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September 17, 2002

Secretary of the Commission
Missouri Public Service Commission
200 Madison, Suite 100
St. Louis, Missouri 65101

Via Courier

FILED²
SEP 17 2002
Missouri Public
Service Commission

Re: Case No. TT-2003-0093

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies each of the following documents on behalf of MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc. and MCImetro Access Transmission Services, LLC:

1. Concurrence of WorldCom with Staff's Motion to Suspend and/or Reject SWBT's Tariff
2. Application to Intervene
3. Petition for Entry of Appearance of Stephen F. Morris and Patricia Ana Escobedo

Upon your receipt, please file stamp the extra copies received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact us. Thank you.

Very truly yours,

Carl J. Lumley

CJL:dn
Enclosure
cc. Parties of Record (W/Enclosure)

FILED²

SEP 17 2002

Missouri Public
Service Commission

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of Southwestern Bell
Telephone Company's Tariff Filing to
Initiate Residential Customer Promotion.

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Case No. TT-2003-0093
Tariff File: 2003000117

MCIMETRO ACCESS TRANSMISSION SERVICES, LLC,
BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC.
MCI WORLDCOM COMMUNICATIONS, INC.
APPLICATION TO INTERVENE

Come now MCImetro Access Transmission Services, LLC (MCImetro), Brooks Fiber Communications of Missouri, Inc., (Brooks) and MCI WorldCom Communications, Inc. (MCIWC) (collectively "Intervenors") pursuant to 4 CSR 240-2.075 and Commission Order in this case and for their Application to Intervene state to the Commission:

1. MCImetro is a Delaware limited liability company in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCImetro is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

2. Brooks is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. Brooks is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

3. MCIWC is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCIWC is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

4. All communications and pleadings in this case should be directed to:

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5. On or about August 16, 2002, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company (SWBT) submitted a proposed 11th Revised Sheet 1 to its Local Exchange Tariff Appendix P.S.C. Mo. No. 24 that proposed a revision to introduce a promotion for residential customers who purchase a flat rate access line with the Metropolitan Calling Area (MCA) plan and selected vertical features, which tariff had an effective date of September 16, 2002. On September 10, 2002, the Commission issued an order suspending the tariff until October 16, 2002 in order to allow the Commission to further study the tariff and establishing a response deadline for any party wishing to respond of September 17, 2002.

6. Intervenors seek to intervene in this proceeding because the Commission's decision will affect their interests as providers of telecommunications services in competition against SWBT.

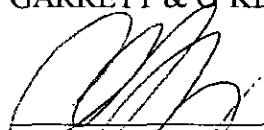
7. Intervenor's interests as telecommunications companies are different from those of the general public. Furthermore, their intervention in this proceeding is in the public interest because of their interest in enhancing competition and because of their expertise in the telecommunications industry.

8. Intervenor's oppose SWBT's proposed tariff, which includes unlawfully discriminatory winback discounts that would adversely impair competition contrary to the public interest.

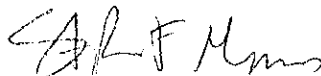
WHEREFORE, MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc., respectfully request the Commission to issue its order granting their Application to Intervene.

Respectfully submitted,

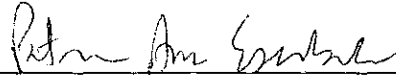
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Attorneys for Brooks Fiber Communications of Missouri, Inc.,
MCImetro Access Transmission Services, LLC, and
MCI WorldCom Communications, Inc.

CERTIFICATE OF SERVICE

A true and correct copy of the forgoing was mailed this 17 day of September, 2002, by placing same in the U.S. Mail postage paid, to the persons listed on the attached service list.



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