

COPY

January 25, 2002

By Overnight Courier

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

Re: Docket No. 010743-TL

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies and an electronic copy on diskette of the Prehearing Statement of NeuStar, Inc., the North American Numbering Plan Administrator.

Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Kimberly Wheeler Miller
Regulatory Policy Counsel
NeuStar, Inc.

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

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

In re:

Petition for review of proposed numbering plan relief for the 407/321 area codes by Neustar, Inc., as North American Numbering Plan Administration (NANPA), on behalf of Florida Telecommunications industry.

Docket No. 010743-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 September 24, 2001 Order Establishing Procedure, (“Order”) issued by the Florida Public Service Commission (“FPSC”) in the above-captioned proceeding, hereby submits its prehearing statement as directed by the FPSC 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 FPSC on October 4, 2001 in the above-captioned proceeding. 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 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 407/321 Area Code, and attachments thereto, originally filed with the FPSC on May 15, 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 FPSC.
- (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 407/321 NPAs to the FPSC. In furtherance of that goal and in accordance with industry guidelines, NANPA compiled and filed a petition with the FPSC requesting approval of the industry’s recommended relief plan for the 407/321 area code. As a neutral third party

administrator, NANPA has no independent view regarding the NPA relief plan selected by the FPSC.

- (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 FPSC. 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 FPSC 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)*.
- (l) NANPA has no objections to any party's qualifications.

Respectfully submitted,



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January 25, 2002

CERTIFICATE OF SERVICE

I, Kimberly Wheeler Miller, do hereby certify that the foregoing **Prehearing Statement** was delivered, by First Class Mail, this 25th day of January 2002, to the following:

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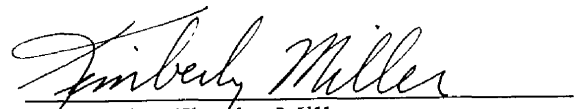
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