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Legal Department
ORIGINAL

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RECORDS AND REPORTING

October 18, 1999

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

Re: Docket No. 990750-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Interrogatory No. 42A and Request for Production Nos. 12 and (a portion of No. 15) to Staff's Second Set of Interrogatories and Second Request for Production of Documents dated September 28, 1999, 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.

Sincerely,

Michael P. Goggin
Michael P. Goggin

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

This notice of intent was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. ~~1273-99~~ The confidential material has been placed in locked storage pending staff advice on handling.

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12730 OCT 18 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:) Docket No. 990750-TP
)
Petition for Arbitration of ITC^DeltaCom)
Communications, Inc. with BellSouth)
Telecommunications, Inc. pursuant to the)
Telecommunications Act of 1996.)
_____) Filed: October 18, 1999

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On September 28, 1999 the Staff of the Florida Public Service Commission (the "Staff") served its Second Set of Interrogatories and Second First Request for Production of Documents to BellSouth. On October 8, 1999, BellSouth filed its General Objections to that discovery. Today, BellSouth is serving its Responses and Objections to the Staff's First Set of Interrogatories and First Request for Production of Documents. The information provided in BellSouth's responses to Interrogatory No. 42A and Requests for Production Nos. 12 and a portion of No. 15 (The BellSouth ADSL Technical Service Description) includes proprietary information.

2. The information in BellSouth's response to Interrogatory No. 42A includes vendor specific information, and/or, vendor specific prices negotiated by BellSouth. The information in BellSouth's response to Request for Production No. 12 includes BellSouth's business plans, forecasts and other confidential business information. The information in BellSouth's response to a portion of

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Request for Production No. 15 (The BellSouth ADSL Technical Service Description) includes vendor specific information, and/or, vendor specific prices negotiated by BellSouth.

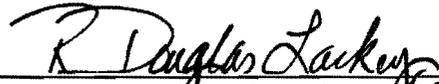
3. Because this information is proprietary, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the discovery without delay. The original of 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 18th day of October, 1999

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE
Docket No. 990750-TP

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

U.S. Mail this 18th day of October, 1999 to the following:

Diana Caldwell
Staff Counsel
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Commission
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Michael P. Goggin

*Signed a Protective Agreement

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