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July 27, 2000

FILED³

JUL 27 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

Missouri Public
Service Commission

Re: Case No. TA-2000-829

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight copies of Southwestern Bell Telephone Company's Application to Intervene.

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

Very truly yours,

A handwritten signature in cursive script that reads "Leo J. Bub /tm".

Leo J. Bub

Enclosure

cc: Attorneys of Record

FILED³

JUL 27 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Cypress)
Communications Operating Company, Inc. for a)
Certificate of Service Authority to Provide Basic)
Local Telecommunications Services Throughout the)
State of Missouri and to Classify Said Services and)
the Company as Competitive.)

Missouri Public
Service Commission

Case No. TA-2000-829

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

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding and states:

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

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 3518
St. Louis, Missouri 63101

3. In this proceeding, Cypress Communications Operating Company, Inc. seeks a certificate of service authority to provide basic local telecommunications services in exchanges currently served by GTE Midwest Incorporated, Sprint/United Telephone Company and Southwestern Bell. Cypress seeks classification as a competitive company and to receive a

¹ All statutory cites are to the Missouri Revised Statutes.

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. Southwestern Bell seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on Cypress' Application. Southwestern Bell is authorized to provide basic local and local exchange telecommunications services within the State of Missouri. Pursuant to tariffs on file with the Commission, Southwestern Bell is authorized to provide the type of services within the State of Missouri that Cypress seeks to provide. Cypress in this certification proceeding has requested service authority in exchanges served by Southwestern Bell, GTE and Sprint. In order to protect its interests, Southwestern Bell believes it necessary for it to participate in the Commission's review of Cypress' initial request for certification.

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

6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise and experience as a telecommunications provider.

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

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Leo J. Bub / TM

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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 July 27, 2000.

Leo J. Bub /tm
Leo J. Bub

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