

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

In the Matter of the Review of the Deaf)	
Relay Service and Equipment Distribution)	Case No. TO-2007-0306
Fund Surcharge)	

**AT&T MISSOURI'S APPLICATION TO INTERVENE AND
RESPONSE TO STAFF'S RECOMMENDATION**

AT&T Missouri¹ respectfully submits this Application to Intervene in the above-captioned proceeding, in accordance with the provisions of Commission Rule 2.075 (4 CSR 240-2.075), and further, provides its response to Staff's recommendation that the Commission maintain the current surcharge of \$.13 per month and also maintain the current retention amount for local telephone companies.

1. AT&T Missouri is a limited partnership duly authorized to conduct business in Missouri with its principal Missouri office located at One AT&T Center, 35th Floor, St. Louis, Missouri 63101. AT&T 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:

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¹ Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, ("AT&T Missouri").

3. This case arose from the Staff's February 13, 2007, Motion to Open Case to Review Staff Recommendation requesting that the Commission open a case to review the surcharge that funds the Relay Missouri Program. The Staff recommends that the Commission maintain the current surcharge of \$.13 per month and also maintain the current retention amount for local telephone companies. In the Commission's March 8, 2007, Order Establishing Case, the Commission directed that any party wishing to intervene and to respond to Staff's recommendation do so by not later than March 22, 2007.

4. The Commission should permit AT&T Missouri to intervene in this case pursuant to Commission Rule 2.075(4)(B) (4 CSR 240-2.075(4)(B)) because doing so would be in the public interest. AT&T Missouri bills the Relay Missouri surcharge to its end-user customers, and thus has a significant and direct interest in the operation of the Relay Missouri Program in general, and in particular, the continued accurate and timely billing of any Commission-ordered surcharge.

5. AT&T Missouri's intervention is also warranted under Commission Rule 2.075(4)(A) (4 CSR 240-2.075(4)(A)) because AT&T Missouri's interests differ from those of the general public. No other party to this proceeding will adequately protect AT&T Missouri's interest.

6. Finally, AT&T Missouri's intervention is also appropriate under Commission Rule 2.075(4)(B) (4 CSR 240-2.075(4)(B)) in that AT&T Missouri will bring to this proceeding its extensive experience as a telecommunications provider. In addition, AT&T Missouri intervened and participated in the last previous instance (Case No. TO-2005-0306) in which the Commission addressed the same surcharge it has been asked to address in this case.

7. The Commission's Order Establishing Case also provides that responses to Staff's recommendation should be filed no later than March 22, 2007. AT&T Missouri states that it has no objection to Staff's recommendations. If, however, the Commission ultimately determines to change the monthly surcharge amount, whether by increasing it or by decreasing it, the Commission should make its order doing so effective not less than approximately 60 days from the date on which the order is issued, so that AT&T Missouri can effectively provide appropriate advance bill messages to customers and implement necessary billing system changes.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

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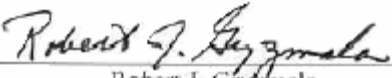
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on or about March 14, 2007.


Robert J. Gryzmala

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