

Leo J. Bub
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June 23, 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED

JUN 24 1999

Missouri Public
Service Commission

Re: Case No. TO-99-593

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application to Intervene.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in black ink, appearing to read "Leo J. Bub".

Leo J. Bub

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUN 24 1999

Missouri Public
Service Commission

In the Matter of the Investigation into Signaling)
Protocols, Call Records, Trunking Arrangements,) Case No. TO-99-593
and Traffic Measurement.)

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
APPLICATION TO INTERVENE**

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994 Revised) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding. In support of its application, Southwestern Bell states:

1. Southwestern Bell is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101. Southwestern Bell 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 are defined in §386.020 RSMo (1994 Revised).

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

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Katherine C. Swaller
Attorneys for Southwestern Bell
Telephone Company
One Bell Center, Room 3518
St. Louis, Missouri 63101

3. The Commission established this case in its June 10, 1999 Report and Order in Case No. TO-99-254, et al. to investigate the issues of signaling protocols, call records, trunking arrangements and traffic measurement. Southwestern Bell was a party to the proceedings in Case No. TO-99-254, et al. and wishes to participate as a party in this case as well.

4. Southwestern Bell's interests differ from those of the general public. No other party to this proceeding will adequately protect Southwestern Bell's interest.

6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY



PAUL G. LANE #27011

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ANTHONY K. CONROY #35199

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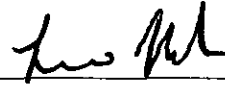
St. Louis, Missouri 63101

314-235-2508 (Telephone)

314-247-0014 (Fax)

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on June 23, 1999.



Leo J. Bub

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