Leo J. Bub Senior Counsel



FILED AUG 0 3 1999

Missouri Public Irvice Commission

Southwestern Bell Telephone One Bell Center Room 3518 St. Louis, Missouri 63101 Phone 314 235-2508 Fax 314 247-0014

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August 2, 1999

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Floor 5A Jefferson City, Missouri 65101

Re: Case No. TA-2000-1

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application To Intervene.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed selfaddressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

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Leo J. Bub

Enclosure

cc: Attorneys of Record

## **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of the Application of Allegiance Telecom of Missouri, Inc. for a Certificate of Service Authority to provide Basic Local Telecommunications Service in portions of the State of Missouri and for Competitive Classification.

Case No. TA-2000-1

## SOUTHWESTERN BELL TELEPHONE COMPANY'S APPLICATION TO INTERVENE

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding and states:

1. Southwestern Bell is a Missouri corporation duly authorized to conduct business

in Missouri with its principal office at One Bell Center, St. Louis, Missouri 63101.

Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and

is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in §386.020 RSMo (1994).<sup>1</sup>

2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul G. Lane Leo J. Bub Anthony K. Conroy Katherine C. Swaller Attorneys for Southwestern Bell Telephone Company One Bell Center, Room 3518 St. Louis, Missouri 63101

3. In this docket Allegiance Telecom of Missouri, Inc. seeks a certificate of service authority to provide resold and facilities-based basic local telecommunications service in portions of the State of Missouri, including exchanges currently served by Southwestern Bell. Allegiance proposes to provide facilities-based basic local exchange services to non-residential

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All statutory cites are to the Missouri Revised Statutes.

business customers in exchanges currently served by Southwestern Bell, GTE Midwest Inc. and Sprint of Missouri in portions of the State of Missouri. Allegiance also seeks classification as a competitive telecommunications company and the waiver of certain Commission rules and statutory provisions.

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4. Southwestern Bell seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on Allegiance's Application. Southwestern Bell is authorized to provide basic local telecommunications services and exchange access services within the State of Missouri. Pursuant to tariffs on file with the Commission, Southwestern Bell is authorized to provide the type of services within the State of Missouri that Allegiance seeks to provide. Allegiance's services will be offered in direct competition with Southwestern Bell if this application is granted.

5. Southwestern Bell's interests as a basic local telecommunications service provider differ from those of the general public. No other party to this proceeding will adequately protect Southwestern Bell's interest.

6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise and experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY

PAUL G. LANE #27011 LEO J. BUB #34326 ANTHONY K. CONROY #35199 KATHERINE C. SWALLER #34271 Attorneys for Southwestern Bell Telephone Company One Bell Center, Room 3518 St. Louis, Missouri 63101 314-235-2508 (Telephone) 314-247-0014 (Facsimile)

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 2, 1999.

Leo J. Bub

DAN JOYCE MISSOURI PUBLIC SERVICE COMMISSION 301 W. HIGH STREET, SUITE 530 JEFFERSON CITY, MO 65101

MICHAEL F. DANDINO OFFICE OF THE PUBLIC COUNSEL 301 W. HIGH STREET, SUITE 250 JEFFERSON CITY, MO 65101

MR. CHARLES BRENT STEWART STEWART & KEEVIL, L.L.C. 1001 CHERRY STREET, SUITE 302 COLUMBIA, MO 65201