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July 30, 1999

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101

FILED

JUL 30 1999

Missouri Public  
Service Commission

Re: Case No. TA-2000-24

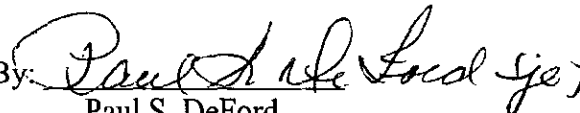
Dear Judge Roberts:

Attached for filing with the Commission is the original and fifteen (15) copies of AT&T Communications of the Southwest Inc's Application to Intervene and Motion to Consolidate in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

By:   
Paul S. DeFord

Attachment

cc: All parties of record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JUL 30 1999

Missouri Public  
Service Commission

In the Matter of the application of )  
Fiber Four Corporation )  
d/b/a Holway Long Distance for a certificate of )  
service authority to provide interexchange and )  
local exchange telecommunications services. )

Case No. TA-2000-24

APPLICATION TO INTERVENE AND MOTION TO CONSOLIDATE

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and AT&T Wireless Services, Inc. ("AWS") and for their Application to Intervene state as follows:

1. AT&T is a competitive interexchange telecommunications company duly incorporated and existing under and by virtue of the laws of the State of Delaware, authorized to do business in the State of Missouri as a foreign corporation. AT&T's principal Missouri offices are located at 1100 Walnut, Kansas City, Missouri 64106. AT&T is an authorized provider of intrastate interexchange telecommunications services in Missouri under authority granted and tariffs approved by the Commission, as well as an authorized provider of interstate interexchange telecommunications services under a certificate granted and tariffs approved by the Federal Communications Commission. AT&T has been granted authority to provide local exchange service and basic local exchange service in portions of Missouri.

2. All communications and pleadings in this docket should be directed to:

Paul S. DeFord  
Lathrop & Gage L.C.  
2345 Grand Boulevard, Suite 2800  
Kansas City, MO 64108

Kevin Zarling  
AT&T Communications  
919 Congress, Suite 1500  
Austin, Texas 78701

3. Fiber Four Corporation, an entity previously granted a certificate of authority to provide interexchange telecommunications services throughout Missouri, has recently filed four separate applications with the accompanying tariffs seeking authority to provide interexchange and local exchange telecommunications services in Missouri. Each of the four applications identifies a different fictitious name under which the corporation proposes to provide service in four separate incumbent local exchange companies service territories. Different toll rates are proposed for each of the four "service territories."


4. AT&T does not oppose approval of the applications or the accompanying tariffs. However, it is compelled to point out that the effect of the proposed tariffs is to put in place a rate structure identical to that proposed to AT&T's "intraLATA overlay plan" tariff which has been suspended by the Commission. Applicant's parent companies or its affiliates requested such suspension based on their contention that AT&T's proposed overlay tariff constituted geographic deaveraging of rates. To the extent applicant's proposed tariffs are similar, if not identical, in principal to AT&T's proposed tariffs, it is AT&T's position that they must be treated and processed in the same manner by the Commission. To that end, AT&T submits that applicant's tariffs should not be approved or should be suspended until such time as the Commission resolves the issue associated with AT&T's overlay tariff. AT&T submits that time and resources may be conserved by consolidation of applicant's four filings with AT&T's overlay docket.

5. As a provider of the telecommunication services, AT&T interests are different than that of the public generally and no other party to this case can adequately project those interests. Further, AT&T's intervention in this proceeding is in the public interest because of its interest in enhancing competition and because of its expertise in the telecommunications industry.

**WHEREFORE**, AT&T respectfully requests the Commission enter its Order granting AT&T's Application to Intervene.

Respectfully submitted,

**LATHROP & GAGE L.C.**

  
Paul S. DeFord MO Bar #29509

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Attorneys for AT&T Communications

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was served upon the following persons by depositing a true copy thereof in the United States mail, postage prepaid, this 30th day of July, 1999.

W.R. "Trip" England  
Sondra Morgan  
rydon, Swearngen & England  
312 E. Capitol  
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AN ATTORNEY FOR AT&T COMMUNICATIONS  
OF THE SOUTHWEST, INC.