

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of) Docket No. 990455-TL
proposed numbering plan relief)
for the 305/786 area code - Dade)
County and Monroe County/Keys)
Region.)
_____)

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

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

In re: Request for review of) Docket No. 990517-TL
proposed numbering plan relief)
for the 904 area code.)
_____)
Filed: April 27, 2000

OMNIPOINT'S PREHEARING STATEMENT

Omnipoint Communications MB Operations, LLC d/b/a Omnipoint Communications ("Omnipoint"), now known as Voicestream Wireless, by and through its undersigned counsel, and pursuant to Order No. PSC-99-2145-PCO-TL issued November 1, 1999, hereby files the following Prehearing Statement in the above-referenced dockets.

A. Witnesses

Omnipoint does not intend to call a witness in this proceeding.

B. Exhibits

Omnipoint has not prefiled any exhibits in this proceeding. Omnipoint reserves the right to use exhibits for purposes of cross-examination at the final hearing.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

C. Basic Position

Omnipoint is a personal communications service ("PCS") provider licensed by the Federal Communications Commission to operate in the State of Florida. Omnipoint began offering PCS in the South Florida area in March of 1998, and currently provides facilities-based wireless communications services in Monroe, Dade, Broward and Palm Beach Counties. Omnipoint is a current NXX codeholder in the 305, 954 and 561 area codes.

Omnipoint generally supports the use of an overlay for area code relief, including wireless only overlays. With an overlay, no existing customers, wireline or wireless, are required to change their area code or telephone number. For wireless carriers, which are not limited to assigning telephone numbers from within the customer's "home" rate center, the existing inventory of numbers can be efficiently utilized to meet new customer demand until the resources are depleted. From a networking perspective, overlays are easier to implement because there is no need to reprogram existing NXX switch translations.

Omnipoint also maintains that the availability of number resources will be optimized by consolidation of wireline rate centers which will reduce the demands on existing area codes by new entrants and will maximize the efficient utilization of existing numbering resources among existing carriers. Wireless carriers typically obtain numbering resources in approximately one out of ten rate centers and use this supply to serve customers throughout their serving area. Rate center consolidation would implement a similar method of number efficiency and conservation for wireline carriers.

D. Issues of Fact, Law and Policy

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

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint preliminarily supports the industry's consensus relief plan for the 954 area code.

Issue 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

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint preliminarily supports a relief plan for the 305/786 area codes which would implement an overlay, place priority on achieving a maximum exhaust period for Dade County over Monroe County, and include implementation of rate center consolidation .

- B) 561

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint preliminarily supports the relief plan outlined as Alternative 11 in Exhibit No. LF-3 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 561 area code.

- C) 954

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint preliminarily supports the relief plan outlined as Alternative 3 in Exhibit No. LF-4 attached to the prefiled direct testimony of staff witness Lennie Fulwood for the 954 area code, in the event the Commission does not approve the industry consensus relief plan.

- D) 904

Omnipoint: No position.

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

A) 305/786

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Dade and Monroe County areas.

B) 561

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Palm Beach County and surrounding areas comprising the 561 area code.

C) 954

Omnipoint: Omnipoint supports implementation of rate center consolidation for the Broward County area comprising the 954 area code.

D) 904

Omnipoint: No position.

Issue 2b: If conservation measures are to be implemented, when should they be implemented?

A) 305/786

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

B) 561

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

C) 954

Omnipoint: Subject to consideration of all evidence presented at the final hearing, Omnipoint's current position is that the time frame for implementation of rate center consolidation remains at issue and subject to a recommendation by the industry rate center consolidation working group established in Docket No. 981444-TP.

D) 904

Omnipoint: No position.

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

A) 305/786

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

B) 561

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

C) 954

Omnipoint: Omnipoint supports 10-digit dialing for local/EAS/ECS calls consistent with implementation of an overlay.

D) 904

Omnipoint: No position.

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

A) 305/786

Omnipoint: No position.

B) 561

Omnipoint: No position.

C) 954

Omnipoint: No position.

D) 904

Omnipoint: No position.

E. Stipulated Issues

Omnipoint is not aware of any issues that have been stipulated at this time.

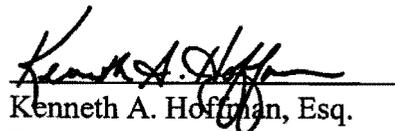
F. Pending Matters

On April 21, 2000, Omnipoint filed a Motion for Extension of Time to File Prehearing Statement. That motion remains pending. In addition, Issues 2a and 2b may be affected by the Commission's decision in response to the Joint Petitioners' Offer of Settlement to resolve the number pooling implementation protest filed in Docket No. 981444-TP. That decision is currently scheduled for a Special Agenda Conference on May 5, 2000.

G. Requirements that cannot be Complied With

Omnipoint is aware of no procedural requirements that cannot be complied with at this time.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Omnipoint Communications' Prehearing Statement was furnished by U. S. Mail this 27th day of April, 2000, to the following:

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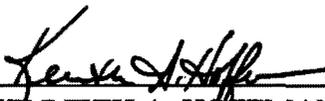
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