

COPY

Before the
FLORIDA PUBLIC SERVICES COMMISSION
Tallahassee, Florida 32399-0850

In re:

Request for Review of Proposed Numbering Plan
Relief for the 941 Area Code

Docket No. 000604-TL

**PREHEARING STATEMENT
OF NEUSTAR, INC. AS THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR**

NeuStar, Inc., as the North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party NPA Relief Planner for Florida under the North American Numbering Plan and pursuant to the January 11, 2001 Order Establishing Procedure, (“Order”)¹ issued by the Florida Public Service Commission (“PSC”) in the above-captioned proceeding, hereby submits its prehearing statement as directed by the PSC Order.

- (a) NANPA expects to call Thomas C. Foley, NPA Relief Planner, as a witness to admit into the record his prefiled direct testimony and attached exhibits (“Exhibits”), filed with the PSC on February 2, 2001 in the above-captioned proceedings. Mr. Foley will be prepared to answer cross examination questions regarding area code relief planning. NANPA reserves the right to call additional witnesses to answer cross

¹ Order No. PSC-01-0093-PCO-TL. The procedural schedule was modified by the *Order Modifying Procedural Schedule*, Order No. PSC-01-0816-PCO-TL, issued March 29, 2001.

DOCUMENT NUMBER-DATE

08228 JUL-5

FPSC-REGULATORY REPORTING

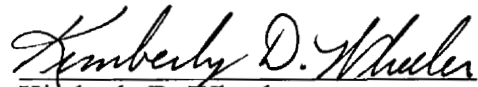
examination questions from commissioners and parties regarding number conservation and central office code administration.

- (b) The exhibit attached to the direct testimony of Thomas C. Foley constitutes all known exhibits that NANPA may rely upon. The exhibit is Exhibit TCF-1: Petition of the North American Numbering Plan Administrator on Behalf of the Florida Telecommunications Industry for Approval of a Relief Plan for the 941 Area Code, and attachments thereto, originally filed with the PSC on September 19, 2001. Mr. Foley will be the witness sponsoring the above-identified exhibit. NeuStar reserves the right to introduce other exhibits for cross-examination for any other purpose authorized by the applicable Florida Rules of Evidence and rules of the PSC.
- (c) NANPA's basic position in this proceeding is that, in accordance with industry guidelines, NANPA's role is to facilitate the Florida telecommunications industry to reach consensus to recommend a single relief plan for the 941 NPA to the Florida PSC. In furtherance of that goal and in accordance with industry guidelines, NANPA compiled and filed a petition with the PSC requesting approval of the industry's recommended relief plan for the 941 area code. As a neutral third party administrator, NANPA has no independent view regarding the NPA relief plan selected by the PSC.
- (d, e, f) As stated above, NANPA, as a neutral third party, does not have an independent view regarding the NPA relief plan ultimately ordered by the PSC. At this time, NANPA has no statement regarding which questions of fact, law or policy are at issue.
- (g) NANPA is aware of no stipulations.
- (h) With the exception of its original area code relief petition, NANPA has no other motions or other matters pending before the PSC in these proceedings.

- (i) At this time, NANPA is aware of no pending requests or claims for confidentiality.
- (j) At this time, NANPA is aware of no requirement set forth in the Order with which it cannot comply; and
- (k) The FCC has delegated authority to review and approve NPA relief plans to the states. 47 C.F.R. § 52.19. FCC decisions or pending decisions that may preempt or otherwise impact the Commission's ability to resolve any of the issues presented or relief requested in this docket include the following: (1) *Numbering Resource Optimization, Petition for Declaratory Ruling, (CC Docket No. 99-200) and Request For Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717 (CC Docket No. 96-98), Second Report and Order, Order on Reconsideration and Second Further Notice of Proposed Rulemaking, FCC 00-429 (rel. Dec. 29, 2000)*; (2) *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 7574 (2000)*; (3) *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, Memorandum Opinion and Order and Order on Reconsideration, 13 FCC Rcd. 19009 (1998)*; and (4) *Florida Public Service Commission Petition To Federal Communications Commission For Expedited*

Decision For Grant Of Authority To Implement Number Conservation Measures,
Order, 14 FCC Rcd. 17,506 (1999).

Respectfully submitted,



Kimberly D. Wheeler
NEUSTAR, INC.
1120 Vermont Avenue, N.W.
Suite 400
Washington, D.C. 20005
(202) 533-2912
kimberly.wheeler@neustar.com

July 3, 2001

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that the foregoing Prehearing Statement, was mailed on this 3rd day of July, 2001 via U.S. First Class Mail, to the following individuals:

Charlotte County Attorney's Office
Renee Francis Lee, County Attorney
Martha Young Burton
18500 Murdock Circle
Port Charlotte, FL 33948-1094

Collier County Board of Commissioners
3301 E. Tamiami Trail
Naples, FL 33962-4977

Florida Cable Telecommunications Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Lee County Board of Commissioners
P.O. Box 398
Ft. Myers, FL 33902-0398

Manatee County Board of Commissioners
James A. Minix, Esq.
P.O. Box 1000
Bradenton, FL 34206-1000

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, FL 32302-1876

Monroe County Board of Commissioners
Clerk
500 Whitehead St.
Key West, FL 33040-6547

NeuStar, Inc., NANPA
Thomas C. Foley, NPA Relief Planner
820 Riverbend Boulevard
Longwood, FL 32779

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32302-2095

Sarasota County
Kathleen Schneider, Assis. County Atty
1660 Ringling Blvd., 2nd fl.
Sarasota, FL 34236

Sprint PCS
Joe Assenzo
Legal Department
6160 Sprint Parkway, 4th Floor
Overland Park, KS 66251

Sprint-Florida, Incorporated
Charles Rehwinkel/Susan Masterton
(MC FLTLHO0107)
P. O. Box 2214
Tallahassee, FL 32316-2214

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
c/o Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002

Verizon Florida Inc.
Ms. Michelle A. Robinson
% Mr. David Christian
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704

Verizon Select Services Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

City of Punta Gorda
Robert H. Berntsson
326 W. Marion Avenue
Punta Gorda, FL 33950-4492

Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551

Benjamin & Alice Gullett
5216 30th Street West
Bradenton, FL 34207

Katz, Kutter Law Firm
Patrick Wiggins/Natalie Futch
12th Floor
Tallahassee, FL 32301

Sharon Mills
5208 30th Street West
Bradenton, FL 34207

Sprint-Southern Operations
John M. Snyder, Senior Planner
P. O. Box 165000
Altamonte Springs, FL 32716-5000

NeuStar, Inc.
D. Wayne Milby
Senior NPA Relief Planner - Eastern Region
8385 Yahley Mill Road
Richmond, VA 23231

Dr. Willard Coy
Chair, Area Planning Board
4005 Cape Haze Drive
Placida, FL 33946

Verizon Wireless
Anne Hoskins, Esq.
1300 I Street, NW
Suite 400 W
Washington, DC 20005

Alarm Association of Florida, Inc.
Bob Neely
1802 North University Drive #329
Plantation, FL 33322-4115

Boca Grande Area Chamber of Commerce
Debbi Ricci, Office Manager
PO Box 704
Boca Grande, FL 33921

Office of Public Counsel
Charles Beck
c/o The Florida Legislature
Tallahassee, FL 32399-1400



Theresa Pringleton