

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

In the Matter of the Application of Southwestern Bell	)	
Telephone Co. d/b/a SBC Filing Tariff Revisions to	)	Docket No. JI-2004-0176
Suspend Billing and Collection Services for a Customer	)	
if the Customer is in Breach of Any Other Agreement	)	
Between the Parties	)	

**SPRINT'S MOTION TO INTERVENE**

*COMES NOW* Sprint Communications Company L.P. ("Sprint"), and hereby moves for an order permitting it to intervene in the above-captioned proceeding. In support of this Motion, Sprint states as follows:

1. On August 13, 2003, Southwestern Bell Telephone, L.P. d/b/a/ SBC Missouri ("SBC") filed tariffs for the Commission's approval seeking revisions to its access service tariff. The revisions address Billing and Collection Services SBC provides to interexchange companies ("IXC's"). The revisions will allows SBC to withhold money it collects for services rendered by IXCs to mutual customers if there exists any dispute at all between the IXC and *SBC or any affiliate of SBC*. Further, SBC can withhold the money even if the IXC has *valid grounds upon which to dispute the charges*. SBC can also withhold amounts even if a separate agreement between the IXC and SBC or its affiliates provide a mechanism to dispute claims. Finally, SBC can withhold monies that may relate to *any potential obligation of an IXC that may be due SBC or an affiliate*.

2. Sprint is a certified IXC that will be bound by the Commission's decision in this case and could be adversely affected thereby.

3. The representation of Sprint's interests in this case by existing parties is, or may be, insufficient to adequately protect its interests herein. Sprint will file a motion opposing

approval of the Tariff revisions. Therefore, Sprint respectfully requests permission to intervene in this case.

4. No party to this action will be adversely affected or otherwise harmed and the interests of justice would be served.


5. Copies of pleadings, correspondence, and orders should be addressed to:

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[lisa.c.creightonhendricks@mail.sprint.com](mailto:lisa.c.creightonhendricks@mail.sprint.com)

WHEREFORE, Sprint moves the Commission for an order allowing it to intervene in this case and become a party of record with all rights to have notice of and fully participate in this matter, including, but not limited to the right to file briefs and motions and to participate in arguments, and for all other necessary and proper purposes.

Respectfully submitted,

SPRINT



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### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by first-class/electronic/facsimile mail, this \_\_\_\_ day of September, 2003.

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