

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Application of Southwestern Bell Telephone)
Company to Provide Notice of Intent to File)
an Application for Authorization to Provide)
In-Region InterLATA Services Originating)
in Missouri Pursuant to Section 271 of the)
Telecommunications Act of 1996.)

Case No. TO-99-227

FILED
NOV 30 1998
Missouri Public
Service Commission

MOTION TO REJECT FILING OR REQUIRE SERVICE

Comes Now MCI Telecommunications Corporation (MCI), a MCI WorldCom company, and for its Motion to Reject Filing or Require Service states to the Commission:

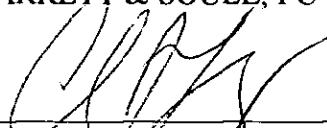
1. In Case No. TO-97-56, the Commission granted MCI's Motion for Advance Notice and ordered Southwestern Bell Telephone Company (SWBT) to give notice to the Commission **and the parties to the case** by filing an appropriate pleading and direct testimony at least 120 days before it files an application with the FCC to provide in-region interLATA telecommunications services in Missouri.
2. SWBT filed its pleading and direct testimony on November 20, 1998.
3. SWBT failed to serve this filing on the parties to Case No. TO-97-56 as ordered by the Commission. SWBT's certificate of service reflects service only upon General Counsel and the Office of Public Counsel.
4. Counsel for MCI made multiple requests for a copy of the filing and specifically reminded SWBT of its obligation to serve the parties to Case No. TO-97-56, but did not receive a copy of the filing until after 2:00 p.m. on November 25, 1998. There are at least eight other parties of record.
5. The Commission should reject SWBT's filing for failure to comply with the Commission's order in Case No. TO-97-56. Alternatively, the Commission should require SWBT to certify that it has served its filing on all parties to Case No. TO-97-56 and order that the 120 day advance notice period will not commence until such certification is filed.

WHEREFORE, MCI Telecommunications Corporation moves the Commission to reject SWBT's filing, or alternatively to order SWBT to serve its filing on all parties to Case No. TO-97-56 and postpone commencement of the required 120 day advance notice period until

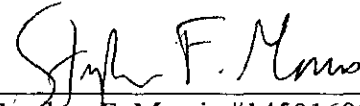
certification of such service is filed with the Commission.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served this 25 day of November, 1998, by placing same in a postage paid envelope and depositing in the US Mail addressed to each of the parties on the attached service list.

[REDACTED]

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