

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Request for Expansion of)	
the St. Louis Metropolitan Calling Area Plan to)	
Include the Exchanges of Washington, Union,)	Case No. TO-2005-0141
Wright City, St. Clair, Marthasville, Beaufort,)	
Foley, and Warrenton.)	

**SOUTHWESTERN BELL TELEPHONE, L.P.,
D/B/A SBC MISSOURI'S APPLICATION TO INTERVENE**

Comes now Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, pursuant to Section 386.420, RSMo. 2000 and 4 CSR 240-2.075, and respectfully submits its Application to Intervene. In support of its Application to Intervene, SBC Missouri states as follows:

1. On February 25, 2003, the Office of Public Counsel ("OPC") filed a motion requesting that the Missouri Public Service Commission ("Commission") conduct an investigation into the adequacy of the local calling scopes of the SBC Missouri exchanges of Washington, Union, St. Clair, and Beaufort, in and around Franklin County. That motion opened Case No. TO-2003-0298.

2. On November 22, 2004, OPC filed a new motion, which opened Case No. TO-2005-0141, requesting the Commission to expand the St. Louis Metropolitan Calling Area ("MCA") Plan to include the exchanges of Washington, Union, Wright City, St. Clair, Marthasville, Beaufort, Foley, and Warrenton, as an optional Tier 6.

3. On March 3, 2005, the Commission entered its Order Consolidating Cases, Denying Motions to Dismiss, Directing Notice, and Setting an Intervention Deadline, in which it consolidated the two cases referenced in paragraphs 1 and 2 above and set an intervention deadline of March 23, 2005.

4. SBC Missouri is a Texas limited partnership¹, duly authorized to conduct business in Missouri,² with its principal Missouri office at One SBC Center, Room 3500, St. Louis, Missouri, 63101. SBC Missouri is authorized to do business in Missouri and its fictitious name is duly registered with the Missouri Secretary of State.³ SBC Missouri 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 is defined in Section 386.020, RSMo. 2000.

5. SBC Missouri seeks to intervene in this proceeding for three reasons. First, SBC Missouri's interest in this proceeding is different from that of the general public. SBC provides local exchange telecommunications service in Washington, Union, St. Clair, and Beaufort. As such, it will be affected by any Order that results from this case. If the Commission modifies or alters the existing MCA Plan, SBC Missouri believes that the Commission must allow incumbent local exchange carriers full recovery of all lost revenue and implementation costs. Thus, SBC Missouri's positions may be different than those of the general public. Second, granting of this intervention will be in the public interest because SBC Missouri 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 SBC Missouri's interests.

¹ SBC Missouri filed a copy of its Limited Partnership Agreement with the Commission on October 12, 2001. See In the Matter of the Application of Southwestern Bell Telephone Company To Transfer Property and Ownership of Stock Pursuant to Section 392.200, RSMo., Case No. TO-2002-185, October 12, 2001.

² SBC Missouri filed a certificate from the Missouri Secretary of State Certifying that Southwestern Bell Telephone, L.P. is a foreign limited partnership that is duly authorized to transact business in the State of Missouri with the Commission on January 7, 2002. See In the Matter of the Application of Southwestern Bell Telephone Company to Transfer Property and Ownership of Stock Pursuant to Section 392.300, RSMo., Case No. TO-2002-185, January 7, 2002.

³ SBC Missouri filed a copy of the registration of the fictitious name “SBC Missouri” with the Commission on January 17, 2003. See In the Matter of the Name Change of Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company to Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, Case No. IN-2003-0247, January 17, 2003.

6. Pursuant to 4 CSR 240-2.075(2), SBC Missouri is unsure of the position that it will take in this case.

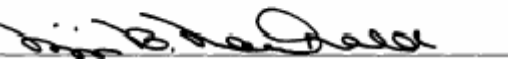
7. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

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Wherefore, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri respectfully requests the Commission to grant this Application to Intervene, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on March 16, 2005.


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