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

April 4, 2000

ORIGINAL

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

Re: 991854-TP (Intermedia Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification (for Intermedia's Request for Production No. 48), which we ask that you file in the above-captioned matter.

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. Goggir

MPG/vf

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 "telco" for Confidential DN <u>O \( \frac{120-00}{200} \)</u>. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE

04125 APR-48

FPSC-RECORDS/REPORTING

## CERTIFICATE OF SERVICE Docket No. 991854-TP

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

(\*) Hand Delivery and (+) Federal Express this 4th day of April, 2000 to the following:

## Signed Protective Agreement

Timothy Vaccaro (\*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6181

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Michael P. Goggin

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	Docket No. 991854-TP
Petition for Arbitration of the Interconnection ) Agreement Between BellSouth Telecommunications,)	ORIGIA
Inc. and Intermedia Communications, Inc.	$\mathcal{O}_{N_{\Lambda}}$
Pursuant to Section 252(b) of the )	). }
Telecommunications Act of 1996.	•
)	Dated: April 4, 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 March 15, 2000, the Staff of the Florida Public Service Commission ("Staff") served its Second Request for Production of Documents (No. 4) to BellSouth. On March 27, 2000, BellSouth filed its General and Specific Objections to that discovery and on April 4, 2000, BellSouth served its Responses and Objections to that discovery.
- 2. The information in BellSouth's response to Intermedia Communications, Inc.'s Request for Production No. 48 includes customer proprietary and business proprietary information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.
- 3. Because this information is proprietary, BellSouth is now filing this
  Notice of Intent to Request Specified Confidential Classification pursuant to Rule 2522.006(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 been filed with

DOCUMENT NUMBER-DATE
04125 APR-48

FPSC-RECORDS/REPORTING

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

Respectfully submitted this 4th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

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