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December 18, 1998

FILED

DEC 18 1998

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Executive Secretary-Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102-0360

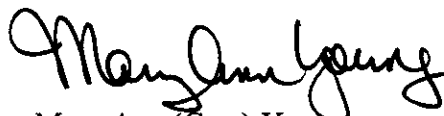
RE: Case No. TO-99-227  
Southwestern Bell Telephone Company Section 271 Docket

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the APPLICATION TO INTERVENE OF THE TELECOMMUNICATIONS RESELLERS ASSOCIATION for filing with the Commission in the above-referenced case.

Thank you for your assistance in processing this filing. A copy is being served on the parties of record. If there are any questions, please call me at 634-8109.

Sincerely,

  
Mary Ann (Garr) Young

Enclosure

cc: Parties of Record  
Andrew Isar (TRA), Harbor Consulting

271

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BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public  
Service Commission

In the Matter of the Application of Southwestern )  
Bell Telephone Company to Provide Notice of )  
Intent to File an Application for authorization ) Case No. TO-99-227  
to Provide In-region InterLATA Services )  
Originating in Missouri Pursuant to Section 271 )  
of the Telecommunications Act of 1996. )

APPLICATION TO INTERVENE OF THE  
TELECOMMUNICATIONS RESELLERS ASSOCIATION

The Telecommunications Resellers Association ("TRA"), on behalf of its members and pursuant to 4 CSR 240-2.075, and the Commission's December 9, 1998, Order Granting Interventions, Granting Protective Order, and Establishing Procedural Schedule in the above-captioned proceeding, hereby respectfully petitions the Missouri Public Service Commission for leave to intervene. In support of its application, TRA submits the following:

1. TRA is a national industry association representing more than 650 providers of interexchange, local, wireless, and enhanced telecommunications services and their suppliers, including Missouri-based companies.

2. TRA's members are generally small to medium-sized telecommunications service providers. The members of TRA who have been authorized to provide interexchange services in Missouri will be in direct competition with Southwestern Bell Telephone Company (SWBT) at the time SWBT may be authorized to provide in-region interLATA service, and therefore may be substantially and materially affected by the Commission's actions in this docket. There are no other parties to this proceeding who can address adequately the concerns of TRA or provide its members' perspective.

3. TRA was granted participation without intervention in the Section 271 investigation proceeding sought by MCI in Case No. TO-97-56 (See Order Establishing Investigatory Docket,

Granting Interventions, and Setting Technical Conference, issued October 1, 1996), and should be made a party to this new Section 271 docket as well.

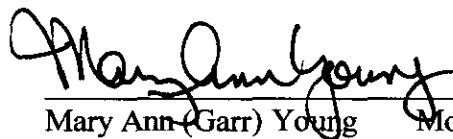
4. Copies of orders, pleadings and correspondence in this matter should be sent to:

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WHEREFORE, the Telecommunications Resellers Association respectfully requests that the Commission grant its Petition for Leave to Intervene in the proceeding.

Respectfully submitted,

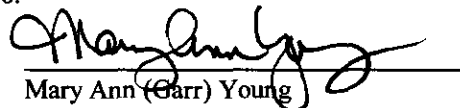


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December 18, 1998

Certificate of Service

I hereby certify that a copy of this document has been served by hand delivery or first class postage upon the parties of record this 18<sup>th</sup> day of December, 1998.



Mary Ann (Garr) Young

Parties of Record  
Case No. TO-99-227  
December 18, 1998

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