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Legal Department

MICHAEL P. GOGGIN General Attorney

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BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

RECORDS AND REPORTING

January 14, 2000

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 991267-TP (Global NAPS Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Staff's First Set of Discovery (Interrogatory Nos. 2, 3, 4, 5, and 10 and Request for Production No. 1), which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely.

Michael P. Goggin (KR)
Michael P. Goggin

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White This notice of intent was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. On the confidential material has been placed in locked storage pending staff advice on handling.

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- DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 991267-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Muchael P. Goggin (KR)

(*) Hand Delivery and U.S. Mail this 14th day of January, 2000 to the following:

Beth Keating *
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6199
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Jon C. Moyle, Jr.
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118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
Represents Global NAPS

William J. Rooney General Counsel John O. Post Assistant General Counsel Global NAPS, Inc. 10 Merrymount Road Quincy, MA 02169 Tel. No. (617) 507-5111 Fax. No. (617) 507-5200

Christopher W. Savage
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1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Tel. No. (202) 828-9811
Fax. No. (202) 452-0067

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)	Docket No. 991267-TP
Complaint of Global NAPs, Inc., against BellSouth Telecommunications, Inc. for)	
Enforcement of Section VI(B) of its)	
Interconnection Agreement with BellSouth Telecommunications, Inc. and Request for Relief)	
)	Filed: January 14, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

- 1. On December 10, 1999, the Staff of the Florida Public Service
 Commission ("Staff") served its First Set of Interrogatories and Request for
 Production of Documents to BellSouth. On December 20, 1999, BellSouth filed
 its General and Specific Objections to that discovery and on January 14, 2000,
 BellSouth served its Responses and Objections to that discovery.
- 2. The information in BellSouth's response to Interrogatory Nos. 2, 3, 4, 5, and 10 and Request for Production No. 1 includes customer specific information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Section 364.183.
- 3. Because this information is proprietary, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the discovery without delay. The original of this notice has

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been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

Respectfully submitted this 14th day of January, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCYB. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

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