

## MARK HERRON, P.A.

ATTORNEY AT LAW

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Also Admitted in Georgia

June 26, 1998

Ms. Blanca Bayo Director, Records & Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

Re:

Docket No. 98-0671

Dear Ms. Bayo:

Enclosed for filing on behalf of BellSouth Mobility Inc is the original and 15 copies of their Petition for Intervention with regard to the above referenced docket. Also enclosed is a diskette containing the same in Wordperfect 6.1.

Sincerely,

If you have any questions or concerns please contact me at 567-4878.

AFA  APP MH/mcd RECEIVED & FILED  CAF  CMU enclosure(s) FISC BUREAU OF R  CTR cc: All parties of record  LEG 1  LIN 5	Mark Herron  ECORDS
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## BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Request for review of	)	DOCKET NO. 98-0671-TL
proposed numbering plan relief	)	
for 407 area code.	)	Filed: June 26, 1998
	)	

## PETITION FOR INTERVENTION BY BELLSOUTH MOBILITY INC

BELLSOUTH MOBILITY INC (BMI), pursuant to Rule 25-22.039, Florida

Administrative Code, respectfully requests that the Commission grant BMI intervention in this proceeding. As grounds, BMI states:

1. The exact name of the Petitioner and the address of its principal business office is:

BellSouth Mobility Inc 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

- 2. BMI is a management and holding company that owns and operates several cellular companies in Florida. BMI operates cellular systems in ten major metropolitan areas of the state. Some of these systems are 100% owned by BMI, while others are partnerships. BMI's systems serve a large number of subscribers in the 407 area code.
- 3. The purpose of this docket is to review a relief plan agreed to by the industry for the 407 area code.
- 4. Representatives of service providers in the 407 area code have agreed that relief from the imminent exhaustion should be accomplished through an overlay relief plan. Under the overlay plan, current customers would not be required to change their area code. All customers would be required to dial all local calls as ten digits, within and between area codes.

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- 5. The proposed plan and any other plan which adds a new area code or changes the area code already assigned to BMI's subscribers will directly and materially affect BMI's substantial interests.
- 6. All notices, pleadings, orders and other papers relating to this docket should be directed to counsel for BMI as follows:

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WHEREFORE, BellSouth Mobility Inc petitions to intervene as party in this docket.

Dated this 21/day of June, 1998.

Respectfully Submitted,

MARK HERR $\phi$ N, ESQUIRE

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Attorneys for BellSouth Mobility Inc

## **CERTIFICATE OF SERVICE**

LHEREBY CERTIFY that a copy of the foregoing was furnished to the following parties this 21 day of June, 1998:

By U.S. Mail or Hand Delivery to:

William Cox Maryrose Sirianni Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Ms. Nancy H. Sims BellSouth Telecommunications 150 South Monroe St., Suite 400 Tallahassee, Florida 32301-1556

Ms. Rhonda P. MerrittAT&T Communications of the Southern States, Inc.101 North Monroe Street, Suite 700Tallahassee, FL 32301-1549

Mr. Jeffry Wahlen Ausley Law Firm P.O. Box 391 Tallahassee, FL 32302 Counsel for Vista-United Telecommunications

Representative Randy Ball 400 South Street, Suite 1C Titusville, FL 32780

Florida Public Telecommunications Assoc. Angela Green 125 S. Gadsden St, #200 Tallahassee, FL 32301-1525 Richard D. Melson Hopping Green Sams & Smith Post Office Box 6526 Tallahassee, FL 32314 Counsel for MCI/MCImetro

Mr. Steven Brown Intermedia Communications of Florida, Inc. 3625 Queen Palm Drive Tampa, FL 33619-1309

D. Wayne Milby Lockheed Martin IMS Communications Industry Services 1133 15th Street, N.W. Washington, D.C. 20005

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Carl H. Schafer 4770 Key Drive East Titusville, FL 32780

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Mr. F.B. (Ben) Poag Sprint-Florida, Incorporated P.O. Box 2214 Tallahassee, FL 32316-2214

Ms. Jill Butler Time Warner Communications 2251 Lucien Way, Suite 320 Maitland, FL 32751-7023

Ms. Lynn B. Hall Vista-United Telecommunications P.O. Box 10180 Lake Buena Vista, FL 32830-0180

Commissioner Helen Voltz District 5 1515 Sarno Road, Bldg. B Melbourne, FL 32935

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