

ANDREW D. SHORE  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0743

January 7, 2002

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

(A)  
Re: Docket No. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for BellSouth's response to Staff's First Request for Production, Item No. 1, 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,

*Andrew D. Shore*  
Andrew D. Shore (KA)

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

418981

DOCUMENT NUMBER-DATE  
00215 JAN-7 8  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
Docket No. 990649A-TP**

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

Federal Express this 7<sup>th</sup> day of January, 2002 to the following:

Wayne D. Knight  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
Fax. No. (850) 413-6217  
wknight@mail.psc.state.fl.us

Joseph A. McGlothlin (+)  
Vicki Gordon Kaufman (+)  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. For FCCA  
Atty. for BlueStar  
jmcglothlin@mac-law.com

Karen Jusevitch  
AT&T Communications  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6313  
Fax. No. (850) 425-6361  
kjusevit@att.com

Jim Lamoureux (+)  
AT&T Communications  
1200 Peachtree Street, N.E.  
Room 8068  
Atlanta, Georgia 30309  
Tel. No. (404) 810-4196  
Fax. No. (404) 877-7648  
jlamoureux@att.com

Richard D. Melson (+)  
Gabriel E. Nieto  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For MCI  
rmelson@hgss.com

Dulaney L. O'Roark  
MCI Telecommunications Corporation  
6 Concourse Parkway  
Suite 600  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
Fax. No. (770) 284-5488  
De.OROark@mci.com

Floyd Self  
Messer, Caparello & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Atty. for AT&T  
fself@lawfla.com

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W.  
Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585  
tmonroe@comptel.org

Kimberly Caswell (+)  
GTE Florida Incorporated  
One Tampa City Center  
201 North Franklin Street  
Tampa, Florida 33602  
Tel. No. (813) 483-2617  
Fax. No. (813) 204-8870  
kimberly.caswell@verizon.com

Karen M. Camechis (+)  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
215 South Monroe Street, 2nd Flr.  
Tallahassee, Florida 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
Represents Time Warner  
Karen@penningtonlawfirm.com

Carolyn Marek (+)  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
Carolyn.Marek@twtelecom.com

Mark E. Buechele, Esquire  
Supra Telecom  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
mbuechele@stis.com

Donna Canzano McNulty, Esq. (+)  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium Bldg., Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
donna.mcnulty@wcom.com

Michael A. Gross (+)  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
mgross@fcta.com

Florida Public Telecomm. Assoc.  
Angela Green, General Counsel  
2292 Wednesday Street, #1  
Tallahassee, FL 32308  
Tel. No. (850) 222-5050  
Fax. No. (850) 222-1355  
abgreen@nettally.com

Intermedia Communications, Inc.  
Scott Sapperstein (+)  
Sr. Policy Counsel  
One Intermedia Way  
MCFLT-HQ3  
Tampa, FL 33647  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923  
SASapperstein@intermedia.com

Charles J. Rehwinkel (+)  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
Counsel for Sprint  
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 224-9115  
Fax. No. (850) 222-7560  
Counsel for Sprint  
jfons@ausley.com

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5500  
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)  
Regional Counsel  
Covad Communications Company  
10 Glenlake Parkway  
Suite 650  
Atlanta, GA 30328-3495  
Tel. No. (678) 579-8388  
Fax. No. (678) 320-9433  
cboone@covad.com

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
Fax. No. (850) 488-4491  
beck.charles@leg.state.fl.us

Eric J. Branfman (+)  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7500  
Fax. No. (202) 424-7645  
Represents Florida Digital Network, Inc.  
ejbranfman@swidlaw.com

John McLaughlin  
KMC Telecom. Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043  
Tel. No. (678) 985-6261  
Fax. No. (678) 985-6213  
jmclau@kmctelecom.com

Bettye Willis (+)  
ALLTEL Communications  
Services, Inc.  
One Allied Drive  
Little Rock, AR 72203-2177  
bettye.j.willis@alltel.com

J. Jeffry Wahlen (+)  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
Atty. for ALLTEL  
jwahlen@ausley.com

Stephen P. Bowen  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
Tel. No. (415) 394-7500  
Fax. No. (415) 394-7505  
stevebowen@earthlink.net

Charles J. Pellegrini  
Katz, Kutter, Haigler, Alderman, Bryant  
& Yon, P.A.  
106 East College Avenue  
Suite 1200  
Tallahassee, FL 32301  
Represents Intermedia  
Tel. No. (850) 577-6755  
Fax No. (850) 222-0103  
jpellegrini@katzlaw.com

George S. Ford (+)  
Chief Economist  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, FL 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
gford@z-tel.com

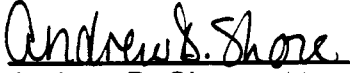
Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19th Street, NW, Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792

jcanis@kelleydrye.com  
mhazzard@kelleydrye.com  
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce  
Shook, Hardy & Bacon, LLP  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
rjoyce@shb.com  
Represents Network Access Solutions

Russell M. Blau  
Thomas R. Lotterman (+)  
Michael Sloan (+)  
Robert Ridings (+)  
Swidler Berlin Shereff Friedman  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7755  
Fax. No. (202) 424-7643  
Attys. for Broadslate Networks, Inc.  
Attys. for Cleartel Comm.  
MCSloan@swidlaw.com  
rdblau@swidlaw.com  
rjridings@swidlaw.com  
trlotterman@swidlaw.com

John Spilman  
Director Regulatory Affairs and  
Industry Relations  
Broadslate Networks, Inc.  
675 Peter Jefferson Parkway  
Suite 310  
Charlottesville, VA 22911  
Tel. No. (804) 220-7606  
Fax. No. (804) 220-7701  
john.spilman@broadslate.net

  
Andrew D. Shore (KA)

**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No.: 990649A-TP  
network element )  
\_\_\_\_\_ ) Filed: January 7, 2002

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

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

1. On January 7, 2002, BellSouth Telecommunications, Inc. filed its Responses to Staff's 1<sup>st</sup> Set of Interrogatories and 1<sup>st</sup> Request for Production. BellSouth's response to Request for Production, Item No. 1 includes vendor-specific information and confidential business information that is considered proprietary to BellSouth.

2. Because this response contains proprietary information, 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 cost studies 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. BellSouth will be filing a Request for Confidential Classification within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 7<sup>th</sup> day of January, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (LA)

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

*Andrew D. Shore*

ANDREW D. SHORE (LA)

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0750