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November 9, 2000

ORIGINAL

RECORDS AND
REPORTING

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BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

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

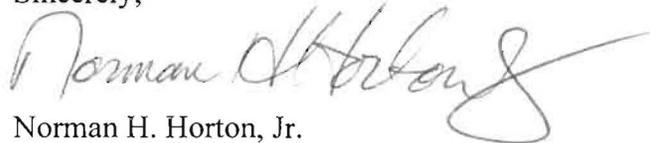
Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of Joint Petitioners Motion to Accept Petition for Reconsideration as Timely Filed in the above referenced dockets.

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 with this filing.

Sincerely,



Norman H. Horton, Jr.

NHH/amb

Enclosure

cc: Parties of Record

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DOCUMENT NUMBER-DATE

14540 NOV-98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Review of Proposed Numbering Plan Relief for the 305/786 Area Code - Dade County and Monroe County/Keys Region))))) _____	Docket No. 990455-TL
In re: Review of Proposed Numbering Plan Relief for the 561 Area Code)) _____	Docket No. 990456-TP
In re: BellSouth Telecommunications, Inc.'s Request for Review of Proposed Numbering Plan Relief for the 954 Area Code)) _____	Docket No. 990457-TL
In re: Review of Proposed Numbering Plan Relief for the 904 Area Code)) _____	Docket No. 990517-TP Filed: November 9, 2000

**MOTION TO ACCEPT PETITION FOR
RECONSIDERATION AS TIMELY FILED**

COMES NOW, Joint Petitioners as identified in the Joint Motion for Reconsideration and Request for Hearing on Proposed Agency Action filed on November 7, 2000, hereby submit this Motion to Accept the Petition for Reconsideration as Having Been Timely Filed. As basis therefore the Joint Petitioners would state:

1. On October 20, 2000, the Commission issued Order No. PSC-00-1937-PAA-TL addressing and disposing of issues related to numbering plans and numbering plan relief in Florida. Portions of the Order were issued as Proposed Agency Action, while the majority of the Order was issued as a Final Order of the Commission. Petitions for Reconsideration on the

portions of the Order which were final agency action were due November 6, 2000. A Joint Motion for Reconsideration was prepared and served on Parties and Staff but despite efforts to file the Petition with the Commission November 6th, it was not stamped as filed until November 7th. The Joint Motion also included a Petition for Formal Hearing on the Proposed Agency Action portion of the Order regarding code sharing. This Petition is not due until November 13, 2000, and this is, without question, timely filed.

2. As has been the case in this proceeding, the Parties concluded that it would be in the best interest of all participants and it would facilitate disposition of issues to file a Joint Motion for Reconsideration rather than several separate motions. The Parties coordinated and exchanged issues and discussion to be included in a Joint Motion for Reconsideration and the document was compiled for filing on November 6th. In the process of making copies to be filed at the Commission and with parties, technical difficulties were encountered which delayed the completion of the copying process. A copy machine from another office was utilized and the copies were completed. Upon completion of the process, a messenger was dispatched with sufficient copies for filing at the Public Service Commission. During the time that these difficulties were encountered, Counsel for the Joint Petitioners communicated with Commission Staff and with the Director of Records and Reporting to alert them to the problem and seek their assistance. The messenger arrived at the Public Service Commission with the copies for filing but found the doors to the Office of Records and Reporting locked. The messenger recorded the time as 5:03 p.m. on November 6th. With the office locked, the messenger returned the copies and they were filed with the Commission November 7, 2000, at 8:00 in the morning. The

service copies for the parties were put in the mail on November 6, 2000 and the Commission Staff was hand delivered a copy of the Petition for Reconsideration on November 6, 2000.

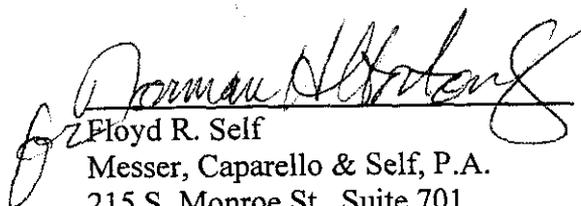
3. Joint Petitioners believe that it would be appropriate to accept the Joint Motion for Reconsideration as having been timely submitted. The Division of Records and Reporting was aware of the situation and was aware that a Motion was to be filed. Moreover, a copy of the Motion was in the hands of Commission Staff on November 6th and copies for parties were in the mail on the 6th. Under the circumstances the Joint Petitioners believe it to be reasonable for the Commission to accept the joint motion or alternatively to grant reconsideration on their own motion and consider those points that are raised in the Joint Motion for Reconsideration.

4. The issues and decisions in these dockets are important to both the citizens and the Joint Petitioners and they are issues which the Commission has the expertise to decide. The Joint Motion raises several points for reconsideration which are important to the process and to reject the Joint Motion or alternatively, to reject reconsideration on its own, leaves the decision on these issues in the hands of the Courts.

5. The Joint Petitioners would prefer to have the points which they had raised considered and disposed of by the Commission and believe that it would be appropriate to do so under the circumstances outlined herein. However, since the Joint Petitioners have a limited time within which to invoke the jurisdiction of the Court, Joint Petitioners request a decision on this Motion as expeditiously as possible.

6. Accordingly, Joint Petitioners request that the Commission accept the Joint Motion for Reconsideration as having been timely filed or alternatively determine to reconsider the points raised in the Joint Motion Petition on its own motion.

Respectfully submitted on behalf of the Joint Petitioners,

A handwritten signature in cursive script, appearing to read "Norman D. Botwin". The signature is written in black ink and is positioned above the typed name of the signatory.

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Motion to Accept Petition for Reconsideration 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 9th day of November, 2000.

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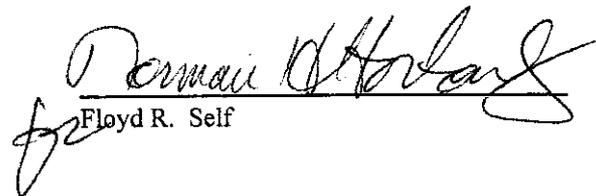
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