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

June 9, 1999

Docket No. 990373-TP Re: Establishment of Statewide Emergency Area Code Relief Plan

Dear Ms. Bayo:

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Please find enclosed an original and fifteen copies of the Direct Testimony of John C. Rollins on behalf of GTE Florida Incorporated for filing in the above matter. Also enclosed are an original and fifteen copies of GTE Florida Incorporated's Prehearing Statement together with a diskette with a copy of the Prehearing Statement in WordPerfect 6.1 format. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of a statewide emergency) area code relief plan

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Docket No. 990373-TP Filed: June 9, 1999

GTE FLORIDA INCORPORATED'S PREHEARING STATEMENT

GTE Florida Incorporated (GTEFL) files its Prehearing Statement in accordance

with Order No. PSC-99-0761-PCO-TP in this docket and Commission Rule 25-22.038.

A. Witnesses

GTEFL's witness for all issues in this docket will be John C. Rollins.

B. Exhibits

GTEFL does not intend to use any exhibits at this time, but reserves the right to do so at the hearing or other appropriate points.

C. GTEFL's Basic Position

GTEFL believes the Commission's objective in this docket is to ensure, to the extent possible, that carriers have put in place measures that will allow number pooling as a number conservation measure, once such pooling becomes practical. Consistent with this objective, GTEFL recommends a voluntary guideline which will ensure that code holders manage numbers responsibly, avoiding opening 1000s blocks unless it is necessary to meet customers' business needs or technical requirements. Adopting this

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guideline will meet the Commission's goal of efficient use of numbering resources, while avoiding potential jurisdictional problems.

D., E., F., G. GTEFL's Specific Positions

GTEFL believes the issue identified for resolution in this case is a mixed question of fact, law, and policy.

<u>Issue 1</u>: Should the Commission order on a statewide basis that the distribution of telephone numbers be made consecutively within area codes, beginning with the lowest assignable telephone number?

<u>GTEFL's Position</u>: No. GTEFL does not believe the Commission has the jurisdiction to issue such an order, as it would go beyond the number conservation authority the FCC has granted to the states. However, the Commission can encourage code holders to adopt voluntary measures to ensure efficient allocation of numbers. GTEFL has proposed a guideline which will ensure responsible number management, so that 1000s block pooling can be implemented here once it becomes practical. The Commission should not take a narrow view of consecutive number assignment that would encourage or require assignment of numbers without regard to the business or technical needs of its customers. Such an approach would only undermine efficient allocation of numbers.

Issue 2: Should this docket be closed?

GTEFL's Position: Yes.

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H. Stipulated Issues

GTEFL is unaware of any stipulations at this time.

I. Pending Matters

GTEFL is unaware of any pending matters.

J. Procedural Requirements

To the best of its knowledge, GTEFL can comply with all requirements set forth in

the procedural order in this case.

Respectfully submitted on June 9, 1999.

By:

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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

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I HEREBY CERTIFY that copies of the Direct Testimony of John C. Rollins and GTE Florida Incorporated's Prehearing Statement in Docket No. 99373-TP were sent via U.S. mail on June 9, 1999, to the parties on the attached list.

Kimberly Caswell

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