

Charlie A. Dooley
County Executive

Saint Louis
COUNTY
COUNTY COUNSELOR

Patricia Redington
County Counselor

July 8, 2004

FILED

JUL 13 2004

Mr. Dale Hardy Roberts
Secretary of the Missouri Public Service Commission
Missouri Public Service Commission
200 Madison Street, Suite 360
Jefferson City, MO 65102-0360

**Missouri Public
Service Commission**

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

Dear Mr. Roberts:

Enclosed for filing please find St. Louis County's Motion for Intervention in the above proceeding.

Yours truly,

Cynthia L. Hoemann

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Associate County Counselor

Encl.

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

**Missouri Public
Service Commission**

In the Matter of Sprint Missouri, Inc. d/b/a)	
Sprint's Tariff Filing to Introduce)	Case No. IT-2005-0005
Wireless E911 Phase 2 Service)	Tariff No. JI-2004-1485

ST. LOUIS COUNTY'S MOTION TO INTERVENE

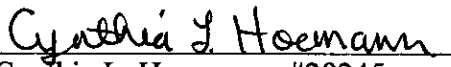
St. Louis County, Missouri ("County"), by and through undersigned counsel, pursuant to the provisions of Rule 240-2.075, hereby moves for leave to intervene in this action. In support of this motion, County states:

1. County Police Department is a Public Safety Answering Point ("PSAP") as defined in Sprint's proposed revision to its P.S.C. MO. – No. 22 General Exchange Tariff, which seeks to introduce a Wireless E911 Phase 2 service.
2. Wireless E911 Phase 2 provides PSAP's with the wireless caller's location and callback number information when the caller makes an emergency 911 emergency call.
3. The County 911 system is capable of receiving and utilizing the data elements associated with Phase II service.
4. County will be directly affected by the fees that are set forth in the proposed tariff, which proposes a monthly rate of \$250.00 per month for ALI Database Upgrade and a Nonrecurring charge of \$3,500 for Extended ALI Display Format.
5. It would be unreasonable to subject County to the additional charges set forth in the proposed tariff. There can be any number of wireless carriers in the St. Louis market, and neither they nor their customers contribute to operation of the public E9-1-1 system. In St. Louis County, only wireline customers pay to support E911, and wireless

customers pay nothing. This contrasts starkly with jurisdictions where the PSAP's costs of implementing wireless E911 are recovered through a tax or surcharge imposed on wireless subscribers.

6. County seeks intervention for the purpose of opposing the proposed tariff.

**PATRICIA REDINGTON
COUNTY COUNSELOR**

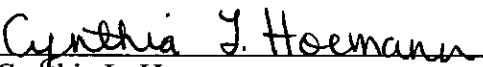

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served via First Class, U.S. Mail, postage prepaid, this the 8th day of July, 2004, on the following:

Marc Poston
Senior Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Margaret R. (Peg) Prendergast
Sprint
6450 Sprint Parkway
Overland Park, KS 66251


Cynthia L. Hoemann