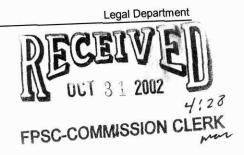
Patrick W. Turner Senior Regulatory Counsel

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



October 31, 2002

ORIGINAL

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. 020119-TP

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

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

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its Second Requests for Production of Documents to US LEC of Florida, 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, 6 W. Turner

Patrick W. Turner

Enclosures

ECR

MMS

OTH

AUS CAF — cc: All Parties of Record Marshall M. Criser III COM _ R. Douglas Lackey

---- Nancy B. White

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

1957 OCT318

FPSC-COMMISSION CLERK

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 Federal Express this 31st 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

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

Patrick Turner

(+) Signed Protective Agreement