

**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

February 1, 2000

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Suite 530 Jefferson City, MO 65101 FILED<sup>2</sup>

Missouri Public Service Commission

Tenda K. Dardner by Don's Bargneya

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

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) copies of an Application to Intervene of Sprint Missouri, Inc., Sprint Communications Company L.P. and Sprint Spectrum L.P. d/b/a Sprint PCS.

If you have any questions, please do not hesitate to contact me at (913) 345-7915.

Sincerely,

Linda K. Gardner

LKG:ket Enclosures

cc: All Parties

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BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Petition of the North American

Numbering Plan Administrator, on Behalf of the

Missouri Telecommunications Industry, for Approval

of NPA Relief Plan for the 314 and 816 Area Codes.

Service Commission
Case No. T0-2000-374

## APPLICATION TO INTERVENE OF SPRINT MISSOURI, INC., SPRINT COMMUNICATIONS COMPANY L.P. AND SPRINT SPECTRUM L.P. d/b/a SPRINT PCS

COME NOW, Sprint Missouri, Inc. (Sprint Local), Sprint Communications Company L.P. (Sprint Long Distance), and Sprint Spectrum L.P. d/b/a Sprint PCS (Sprint PCS), 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. Sprint PCS is a Delaware limited partnership with offices at 4900 Main Street, Kansas City, Missouri 64112. Sprint PCS is authorized to transact business within the State of Missouri and is authorized by the Federal Communications Commission ("FCC") to provide Commercial Mobile Radio Services ("CMRS") within the State
- 4. All correspondence, communications and orders in this docket should be directed to:

Doug Galloway Sprint Missouri, Inc. 319 Madison St. Jefferson City, MO 65101 Linda K. Gardner Sprint Corporation 5454 W. 110<sup>th</sup> Street Overland Park, KS 66211

- 5. The ORDER AND NOTICE OF PETITION sets the Intervention Date as February 4, 2000, consequently, Sprint's APPLICATION TO INTERVENE is timely filed.
- 6. The Commission has opened this case in response to a pleading filed by the North American Numbering Plan Administrator to considering relief plans for 314 and 816 NPAs. Sprint has a direct interest in this matter that is different than that of the general public and will be directly impacted by decisions on these issues. Sprint is vitally interested in this matter not only from the perspective of the end-user customer but in ensuring that numbers are available on an equitable and competitively neutral basis. In addition, Sprint's experience

in the telecommunications industry as an ILEC, CLEC and wireless provider will aid the Commission in examining these issues. Therefore, it is in the public interest to allow Sprint to intervene and to fully participate.

7. At this point in the case, Sprint does not know if its position will be in favor of or opposed to the issues raised in the petition since they are not yet defined.

WHEREFORE, Sprint respectfully requests the Commission to issue an Order granting this Application to Intervene of Sprint Missouri, Inc., Sprint Communications Company L.P., and Sprint Spectrum L.P. d/b/a Sprint PCS.

Respectfully submitted,

Linda K. Gardner MoBar #32224

Sprint

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## 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 1st day of February, 2000:

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

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

K. Dardner by Davis Bargneyer