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CARL J. LUMLEY

August 13, 1997

FILED AUG 1 5 1997

Cecil Wright, Executive Secretary Missouri Public Service Commission Truman State Office Building, 5th Floor 301 West High Street Jefferson City, Missouri 65101-1517

PUBLIC SERVICE COMM:SSION

Re: Case No. TO-98-23

Dear Mr. Wright:

Enclosed herewith for filing in the above-referenced case please find an original and fifteen (15) copies of MCI Telecommunications Corporation's and MCImetro Access Transmission Services, Inc.'s, Application to Intervene and an original and fifteen (15) copies of Entry of Appearance on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. Please file stamp the extra copy and return in the enclosed self-addressed, postage prepaid envelope to the undersigned for our records.

Very truly yours

Carlo. Lumiey

CJL:dn Enclosures

cc. General Counsel
Office of Public Counsel
GTE
SWBT

United

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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GTE Midwest, Inc., intrastate	γ	AUG 1 5 1997
intraLATA Toll Services Agreements with)	PUBLIC SERVICE COMMISSION
Southwestern Bell Telephone Company)	Case No. TO-98-23 SERVICE COM
and United Telephone Company of)	COMMISSION
Missouri pursuant to Order issued in Case)	.,
No. TC-96-439.)	

MCI TELECOMMUNICATIONS CORPORATION'S AND MCImetro ACCESS TRANSMISSION SERVICES, INC.'S APPLICATION TO INTERVENE

Come now MCI Telecommunications Corporation (MCI) and MCImetro Access

Transmission Services, Inc. (MCImetro) and for their Application to Intervene state 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. MCImetro is a competitive telecommunications company organized and existing under the laws of the State of Delaware, and authorized to conduct business in the State of Missouri. Its principal place of business is 2400 North Glenville Drive, Richardson Texas, 75082. It is an authorized provider of intrastate interexchange and local exchange telecommunications services in Missouri under certificates granted and tariffs approved by the Commission, as well as a provider of

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interstate interexchange telecommunications services subject to the jurisdiction of the Federal Communications Commission.

3. 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. Berniston, Suite 200 St. Louis, Missouri 63105

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Stephen F. Morris MCITelecommunicationsCorp. 701 Brazos, Suite 600 Austin, Texas 78701

- 4. On or about July 16, 1997, GTE Midwest Incorporated (GTE) filed with the Commission its Agreements with Class A Carriers, pursuant to the Commission Order dated March 18, 1997 in Case No. TC-96-439.
- 5. MCI and MCImetro seek to intervene in the proceeding because the Commission's decision regarding these Agreements may affect their interests as providers of telecommunications services. MCI was the complainant in Case No. TC-96-439. MCI and MCImetro neither support nor oppose this Agreement at this time.
- 6. MCI's and MCImetro's interests, as competitive telecommunications companies that provide telecommunications services and require interconnection with other companies such as GTE, 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.

WHEREFORE, MCI and MCImetro respectfully request the Commission to issue its order granting their Application to Intervene.

Respectfully Submitted,

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C.

Carl 1.1 mley #32899 Leland B Curtis, #20550 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (FAX)

MCI Telecommunications Corporation

Stephen F. Morris, Texas Bar #14501600

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(512) 495-6727 (512) 477-3845 (FAX)

and MCImetro Access Transmission Services, Inc.

Attorneys for MCI Telecommunications Corporation

CERTIFICATE OF SERVICE BY MAIL

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

· . · ·

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Leo J. Bub Southwestern Bell Telephone Co. 100 North Tucker Blvd., Room 630 St. Louis, Missouri 63101-1976

James C. Stroo GTE Telephone Operations 1000 GTE Drive, MO611LGW P.O. Box 307 Wentzville, Missouri 63385-0307

Linda Gardner United Telephone Company of Missouri 5454 W. 110th Street Overland Park Kansas 66211

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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GTE Midwest, Inc., intrastate)	9 1997
intraLATA Toll Services Agreements with)	PUBLIC SERVICE COMMISSION
Southwestern Bell Telephone Company)	Case No. TO-98-23
and United Telephone Company of)	S.M.MISSION
Missouri pursuant to Order issued in Case)	
No. TC-96-439.)	

ENTRY OF APPEARANCE

COME NOW Stephen F. Morris, Carl J. Lumley, Leland B. Curtis and Curtis, Oetting, Heinz, Garrett & Soule, P.C. and pursuant to rule 4 CSR 240-2.040 herewith file their Entry of Appearance on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc., in connection with the above-styled proceeding. With respect to his entry Mr. Morris hereby advises the Commission that he is a member in good standing of the Bar of Texas. Neither Mr. Morris nor any member of the MCI Telecommunications Corporation Austin Legal Department is disqualified to appear in court. Mr. Morris designates Carl J. Lumley, Leland B. Curtis, and Curtis, Oetting, Heinz, Garrett & Soule, P.C., to serve as his associate counsel, and by their signatures they accept such designation.

Respectfully Submitted,

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C.

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Attorneys for MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc.

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