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February 7, 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

FILED²

FEB 7 2000

Missouri Public
Service Commission

Re: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application to Intervene and Request for Leave to File Application to Intervene Out of Time.

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

Very truly yours,

Mimi B. MacDonald /tm

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

FEB 7 2000

Missouri Public
Service Commission

In the Matter of the North American Numbering)
Plan Administrator's Petition for Approval of NPA)
Relief Plan for the 314 and 816 Area Codes.)

Case No. TO-2000-374

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
APPLICATION TO INTERVENE AND REQUESTS FOR LEAVE
TO FILE APPLICATION TO INTERVENE OUT OF TIME**

COMES NOW pursuant to 386.420 RSMo 1994 and 4 CSR 240-2.075, and respectfully submits its Application to Intervene and Request for Leave to File Application to Intervene Out of Time. In support of its Application to Intervene and Request for Leave to File Application to Intervene Out of Time, SWBT states as follows:

1. On December 29, 1999, the Office of the Public Counsel ("OPC") filed its Motion for Notification of the Filing of the Petition to the Public, Governmental Officials, and Other Interested Parties and for a Reasonable Opportunity for Intervention, for Evidentiary Hearings, for Public Hearings, for the Establishment of a Technical Committee and for an Extension of Time to File Its Response and Recommendations to the Petition ("OPC's Motion").
2. On January 10, 2000, SWBT filed its Response to OPC's Motion.
3. Although SWBT intended to file its Application to Intervene at the same time, it inadvertently did not do so. SWBT did not notice this oversight until after 5:00 p.m. on Friday, February 4, 2000, the date on which applications to intervene and/or to participate were due.
4. SWBT is a Missouri corporation duly authorized to conduct business in Missouri with its principal office at One Bell Center, St. Louis, Missouri 63101. SWBT 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.

5. SWBT participated in the Industry-developed NPA Relief Planning Process.

6. Additionally, SWBT has consistently been an active participant in NPA relief planning dockets in the past.

7. SWBT seeks to intervene in this proceeding for three reasons. First, SWBT's interest in this proceeding is different from that of the general public. Second, granting of this intervention will be in the public interest because SWBT will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider. Third, no other party to this proceeding will adequately protect SWBT's interest.

8. Counsel for SWBT contacted OPC, Counsel for NeuStar, Inc. ("NANPA") and Staff and none of their attorneys had any objection to SWBT filing its Application to Intervene Out of Time. Moreover, no party will be harmed by SWBT's Request for Leave to File Application To Intervene Out of Time and/or Application to Intervene.

9. This Commission has the authority to grant SWBT's application to intervene pursuant to 4 CSR 240-2.075 which provides that: "[a]pplications to intervene filed after the intervention date set by the commission may be granted upon a showing of good cause".

10. 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 3520
St. Louis, Missouri 63101

WHEREFORE, SWBT respectfully requests the Commission to grant this Application to Intervene and Request for Leave to File Application to Intervene Out of Time.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Mimi B. MacDonald /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 February 7, 2000.

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