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May 3, 2001

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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: FPSC Docket Nos. 990455-TL and 990457-TL
AT&T Wireless Services' Further Comments

Dear Ms. Bayó:

The purpose of this letter is to provide the further comments of AT&T Wireless Services ("AWS") in connection with the Notice filed on April 10, 2001, by various carriers (including AWS) to establish implementation schedules for the 305 and 954 NPA relief plans approved in Order No. PSC-00-197-PAA-TL and BellSouth's April 25, 2001, letter on the same subject.

The Notice identified two options for the implementation of the 954 relief plan. Since the submission of the Notice to the Commission, AWS has had the opportunity to further evaluate and consider Option 2's phased overlay approach in view of the requirements of the FCC's Rule 52.19(c)(3)(ii). This Rule provides that area code overlays, such as are contemplated by Option 2, may not be implemented "unless there exists, at the time of implementation, mandatory ten-digit dialing for every call within and between" the two area codes. In view of the clear, mandatory directive of this Rule, AWS believes that the phased implementation of 10 digit local dialing contemplated by Option 2 would violate the Rule.

Notwithstanding the FCC Rule, AWS believes that Option 2 could be implemented as proposed provided that a waiver of the Rule was first obtained from the FCC. Such waivers have previously been sought and obtained, and AWS believes that a request to the FCC for expedited processing could lead to the timely implementation of Option 2 if the FPSC quickly to request such relief.

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Over the last several years the Florida PSC has been able to meaningfully address area code relief through the cooperative process that has been utilized in these and other dockets. While AWS may now disagree with BellSouth regarding Option 2, our disagreement on this particular implementation issue does not represent a lessening of our collective commitment to cooperate whenever possible on area code relief and number conservation. Indeed, even on the Option 2 question, BellSouth has acknowledged that if the FPSC has any concerns regarding the effect of the Rule on Option 2 that the FPSC should proceed to obtain the necessary rule waiver from the FCC. Accordingly, if the FPSC selects Option 2, then the FPSC should file with the FCC the necessary rule waiver and seek such a determination on an expedited basis.

As a final matter, we would like to clarify with respect to Option 1 that the 1+10 digit dialing would not apply to the wireless carriers. The Commission has recognized in the past that it does not regulate wireless carriers and the dialing patterns from wireless telephones. Further, the wireless networks are configured to accept 10 or 1+10 digit dialed calls with such calls being routed as appropriate and treated as local or toll based upon the originating and terminating points and not the number of digits dialed.

We appreciate the opportunity to clarify our concerns regarding these matters. Please acknowledge receipt of this letter by stamping the enclosed extra copy of this letter.

Thank you for your assistance with this filing.

Sincerely,


for Floyd R. Self

FRS/amb
Enclosure

cc: Cindy Manheim, Esq.
Parties of Record