Legal Department

ORGINAL

PATRICK W. TURNER **General Attorney**

BellSouth Telecommunications, Inc. 150 South Monroe Street **Room 400** Tallahassee, Florida 32301 (404) 335-0761

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Mrs. Blanca S. Bayó Director Division of the Commission Clerk and Administrative Services

Florida Public Service Commission 2540 Shumard Oak Boulevard

Tallahassee, FL 32399-0850

Docket No. 020119-TP & Docket No. 020578-TP Re: Petition of Florida Digital Network, Inc. and Florida Competitive Carriers Association for Expedited Review and Cancellation of BellSouth **Telecommunications, Inc.'s Key Customer Promotional Tariffs**

October 4, 2002

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification for its Response to Florida Digital Network, Inc.'s First Set of Interrogatories, Items 4, 14, 15, 18, 19 and 20 and Responses to Production of Documents Numbers 1 and 4, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

AUS CAF CMP COM CTR ECR GCL OPC MMS SEC OTH

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

Sincerely,

W. Tomer

Patrick W. Turner

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for

Confidential DN 10775-02. The confidential material is in locked storage pending staff advice on handling.

FPSC-COMMISSIO

DOCUMENT NUMBER-DATE

10774 OCT-48

RECEIVED & FILED OF RECORDS



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and) Cancellation of BellSouth Telecommunications,) Inc.'s Key Customer promotional tariffs and for) Investigation of BellSouth's promotional pricing) and marketing practices, by Florida Digital) Network, Inc.)

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In re: Petition for expedited review and) Cancellation of BellSouth Telecommunications,) Inc.'s Key Customer promotional tariffs by) Florida Competitive Carriers Association) Docket No. 020119-TP

Docket No. 020578-TP

Filed: October 4, 2002

BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files this Notice of Intent to Request Specified Confidential Classification and says the following:

1. On October 4, 2002, BellSouth Telecommunications, Inc. filed its Responses to the Florida Digital Network, Inc.s ("FDN's") First Set of Interrogatories Item Nos. 4, 14, 15, 18, 19, and 20 and First Request for Production of Documents Nos. 1 and 4. These responses contain confidential business information that is proprietary to BellSouth.

2. Because these responses contain confidential, proprietary information, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the documents without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

Respectfully submitted this 4th day of October 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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Nancy B. White James Meza III 150 West Flagler Street Suite 1910 Miami, Florida 33130 (305) 347-5558

n Alley

R. Douglas Lacke Patrick W. Turner 675 West Peachtree Street, Suite 4300 Atlanta, Georgia (404) 335-0761

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CERTIFICATE OF SERVICE DOCKET NO. 020119-TP and 020578-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 4th day of October 2002 to the following:

Felicia Banks Linda Dodson Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6216 fbanks@psc.state.fl.us Idodson@psc.state.fl.us

Matthew Feil Florida Digital Network 390 North Orange Avenue Suite 2000 Orlando, FL 32801 Tel. No. (407) 835-0460 Fax. No. (407) 835-0309 mfeil@floridadigital.net

Kenneth A. Hoffman, Esq. Martin P. McDonnell, Esq. Marsha Rule Rutidege, Ecenia, Purnell & Hoffman 215 S. Monroe St., Suite 420 (32301) P.O. Box 551 Tallahassee, FL 32302-0551 Tel. No. (850) 681-6788 Fax. No. (850) 681-6515 Atty. for US LEC Ken@Reuphlaw.com Dana Shaffer 105 Molly Street, Suite 300 Nashville, TN 37201 Tel. No. (615) 777-7700 Fax. No. (615) 345-1564 Atty. for XO dana.shaffer@xo.com

Karen Camechis, Esq. Pennington Law Firm P.O. Box 10095 215 South Monroe Street Tallahassee, FL 32302-2095 Tel. No. (850) 222-3533 Fax. No. (850) 222-2126 Atty. for Time Warner Karen@penningtonlawfirm.com

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D. Mark Baxter Stone & Baxter, LLP 577 Mulberry Street, Suite 1111 Macon, Georgia 31201-8256 Tel. No. (478) 750-9898 Fax. No. (478) 750-9899 Atty. for Access

Rodney Page Access Integrated Networks, Inc. 4885 Riverside Drive, Suite 101 Macon, Georgia 31210

Nanette Edwards ITC DeltaCom 4092 South Memorial Parkway Huntsville, AL 35802 Tel. No. (256) 382-3900 Fax. No. (256) 382-3801 nedwards@itcdeltacom.com (+) Signed Protective Agreement