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RECORDS AND REPORTING

Charles J. Rehwinkel General Attorney

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June 9, 1999

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

Docket No. 990373-TP Re:

Dear Ms. Bayo:

Enclosed are the original and copies of the Petition to Intervene and Prehearing Statement of Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS ("Sprint"). Also enclosed are the original and copies of the Prefiled Direct Testimony and Exhibit of Tom Foley. Also enclosed is a diskette containing an electronic version of these documents.

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

Thank you for your assistance in this matter.

Sincerely,

Charles J. Rehwinkel

CJR/th

Enclosures

AFA APP

CAE

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EAG LEG

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CERTIFICATE OF SERVICE DOCKET NO. 990373-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene, Prehearing Statement and Prefiled Direct Testimony of Tom Foley was served by U.S. Mail or hand-delivery this 9th of June, 1999 on the following:

Wireless One Network L.P. d/b/a Cellular One Frank Heaton 2100 Electronics Lane Fort Myers, Florida 33912

Angela Green, General Counsel Florida Public Telecommunications Association 125 S. Gadsden Street, #200 Tallahassee, Florida 32301-1525

Charles J. Beck
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street,
Rm. 812
Tallahassee, Florida 32399-1400

Michael A. Gross, V.P. Regulatory Affairs & Regulatory Counsel FCTA Inc. 310 North Monroe Street Tallahassee, Florida 32301

Peggy Arvanitas c/o RE/MAX First Class Inc. 620 Bypass Drive Clearwater, Florida 33764 AT&T Communications of the Southern States, Inc. Tracy Hatch 101 North Monroe Street Suite 700 Tallahassee, Florida 32301–1549

BellSouth
Telecommunications, Inc.
Ms. Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street,
Suite 400
Tallahassee, Florida 32301-1556

Messer Law Firm Floyd Self AT&T Communications of the Southern States Post Office Box 1876 Tallahassee, Florida 32302

Swidler & Berlin Network Plus, Inc. 234 Copeland Street Quincy, MA 02169

Rutledge Law Firm Omnipoint Communications 600 Ansin Blvd. Hallandale, Florida 33009 Pennington Law Firm Peter M. Dunbar Post Office Box 10095 Tallahassee, Florida 32302

Rutledge Law Firm Kenneth Hoffman, Esq. Post Office Box 551 Tallahassee, Florida 32302 Time Warner AxS of Florida, L.P. Carolyn Marek 233 Bramerton Court Franklin, TN 37069

Swidler & Berlin Richard Rindler 3000 K St. NW, #300 Washington, D.C. 20007-5116

Charles J. Rehwinkel

OR/G/NAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	Establishment of a Statewide
Emerg	gency Area Code Relief Plan

Docket No. 990373-TL

PREHEARING STATEMENT OF SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP, SPRINT-FLORIDA INCORPORATED AND SPRINT PCS

Sprint Communications Company Limited Partnership, Sprint-Florida Incorporated and Sprint PCS ("Sprint") by and through its undersigned attorneys, and pursuant to Rule 25-22.038, Florida Administrative Code, and order of the Florida Public Service Commission ("Commission"), hereby submits its Prehearing Statement in the above-captioned docket.

A. and B. Witnesses and Exhibits

Sprint proposes to call the following witness to offer direct and rebuttal testimony on the issue as indicated:

Witness	<u>Issue</u>	Exhibits
Thomas C. Foley	1	TCF-1, Stipulation and Voluntary Number Management Measures

Sprint reserves the right to call witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference currently scheduled to take place on June 16, 1999. Sprint reserves the right to file exhibits to any testimony that may be filed under these circumstances. Sprint also reserves the right to introduce

exhibits for cross-examination, impeachment, or any other purpose authorized by the Florida Rules of Evidence and the Florida Administrative Code.

C. Statement of Basic Position

Given that the Federal Communications Commission has delegated only very limited authority to State commissions over numbering issues and the technical difficulties associated with consecutive numbering, Sprint believes the Commission should accept the stipulation filed in this docket.

D. - F. Sprint's Position on the Issues

<u>Issue:</u> Should code holders be required to distribute telephone numbers consecutively, beginning with the lowest assignable telephone number? If not, what alternative interim mechanism for number administration would be appropriate?

<u>Position</u>: No. Code holders should not be required nor can they be required under current law to distribute telephone numbers consecutively, beginning with the lowest telephone number. The Commission should accept the <u>Stipulation and Voluntary Number Management Measures</u> as the interim mechanism for number management at this time.

G. Stipulations

On May 27, 1999, numerous industry members entered into and filed their <u>Stipulation and Voluntary Number Management Measures</u> for the Commission to consider in lieu of the proceedings currently scheduled in this docket.

H. Pending Motions

Sprint does not have any pending Motions before the Prehearing Officer at this time.

I. Other Requirements

There are no requirements in the Prehearing Order for which Sprint is unable to comply at this time.

Respectfully submitted this 9th day of June 1999.

Charles Rehwinkel

Sprint-Florida Incorporated

P.O. Box 2214

Tallahassee, Florida 32399-2214

MC FLTLHO0107

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and

Monica M. Barone

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Sprint PCS

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