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Legal Department

MICHAEL P. GOGGIN
General Attorney

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

RECORDS AND
REPORTING

January 18, 2000

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. 991267-TP (Global NAPS Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Global NAPS' First Request for Production of Documents Nos. 3 and 4(c), 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. 00689-00. The confidential material has been placed in locked storage pending staff advice on handling.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:) Docket No. 991267-TP
)
 Complaint of Global NAPs, Inc., against)
 BellSouth Telecommunications, Inc. for)
 Enforcement of Section VI(B) of its)
 Interconnection Agreement with BellSouth)
 Telecommunications, Inc. and Request for Relief)
 _____) Filed: January 18, 2000

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 December 17, 1999, Global NAPs, Inc. ("Global NAPs") served its First Set of Interrogatories, First Request for Production of Documents and First Request for Admissions to BellSouth. On December 27, 1999, BellSouth filed its General Objections to that discovery and on January 18, 2000, BellSouth served its Responses and Objections to that discovery.

2. The information contained in BellSouth's response to Request for Production Nos. 3 and 4(c) includes customer specific information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Section 364.183.

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 January, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

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R. DOUGLAS LACKEY

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193531

CERTIFICATE OF SERVICE
Docket No. 991267-TP

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

(*) Hand Delivery and U.S. Mail this 18th day of January, 2000 to the following:

Beth Keating
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6199
Fax No. (850) 413-6250


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Represents Global NAPS

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