Legal Department

Patrick W. Turner Senior Regulatory Counsel

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

ORIGINAL



October 31, 2002

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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

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

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its Second Requests for Production of Documents to ITC^DeltaCom, 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,

ide W. Turner (CAD) Patrick W. Turner

Enclosures

AUS

CMP

COM CTR

ECR

OPC

MMS

OTH

cc: All Parties of Record Marshall M. Criser III

R. Douglas Lackey Nancy B. White

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11956 OCT 31 8

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 Federal Express this 31st 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 Idodson@psc.state.fl.us

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Kenneth A. Hoffman, Esq. Martin P. McDonnell, Esq. Marsha Rule Rutldege, 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 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

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Patrick Turner

(+) Signed Protective Agreement