

Mimi B. MacDonald  
Attorney

Southwestern Bell Telephone  
One Bell Center, Room 3546  
St. Louis, Missouri 63101  
Phone 314 235-2518  
Fax 314 247-0881



January 7, 2000

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<sup>2</sup>

JAN 10 2000

Missouri Public  
Service Commission

Re: Case No. TA-2000-347

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 "Mimi B. MacDonald".

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

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

**FILED<sup>2</sup>**

**JAN 10 2000**

**Missouri Public  
Service Commission**

In the matter of the Application of CAT )  
Communications International, Inc. for a )  
Certificate of Service Authority to Provide )  
Interexchange and Basic Local Exchange )  
Telecommunications Services in the State )  
of Missouri and to Classify Said Services )  
and the Company as Competitive )

Case No. TA-2000-347

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

COMES NOW Southwestern Bell Telephone Company (SWBT) and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.060 and 2.075.

In support of its Application, SWBT states:

1. SWBT is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101. SWBT is a "local exchange telecommunications company" and a "public utility" and is authorized to provide "telecommunications service" within the state of Missouri as each of those phrases are defined in §386.020 RSMo (1994).

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

Paul G. Lane  
Leo J. Bub  
Anthony K. Conroy  
Mimi B. MacDonald  
Attorneys for Southwestern Bell Telephone Company  
One Bell Center, Room 3514  
St. Louis, Missouri 63101

3. In this proceeding, CAT Communications International, Inc. (CAT) seeks a certificate of service authority to provide interexchange and basic local exchange telecommunications services in exchanges currently served by SWBT. CAT seeks classification as a competitive company and to receive a lesser degree of regulation as permitted under

Sections 392.361 and 392.420 RSMo. (1994) and the waiver of various statutory provisions and Commission rules.

4. The services which CAT seeks Commission authority to provide will be offered in direct competition with SWBT if CAT's Application in this proceeding is granted. SWBT therefore has a direct interest in the Commission's decision on CAT's Application. At this point, SWBT does not have sufficient information to either support or oppose CAT's Application.

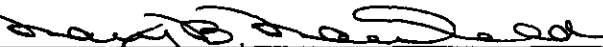
5. SWBT's interests as a provider of basic local exchange service differ from those of the general public. No other party to this proceeding will adequately protect SWBT's interest.

6. Granting SWBT's Application to Intervene is in the public interest because SWBT will bring to this proceeding its extensive expertise and experience as a telecommunications provider.

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

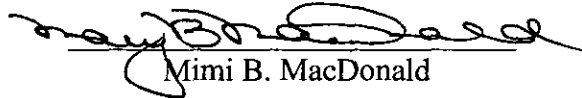
Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By   
PAUL G. LANE #27011  
LEO J. BUB #34326  
ANTHONY K. CONROY #35199  
MIMI B. MACDONALD #37606  
Attorneys for Southwestern Bell Telephone Company  
One Bell Center, Room 3510  
St. Louis, Missouri 63101  
(314) 235-2518 (Telephone)  
(314) 247-0014 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the attached Service List by first-class postage prepaid, U.S. Mail on January 7<sup>th</sup>, 2000.

  
Mimi B. MacDonald

DAN JOYCE  
MISSOURI PUBLIC SERVICE COMMISSION  
301 W. HIGH STREET, SUITE 530  
JEFFERSON CITY, MO 65101

MICHAEL F. DANDINO  
OFFICE OF THE PUBLIC COUNSEL  
301 W. HIGH STREET, SUITE 250  
JEFFERSON CITY, MO 65101

WILLIAM M. WUNDERLICH  
WUNDERLICH & ASSOCIATES  
1504 GRAVOIS  
HIGH RIDGE, MO 63049

MONICA R. BORNE  
NOWALSKY BRONSTONE & GOTHARD  
3500 NORTH CAUSEWAY BLVD, SUITE 1442  
METAIRIE, LA 70002