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ORIGINAL

September 2, 1999

BY HAND DELIVERY THIS DATE

RECORDS AND REPORTING

SEP - 2 PH 2: 53

RECEIVED-FPSC

Blanca S. Bayo
Director
Division of Records and Recording
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket #990750-TP; Petition for Arbitration by ITC^DeltaCom Communications

Dear Ms. Bayo:

On behalf of ITC^DeltaCom Communications, Inc., enclosed for filing in the referenced docket are the following documents:

1. Request for Confidential Classification (original and 16 copies)
2. Redacted Exhibit MT-2 to Michael Thomas direct testimony (3 copies)
3. Redacted Exhibits TAH-1, 2, 3 to Thomas Hyde direct testimony (3 copies)

Please file stamp the extra enclosed copies and return them to our runner. Thank you for your assistance.

Sincerely,

HUEY, GUILDAY & TUCKER, P.A.

J. Andrew Bertron, Jr.

JAB/
Enclosures
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RECEIVED & FILED

FPSO-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10532 SEP-2 99

FPSO-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Petition for Arbitration of ITC^DeltaCom)
Communications, Inc. with BellSouth)
Telecommunications, Inc. Pursuant to the)
Telecommunications Act of 1996)
_____)

Docket No.990750-TP

PETITIONER ITC^DELTA COM'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Petitioner ITC^DeltaCom Communications, Inc. (hereinafter "ITC^DeltaCom"), by its undersigned attorneys, pursuant to Rule 25-22.006, Florida Administrative Code, requests confidential classification of certain documents filed in this docket and says:

1. On August 16, 1999, ITC^DeltaCom filed, among other documents, Exhibit MT-2 to the testimony of Michael Thomas and Exhibits TAH-1, TAH-2, and TAH-3 to the testimony of Thomas Hyde. Concurrently, ITC^DeltaCom filed a notice of intent to request confidential classification.
2. Attached as Composite Exhibit "A" are copies of the exhibits with the confidential information highlighted. Attached as Composite Exhibit "B" are copies of the exhibits with the confidential information redacted.
3. The information in these exhibits is in summary form and therefore, as shown on the highlighted and redacted copies, substantially all of the information on every page of these exhibits is confidential. Because these exhibits are not in the form of numbered testimony, ITC^DeltaCom cannot identify the line numbers of the information claimed to be confidential.
4. The information in these exhibits it intended to be and is treated by ITC^DeltaCom as private and has not been disclosed.

DOCUMENT NUMBER-DATE
10532 SEP-2 99
FPSC-RECORDS/REPORTING

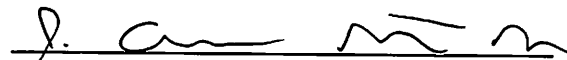
5. The table in Exhibit MT-2 shows the resale ordering and provisioning intervals that ITC^DeltaCom has experienced with BellSouth Telecommunications, Inc. ("BellSouth") for the past six months for completion of local service request orders. Public disclosure of this information would impair ITC^DeltaCom's ability to compete in the marketplace because its competitors could use this information to ITC^DeltaCom's disadvantage. Disclosure of this information would impair the competitive business of ITC^DeltaCom, and therefore the information in the table in Exhibit MT-2 is confidential pursuant to §364.183(3)(e), Florida Statutes, and is exempt from public disclosure requirements under Chapter 119, Florida Statutes, and Article I, Section 24(a), of the Florida Constitution.

6. The tables on pages 1-7 of Exhibit TAH-1 contain the names of ITC^DeltaCom's customers, their locations, and a description of problems experienced by these customers concerning unbundled loop cutovers as a result of performance problems by BellSouth. The tables on pages 1-13 of Exhibit TAH-2 contain the names of ITC^DeltaCom's customers, their locations, a description of problems experienced by these customers concerning unbundled local loop cutovers, and analyses by BellSouth assigning responsibility for the problems to either ITC^DeltaCom or to one of the BellSouth's divisions. The table on the cover page of Exhibit TAH-2 contains a summary of the trouble reports in the tables which follow. The tables on pages 1-4 of Exhibit TAH-3 contain more recent trouble reports for ITC^DeltaCom customers. Public disclosure of this information would impair ITC^DeltaCom's ability to compete in the marketplace because its competitors could use this information to ITC^DeltaCom's disadvantage. Disclosure of this information would impair the competitive business of ITC^DeltaCom, and therefore the information in the tables in Exhibits TAH-1, TAH-2 and TAH-3 is confidential pursuant to §364.183(3)(e), Florida Statutes, and is exempt from public

disclosure requirements under Chapter 119, Florida Statutes, and Article I, Section 24(a), of the Florida Constitution.

7. The original of this request for confidential classification has been filed with the Division of Records and Reporting. Copies, with the confidential information redacted, have been served on counsel for BellSouth. ITC^DeltaCom will make all confidential information in these exhibits available to BellSouth upon execution of a confidentiality agreement suitable to both parties.

Dated this 2nd day of September, 1999.


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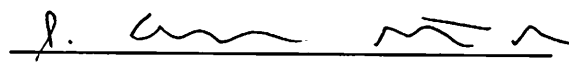
**CERTIFICATE OF SERVICE
DOCKET NO. 990750-TP**

I hereby certify that a true and correct copy of the foregoing has been furnished this 2nd day of September , 1999 to the following:

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