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January 28, 2002

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

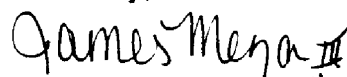
Re: Docket No. 010743-TL (407/321 Area Codes)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


James Meza III (JA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

DOCUMENT RECEIVED

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CERTIFICATE OF SERVICE
Docket No. 010743-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 28th day of January, 2002 to the following:

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James Meza III (LAD)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for review of) Docket No. 010743-TL
proposed numbering plan relief for the)
407/321 area codes by Neustar, Inc.)
as North American Numbering Plan)
Administration (NANPA), one behalf of)
Florida telecommunications industry.)
_____) Filed: January 28, 2002

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-01-1918-PC0-TL) issued on September 24, 2001 and Order Modifying Order Establishing Procedure (Order No. PSC-01-2190-PCO-TL) issued on November 8, 2001, hereby submits its Prehearing Statement for Docket No. 010743-TL.

A. Witnesses

BellSouth proposes to call the following witness to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
Stan L. Greer (Direct)	All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at

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the prehearing conference to be held on March 4, 2002. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

B. Exhibits

None.

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

The area code relief plan the Commission should implement in this proceeding is another overlay in the 407/321 area codes and move the remaining 321 NXXs in the 407/321 overlay to Brevard County.

D. BellSouth's Position on the Issues

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

Position: The Commission should implement the industry recommendation for area code relief for the 407/321 overlay, which was to implement another overlay and to move the remaining 321 NXXs in the 407/321 overlay to Brevard County.

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 Commission should implement the same dialing patterns it required in Order No. PSC-98-1761-FOF-TL, Docket No. 980671-TL, which included:

- a. Local/Extended Area Service within and between area codes - 10 digits;
- b. Extended Calling Service without interexchange carrier competition - 10 digits;
- c. Extended Calling Service with interexchange carrier competition - 1 + 10 digits;
- d. Toll - 1 + 10 digits

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

Position: The Commission should implement the additional overlay as soon as possible and establish an implementation schedule that would provide carriers with at least 90 days after the issuance of final order in this proceeding to implement the new overlay within its operational support systems.

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 Commission should not adopt Volusia County's proposal because it creates numerous issues that the Commission will need to address, including but not limited to (1) establishing a dangerous precedent, (2) prohibiting the allocation of certain numbers, (3) competitive concerns, (4) number pooling issues, (5) the lack of any advantage for Osteen customers, (6) the negative impact on BellSouth's ability to receive additional numbering resources for the Sanford exchange, (7) creating an administrative burden on BellSouth, and (8) the fact that the County's proposal may be outside the Commission's authority.

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 to the 386 numbers?

Position: It does not appear that the Commission has the authority to require telecommunications companies to place 386 numbers in the Sanford exchange. The FCC has exclusive jurisdiction over numbering issues; however the FCC can delegate this power to state commissions. At this point, the FCC has only delegated limited authority to the Florida Public Service Commission: (1) pursuant to the FCC's Local Competition Report and Order, FCC 98-224, the Commission has the authority to create new area codes through the use of geographic splits, area code boundary realignment, or an overlay; and (2) pursuant to FCC Order 99-249, the Commission has the authority to implement certain numbering conservation measures. The above described scenario does not appear to fit in either category and thus the Commission would lack the authority to order it.

Issue 6: Should this docket be closed?

Position: Yes.

E. Stipulations

None.

F. Pending Motions

BellSouth is not aware of any pending motions in this matter.

G. Other Requirements

None.

Respectfully submitted this 28th day of January, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (CA)

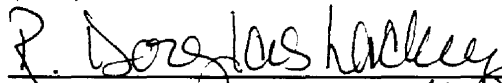
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