

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

In the Matter of the Determination of the)	
Weighted, Statewide Average Rate of)	Case No. TO-2006-0084
Nonwireless Basic Local Telecommunications)	
Services)	

APPLICATION TO INTERVENE OF SOUTHWESTERN BELL TELEPHONE, L.P.

Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (“SBC Missouri”), respectfully submits this Application to Intervene in the above-captioned case, pursuant to Commission Rule 2.075 (4 CSR 240-2.075) and the Commission’s September 8, 2005 Order Establishing Intervention Deadline and Requiring Filing (“Order”). In support of this Application, SBC Missouri states that:

1. SBC Missouri is a limited partnership duly authorized to conduct business in Missouri with its principal Missouri office located at One SBC Center, 35th Floor, St. Louis, Missouri 63101. SBC Missouri 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 is defined in Section 386.020 RSMo (2000).

2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul G. Lane
Leo J. Bub
Robert J. Gryzmala
Mimi B. MacDonald
Attorneys for Southwestern Bell Telephone, L.P.
One SBC Center, Room 3516
St. Louis, Missouri 63101

3. This case arose from the filing, on August 19, 2005, of a Motion to Open Case and Motion for Protective Order by the Commission's Staff. ("Staff's Motion"), so as "to provide a vehicle for the Commission to determine the average rate of nonwireless basic local telecommunications services as of August 28, 2005" pursuant to new subsection 13 to Section 392.245. (Staff's Motion, p. 1). The Commission's September 8, 2005, Order directed that any party wishing to intervene in the case should file an application to do so by not later than September 28, 2005. (Order, p. 2).

4. The Commission should permit SBC Missouri to intervene in this case pursuant to Commission Rule 2.075(4)(A) (4 CSR 240-2.075(4)(A)) because SBC Missouri's interests differ from those of the general public. As a local exchange telecommunications company, SBC Missouri is one of those companies that have been ordered to submit to the Commission's Staff the information referred to in the Commission's Order. (Order, p. 2). No other party to this proceeding will adequately represent or protect SBC Missouri's interests.

5. SBC Missouri's intervention is also warranted pursuant to Commission Rule 2.075(4)(B) (4 CSR 240-2.075(4)(B)) because doing so would be in the public interest. SBC Missouri's participation in the case will contribute to the implementation of new subsection 13 to Section 392.245.

6. For the foregoing reasons, SBC Missouri respectfully requests that the Commission grant its Application to Intervene in the above-captioned case.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

PAUL G. LANE	#27011
LEO J. BUB	#34326
ROBERT J. GRYZMALA	#32454
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone, L.P.
One SBC Center, Room 3516
St. Louis, Missouri 63101
314-235-6060 (Telephone)\314-247-0014 (Facsimile)
robert.gryzmala@sbc.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on September 13, 2005.


Robert J. Gryzmala

General Counsel
Colleen M. Dale
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
william.haas@psc.mo.gov

Craig Johnson
Missouri Independent Telephone Group
(MITG)
1648-A East Elm
Jefferson City, MO 65101
craig@csjohnsonlaw.com

Lewis R. Mills
Office of Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov
lewismills@ded.mo.gov

Brett Leopold
Sprint Communications Company, L.P.
Sprint Missouri, Inc. d/b/a Sprint
6450 Sprint Parkway
Overland Park, KS 66251
brett.d.leopold@mail.sprint.com