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May 9, 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 FILED²
MAY 1 0 2000

Missouri Public Service Commission

Re: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case are an original and 14 copies of Southwestern Bell Wireless, Inc.'s Application to Intervene and Request for Leave to File Application to Intervene Out of Time. 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,

Kenneth L. Judd

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



In the Matter of the North American Numbering)	Service	Compublic
Plan Administrator's Petition for Approval of NPA	Case No. TO-2000-374	Commission
Relief Plan for the 314 and 816 Area Codes.		

SOUTHWESTERN BELL WIRELESS INC'S APPLICATION TO INTERVENE AND REQUEST FOR LEAVE TO FILE APPLICATION TO INTERVENE OUT OF TIME

Southwestern Bell Wireless Inc., ("SWBW"), pursuant to §386.420 RSMo (1994 Revised) and 4 CSR 240-2.075, respectfully submits its Application to Intervene and Request for Leave to File Application to Intervene Out of Time. In support of its Application to Intervene and Request for Leave to File Application to Intervene Out of Time, SWBW states as follows:

- 1. SWBW is a Delaware corporation with its principal place of business at 17330 Preston Road, 100A, Dallas, Texas 75252. SWBW is a telecommunications company and is providing wireless telecommunications service within the State of Missouri.
- 2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Kenneth L. Judd Attorney for Southwestern Bell Wireless Inc. 13075 Manchester Road, 100N St. Louis, Missouri 63131

- 4. SWBW seeks to intervene in this proceeding because it is a wireless carrier with a direct interest in the Commission's decision on the proposed NPA Relief Plan.
- 5. SWBW inadvertently missed the intervention due date as a result of changes in SWBW's legal and regulatory representation in the state of Missouri.
- 5. SWBW seeks to intervene in this proceeding for the following three reasons: First, SWBW's interest in this proceeding is different from that of the general public. Second, granting of this intervention will be in the public interest because SWBW will bring to this proceeding its expertise in the areas being investigated and its experience as a wireless



telecommunications provider. Third, no other party to this proceeding will adequately protect SWBW's interest.

- 6. No party will be harmed by SWBW's Request for Leave to File Application To Intervene Out of Time and/or Application to Intervene.
- 7. This Commission has the authority to grant SWBW's Application to Intervene pursuant to 4 CSR 240-2.075 which provides that: "[a]pplications to intervene filed after the intervention date set by the commission may be granted upon a showing of good cause".

WHEREFORE, SWBW respectfully requests the Commission to grant this

Application to Intervene and Request for Leave to File Application to Intervene Out of Time.

Respectfully submitted,

SOUTHWESTERN BELL WIRELESS INC.

Kenneth L. Judd

Attorney for Southwestern Bell Wireless Inc.

#39510

13075 Manchester Road, 100N

St. Louis, Missouri 63131

314-984-2010 (Telephone)

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage

prepaid, U.S. Mail on May 94, 2000.

Kenneth L. Jude

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