Legal Department

SEP 20 PH 4: 48

PATRICK W. TURNER General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0761

September 20, 2002

Mrs. Blanca S. Bayó Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No.: 020578-TP

Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc's Key Customer Promotional Tariffs

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification for its Response to Florida Competitive Carriers Association's and Mpower Communications Corp.'s First Set of Interrogatories, Item 11(a) and Production of Documents, Item 2, 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,

Patrick W. Turner

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

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 10143-02. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER - DATE

10142 SEP 20 %

000623

FPSC-COMMISSION CLERK



## CERTIFICATE OF SERVICE DOCKET NO. 020578-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (\*), electronic mail and Federal Express overnight delivery this 20th day of July 2002 to the following:

Felicia Banks (\*)
Linda Dodson (\*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6191
Fax. No. (850) 413-6250
fbanks@psc.state.fl.us

(+) Signed Protective Agreement

Joseph A. McGlothlin
Vicki Gordon Kaufman
Timothy J. Perry
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
Attys. for Mpower
imcglothlin@mac-law.com
vkaufman@mac-law.com

Rick Heatter, Vice President Mpower Communications, Corp. 175 Sully's Trail, Suite 300 Pittsford, New York 14534 Tel. No. (585) 218-6556 Fax. No. (585) 218-0635

Patrick W. Turner (V)

**ORIGINAL** 

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Competitive,	)	
Carriers Association, for Expedited Review	)	
and Cancellation of BellSouth	)	Docket No. 020578-TP
Telecommunications, Inc.'s Key Customer	)	
Promotional Tariffs.	)	Filed: September 20, 2002
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## BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files this Notice of Intent to Request Specified Confidential Classification and says the following:

- 1. On August 13, 2002, Florida Competitive Carriers Association ("FCCA") and Mpower Communications Corporation ("Mpower") served their First Set of Interrogatories (Nos. 1-19) and First Request for Production of Documents (Nos. 1-5) upon BellSouth. Based on an agreement between parties to a one-week extension to respond, BellSouth filed its Responses to First Set of Interrogatories and First Request for Production of Documents to FCCA and Mpower on September 20, 2002.
- 2. The information contained in BellSouth's Response to FCCA and Mpower's First Set of Interrogatories, Item 11(a), and First Request for Production of Documents, Item 2, includes, but is not limited to, confidential business information that is proprietary to BellSouth.
- 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 documents without delay.

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLEROOOE26

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 20th day of September 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

James Meza III

c/o Nancy H. Sims

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

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