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Missouri Public Service Commission T.

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November 8, 1999

Dale Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Truman State Office Building, 5th Floor 301 West High Street Jefferson City, Missouri 65101-1517

Re: Case No. TO-2000-261

Dear Mr. Roberts:

Enclosed please find for filing with the Commission an original and fifteen copies of MCImetro Access Transmission Services, LLC's, Brooks Fiber Communications of Missouri, Inc.'s and MCI WorldCom Communications, Inc.'s Application for Participation Without Intervention. 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 do not hesitate to contact us.

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CJL:dn Enclosures cc. Parties of Records (W/Enclosures)

NOV 0 9 1999 BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of) SBC Advanced Solutions, Inc., for) approval of its Interconnection Agreement) with Southwestern Bell Telephone Co. Under 47 U.S.C. § 252(a)(1) and (i0

Missouri Public Service Commission Case No. TO-2000-261

FILED²

MCIMETRO ACCESS TRANSMISSION SERVICES, LLC'S, BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC.'S AND **MCI WORLDCOM COMMUNICATIONS, INC.'S APPLICATION FOR PARTICIPATION** WITHOUT INTERVENTION

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Come now MCImetro Access Transmission Services, LLC (MCImetro), Brooks Fiber Communications of Missouri, Inc., (Brooks) and MCI WorldCom Communications, Inc. (MCIWC) and for their Application for Participation Without Intervention 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 formerly known as WorldCom Technologies, Inc., and is 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)

Stephen F. Morris MCI WorldCom 701 Brazos, Suite 600 Austin, Texas 78701 (512) 495-6721 (512) 477-3845 (FAX)

5. On or about September 30, 1999, SBC Advanced Solutions, Inc. (SBC) filed its Application for Approval of its Interconnection Agreement with Southwestern Bell Telephone Company, Under 47 U.S.C. § 252(a)(1) and (i). On or about October 7, 1999, the Commission issued its Order and Notice setting a participation without intervention deadline of October 27, 1999. MCImetro, Brooks and MCIWC seek leave to late-file this application. They were unaware of the deadline due to personnel absence. Such late filing will not prejudice any party or the public interest. There is good cause to grant this late application to allow a full exploration of the issues raised by this very unique application, by which the SBC companies seek to implement the conditions of the FCC's order approving the SBC/Ameritech merger.

6. MCImetro, Brooks, and MCIWC seek to participate in this proceeding because the Commission's decision may adversely affect MCImetro's, Brooks' and MCIWC's interests as providers of telecommunications services, including as CLECs. MCImetro, Brooks, and MCIWC neither support nor oppose SBC's application at this time, as they have not been provided sufficient information yet.

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

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 for Participation Without Intervention.

Respectfully submitted,

CURTIS, OETTING, HEIŃZ, GARRÉTT & SOULE / P.C.

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

Certificate of Service

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A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this $\underline{40}$ day of $\underline{19}$, by placing same in the U.S. Mail, postage paid.



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

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Jim Fischer 101 West McCarty, Suite 215 Jefferson City, Missouri 65101

Legal Department Southwestern Bell Telephone Co. One Bell Center, Room 3520 St. Louis, Missouri 63101