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via Hand Delivery

REPLY TO: P.O. BOX 10095 TALLAHASSEE, FL 32302-2095

June 15, 1998

Ms. Blanco Bayo, Director Division of Records and Reporting Florida Public Service Commission Betty Easley Conference Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> IN RE: Request for review of Re: proposed numbering plan relief for 305 area code. DOCKET NO. 971058-TL

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen coppes of the Petitioner for Leave to Intervene by SecurityLink from Ameritech, Inc. and Response in Partial Support of BellSouth Telecommunication's Motion for Extension of Permissive Dialing Period. You will also find a copy of this letter enclosed. date-stamp this copy to indicate that the original was filed and return a copy to me.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

RECEIVED & FILED

Barbara D. Auger

Respectfully,

BDA/kab

As noted Enclosure:

Counsel of record w/enclosure cc:

VEA

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CAF

SEC

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DOCUMENT HI "FER-DATE

BEFORE THE PUBLIC SERVICE COMMISSION

ODIATAT

IN RE: Request for review of proposed numbering plan relief for 305 area code.

DOCKET NO. 971058-TL

FILED: June 15, 1998

PETITION FOR LEAVE TO INTERVENE BY SECURITYLINK FROM AMERITECH, INC. AND RESPONSE IN PARTIAL SUPPORT OF BELLSOUTH TELECOMMUNICATION'S MOTION FOR EXTENSION OF PERMISSIVE DIALING PERIOD

SecurityLink from Ameritech, Inc. ("SecurityLink"), pursuant to Commission Rule 25-22.039, Florida Administrative Code, by and through its undersigned counsel, does hereby file its Petition of Intervention and Response in Partial Support of BellSouth Telecommunications, Inc.'s (BellSouth) Motion for Extension of Permissive Dialing Period, and in support thereof states as follows:

- 1. Petitioner SecurityLink is a Delaware Corporation authorized to do business in Florida. SecurityLink operates in Florida as an alarm service company with its principal place of business located at Oakbrook Terrace, Illinois.
- 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:

Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
(850) 222-3533
(850) 222-2126 (facsimile)

O6282 JUNISE

- 3. SecurityLink's interest will be substanially affected bythe decision of the commission on BellSouth's request for extension of time as follows:
- a. SecurityLink is an alarm services company with approximately 30,000 customers in the Miami-Dade County area, seventy-five percent (75%) of which are residential customers.
- b. Once activated or tripped many of SecurityLink's customer's alarm systems send an electronic signal via the telephone lines to one of SecurityLink's central monitoring stations. Presently, the alarms in the Miami-Dade County area dial a local seven digit phone number. In order to continue to provide alarm service to its existing customers, SecurityLink must reprogram the alarm panels in each business or residence to allow for the mandatory ten-digit local dialing.
- c. On December 29, 1997, SecurityLink was notified by facsimile that ten-digit dialing would become mandatory. A copy of the Order was received by certified mail on March 18, 1998. Since receipt of notification that the ten-digit dialing would become mandatory, SecurityLink has taken all necessary and reasonable steps to complete the conversion by the deadline. SecurityLink has, however, been unable to complete the necessary conversion.
- d. SecurityLink's customer base is comprised substantially of original customers of ten to twelve companies, which companies or their assets were later acquired by SecurityLink. The majority of these customers have different technologies, which require a site visit to make the necessary conversion. Since the majority of the site visits are residential,

an appointment must be made to gain entry. SecurityLink has discovered that approximately 10-15% of the site visits require a total replacement of the equipment before the conversion can be made.

- 4. SecurityLink supports BellSouth's Motion for Extension of Permissive Dialing Period with exception to the amount of time requested for compliance. SecurityLink would request the Commission to extend the permissive dialing period for six (6) months instead of BellSouth's requested three (3) months or until January 1, 1999.
- 5. For the reasons stated above, SecurityLink respectfully request that the Commission grant its petition for intervention, permit SecurityLink to participate as a full party in this docket and grant BellSouth's Motion for Extension of Permissive Dialing Period but extend the period for six ((6) months.

This Petition to Intervene is respectfully submitted this 15 h

Fla. Bar No. 946400
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Tallahassee, Florida 32302-2095

(850) 222-3533 (850) 222-2126 (fax)

Counsel for: SecurityLink from Ameritech

CERTIFICATE OF SERVICE DOCKET NO. 371058-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 3rd day of June, 1998, to the following parties of record:

ABC Paging Paul Klugerman 16500 NW 52nd Ave. Hialeah, FL 33014

ACSI of AL Bill Stipe 131 National Bus Pkwy., #100 Annapolis Junction, MD 20701

AirTouch Cellular Chris Horton 4151 Ashford Dunwoody Road Atlanta, GA 30319

AirTouch Paging Birtwistle/Jim Cigler 6420 Congress Ave., #1800 Boca Raton, FL 33487

AirTouch Paging Jeffy Sutton 12221 Merit Dr., #800 Dallas, TX 75251

Akerman, Senterfitt & Eidson Mark Herron 216 S. Monroe St., #200 Tallahassee, FL 32301 Ameripage, Inc. Doug Thompson 5043 NW 167th St. Hialeah, FL 33015

AT&T Communications of the Southern States, Inc. Ms. Rhonda P. Merritt 101 North Monroe Street Suite 700 Tallahassee, FL 32301-1549 AT&T Wireless Services Richard Cahall 1920 Corporate Dr. Boynton Beach, FL 33426

AT&T Wireless Services John Giannella 11760 North US Highway 19th Fl. West Palm Beach, FL 33408

AT&T Wireless Services, Inc. Char Meins/HQ External Affairs 5000 Carillon Point Kirkland, WA 98033

ATC Long Distance Bubba Phillips 2315 Salem Road Conyers, GA 30208

ATC Long Distance Dave Elchelkraut 2121 E. 63rd St. Kansas City, MO 64130

Beep-Net Julian Gonzalez 236 SW 22nd Ave. Miami, FL 33135

BellSouth Cellular Corp. Susan Israel/Ron Burtleson 1100 Peachtree St., NE, #809 Atlanta, GA 30309

BellSouth Long Distance, Inc. Melvin McCowan 32A Perimeter Center East Atlanta, GA 30346

BellSouth Mobility, Inc. (Atl) 1100 Peachtree St., NE, #910 Atlanta, GA 30309-4599 BellSouth Telecommunications, Inc. Ms. Nancy H. Sims 150 South Monroe St., Suite 400 Tallahassee, FL 32301-1556

BellSouth Telecommunications, Inc., (Mia) Judy Childers 150 W. Flagler St., #1801 Miami, FL 30375

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BellSouth-IFP Larry Whipple 18560 NW 27th Ave., #330 Miami, FL 33056

BellSouth-Ind. Rel. Gene Lunceford 600 N. 19th St., 3rd Fl. Birmingham, AL 35203

BellSouth-IT Charles Lewis 675 W. Peachtree St., 13C55BSC Atlanta, GA 30375

BellSouth-NPA Stan Washer 3535 Colonade Pkwy., North W1C Birmingham, AL 35243

Bryant Law Firm Mark Logan 201 S. Monroe St., #500 Tallahassee, FL 32301

City of Key West Commissioner Merili McCoy Post Office Box 1409 Key West, FL 33041-1409

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Continental Florida Telecommunications, Inc. Bill Hopfer 4455 Bay Meadows Rd. Jacksonville, FL 32257

CONXUS Network, Inc. Mazie Robinson 15 S. Main St. Greenville, SC 29601

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