

Southwestern Bell Telephone One Bell Center Room 3518 St. Louis, Missouri 63101 Phone 314 235-2508 Fax 314 247-0014

November 30, 1999

DEC 0 1 1999

Missouri Public Service Commission

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Floor 5A Jefferson City, Missouri 65101

Re: Case No. Case No. TA-2000-309

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application to Intervene.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Leo J. Bub

Enclosure

cc: Attorneys of Record

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



In the Matter of the Application of QWEST COMMUNICATIONS CORPORATION, for a Certificate of Authority to Provide Basic Local and Local Exchange Intrastate Telecommunications	) )	Missouri Public Service Commission Case No. TA-2000-309
Local Exchange Intrastate Telecommunications	)	
Services within the State of Missouri.	)	

## SOUTHWESTERN BELL TELEPHONE COMPANY'S APPLICATION TO INTERVENE

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding and states:

- 1. Southwestern Bell is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101. Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in §386.020 RSMo (1994).<sup>1</sup>
- 2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Katherine C. Swaller
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, Missouri 63101

3. In this docket, QWEST COMMUNICATIONS CORPORATION seeks a certificate of service authority to provide competitive basic local and local exchange intrastate telecommunications services within the State of Missouri. QWEST also seeks classification as a competitive telecommunications company and the waiver of certain Commission rules and statutory provisions.

<sup>1</sup> All statutory cites are to the Missouri Revised Statutes.

- 4. Southwestern Bell seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on QWEST's Application. Southwestern Bell is authorized to provide basic local and local exchange telecommunications services within the State of Missouri. Pursuant to tariffs on file with the Commission, Southwestern Bell is authorized to provide the type of services within the State of Missouri that QWEST seeks to provide. OWEST in this certification proceeding has requested service authority in exchanges served by Southwestern Bell, GTE and Sprint. In order to protect its interests, Southwestern Bell believes it necessary for it to participate in the Commission's review of QWEST's initial request for certification.
- 5. Southwestern Bell's interests as a local exchange telecommunications service provider differ from those of the general public. No other party to this proceeding will adequately protect Southwestern Bell's interest.
- 6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise and experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on November 30, 1999.

Leo J Bub

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