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Legal Department

MICHAEL P. GOGGIN  
General Attorney

00 JAN 21 PM 4:39

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

RECORDS AND  
REPORTING

January 21, 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 certain portions of the Deposition Transcript of David Scollard, 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 (KR)*

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. 009177-00. The confidential material has been placed in locked storage pending staff advice on handling.**

DOCUMENT NUMBER-DATE

00966 JAN 21 00

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 21, 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 January 20, 2000, Global NAPs, Inc. ("Global NAPs") took the Deposition of David Scollard.
2. The information contained in the Deposition Transcript for David Scollard includes customer specific and proprietary business information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.
3. Because this information is confidential and 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.

DOCUMENT NUMBER-DATE

00966 JAN 21 8

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FPSC-RECORDS/REPORTING

Respectfully submitted this 21st day of January, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KR)

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey (KR)

R. DOUGLAS LACKEY

E. EARL EDENFIELD, JR.

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

194080

STATE OF ALABAMA )

COUNTY OF JEFFERSON )

AFFIDAVIT

I, the undersigned authority, certify that **DAVID SCOLLARD**

Personally appeared before me at 600 North 19th St.

and was duly sworn by me to tell the truth. Present in the room with Mr. Scollard

is/are only myself

WITNESS my hand and official seal in the city of Birmingham

County of Jefferson, State of Alabama, this (DAY/MO)

January 20, 2000.

Rita R. Barwell  
Notary Public

State of Alabama

Personally known  or produced identification \_\_\_\_\_.

Type of identification produced \_\_\_\_\_.

NOTARY PUBLIC STATE OF ALABAMA AT LARGE.  
MY COMMISSION EXPIRES: Dec. 28, 2000.  
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

**CERTIFICATE OF SERVICE  
Docket No. 991267-TP**

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

Facsimile this 21st 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

  
Michael P. Goggin (ck)

Jon C. Moyle, Jr.  
Cathy M. Sellers \*  
Moyle Flanigan Katz Kolins  
Raymond & Sheehan, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
Represents Global NAPS

William J. Rooney  
General Counsel  
John O. Post  
Assistant General Counsel  
Global NAPS, Inc.  
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Tel. No. (617) 507-5111  
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