

ORIGINAL

RECEIVED-FFSC

Legal Department

BENNETT L. ROSS  
General Attorney

00 SEP 14 PM 4:36

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0793

RECORDS AND  
REPORTING

September 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. 990649-TP (UNE Docket)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification for BellSouth's Supplemental Response to Rhythms Links, Inc.'s First Request for Production No. 3, which was inadvertently left out of the filing dated September 13, 2000.

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,

  
Bennett L. Ross *(ml)*

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

228530

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 11436-00. The confidential material is in locked storage pending staff advice on handling.

RECEIVED & FILED

FFSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11546 SEP 14 8

FFSC-RECORDS/REPORTING

In re: Investigation into )  
Pricing of Unbundled Network )  
Elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: September 14, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST 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 Confidential Classification.

1. On May 19, 2000, Rhythms Links, Inc. ("Rhythms") served its First Set of Interrogatories and First Request for Production on BellSouth. On May 30, 2000, BellSouth filed its General Objections to that discovery and on June 22, 2000, BellSouth served its Responses and Objections to that discovery.

2. On September 13, 2000, BellSouth served its Supplemental Response to Rhythms' First Request for Production No. 3. However, the information contained in BellSouth's Supplemental Response to Rhythms' Request for Production No. 3 includes, but is not limited to, confidential business information that is 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

DOCUMENT NUMBER-DATE

11546 SEP 14 8

FPSC-RECORDS/REPORTING

25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of BellSouth's Supplemental Responses without delay.<sup>1</sup>

4. The original of this notice has 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 September, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE  
MICHAEL P. GOGGIN  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558



BENNETT L. ROSS  
E. EARL EDENFIELD JR  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0793

228509

---

<sup>1</sup> BellSouth sent a cover letter to the Commission dated September 13, 2000, indicating that this Notice of Intent was being filed. However, the Notice of Intent was inadvertently omitted and is being filed today to correct this oversight.

**CERTIFICATE OF SERVICE  
Docket No. 990649-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and Federal Express this 14th day of September, 2000 to the following:

Wayne D. Knight  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
Fax. No. (850) 413-6217  
wknight@mail.psc.state.fl.us

Joseph A. McGlothlin (+)  
Vicki Gordon Kaufman (+) \*  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. For FCCA  
\*Atty. for BlueStar  
jmcglothlin@mac-law.com

Marsha Rule (+)  
AT&T Communications  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
Fax. No. (850) 425-6343  
mrule@att.com

Jim Lamoureux (+)  
AT&T Communications  
1200 Peachtree Street, N.E.  
Room 8068  
Atlanta, Georgia 30309  
Tel. No. (404) 810-4196  
Fax. No. (404) 877-7648  
jlamoureux@att.com

Richard D. Melson (+)  
Gabriel E. Nieto  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For MCI  
Atty. for Rhythms Link  
rmelson@hgss.com

Dulaney L. O'Roark  
MCI Telecommunications Corporation  
6 Concourse Parkway  
Suite 600  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
Fax. No. (770) 284-5488  
De.OROark@mci.com

Floyd Self  
Messer, Caparello & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701

Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Atty. for AT&T  
fself@lawfla.com

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W.  
Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585  
tmonroe@comptel.org

Jeremy Marcus (+)  
Kristin Smith  
Blumenfeld & Cohen  
1625 Massachusetts Ave., Ste. 300  
Washington, D.C. 20036  
Tel. No. (202) 955-6300  
Fax. No. (202) 955-6460  
Represents Rhythms Links, Inc.  
jeremy@technologylaw.com  
kristin@technologylaw.com

Kimberly Caswell (+)  
GTE Florida Incorporated  
One Tampa City Center  
201 North Franklin Street  
Tampa, Florida 33602  
Tel. No. (813) 483-2617  
Fax. No. (813) 204-8870  
kimberly.caswell@verizon.com

Karen M. Camechis (+)  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
215 South Monroe Street, 2nd Flr.

