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December 28, 1998

FILED

DEC 29 1998

Missouri Public
Service Commission

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

Re: Case No. T0-99-227

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen copies of Opposition of Southwestern Bell Telephone Company to The Application to Intervene of Show Me Competition, Inc. Please stamp the extra copy with the date same is filed and return it to me in the enclosed stamped, self-addressed envelope.

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

Very truly yours,

A handwritten signature in cursive script that reads "Paul G. Lane".

Paul G. Lane

Enclosure

cc: All Attorneys of Record

241

FILED

DEC 29 1998

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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

OPPOSITION OF SOUTHWESTERN BELL TELEPHONE COMPANY
TO THE APPLICATION TO INTERVENE OF SHOW ME COMPETITION, INC.

COMES NOW, Southwestern Bell Telephone Company (hereafter "SWBT") and for its
Opposition to the Application to Intervene of Show Me Competition, Inc. (hereafter "Show Me")
states as follows:

1. Show Me filed an Application to Intervene on December 21, 1998. As required
by Commission Rule, 4 CSR 240-2.075(3), Appendix A of the Application to Intervene listed the
following members of Show Me:

Citizen Action
CompTel-Mo
Telecommunications Resellers Association
Missouri Telecommunications Coalition c/o AT&T
Missouri Cable Telecommunications Association
City Utilities of Springfield
McLeod USA

2. Applications to Intervene must demonstrate that the proposed intervention would
serve the public interest. 4 CSR 240-2.075(4)(C). Show Me's Intervention would not serve the
public interest, because Show Me is merely a front group for entities which are otherwise
participating in this docket. These entities should not be allowed to have "two bites at the apple"

that would give these entities an opportunity to give two opening statements, engage in two cross-examinations of each witness, and engage in unilateral discovery, while claiming to be insulated from discovery on the basis that it has no information independent of its members. Show Me has not provided any information that would justify a separate intervention by that trade group, when the vast majority of its members are already active participants in this docket.

3. McLeod USA was made a party to the case by virtue of the Commission's December 9, 1998 Order Granting Intervention. It filed an entry of appearance on December 21, 1998. City Utilities of Springfield filed a Motion to Participate Without Intervention on December 21, 1998. Missouri Cable Telecommunications Association filed a Motion to Intervene on December 15, 1998. Telecommunications Resellers Association filed an Application to Intervene on December 18, 1998. Missouri Telecommunications Coalition c/o AT&T is, itself, a front group for various long distance companies, including AT&T. CompTel-MO is also an association of small long distance companies¹, and many of its members are presumably members of the Telecommunications Resellers Association.² Only the group Citizen Action has not intervened directly or through an association other than Show Me.

4. The process of evaluating the benefits of SWBT's entry into the long distance market will not be enhanced by companies seeking to intervene multiple times under the names of various front groups. Such a practice is also unfair and would give a party multiple

¹The CompTel-Mo members were identified in TT-98-351 as including Dial US which was being acquired by McLeod USA. T. 737

²The Telecommunications Resellers Association did not list its members in its Application to Intervene, as required by 4 CSR 240-2.075(3).

opportunities to cross-examine witnesses, present opening statements and briefs, and participate in discovery. The Commission should not countenance this practice and should make its position clear by rejecting the Application to Intervene by Show Me.

WHEREFORE, for all the foregoing reasons, SWBT respectfully requests the Commission to deny the Application to Intervene filed by Show Me.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Paul G. Lane

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Opposition of Southwestern Bell Telephone Company to the Application to Intervene of Show Me Competition, Inc. was served by first-class, postage prepaid U.S. Mail, on all parties on the attached service list this 29th day of December, 1998.

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