

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED⁴
SEP 17 2002
Missouri Public
Service Commission

In the Matter of an Investigation into the)
Effects of the Bankruptcy of Telecommunications)
Carriers in the State of Missouri)
)

Case No. TW-2003-0063

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
APPLICATION TO INTERVENE**

COMES NOW Southwestern Bell Telephone Company,¹ and pursuant to Section 386.420 RSMo (2000) and 4 CSR 240-2.075, respectfully seeks to intervene in this new proceeding. In support of its application to intervene, Southwestern Bell states to the Missouri Public Service Commission (Commission) as follows:

1. Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in Section 386.020 RSMo (2000).² Southwestern Bell's principal Missouri office is located at One SBC Center, 35th Floor, St. Louis, Missouri 63101.
2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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¹ Southwestern Bell Telephone Company, L.P., d/b/a Southwestern Bell Telephone Company, will be referred to in this pleading as "Southwestern Bell" or "SWBT."

² All statutory cites are to the Missouri Revised Statutes.

3. In its Order Establishing Case, the Commission stated that it was opening this case “to monitor the status of bankrupt telecommunications carriers, including WorldCom and its subsidiaries.”³ The Commission also stated that it “will examine the impact of the bankruptcies upon Missouri consumers and upon other Missouri telecommunications carriers.”⁴ Finally, the Commission indicated that it “may further inquire into other related matters as may appear appropriate,” and charged its Staff “with the principal responsibility for this matter.”⁵

4. Southwestern Bell seeks to intervene in this proceeding because it has a substantial and direct interest in proceedings involving bankrupt telecommunications carriers, and in particular, the bankruptcy proceeding involving WorldCom, Inc. and its affiliates. Moreover, Southwestern Bell’s interests differ from those of the general public. As the Commission pointed out in its Order Establishing Case, the bankruptcy filing by WorldCom, Inc. and almost all of its active, domestic subsidiaries has been reported as “the largest single bankruptcy filing in the history of the United States.”⁶ WorldCom’s bankruptcy filing will significantly impact Southwestern Bell. Pursuant to interconnection agreements, service agreements and applicable tariff arrangements, Southwestern Bell and its affiliates have furnished and continue to furnish a variety of telecommunications services to various WorldCom companies. The WorldCom companies have approximately 45,000 accounts with Southwestern Bell and its affiliates, along with billing, collection and customer account data agreements. As of the date of the WorldCom bankruptcy filing, these accounts had an aggregate unpaid balance owed to Southwestern Bell and its affiliates of approximately \$325 million, and much of this balance is significantly past due. Furthermore, the bankrupt WorldCom companies are consuming in excess of \$150 million

³ Order Establishing Case, p. 1.

⁴ Order Establishing Case, pp. 1-2.

⁵ Order Establishing Case, p. 2.

⁶ Order Establishing Case, p. 1.

per month (or \$5 million per day) in services provided by Southwestern Bell and its affiliates. The WorldCom bankruptcy filing, along with other telecommunications carriers' bankruptcy filings, has and will continue to directly impact Southwestern Bell and its affiliates.

5. Granting Southwestern Bell's application to intervene in this proceeding is also in the public interest because Southwestern Bell will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,


SOUTHWESTERN BELL TELEPHONE COMPANY

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail or hand-delivery on September 17, 2002.



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