

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.

I am the same Steve Brownworth who caused to be filed my written testimony and three exhibits on August 16, 2005, in Docket No. 041269-TP, accompanied by a series of exhibits.

4.

Several of the exhibits were filed in redacted form because they contain detailed diagrams illustrating and describing elements of ITC^DeltaCom's proprietary telecommunications network architecture. These exhibits are: Diagrams 1A, 1B, 2A, 2B, 3A, 4A, and 4B, hereinafter referred to as "the Redacted Diagrams."

5.

The information contained in the Redacted Diagrams was created by, and is the exclusive property of, ITC^DeltaCom.

6.

ITC^DeltaCom has never disseminated the Redacted Diagrams, 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 that have a need to know.

8.

The information contained in the Redacted Diagrams was developed by network personnel 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, 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 use the configurations to 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 the Redacted Diagrams was to be disseminated publicly.

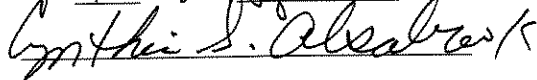
11.

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**