

**AFFIDAVIT OF STEVE BROWNORTH**

Steve Brownworth, after having been first duly sworn, deposes and states as follows:

1.

I am Steve Brownworth and I am Vice President of Systems Planning for ITC^DeltaCom Telecommunications, Inc., in West Point, Georgia. I am over 18 years of age. This affidavit is based on my personal knowledge.

2.

In my capacity as Vice President of Systems Planning, I am responsible for the network architecture of the local and long-distance voice network, data network, and fiber-optic transport network for ITC^DeltaCom.

3.

On June 30, 2005, ITC^DeltaCom filed its Petition for Mediation and Dispute Resolution in Docket No. 050450-TP, accompanied by three exhibits.

4.

Exhibit B to this filing was filed in redacted form, and contains a series of Commingling Diagrams and accompanying text, which illustrate and describe elements of ITC^DeltaCom's telecommunications network architecture. I am personally familiar with the contents and significance of Exhibit B.

5.

The information redacted from Exhibit B was created by, and is the exclusive property of, ITC^DeltaCom.

6.

ITC^DeltaCom has never disseminated the diagrams and lists in Exhibit B, or their contents, for inspection by the public or by any ITC^DeltaCom competitor, other than in connection with a legal or regulatory proceeding in which disclosure was required, or under the protection of a legally binding confidentiality agreement.

7.

ITC^DeltaCom has established and enforced internal procedures by which its network configurations are kept confidential. These procedures include but are not limited to dissemination to only those key personnel with a need to know.

8.

The information contained in Exhibit B was developed by network employees for ITC^DeltaCom for its exclusive use, and would have substantial value to a competitor if disclosed. For example, a competitor could copy the manner in which ITC^DeltaCom configures its network elements, so as to be able to advertise that its services were the same as those provided by ITC^DeltaCom, or to offer services indistinguishable from those offered by ITC^DeltaCom, or otherwise gain a competitive advantage.

9.

The manner in which a Competitive Local Exchange Carrier configures its network elements affects the manner in which service is delivered to commercial end users, and therefore, is a significant factor differentiating the offerings of one CLEC from another.

10.

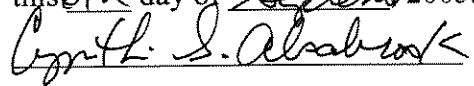
ITC^DeltaCom would suffer substantial competitive injury if the proprietary confidential business information contained in Exhibit B was to be disseminated publicly.

11.

This concludes my affidavit.

  
\_\_\_\_\_  
Steve Brownworth

Sworn to and subscribed before me  
this 6th day of September 2005.

  
\_\_\_\_\_  
Notary Public

My Commission expires:                      **MY COMMISSION EXPIRES FEB. 1, 2006**