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Via Hand Delivery

January 28, 2002

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

RECEIVED - FPSC
02 JAN 28 PM 4:30
COMMISSION
CLERK

Re: Docket No. ~~01-1000-01~~ Sprint's Prehearing Statement

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated, Sprint Communications Company Limited Partnership and Sprint PCS (collectively, "Sprint") are the original and fifteen (15) copies of Sprint's Prehearing Statement. Also, enclosed is a diskette of the Prehearing Statement. Service has been made this same day via U.S. Mail to the parties listed on the attached service list.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

- AUS
- CAF
- CMP
- COM
- CTR
- ECR
- GCL
- OPC
- MMS
- SEC
- OTH

Susan S. Masterton

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SSM/tk

Enclosures

RECEIVED & FILED
M. Lockard
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
01057 JAN 28 02
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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
Filed: January 28, 2002

SPRINT'S PREHEARING STATEMENT

Pursuant to Orders Establishing Procedure (Order No. PSC- 01-1918-PCO-TL, Order No. PSC-01-2190-PCO-TL and Order No. PSC-01-2369-PCO-TL) Sprint-Florida, Incorporated, Sprint Communications Company Limited Partnership, and Sprint PCS (collectively, "Sprint") file this Prehearing Statement:

A. **WITNESSES:** Sprint proposes to call the following witnesses to offer testimony in this docket:

WITNESS:

Sandra A. Khazraee (Direct)

ISSUES:

1-5

Sprint has listed the witnesses for whom Sprint believes testimony will be filed, but reserves the right to supplement that list if necessary.

B. **EXHIBITS:** Sprint has filed no exhibits at this time, but reserves the right to introduce exhibits at the hearing or other appropriate points.

DOCUMENT NUMBER-DATE

01057 JAN 28 02

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C. **BASIC POSITION:** The Commission should approve the industry's consensus plan for relief for the 407/321 area codes. The all-services distributed overlay supported by the industry is the best alternative because customers within the existing 407/321 overlay have already been educated regarding an overlay and currently dial their local calls as 10-digit. In addition, the industry-supported plan allows Brevard County to maintain only the 321 NPA.

D-F. **ISSUES AND POSITIONS:**

ISSUE 1: What method of area code relief plan should the Commission approve for the 407/321 area codes?

POSITION: The Commission should approve the industry's consensus plan for relief for the 407/321 area codes. The industry plan is an all-services distributed overlay that provides for no new 321 codes to be assigned within the overlay. Remaining 321 codes are reserved for future use within the Brevard County 321 area. All new codes within the existing 407/321 overlay would be assigned from the new NPA.

ISSUE 2: What should the dialing pattern be for the method of relief chosen for the following types of calls?

- a. Local
- b. Toll
- c. EAS
- d. ECS

POSITION: The existing dialing plan should be maintained. Within the overlay, all local calls and EAS calls must be dialed with 10 digits. Toll calls must be dialed with one plus ten digits. ECS calls can be dialed with either one plus ten or ten digits, depending on whether the customer wants the call carried and billed by their intraLATA provider as a toll call or by their local service provider as a local call.

ISSUE 3: When should area code relief be implemented for the 407/321 area codes?

POSITION: The time frame for implementing the area code relief will depend on when the Commission issues its final order in this docket.

ISSUE 4: What type of mechanisms, not previously considered, if any, should the Commission approve to address Volusia County's area code and local dialing issues, and, if so, when?

POSITION: The NPA relief docket is not the appropriate place to consider Volusia County's area code and local dialing issues. If new alternatives are to be considered, they should be considered in a separate docket.

ISSUE 5: Pursuant to the Florida Statutes, FCC delegated authority, or both, does the Commission have the authority to require telecommunications carriers to place 386 numbers in their Sanford exchange to allow customers in the Osteen area to get new lines and migrate their existing services the 386 numbers?

POSITION: The NPA relief docket is not the appropriate place to consider Volusia County's area code and local dialing issues. If new alternatives are to be considered, they should be considered in a separate docket.

ISSUE 6: Should this docket be closed?

POSITION: No position at this time.

G. **STIPULATIONS:** None.

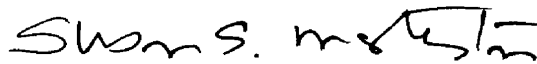
H. **PENDING MOTIONS:** Sprint has no motions pending at this time.

I. **CONFIDENTIALITY CLAIMS**: Sprint has no pending claims for confidentiality at this time.

J. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE**: Sprint does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

K. **DECISIONS THAT MAY IMPACT COMMISSION'S RESOLUTION OF ISSUES**:
Sprint is not aware of any pending FCC or court actions that may preempt the Commission action in this docket at this time.

RESPECTFULLY SUBMITTED this 28th day of January 2002.



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ATTORNEY FOR SPRINT

**CERTIFICATE OF SERVICE
DOCKET NO. 010743-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 28th day of January, 2002 to the following:

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