

ORIGINAL

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JON C. MOYLE, JR.
E-mail: jmoylejr@moylslaw.com

February 19, 2004

By Hand Delivery

Ms. Blanca Bayó
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED - FPSC
COMMISSION
CLERK
04 FEB 19 PM 4:39

Re: NewSouth Communications Corp. Responses to PSC Data Requests - Docket numbers
030852-TP and 030851-TP

Dear Ms. Bayó:

Attached please find confidential responses to data requests sought by PSC staff that was the subject matter of Mr. Melson's letter of February 2, 2004. While NewSouth is a party in both dockets involving the Federal Communication Commission's Triennial Review Order, and has responded to discovery in these dockets, this additional information is being provided after working with your staff counsel, Mr. Susac.

NewSouth Communications Corp. (NewSouth) is claiming confidentiality pursuant to Section 364.183(1), Florida Statutes, as the information provided is relating to NewSouth's competitive interest and the disclosure of such would impair NewSouth's competitive business. The following documents are subject to this request:

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL I
- OPC _____
- MMS _____
- SEC I
- OTH _____

1. Responses to switching_questions_FL.xls.
2. Responses to loop_questions_FL.xls.
3. Responses to remote_questions_FL.xls.
4. Responses to general_questions_FL.xls.
5. Responses to transport_questions_FL.xls.

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential Docket 02440-04. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

1 each dkt
1 conf records

RECEIVED & FILED

Oh
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02439 FEB 19 04

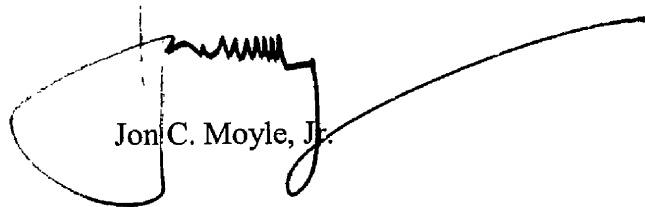
FPSC-COMMISSION CLERK

Letter to Ms. Blanco Bayo
February 19, 2004
Page 2

This information should be treated as confidential by operation of law. See §364.183(1), Fla. Stat.(2003)

I trust that this concludes the matter. If you have any questions or need any additional information, please let me know.

Sincerely,



Jon C. Moyle, Jr.

JCMJ/ds/m

Enclosures

c: Jeremy Susac (w/o enclosure)
Richard Melson (w/o enclosure)
Pat Lee (w/o enclosure)



February 16, 2004

Sent Via Electronic and Overnight Mail

Jon Moyle
Moyle, Flanigan, Katz, Raymond & Sheehan
The Perkins House
118 North Gadsen Street
Tallahassee, FL 32301

RE: John Fury Affidavit.

Dear Jon,

Enclosed please find the original signed affidavit request of John Fury. An electronic copy was sent to the following email address: jmoylejr@moylelaw.com

Should you have any questions, please feel free to contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Keiki Hendrix", written over a white background.

Keiki Hendrix
Assistant to Jake Jennings
Main: 864-672-5000
Direct: 864-672-5976
Fax: 864-672-5105
Email: khendrix@newsouth.com

MOYLE, FLANAGAN, KATZ,
RAYMOND & SHEEHAN, P.A.

FEB 18 2004

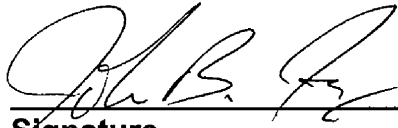
RECEIVED

Two North Main St.
Greenville, South Carolina 29601
www.newsouth.com

AFFIDAVIT

By my signature below, I, JOHN B. FURY, attest to the accuracy of the information contained herein and the attached documents. I have reviewed the foregoing and declare that, to the best of my knowledge and belief, the information is true and correct. I attest that I have the authority to sign on behalf of NEW SOUTH COMMUNICATIONS CORP.

Further, I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."


<u>JOHN B. FURY</u> Print Name	<u></u> Signature
<u>CARRIER RELATIONS MANAGER</u> Title	<u>2/16/2004</u> Date
<u>864 672 5064</u> Telephone No.	<u>864 672 5105</u> Fax No.

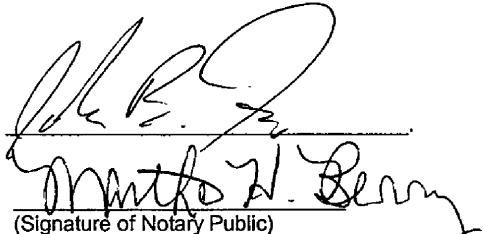
NEW SOUTH COMMUNICATIONS CORP
Utility

Address: 2 N. MAIN ST.
GREENVILLE, SC 29601

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

Sworn to (or affirmed) and subscribed before me this 16th day of FEB., 2004, by 


(Signature of Notary Public)
Martha H. Berry
(Name of Notary Typed, Printed, or Stamped)

(NOTARY SEAL)

Personally Known OR Produced Identification My Commission Expires July 8, 2008
Type of Identification Produced _____