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September 29, 1997

ORIGINAL

Ms. Blanca S. Bayó Director, Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket 971058-TL

Dear Ms. Bayó:

JAMES S. ALVES

BRIAN H. BIBEAU KATHLEEN BLIZZARD

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Enclosed for filing in the above docket on behalf of MCI Telecommunications Corporation are the original and 15 copies of MCI's Prehearing Statement.

By copy of this letter this document has been provided to the parties on the attached service list.

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Request for review of proposed numbering plan relief for 305 area code

Docket No. 971058-TL Filed: September 29, 1997

MCI'S PREHEARING STATEMENT

MCI Telecommunications Corporation and McImetro Access
Transmission Services, Inc. (collectively, MCI) hereby files
their prehearing statement in accordance with the requirements of
Order No. PSC-97-1002-PCO-TL.

A. <u>Known Witnesses</u>. MCI has prefiled the testimony of the following witness:

Witness	Testimony	Issues
Elizabeth G. Kistner	Direct	1

- B. <u>Known Exhibits</u>. None. MCI reserves the right to use exhibits for the purposes of cross-examination.
- C. <u>Basic Position</u>. In general, geographic splits are preferable to overlays as a means of providing area code relief. Geographic splits tend to have fewer end-user impacts and fewer negative impacts on emerging competition. If the Commission nevertheless determines, due to unique circumstances in the 305 area code, that an overlay plan is in the public interest, it should impose several conditions to mitigate the adverse impacts on competition. These conditions include: 1) no slippage in the current BellSouth implementation plan for local number portability should be allowed; 2) 10-digit dialing should be

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required both within and between the old and new area codes; 3)
BellSouth should be required to analyze and report on the
feasibility of a revenue-neutral rate center consolidation plan
for the 305 area; and 4) a workshop or other process should be
established to consider a number pooling mechanism for the Miami
area.

D-F. <u>Issues</u>. MCI's position on the issue that has been identified in the Order Establishing Procedure is as follows:

Issue 1. Should the Commission approve the overlay plan for 305 area code relief, and if not, what relief plan should the Commission approve?

MCI: The Commission should not approve the overlay plan for 305 area code relief unless it also imposes the following conditions to mitigate the potential adverse impacts that such a plan can have on competition: 1) no slippage in the current BellSouth implementation plan for local number portability should be allowed; 2) 10-digit dialing should be required both within and between the old and new area codes; 3) BellSouth should be required to analyze and report on the feasibility of a revenue-neutral rate center consolidation plan for the 305 area; and 4) a workshop or other process should be established to consider a number pooling mechanism for the Miami area.

- G. <u>Stipulations</u>. MCI is not a party to any stipulations at this time. MCI would be willing to withdraw its testimony if Bellsouth would stipulate to accept the imposition of the four conditions listed in MCI's position on Issue 1 as a condition of implementing an overlay plan.
- H. <u>Pending Motions</u>. MCI has no pending motions at this time.

Requirements of Order on Procedure. MCI believes that this prehearing statement complies with all the requirements of the Order on Procedure.

RESPECTFULLY SUBMITTED this 29th day of September, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

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and

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Attorneys for MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 29th day of September, 1997.

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