HENRY ANDRAE (RETIRED) RICHARD S. BROWNLEE III MICHAEL A. DALLMEYER DUANE E. SCHREIMANN DOUGLAS L. VAN CAMP MICHAEL G. BERRY DONALD C. OTTO, JR. JOHN W. KUEBLER SUSAN M. TURNER CHRISTOPHER P. RACKERS SARA C. MICHAEL PATRICIA D. PERKINS

5

÷.,

HENDREN AND ANDRAE, L.L.C.

ATTORNEYS AT LAW RIVERVIEW OFFICE CENTER 221 BOLIVAR STREET, SUITE 300 P.O. BOX 1069 JEFFERSON CITY, MISSOURI 65102

(573) 636-8135

JOHN H. HENDREN (1907-1988) CHARLES H. HOWARD (1925-1970) JOHN E. BURRUSS, JR. (1933-1985) GERALD E. ROARK (1956-1995)

> FACSIMILE (573) 636-5226

E-MAIL henand@socket.net

December 15, 1998



DEC 1 5 1998

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

Re: Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 21 of the Telecommunications Act of 1966 - Case No. TO-99-227

Dear Mr. Roberts:

Enclosed please find for filing on behalf of Missouri Cable Telecommunications Association the original plus 14 copies of their Application to Intervene in the above-captioned matter.

Very truly yours,

HENOREN AND ANDRAE, L.L.C.

Richard S. Brownlee, III

RSB/s Enclosures cc: Paul G. Lane Office of the Public Counsel Charlie Broomfield

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

)

)

)

)

)

- ----

Missouri Public Service Commission

FILED

DEC 1 5 1998

Application of Southwestern Bell Telephone Company to Provide Notice) of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1966.

Case No. TO-99-227

APPLICATION TO INTERVENE

Comes now the Missouri Cable Telecommunications Association by Hendren and Andrea, L.L.C., Richard S. Brownlee, III and for its Application to Intervene states as follows:

The Missouri Cable Telecommunications Association, 1. ("MCTA") is a Missouri Trade Association, organized as a not-forprofit corporation with its principal office and place of business located at 705 N.W. 44th Street, Kansas City, Missouri 64116. It represents 33 member companies that provide cable television and some interexchange intrastate telecommunications services within the State of Missouri, some or all of which are potentially affected by the issues in this proceeding.

2. Copies of all notices, orders and correspondence in this proceeding should be mailed to the attorney for applicant at the following address:

> Richard S. Brownlee, III Hendren and Andrae, L.L.C. 221 Bolivar Street P.O. Box 1069 Jefferson City, MO 65102 (573) 636-8135 (573) 636-4905 (Facsimile)

affected by the action taken in this proceeding, and has a direct interest which is different from the interests of the general public.

4. The granting of this application will not unduly burden these proceedings. It will, however, facilitate the reasoned resolution by the Commission of the issues presented.

WHEREFORE, Missouri Cable Telecommunications Association prays an order allowing its intervention in the above captioned matter.

Respectfully submitted,

HENDREN AND ANDRAE, L.L.C.

Richard S. Brownlee, III, #22422 Patricia D. Perkins, #29606 221 Bolivar Street P.O. Box 1069 Jefferson City, MO 65102 (314) 636-8135 (Telephone) (314) 636-4905 (Facsimile) Attorneys for Intervenor

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was mailed on December 15, 1998, 1998, Paul G. Lane, Leo J. Bub, Anthony K. Conroy and Katherine C. Swaller, Attorneys for Southwestern Bell Telephone Company, One Bell Center, Room 3520, St. Louis, MO 63101 and Office of Public Counsel, P.O. Box 7800, Jefferson City, MO 65102.

Richard S. Brownlee, III

ATTORNEY VERIFICATION

STATE OF MISSOURI

))

)

COUNTY OF COLE

I, Richard S. Brownlee, III, being first duly sworn, do hereby certify, depose and state that I am the attorney for Missouri Cable Telecommunications Association which seeks intervention in the above-captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief, and I further state that I am authorized to verify the foregoing application by the above said applicant.

hard S. Brownlee, III

Subscribed and sworn to before me, a Notary Public; 15th day of December, 1998.

Notary

LAURA J. STRATMAN, NOTARY PUBLIC STATE OF MISSOURI My commission expires September 13, 1999 COMMISSIONED FOR MARIES COUNTY

My Commission Expires: