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April 26, 2002

Secretary of the Commission Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102-0360

Re: Case No. TT-2002-472

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc. Application to Intervene. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact us.

Very/truTy fours,

Carl J. Lymley

CJL:dn Enclosure

CARL J. LUMLEY

cc. SWBT (W/Enclosure)

Public Counsel (W/Enclosure) General Counsel (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Southwestern Bell)	
Telephone Company's Tariff to Initiate)	Case No. TT-2002-472
Residential Customer Winback Promotion)	Tariff No. 200200831

MCIMETRO ACCESS TRANSMISSION SERVICES, LLC, BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC. MCI WORLDCOM COMMUNICATIONS, INC. APPLICATION TO INTERVENE

Come now MCImetro Access Transmission Services, LLC (MCImetro), Brooks Fiber Communications of Missouri, Inc., (Brooks) and MCI WorldCom Communications, Inc. (MCIWC) (collectively "Intervenors") pursuant to 4 CSR 240-2.075 and Commission Order in this case and for their Application to Intervene state to the Commission:

- 1. MCImetro is a Delaware limited liability company in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCImetro is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.
- 2. Brooks is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. Brooks is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.
- 3. MCIWC is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCIWC is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

4. All communications and pleadings in this case should be directed to:

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5. On or about March 29, 2002, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company (SWBT) filed a tariff sheet that would revise its Local Exchange Tariff to offer, as a promotion, waiver of the Service and Equipment Charge to residential customers who have disconnected their access line with SWBT for the purpose of establishing service with another local exchange carrier and now wish to return to SWBT, which tariff had an effective date of April 9, 2002. On April 5, 2002, the Commission issued an order suspending the tariff until May 9, 2002 in order to allow the Commission to further study the tariff. On April 18, 2002, the Commission issued its order further suspending tariff and directing notice and establishing an intervention deadline of May 9, 2002.

6. Intervenors seek to intervene in this proceeding because the Commission's decision will affect their interests as providers of telecommunications services in competition against SWBT.

7. Intervenors' interests as telecommunications companies are different from those of

the general public. Furthermore, their intervention in this proceeding is in the public interest because

of their interest in enhancing competition and because of their expertise in the telecommunications

industry.

8. Intervenors oppose SWBT's proposed tariff, which includes unlawfully

discriminatory winback discounts that would adversely impair competition contrary to the public

interest.

WHEREFORE, McImetro Access Transmission Services, LLC, Brooks Fiber

Communications of Missouri, Inc. and MCI WorldCom Communications, Inc., respectfully request

the Commission to issue its order granting their Application to Intervene.

CURTIS, OETTING, HEINZ,

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Attorneys for MCImetro Access Transmission Services LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc.

Certificate of Service

			was served	upon the parties identified on the
attached service list on this	26	day of	And	, 2002, by placing same in the
U.S. Mail, postage paid.			1	

Office of Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

Paul G. Lane General Attorney-Missouri Southwestern Bell Telephone Company One Bell Center, Room 3520 St. Louis, Missouri 63101-1976

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