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ATTORNEY GENERAL OF MISSOURI DEC 17 PM 3 09

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JEFFERSON CITY
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MO PSC P.O. Box 899
RECORDS DEPT. 751-3321

December 17, 1998

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
Room 530, Truman State Office Building
301 West High Street
Jefferson City, MO 65101

RE: Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996, Case No. TO-99-227

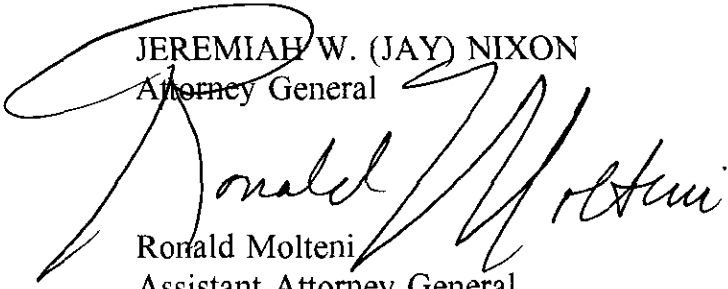
Dear Judge Roberts:

Enclosed for filing in the above-referenced case are the original and 14 copies of the State of Missouri's Application to Intervene.

Thank you for your attention to this matter.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General


Ronald Molteni
Assistant Attorney General

mlw
Enclosures
cc: All Parties on the Service List

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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

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MO PSC
RECORDS DEPT.

Application of Southwestern Bell Telephone)
Company to Provide Notice of Intent to File an)
Application for Authorization to Provide In-Region)
InterLATA Services Originating in Missouri)
Pursuant to Section 271 of the Telecommunications)
Act of 1996)

Case No. TO-99-227

STATE OF MISSOURI'S
APPLICATION TO INTERVENE

The State of Missouri, through the Attorney General, seeks to intervene in order to protect its interest in having competitive local and long distance services at reasonable and lawful telephone rates available to its many agencies and officials. Those rates are affected by the ability of CLEC's to compete in areas serviced by ILEC's like Southwestern Bell. Those rates are also affected by competition in long distance market. The State submits this application to intervene pursuant to 4 CSR 240-2.075. In support of its application, the State of Missouri states:

1. Jeremiah W. (Jay) Nixon is the duly elected Attorney General of the State of Missouri and, as such, is authorized by law pursuant to § 27.060, RSMo 1994, to appear and interplead on behalf of the State of Missouri in any proceeding in which the State's interest may be involved.

2. The State of Missouri and its constituent agencies, departments, and institutions (collectively referred to as the "State") are major consumers of

telecommunication services, both local and long distance, throughout the State generally, and the procurement of telecommunication services for the State of Missouri is made entirely of public funds, thereby necessitating state intervention.

3. Because the State is a consumer of telecommunication services, the State has a significant interest in this matter, apart from that of the general public, which cannot be protected adequately by any other party to this proceeding. The State has a definite interest in the issues pertaining to Southwestern Bell's satisfying the Section 271 "checklist".

4. The State, therefore, adequately satisfies the relevant standards for intervention within 4 CSR 240-2.075.

5. The granting of this application will in no way delay this proceeding nor unduly expand its scope.

6. This application to intervene is filed on a timely a basis.

7. There is insufficient information currently available to identify individual issues that may arise in this case that may affect the State's interests. Consequently, the State reserves the right to take a position and participate with regard to any matter or issue arising in this case that may affect the State's interests.

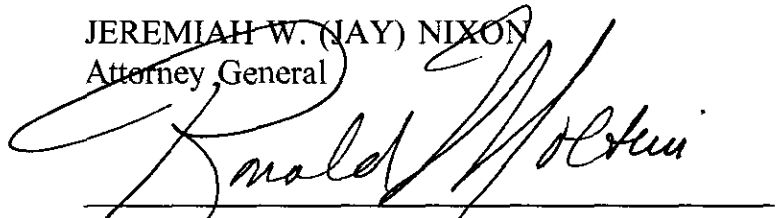
8. If this application to intervene is granted, the State of Missouri requests that a copy of each document filed by any party to this proceeding be mailed or delivered to

Ronald Molteni/Mark Long, Assistant Attorneys General, Broadway State Office Building,
221 West High Street, P.O. Box 899, Jefferson City, Missouri 65102.

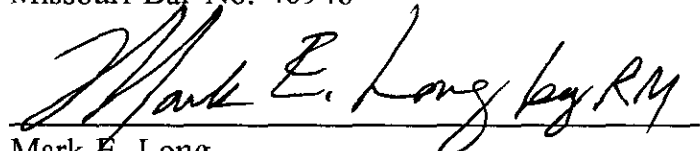
WHEREFORE, the State of Missouri respectfully requests the Commission grant
this application to intervene.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON
Attorney General



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Assistant Attorney General
Missouri Bar No. 40946



Mark E. Long
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Attorneys for State of Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this 17th day of December, 1998 to the parties listed below and those on the attached list:

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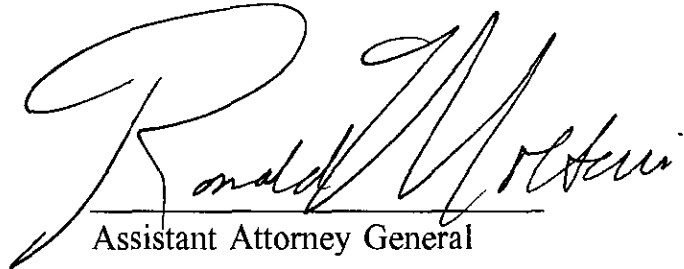
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Teligent, Inc.
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Vienna, VA 22182

The Cube
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Houston, TX 77005

Transamerican telephone
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