

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

In the Matter of a Recommendation)	
Concerning the Surcharge for Deaf Relay)	Case No. TO-2003-0171
Service and Equipment Distribution Program Fund)	

**SBC MISSOURI'S
APPLICATION TO INTERVENE**

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (SBC Missouri), and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of its Application, SBC Missouri states to the Missouri Public Service Commission (Commission) as follows:

1. SBC Missouri is a limited partnership duly authorized to conduct business in Missouri with its principal Missouri office located at One SBC Center, St. Louis, Missouri 63101. SBC Missouri is a "local exchange telecommunications company" and a "public utility" and is authorized to provide "telecommunications service" within the state of Missouri as each of those phrases are defined in §386.020 RSMo (1994).

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

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Mary B. MacDonald
Attorneys for Southwestern Bell Telephone Company,
L.P., d/b/a SBC Missouri
One SBC Center, Room 3516
St. Louis, Missouri 63101

3. On November 5, 2002, the Staff of the Commission filed a motion requesting that the Commission open a new case to review the surcharge which funds the Relay Missouri Program. The Commission issued its Order Establishing Case on December 17, 2002.

4. SBC Missouri seeks to intervene in this case because as a telecommunications company authorized to provide basic local telecommunications services and exchange access services throughout the State of Missouri, SBC Missouri has a significant and direct interest in the operation of the Relay Missouri Program, including the amount of the surcharge local exchange carriers are permitted to retain.

5. This Commission should permit intervention pursuant to 4 CSR 240-2.075(4)(A) because SBC Missouri's interests differ from those of the general public. No other party to this proceeding will adequately protect SBC Missouri's interest.

6. The Commission should also permit intervention pursuant to 4 CSR 240-2.075(4)(C) because granting SBC Missouri's Application to Intervene is in the public interest in that SBC Missouri will bring to this proceeding its extensive expertise and experience as a telecommunications provider. In addition, SBC Missouri has intervened and participated in each of the Commission's previous cases in which the Commission addressed the issues which it will address in this proceeding.

WHEREFORE, SBC Missouri respectfully requests that the Commission grant this Application to Intervene.

Respectfully submitted,

Southwestern Bell Telephone Company, L.P., d/b/a SBC Missouri

By /s/ Anthony K. Conroy

PAUL G. LANE #27011

LEO J. BUB #34326

ANTHONY K. CONROY #35199

MARY B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone Company, L.P.,
d/b/a SBC Missouri

One SBC Center, Room 3516

St. Louis, Missouri 63101

(314) 235-6060 (Telephone)

(314) 247-0014 (Facsimile)

e-mail address: anthony.conroy@sbc.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served on all parties listed below by electronic mail on this 31st day of December, 2002.

/s/ Anthony K. Conroy
Anthony K. Conroy

ERIC ANDERSON
MISSOURI PUBLIC SERVICE COMMISSION
301 W. HIGH STREET, SUITE 530
JEFFERSON CITY, MO 65101
ericanderso@mail.state.mo.us

MICHAEL F. DANDINO
OFFICE OF THE PUBLIC COUNSEL
301 W. HIGH STREET, SUITE 250
JEFFERSON CITY, MO 65101
mdandino@ded.state.mo.us