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November 25, 1998

Mr. Dale Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, Missouri 65101-1517

Re:

CARL J. LUMLEY

Case No. TO-99-227

Via Federal Express

FILED

NOV 3 0 1998

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed herewith for filing in the above-referenced case please find an original and fifteen (15) copies of the following documents:

- 1. MCI Telecommunications Corporation's Application to Intervene;
- 2. MCI Telecommunications Corporation's Entry of Appearance; and
- 3. MCI Telecommunications Corporation's Motion to Reject Filing or Require Service.

Please file stamp the extra copies and return in the enclosed self-addressed, postage prepaid envelope to the undersigned for our records.

CJL:ce

Enclosures

cc:

Parties of Record

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BEFORE THE MISSOURI PUE	BLIC SE	ERVICE COMMISSION	Nov
Application of Southwestern Bell Telephone)	Sen	11/5501
Company to Provide Notice of Intent to File)		Ce Cyri p
an Application for Authorization to Provide)	Case No. TO-99-227	OMERAN
n-Region InterLATA Services Originating)		"NISSIC
n Missouri Pursuant to Section 271 of the)		310N
Telecommunications Act of 1996)		

MCI TELECOMMUNICATIONS CORPORATION'S MOTION TO INTERVENE

Comes Now MCI Telecommunications Corporation (MCI), an MCI WorldCom company, and for its Application to Intervene states to the Commission:

- 1. MCI is a competitive interexchange telecommunications company duly incorporated and existing under and by virtue of the laws of the State of Delaware, authorized to do business in the State of Missouri as a foreign corporation. Its principal Missouri offices are currently located at 100 S. Fourth Street, St. Louis, Missouri 63102. It is an authorized provider of intrastate interexchange telecommunications services in Missouri under certificates granted and tariffs approved by the Commission, as well as an authorized provider of interstate interexchange telecommunications services subject to the jurisdiction of the Federal Communications Commission.
 - 2. All communications and pleadings in this docket should be directed to:

Carl J. Lumley Leland B. Curtis Curtis, Oetting, Heinz, Garrett & Soule, P.C. 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105 Stephen F. Morris MCI Telecommunications Corp. 701 Brazos, Suite 600 Austin, Texas 78701

3. On or about November 20, 1998, Southwester Bell Telephone Company (SWBT) filed its <u>Application to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri</u>.

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- 4. MCI seeks to intervene in the proceeding because the Commission's decision may affect MCI's interests as a provider of interexchange telecommunications services. MCI opposes the application.
- 5. MCI's interests as a telecommunications company are different from those of the general public. Furthermore, MCI's intervention in this proceeding is in the public interest because of MCI's interests in enhancing competition, and because of its expertise in the telecommunications industry.

WHEREFORE, MCI respectfully requests the Commission to issue its order granting MCI's Application to Intervene.

Respectfully submitted,

CURTIS, OETTING, HEINZ GARRETT & SOULE, PC

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Attorneys for MCI Telecommunications
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served this 25 day of North, 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.

eracy contracts

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