

BEFORE THE PUBLIC SERVICE COMMISSION

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IN RE: Request for review of proposed numbering plan relief for 407 area code.

DOCKET NO. 980671-TL
RECORDS AND REPORTING
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EMERGENCY REQUEST FOR TEMPORARY VARIANCE

ADT Security Services, Inc. ("ADT"), pursuant to 28-104.001, et. seq., Florida Administrative Code, by and through its undersigned counsel, does hereby file with the Public Service Commission ("Commission") its Emergency Request for Temporary Variance and in support thereof states as follows:

1. ADT is a Delaware corporation authorized to do business in Florida. ADT operates in Florida as an alarm company with its principal place of business located in Boca Raton, Florida.
2. The names and addresses of the persons to whom copies of all correspondence, notices, orders and other documents in this proceeding should be sent are as follows:

Daniel H. Thompson
Berger Davis & Singerman
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301
850/561-3010 Telephone
850/561-3013 Facsimile

3. ADT requests a temporary variance from the Commission's Order Number 99-0384-

FOF-TL in the nature of an extension of the mandatory ten-digit dialing established in that order until December 1, 1999, for Orange, Osceola and Seminole Counties and October 1, 2000, for Brevard County.

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4. ADT is an alarm services company with approximately 15,000 customers in the Orange-Seminole County area, 65 per cent of whom are residential customers.

5. Once activated or tripped, many of ADT customers' alarm systems send an electronic signal via the telephone lines to one of ADT's monitoring stations. Presently, the alarms in the Orange-Seminole County area dial a local seven-digit phone number. In order to provide alarm service to ADT's existing customers, ADT must reprogram the alarm panels in each business or residence to allow for the mandatory ten-digit local dialing.

6. On April 9, 1999, ADT was notified by certified mail from Bell South that the ten-digit dialing would become mandatory on December 1, 1999. Orange-Seminole County is split by two different telephone companies. ADT was notified by Sprint on April 14, 1999, by facsimile that ten-digit dialing would become mandatory. Since receipt of notification that the ten-digit dialing would become mandatory, ADT has taken all necessary and reasonable steps to complete the conversion by the deadline. ADT has found, however, that it will be unable to complete the necessary conversion by December 1.

7. On January 29, 1999, ADT acquired Entergy Security Systems ("Entergy"). Entergy was comprised of many smaller alarm companies. The age of the alarm systems has made it difficult for ADT to acquire the appropriate reprogramming equipment to complete the task. Also, ADT is required to make an appointment in order to gain entry to the homes of the 65 per cent of ADT's customer base that is residential. ADT has discovered that approximately five to ten per cent of the site visits require a total replacement of the equipment before conversion can be made.

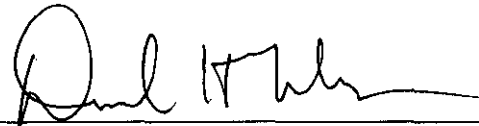
8. ADT will be unable to complete the conversion process until April 1, 2000. If an extension of time is not granted, approximately 3000 customers will be without monitoring service

for a period of time up to four months. The inability to provide service to those customers could expose ADT's customers to potential life threatening situations.

9. ADT requests a temporary variance and/or extension of time of the mandatory ten-digit dialing for a period of four months for those phone exchanges where ADT has affected customers. A denial of ADT's request would create a substantial hardship on ADT and its customers. Additionally, a denial could expose ADT's customers to significant and unintended harm.

10. Inasmuch as the pertinent order requires mandatory ten-digit dialing on December 1, 1999, for Orange, Osceola and Seminole Counties, emergency relief is requested and necessary.

This Emergency Request for Variance is respectfully submitted this 10th day of September, 1999.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original of the foregoing has been furnished by U.S. Mail on this 10th day of September, 1999, to the following:

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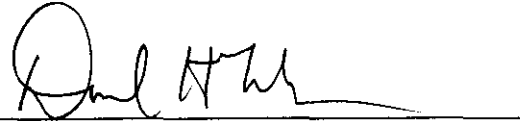
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