

Patrick W. Turner  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0761

ORIGINAL

October 17, 2002

RECEIVED-PPSC  
02 OCT 17 PM 4:51  
COMMISSION  
CLERK

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

Re: **Docket No. 020119-TP**  
**Petition of Florida Digital Network, Inc. for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs and For an Investigation of BellSouth Telecommunications, Inc.'s Promotional Pricing and Marketing Practices**

**Docket No.: 020578-TP**  
**Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its First Request for Production of Documents and First Set of Interrogatories to Access Integrated Networks, Inc., in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me. Copies have been served to the parties shown on the attached certificate of service.

Sincerely,

*Patrick W. Turner*

Patrick W. Turner (WA)

Enclosures

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC T  
OTH L to  
each file

RECEIVED & FILED

*RYM*

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11322 OCT 17 02

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 020119-TP and 020578-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
(\* ) Hand Delivery, Electronic Mail, and Overnight Federal Express this 17th day of  
October 2002 to the following:

Felicia Banks (\*)  
Linda Dodson (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)  
[ldodson@psc.state.fl.us](mailto:ldodson@psc.state.fl.us)

Matthew Feil  
Florida Digital Network  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Marsha Rule  
Rutledge, Ecenia, Purnell & Hoffman  
215 S. Monroe St., Suite 420 (32301)  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
Atty. for US LEC  
[Ken@Reuphlaw.com](mailto:Ken@Reuphlaw.com)

Dana Shaffer  
105 Molly Street, Suite 300  
Nashville, TN 37201  
Tel. No. (615) 777-7700  
Fax. No. (615) 345-1564  
Atty. for XO  
[dana.shaffer@xo.com](mailto:dana.shaffer@xo.com)

Karen Camechis, Esq.  
Pennington Law Firm  
P.O. Box 10095  
215 South Monroe Street  
Tallahassee, FL 32302-2095  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
Atty. for Time Warner  
[Karen@penningtonlawfirm.com](mailto:Karen@penningtonlawfirm.com)

Carolyn Marek  
Time Warner  
233 Bramerton Court  
Franklin, TN 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
[Carolyn.Marek@twtelecom.com](mailto:Carolyn.Marek@twtelecom.com)


Joseph A. McGlothlin (+)  
Vicki Gordon Kaufman  
Timothy J. Perry  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold  
& Steen, PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[imcglathlin@mac-law.com](mailto:imcglathlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Attys. for Access  
Attys. for FCCA  
Attys. for Mpower

D. Mark Baxter  
Stone & Baxter, LLP  
577 Mulberry Street, Suite 1111  
Macon, Georgia 31201-8256  
Tel. No. (478) 750-9898  
Fax. No. (478) 750-9899  
Atty. for Access

Rodney Page  
Access Integrated Networks, Inc.  
4885 Riverside Drive, Suite 101  
Macon, Georgia 31210

Nanette Edwards  
ITC DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3900  
Fax. No. (256) 382-3801  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Rick Heatter, Vice President  
Mpower Communications Corp.  
175 Sully's Trail, Suite 300  
Pittsford, New York 14534  
Tel. No. (585) 218-6556  
Fax. No. (585) 218-0635

  
Patrick Turner (CLA)

**(+) Signed Protective Agreement**