

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Southwestern)
Bell Telephone Co., d/b/a SBC Filing Tariff)
Revisions to Suspend Billing and Collection) Case No. TT-2004-0120
Services for a Customer if the Customer is in)
Breach of Any Other Agreement between the) Tariff No.: JI-2004-0176
Parties.

MCI WORLDCOM COMMUNICATIONS, INC.'S
APPLICATION TO INTERVENE

COMES NOW MCI WorldCom Communications, Inc. (MCI) pursuant to 4 CSR 240-2.075
and for its Application to Intervene states to the Commission:

1. MCI is a Delaware corporation in good standing duly authorized to conduct business
in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCI is
authorized as a competitive telecommunications company under certificates granted and tariffs
approved by the Commission.

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

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3. On or about August 13, 2003, Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (SBC) filed proposed tariff sheets regarding billing and collection services. The tariff sheets bore an effective date of September 12, 2003. On September 4, 2003 AT&T Communications of the Southwest filed a Motion to Suspend or Reject the tariff sheets. The Commission issued an order directing parties to respond to AT&T's motion by September 8, 2003. Sprint Communications Company, L.P. also filed a motion to reject the tariff sheets. On September 8, 2003 SBC filed a Motion for Extension of Time to Respond to September 18, 2003, and extended the effective date of the proposed tariff sheets to September 26, 2003. Staff also requested that the Commission extend the deadline to respond to September 18, 2003. On September 8, 2003, the Commission issued its Order extending the time to respond to September 18, 2003.

4. MCI seeks to intervene in this proceeding because the Commission's decision will affect MCI's interest as a customer of SBC's billing and collection services.

5. MCI's interests are different from those of the general public. Furthermore, MCI's intervention in this proceeding is in the public interest because of its expertise in the telecommunications industry.

6. MCI opposes the proposed tariff changes for the reasons set forth in its Motion to Suspend or Reject filed herewith.

WHEREFORE, MCI WorldCom Communications, Inc., respectfully requests the Commission to issue its order granting its Application to Intervene.

CURTIS, OETTING, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 11th day of September, 2003, by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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