



Linda K. Gardner
Senior Attorney

Sprint Corporation
5454 West 110th Street
Overland Park, KS 66211
Voice 913 345 7915
Fax 913 345 7568
linda.gardner@mail.sprint.com

August 23, 1999

FILED

AUG 23 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, Missouri 65101

**Missouri Public
Service Commission**

**Re: In the Matter of the Motion to Establish a Docket Investigating the
IntraLATA Toll Service Provisioning Practices of Missouri
Interexchange Carriers, Public Utility or Common Carrier Duties of
Interexchange Carriers, Motion to Show Cause, Request for
Emergency Hearing, and Alternative Petition for Suspension and
Modification
Case No. TO-2000-16**

Dear Mr. Roberts:

Enclosed for filing, please find the original and fourteen (14) copies of the
Application to Intervene of Sprint Missouri, Inc. and Sprint Communications Company
L.P.

Please call me at 913-345-7915 if you have any questions regarding this matter.

Very truly yours,

Linda K. Gardner

Linda K. Gardner

by David Bergmeyer

LKG:ket
Enclosure

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

AUG 23 1999

In the Matter of the Motion to Establish)
a Docket Investigating the IntraLATA Toll)
Service Provisioning Practices of Missouri)
Interexchange Carriers, Public Utility or)
Common Carrier Duties of Interexchange)
Carriers, Motion to Show Cause, Request)
for Emergency Hearing, and Alternative)
Petition for Suspension and Modification.)

Missouri Public
Service Commission

Case No. T0-2000-16

APPLICATION TO INTERVENE

COME NOW, Sprint Missouri, Inc. (Sprint Local) and Sprint Communications Company L.P. (Sprint Long Distance), collectively referred to as "Sprint," and pursuant to Section 386.420 RSMo and 4 CSR 240-2.110 respectfully seek an Order granting intervention into the above referenced proceeding. In support, Sprint states as follows:

1. Sprint Local is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. Sprint Local is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local and interexchange telecommunications service within the state.

2. Sprint Long Distance is a Delaware limited partnership with its principal place of business at 8140 Ward Parkway, Kansas City, MO 64114. Sprint Long Distance is authorized to transact business within the State of Missouri and is authorized by the Commission to provide interexchange telecommunications service and basic local exchange telecommunications service within the state.

3. All correspondence, communications and orders in this docket should be directed to:

Doug Galloway
Sprint Corporation
319 Madison St.
Jefferson City, MO 65101

Linda K. Gardner
Sprint Corporation
5454 W. 110th Street
Overland Park, KS 66211

4. The ORDER DIRECTING NOTICE, DIRECTING REPORTS, AND REQUIRING RECORD COLLECTION sets the Intervention Date as August 24, 1999, consequently, Sprint's APPLICATION TO INTERVENE is timely filed.

5. The Commission has established this docket to consider a Staff report detailing the results of an investigation of certain practices of AT&T related to serving customers in the secondary carriers' exchanges. As providers of toll service, Sprint Long Distance and Sprint Local are interested in the Commission's decisions regarding business office obligations and common carrier obligations on toll providers. Moreover, many of Sprint Local's customers have AT&T as their toll provider and Sprint Local is interested in the effect, if any, on its local customers that currently use AT&T. Consequently, Sprint has a direct interest in this matter that is different than that of the general public. In addition, Sprint's experience in the telecommunications industry will aid the Commission in examining these issues. Therefore, it is in the public interest to allow Sprint to intervene and to fully participate.

6. Sprint is unable to state whether it supports or opposes this request until more information is known and the case is more fully presented.

WHEREFORE, Sprint respectfully requests the Commission to issue an Order

granting this Application to Intervene of Sprint.

Respectfully submitted,
SPRINT MISSOURI, INC.
SPRINT COMMUNICATIONS COMPANY L.P.

Linda K. Gardner
Linda K. Gardner MoBar #32224 *by Denis Bergmeyer*
Sprint Corporation
5454 W. 110th Street
Overland Park, KS 66211
Tele. (913) 345-7915
Fax (913) 345-7568

CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served to the following by first class mail or hand-delivery on this 23 day of August, 1999:

Paul S. DeFord
Lathrop & Gage
2345 Grand Blvd
Kansas City, MO 64108
W.R. England, III
Brydon, Swearengen & England
P.O. Box 456
Jefferson City, Missouri 65102

Craig S. Johnson
Andereck, Evans, Milne, Peace &
Baumhoer
P.O. Box 1438
Jefferson City, Missouri 65102

Martha Hogerty
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Dan Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Linda K. Gardner
Linda K. Gardner *by Denis Bergmeyer*