

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

In the Matter of Sprint Missouri, Inc. d/b/a)
Sprint's Tariff Filing to Introduce)
Wireless E911 Phase 2 Service.)

Case No. IT-2005-0005
Tariff No. JI-2004-1485

**SPRINT'S OPPOSITION TO
ST. LOUIS COUNTY'S MOTION TO INTERVENE**

COMES NOW Sprint Missouri, Inc. and hereby provides its Opposition to St. Louis County's Motion to Intervene in the above mentioned tariff. Because the County does not have an interest that can be adversely affected by the Sprint tariff, intervention should be denied. Sprint states:

1. On June 16, 2004, Sprint Missouri, Inc. d/b/a Sprint ("Sprint") filed a proposed revision to its P.S.C. MO. - No. 22 General Exchange Tariff to introduce a Wireless E911 Phase 2 service. The tariff revisions bear an effective date of September 16, 2004¹.

2. On July 8, 2004, St. Louis County filed its Motion to Intervene for the purpose of opposing Sprint's tariff. In its Motion, St. Louis County claims its County Police Department will be impacted by Sprint's proposed tariff. Furthermore, St. Louis County claims it would be "unreasonable to subject the County to the additional charges set forth in [Sprint's] proposed tariff". St. Louis County also makes reference to wireless carriers not contributing to the E911 system as a reason for intervention.

3. Intervention is granted under the Commission's rules if the proposed intervenor has an interest different than the general public which may be adversely

¹ On July 8, 2004, Sprint voluntarily extended the effective date to September 16, 2004 to allow Staff sufficient time for review.

affected by a final order in the case and granting the intervention is in the public interest.
4 CSR 240-2.075.

4. St. Louis County does not meet the requirements for intervention. St. Louis County does not have an interest that could be affected adversely or otherwise, by this proposed tariff filing. None of Sprint's 80 local exchanges are within St. Louis County. In fact, the closest Sprint exchange to St. Louis County that is also within the St. Louis LATA is Rolla, Missouri. St. Louis County does not purchase any of the PSAP services offered by Sprint that are subject to this proposed tariff. Since the County does not purchase the subject services, it cannot not be adversely affected by the Commission approving this tariff. Moreover, because the County does not purchase PSAP services from Sprint, it does not have interests different from the general public. Consequently, the public interest will not be served by allowing the County to intervene. In sum, the County does not satisfy the requirements for intervention set forth in Section 4 CSR 240-2.075 of the Rules of Practice and Procedure.

WHEREFORE, Sprint requests the Commission deny St. Louis County's Motion to Intervene.

Respectfully submitted,
SPRINT



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16 day of July, 2004, a copy of Sprint's Opposition to St. Louis' County's Motion to Intervene was served via U.S. Mail, Email and or facsimile to each of the following parties:

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