Patrick W. Turner Senior Regulatory Counsel

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

ORIGINAL

October 17, 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



Docket No. 020119-TP Re:

Petition of Florida Digital Network, Inc. for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs and For an Investigation of BellSouth Telecommunications, Inc.'s Promotional Pricing and Marketing Practices

Docket No.: 020578-TP Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc's Key Customer Promotional Tariffs

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its First Request for Production of Documents and First Set of Interrogatories to Florida Digital Network, Inc., in the captioned dockets.

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

Sincerely,

Patrick W. Turner (ICA)

Enclosures COM CTR cc: All Parties of Record ECR GCL Marshall M. Criser III OPC R. Douglas Lackey MMS Nancy B. White SEC

AUS

RECEIVED & FILED

DOCUMENT NUMBER - DATE FPSC-BUREAU OF RECORDS

1 1 3 1 7 OCT 17 8

## CERTIFICATE OF SERVICE DOCKET NO. 020119-TP and 020578-TP

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

(\*) Hand Delivery, Electronic Mail, and Overnight Federal Express this 17th day of October 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) 413-6216
fbanks@psc.state.fl.us
Idodson@psc.state.fl.us

Matthew Feil
Florida Digital Network
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net

Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Marsha Rule
Rutldege, Ecenia, Purnell & Hoffman
215 S. Monroe St., Suite 420 (32301)
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Atty. for US LEC
Ken@Reuphlaw.com

Dana Shaffer
105 Molly Street, Suite 300
Nashville, TN 37201
Tel. No. (615) 777-7700
Fax. No. (615) 345-1564
Atty. for XO
dana.shaffer@xo.com

Karen Camechis, Esq.
Pennington Law Firm
P.O. Box 10095
215 South Monroe Street
Tallahassee, FL 32302-2095
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Atty. for Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek
Time Warner
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold
& Steen, PA
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
jmcglothlin@mac-law.com
vkaufman@mac-law.com
Attys. for Access
Attys. for FCCA
Attys. for Mpower

D. Mark Baxter Stone & Baxter, LLP 577 Mulberry Street, Suite 1111 Macon, Georgia 31201-8256 Tel. No. (478) 750-9898 Fax. No. (478) 750-9899 Atty. for Access

Rodney Page
Access Integrated Networks, Inc.
4885 Riverside Drive, Suite 101
Macon, Georgia 31210

Nanette Edwards
ITC DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3900
Fax. No. (256) 382-3801
nedwards@itcdeltacom.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 Turner (1/4)

(+) Signed Protective Agreement