



United Telephone of Missouri - United Telephone of Arkansas
United Telephone of Minnesota - United Telephone of Iowa
United Telephone of Kansas - United Telephone of the West

Beth
United Telephone System — Midwest Group
6666 West 110th Street • Overland Park, Kansas 66211 • (913) 345-7600

913-345-7915

July 29, 1988

Mr. Harvey Hubbs, Secretary
Missouri Public Service Commission
Truman State Office Building
P.O. Box 360
Jefferson City, Missouri 65102

RE: Case No. TA-88-218

Dear Mr. Hubbs:

Enclosed please find an original and 14 copies of United Telephone Company of Missouri's application to intervene in the above matter. Please see that the application is appropriately filed and brought to the attention of the Commission.

I have this day mailed copies to all parties of record.

Sincerely,

David K. Knowles

David K. Knowles
General Attorney

1p
Enclosures
pc D. B. Heidebrecht

FILED
JUL 29 1988
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Consolidated Case)
Regarding Applications for Authority)
to Establish Operator Services)

Case No. TA-88-218

APPLICATION TO INTERVENE

United Telephone Company of Missouri (United) hereby requests an Order of the Commission allowing it to intervene in this proceeding, pursuant to 4 CSR 240-2.110, and in support thereof states as follows:

1. United is a Missouri corporation with its principal office at 319 Madison Street, Jefferson City, Missouri 65101 and is a "telecommunications company" and a "public utility" as those terms are defined in §386.020, RSMo, and is duly authorized to provide telecommunications service within the state of Missouri.

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

David K. Knowles
J. Richard Smith
United Telephone Company of Missouri
5454 West 110th Street
Overland Park, Kansas 66211
Telephone: (913) 345-7915

FILED

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PUBLIC SERVICE COMMISSION

3. By Order dated July 15, 1988, this Commission ordered persons wishing to intervene in this proceeding to file their application on or before July 29, 1988. Said Order was in response to a Motion to Consolidate filed by the Office of the Public Counsel.

4. In this proceeding the Commission will determine issues which may have a direct bearing on United's interconnection and relationship with the

applicants. United, as a local exchange carrier and a primary toll carrier, has a direct interest in this proceeding.

5. By reason of the foregoing, United's interests in this proceeding differ from those of the general public and United's intervention would serve the public interest.

WHEREFORE, United requests that it be permitted to intervene in this proceeding and that the Commission issue an order granting intervention.

Respectfully submitted,

UNITED TELEPHONE COMPANY OF MISSOURI

By David K. Knowles
David K. Knowles
General Attorney
J. Richard Smith, MO Bar #18840
Vice President and General Counsel
5454 West 110th Street
Overland Park, Kansas 66211
(913) 345-7915

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of July, 1988, I mailed postage prepaid, a copy of the above and foregoing to all parties of record.

David K. Knowles
David K. Knowles

CERTIFICATION

The undersigned Counsel, David K. Knowles, hereby certifies, pursuant to 4 CSR 240-2.040(3)(C) and Supreme Court Rule 9.03, that he is a licensed attorney admitted to practice and in good standing in the Bar of the Supreme Court of the State of Kansas and the United States Federal District Court of Kansas and further certifies that he is duly qualified to appear and practice before said courts. The undersigned hereby designates J. Richard Smith, Missouri Bar #18840 as associate counsel in the above-captioned matter.

I hereby certify that the foregoing statement is true and correct by affixing my signature hereto this 29th day of July, 1988.

David K. Knowles
David K. Knowles - KS Bar #11925 *me*