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January 24, 2000

FILED

JAN 2 5 2000

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Missouri Public Service Commission

70 -RE: Case No. TA-2000-374

Dear Mr. Roberts:

Enclosed please find an original and fifteen (15) copies of an Application to Intervene of Ameritech Cellular in the above-referenced proceeding. Please file this Application in your usual manner and return the extra enclosed copy with the date of filing stamped thereon directly to the undersigned in the enclosed self-addressed stamped envelope at your first opportunity.

Should you have any questions with respect to this filing, please contact me. Thank you for your attention to this matter.

Yours very truly,

James F. Mauzé

JFM\wh
Enclosure

cc:

Stephanie S. Cassioppi (w/enclosure)

Jef Leary (w/enclosure)

Lee S. Adams, Esq. (w/enclosure)
Office of Public Counsel (w/enclosure)

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JAN 2 5 2000

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In the Matter of the Petition of the North)	
American Numbering Plan Administrator, on)	TO
Behalf of the Missouri Telecommunications)	Case No. IA-2000-374
Industry, for Approval of NPA Relief)	
Plan for the 314 and 816 Area Codes)	

APPLICATION TO INTERVENE

COMES NOW CyberTel Cellular Telephone Company, a Missouri partnership, and CyberTel RSA Limited Partnership, a Delaware limited partnership, d/b/a Ameritech CellularTM, ("Ameritech CellularTM") and pursuant to 4 CSR 240-2.075(1), hereby applies for leave to intervene in the above-captioned proceeding. In support of its Application, Ameritech CellularTM states as follows:

- 1. Ameritech CellularTM provides cellular telephone service in the St. Louis CGSA and in Missouri RSAs Nos. 8, 12, 18 and 19 through licenses duly issued by the Federal Communications Commission. "Ameritech CellularTM" is a trademark owned by Ameritech Corporation and used pursuant to a license from Ameritech Corporation.
- 2. Ameritech Cellular requests that the following persons be added to the official service list for this proceeding and that all correspondence, pleadings, orders, decisions and communications regarding this proceeding be sent to:

James F. Mauzé, Esq. Thomas E. Pulliam, Esq. Ottsen, Mauzé, Leggat & Belz, L.C. 112 South Hanley Road St. Louis, Missouri 63105-3418 (314) 726-2800 (314) 863-3821 (facsimile) Mrs. Stephanie S. Cassioppi Director-External Affairs Ameritech CellularTM 1515 Woodfield Road, 9th Floor Schaumburg, Illinois 60193 (847) 619-5065 (847) 706-7601 (facsimile)

Mr. Jef Leary
Asst. Director-Network Strategies & Contracts
Ameritech CellularTM
1515 Woodfield Road, Suite 1400
Schaumburg, Illinois 60193
(847) 619-5352
(847) 706-2557 (facsimile)

- 3. This proceeding was commenced by NeuStar, Inc., the North American Numbering Plan Administrator, filing a pleading requesting that the Missouri Public Service Commission ("Commission") approve a "retroactive" all services overlay relief plan for the 314 number plan area (NPA) and a single all services overlay relief plan for the 816 NPA. As described in paragraph 1 hereof, Ameritech CellularTM provides cellular telephone service in the 314 NPA which makes its interest in this proceeding, and that of its customers, different from that of the general public.
- 4. As a code holder in the 314 NPA, Ameritech CellularTM shall be materially and directly impacted by whatever decision is rendered by the Commission and, as a cellular telecommunications service provider, may be in a position to offer information and a viewpoint from a segment of the telecommunications industry which may not otherwise be heard.
- 5. At this point in time, Ameritech CellularTM does not have sufficient information to either support or oppose the relief sought by NeuStar.

WHEREFORE, Ameritech CellularTM respectfully requests the Commission to grant this Application to Intervene, and that Ameritech CellularTM be made an intervening party to this

proceeding for all purposes and with all rights permitted by law and the Commission's rules and regulations.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By:

James F. Mauzé

#18684 #31036

Thomas E. Pulliam

#J10.

1 (2 South Hanley

St. Louis, Missouri 63105-3418

(314) 726-2800

(314) 863-3821 (Fax)

Attorneys for Intervenor Ameritech CellularTM

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing was sent via first-class U.S. mail, postage prepaid, this 24⁷⁷ day of January, 2000 to:

Lee S. Adams Morrison & Foerster, LLP 2000 Pennsylvania Avenue N.W. Suite 5500 Washington, D.C. 20006

Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

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