Tallahassee, Florida 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
Represents Time Warner  
Karen@penningtonlawfirm.com

Carolyn Marek (+)  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
Carolyn.Marek@twtelecom.com

Mark E. Buechele, Esquire  
Supra Telecom  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
mbuechele@stis.com

Donna Canzano McNulty, Esq. (+)  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium Bldg., Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
donna.mcnulty@wcom.com

Michael A. Gross (+)  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
310 North Monroe Street

Tallahassee, FL 32301  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
mgross@fcta.com

Florida Public Telecomm. Assoc.  
Angela Green, General Counsel  
125 South Gadsden Street  
#200  
Tallahassee, FL 32301-1525  
Tel. No. (850) 222-5050  
Fax. No. (850) 222-1355  
abgreen@nettally.com

Intermedia Communications, Inc.  
Scott Sapperstein (+)  
Sr. Policy Counsel  
3625 Queen Palm Drive  
Tampa, FL 33619-1309  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923  
SASapperstein@intermedia.com

Charles J. Rehwinkel (+)  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
Counsel for Sprint  
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 224-9115  
Fax. No. (850) 222-7560  
Counsel for Sprint  
jfons@ausley.com

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway  
Suite 3200

Atlanta, GA 30328  
Tel. No. (770) 284-5500  
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)  
Regional Counsel  
Covad Communications Company  
10 Glenlake Parkway  
Suite 650  
Atlanta, GA 30328-3495  
Tel. No. (678) 579-8388  
Fax. No. (678) 320-9433  
cboone@covad.com

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
Fax. No. (850) 488-4491  
beck.charles@leg.state.fl.us

Eric J. Branfman (+)  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7500  
Fax. No. (202) 424-7645  
Represents Florida Digital Network, Inc.  
ejbranfman@swidlaw.com

John McLaughlin  
KMC Telecom. Inc.  
Suite 170  
3025 Breckinridge Boulevard

Duluth, GA 30096  
Tel. No. (770) 931-5260  
Fax. No. (770) 638-6796  
jmclau@kmctelecom.com

Betty Willis (+)  
ALLTEL Communications  
Services, Inc.  
One Allied Drive  
Little Rock, AR 72203-2177  
bettye.j.willis@alltel.com

J. Jeffry Wahlen (+)  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
Atty. for ALLTEL  
jwahlen@ausley.com

Stephen P. Bowen  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
Tel. No. (415) 394-7500  
Fax. No. (415) 394-7505  
stevebowen@earthlink.net

Norton Cutler (+)  
General Counsel  
BlueStar Networks, Inc.  
5 Corporate Centre  
801 Crescent Centre Drive  
Suite 600  
Franklin, Tennessee 37067  
Tel. No. (615) 778-7316  
norton.cutler@bluestar.com

Michael Bressman (+)  
Associate General Counsel  
5 Corporate Centre  
801 Crescent Centre Drive

Suite 600  
Franklin, Tennessee 37067  
Tel. No. (615) 778-7350  
Fax. No. (615) 788-7354  
michael.bressman@bluestar.com

Charles J. Pellegrini  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard, Suite 200  
Tallahassee, FL 32303  
Represents Intermedia  
cjpellegrini@nettally.com

George S. Ford (+)  
Chief Economist  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, FL 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
gford@z-tel.com

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19th Street, NW, Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
jcanis@kelleydrye.com  
mhazzard@kelleydrye.com  
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce  
Shook, Hardy & Bacon, LLP  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005-2004

Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
rjoyce@shb.com  
Represents Network Access Solutions

Russell M. Blau  
Thomas R. Lotterman (+)  
Michael Sloan (+)  
Robert Ridings (+)  
Swidler Berlin Shereff Friedman  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7755  
Fax. No. (202) 424-7643  
Attys. for Broadslate Networks, Inc.  
Attys. for Network Telephone  
Attys. for Cleartel Comm.  
MCSloan@swidlaw.com  
rmbrau@swidlaw.com  
rjridings@swidlaw.com  
trlotterman@swidlaw.com

John Spilman  
Director Regulatory Affairs and  
Industry Relations  
Broadslate Networks, Inc.  
675 Peter Jefferson Parkway  
Suite 310  
Charlottesville, VA 22911  
Tel. No. (804) 220-7606  
Fax. No. (804) 220-7701  
john.spilman@broadslate.net

Gary Cohen (+)  
Blumfeld & Cohen  
1625 Massachusetts Ave., N.W.  
Suite 320

Washington, D.C. 20036  
Represents Rhythms Links, Inc.  
gary@technologylaw.com

Hope G. Colantonio  
Legal & Regulatory Manager  
Cleartel Communications, Inc.  
1255 22nd Street N.W., 6th Floor  
Washington, D.C. 20037  
Tel. No. (202) 715-1300  
h.colantonio@cais.com

Brent E. McMahan  
Vice President Regulatory and  
Government Affairs  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501  
brentm@networktelephone.net

  
Bennett L. Ross (120)

**(+) Signed Protective Agreement**

219337