CURTIS, OETTING, HEINZ, GARRETT & SOULE, P. C. ATTORNEYS AT LAW

130 SOUTH BEMISTON, SUITE 200 ST. LOUIS, MISSOUR: 63105 (314) 725-8788 FACSIMILE (314) 725-8789

www.cohgs.com

CARL J. LUMLEY

EMAIL APDRESS clumley@cohgs.com

April 26, 2002

Secretary of the Commission Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102-0360

Re: Case No. TT-2002-473

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc. Application to Intervene. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact us.

CJL:dn

Enclosure

cc. SWBT (W/Enclosure)

Public Counsel (W/Enclosure) General Counsel (W/Enclosure)

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BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Southwestern Bell Telephone)	
Company's Tariff Filing to Extend Business)	Case No. TT-2002-473
Customer Winback Promotions.)	Tariff No. 200200828

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:

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule, PC
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
314-725-8788
314-725-8789 (FAX)
clumley@cohgs.com
lcurtis@cohgs.com

Stephen F. Morris
WorldCom Communications
701 Brazos, Suite 600
Austin, Texas 78701
(512) 495-6727
(512) 495-6706 (FAX)
stephen.morris@wcom.com

- 5. On or about March 29, 2002, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company (SWBT) filed a tariff sheet that would extend certain expiring winback promotions, which tariff had an effective date of April 9, 2002. On April 5, 2002, the Commission issued an order suspending the tariff until May 9, 2002 in order to allow the Commission to further study the tariff. On April 18, 2002, the Commission issued its order further suspending tariff and directing notice and establishing an intervention deadline of May 9, 2002.
- 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. Intervenors 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.

CURTIS, OETTING, HEINZ,

GARRETT & SOULE, P.C.

Carl / Lumley, #32869

Leland/B. Curtis/#20550

130 S/Bemiston, Suite 200

Clayton, Missouri 63105

(314) 725-8788

(314) 725-8789 (FAX)

clumley@cohgs.com

lcurtis@cohgs.com

Stephen R Morris #14501600

WorldCom

701 Brazos, Suite 600

Austin, Texas 78701

(512) 495-6721

(512) 495-6706 (FAX)

stephen.morris.@wcom.com

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

Certificate of Service

A true and correct	copy of the	e foregoing	was	served	upon	the parties	s identified	on the
attached service list on this	26	day ofA	<u></u>	0		, 2002, by j	placing sam	e in the
U.S. Mail, postage paid.			1					

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

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Paul G. Lane General Attorney-Missouri Southwestern Bell Telephone Company One Bell Center, Room 3520 St. Louis, Missouri 63101-1976

Office of General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 651012