (D):

Sprint Position: The Commission should consider implementing thousands block number pooling trials consistent with the revised plan submitted by the Joint Petitioners on April 11, 2000 in Docket No. 981444-TP.

ISSUE 2-B: If conservation measures are to be implemented, when should they be implemented?

Sprint Position: The Commission should consider implementing thousands block number pooling trials on a time frame consistent with the revised plan submitted by the Joint Petitioners on April 11, 2000 in Docket No. 981444-TP.

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

Sprint Position: If the industry recommendation (Alternative 1) is adopted, 10 digit dialing would be required for local, EAS and ECS calls and 1 plus 10 digit dialing would be required for toll calls. For geographic splits, dialing patterns should be unaffected except for interNPA calls which should be dialed on a 10- or 11- digit basis as appropriate.

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

A - D:

Sprint Position: The Commission should establish an implementation schedule consistent with the overlay ordered in Docket No. 980671-TL (407 NPA) or the geographic split ordered in Docket No. 990223-TL. In no event should area code relief occur after the last NXX code in the existing area code is assigned.

H. **STIPULATIONS:** The company is not aware of any pending stipulations at this time.

I. PENDING MOTIONS: Sprint has filed a Motion to accept Late-Filed Prehearing Statement.

J. COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE: The company does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 26th day of April, 2000.



Charles J. Rehwinkel
Susan Masterton
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ATTORNEYS FOR SPRINT

CERTIFICATE OF SERVICE

DOCKET NO. 981444-TL, 990455-TL, 990456-TL, 990457-TL and 990517-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 26th day of April, 2000 to the following:

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