BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

n re: Petition for expedited eview and cancellation of ellSouth Telecommunications, mc.'s Key Customer promotional ariffs and for investigation of ellSouth's promotional pricing td marketing practices, by lorida Digital Network, Inc.

DOCKET NO. 020119-TP FILED: MARCH 14, 2002

I HEREBY CERTIFY that the original and one copy of Staff's crst Request for Production of Documents (Nos. 1 - 4), have been erved VIA-U.S. MAIL upon Nancy B. White, Esquire, c/o Ms. Nancy H. ms 150 South Monroe Street, Suite 400, Tallahassee, Florida 301-1556, on behalf of BellSouth Telecommunications, Inc., and at a true and correct copy thereof has been furnished by U.S. LL, this 14th day of March, 2002, to the following:

r. Matthew Feil lorida Digital Network, Inc. 90 North Orange Avenue uite 2000 rlando, FL 32801-1640

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OPC

MMS SEC OTH LINDA H. DODSON, Staff Counsel

Linda H. Dodson

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6199

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